Service Provider:

STS Location:

Equipment Stations:



ON BEHALF OF TANKER OPERATORS

Version: 1.01 (Sep. 17)

Auditing of STS Service Providers on behalf of Tanker Operators

Audit Report for STS Service Provider name Location of Equipment Station

version: 1.00 (M.Y)

Supporting Organizations (M.Y):

- Arab Maritime Petroleum Transport Co
- Andriaki Shipping Co. Ltd.
- Athenian Sea Carriers Ltd.
- Bernhard Schulte Shipmanagement (Cyprus) Itd
- Bernhard Schulte Shipmanagement (Singapore) Pte Ltd
- Bernhard Schulte Shipmanagement (UK) Limited
- Bernhard Schulte Shipmanagement (GR) Limited
- Claus-Peter Offen Tankschiffreederei (GmbH & Co.)
- Dorian Hellas SA
- Dorian LPG Management Corp.
- IONIA MANAGEMENT S.A.
- GRACE MANAGEMENT S.A.
- Kuwait Oil Tanker Company
- Maran Tankers Management Inc.
- Optimum Ship Services Ltd.
- Spring Marine Management S.A.
- Thenamaris (Ships Management) Inc.
- TMS TANKERS LTD
- TMS CARDIF GAS LTD
- Truong Phat Loc Shipping Trading Joint Stock Company
- Tsakos Columbia Shipmanagement ("TCM") S.A.
- Western Shipping PTE LTD.
- Byzantine Maritime Gas

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Introduction to the concept of the Audit

Objective

DYNAMARINe has introduced audits of STS Service Providers on behalf of Tanker Operators to establish effective collaboration between those involved in STS operation and to ensure the safe, efficient and diligent undertaking of such operations by all participants.

The audit scheme rests on MARPOL requirements, IMO and OCIMF Guidelines and best practice across the industry.

Masters, appointed by Tanker Operators, are responsible for the safety of their ships at all times including during STS operations and they "... shall under no circumstances permit safety to be jeopardized by the actions of others." [paragraph 1.5.1 OCIMF Guide 2013].

On the other hand, STS Service Providers, who are considered to play a vital role in safety and environmental protection during the STS operation are nominated by charterers of cargo interests. Sadly, experience has shown that on a global scale not all of STS Service Providers meet customers and regulatory requirements.

The intention behind this audit scheme is for Tanker Operators and STS Service Providers to work together to address this problem and safeguard the safety and environmental protection of all STS operations thereby avoiding substandard performance during STS operations.

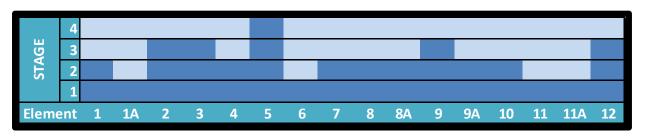
Masters in particular must be confident of the level of service they will receive and that all risk mitigation measures are in place. The audit scheme therefore focuses on the elements that are significant from the tanker operator's perspective and is specifically designed to encourage close cooperation with the STS Service providers working towards the common objective of ensuring the safe, efficient and diligent execution of STS operations by all those involved.

Standards

It is important that the management system of the STS Service Provider is consistent and follows the latest industry standards. The Self-Assessment scheme developed by OCIMF identifies 12 elements that address Management System KPIs towards adopted policies and procedures. Each element includes 4 stages and each stage includes a number of KPIs.

The level of compliance with these KPIs indicates the general safety culture, the preparedness and the quality of the services provided. The expected level of compliance will in practice depend on the resources available to a service provider linked to the size of the organisation and the number of operations conducted on a regional or worldwide basis. Tanker Operators consider that it is essential to establish a minimum level of compliance, as a base line, for a prudent company.

The figure below shows the baseline as proposed by Tanker Operators. This figure shows the minimum compliance level considered appropriate for each individual element of SPSA [OCIMF STS Service Providers Self-Assessment Guide]. This baseline may be revised in the future in the light of experience, OSIS and industry feedback. The conceptual basis for this baseline is explained in detail the referenced paper, a link of which is shown below.



Required for compliance

Above minimum standards

In addition to the review of the management system, the audit includes a visit to each of the STS Service Provider's equipment stations to verify the condition of the equipment, it's storage and maintenance facilities and consistency with the examined management plan.

The feedback from Masters that are reported to OSIS will be utilized during the audit and any issues arising will be discussed. Furthermore, issues regarding the location assessment will be discussed and information will be exchanged in order for the tanker operators to be aware and properly prepared for the hazards as well as the available recourses in each location.

Validity

The validity of the final audit report is strongly related to the feedback available through OSIS and may be extended or withheld accordingly. The approval may be terminated when there is evidence, or strong indications, of inconsistency or noncompliance with the requirements of the Tanker Operators or the IMO and OCIMF guidelines. In cases where no feedback is available through OSIS the validity is set to one year when a follow up audit will be performed.

Confidentiality

Tanker operators are interested mainly that the outcome of the audit fulfils their criteria and not in the raw information itself. This means that there should be no conflict of interest in establishing a confidentiality regime regarding sensitive commercial, technical or other data. These issues will be extensively discussed and clarified before the initiation of an individual audit.

It is obvious that all information that will be shared with DYNAMARINe prior, during and after the audit, will be strictly confidential and will be used only for the purpose of the audit. All the material (including photos, documents, records and the final report) will be available to the audited party. Tanker Operators will have access only to the final report.

NOTE: During a past STS operation a Service Provider may have provided confidential information to DYNAMARINe or to one of our client. This information was provided only for the scope of the particular operation. When requesting an audit on behalf of Tanker Operators, the STS Service Provider should give his permission for such information to be considered as part of the audit.

Audit Report

Programme

The programme includes all the details regarding the participants and the auditors during the audit procedure and the schedule of the visit at the Service Provider's premises.

Executive Summary

This includes a general profile of the company as well as the outcome of the audit.

Company profile

This section includes general information about the company as well as its structure and organizational chart. Also, a small summary is included regarding each policy such as Quality, Safety etc.

Management System

The Management System section will mention any information regarding the management system and Certifications (ISO 9001, ISO 14001, ISO 18001, ISO 15000, CO2 or other energy footprint reduction programs).

Additionally, the company's management system is reviewed based on the Ship to Ship Service Provider Management, STS Service Provider Self-Assessment. The management system is evaluated based on each element of the SPSA guide and comments are made when the minimum level as set by tanker operators is not achieved. Each element is examined as shown at the table below:

Element 2

Recruitment and Management of Personnel

Minimum Stage: 3

General Comment:

A robust system is in place however it does not include a procedure regarding the validation of experience for STS superintendents, their induction procedure or their refresher training.

- 2.1.3 During recruitment, there is no clear procedure for validating the experience of STS Superintendents.
- 2.1.4 Induction procedure for STS superintendents is not in place.
- **2.3.** There is no clear policy for refresher courses and simulator training.

Guidance / Proposal

A procedure for validating the experience of STS superintendents should be developed that will enable the company to cross check

An induction procedure should be developed for newly recruited STS superintendents and personnel, involving necessary training and a minimum number of supervised operations.

A clear policy for refresher training should be developed, at regular intervals, in order for STS superintends to retain core technical skills through seminars. Additionally, a written procedure should ensure that the STS superintendents are assessed while conducting STS transfers.

There is a potential of achieving stage 3, which is the baseline.

Major Procedures

In this section, various operational procedures are examined, which should be in line with the best industry practices. The JPO development, the fender selection, mooring plan and the risk assessment procedures are examined against their compliance with the best industry practices and the OCIMF guidelines. Additionally, the POACs are reviewed for their qualifications and experience.

Equipment Station and Equipment

In this section, the equipment station and level of maintenance standards will be presented. Specific techniques that are not directly associated with safety and environmental perversion is not mentioned due to confidentiality issues.

Information is presented regarding the records, properties and condition of available STS equipment; especially Fenders and Hoses. It also includes information regarding any hired equipment.

Location Assessment

A brief overview of the location is presented. Procedures of the service provider and their implementation are examined against the location specific requirements.

Exchange of information

Following an audit, the STS Service Provider will work directly with DYNAMARINe, in order to minimize logistic of exchange of information with respect to certification of assigned equipment and STS Superintendent experience and qualification.

Findings

As an outcome of the audit procedure, the auditing team will gather various comments (if applicable) related to the previous elements. The aim of the audit conducted by DYNAMARINe was targeting practices associated to the quality of service delivered to the Master and the vessels. From a prudent STS organization, such service to ships, is the outcome of diligent procedures, as part of the developed SMS system.

Comments and recommendations to be rectified are listed for compliance with the minimum requirements as mentioned in the baseline set by tanker operators. Any open recommendations will

SPSA

This section will include a complete review of all the SPSA elements, along with any recommendations for elements not achieving the minimum baseline as per tanker operators.

Additional Tanker Operators requirements

In case a tanker operator has any specific requirements, the Service Provider's compliance will be examined in this section.

Commercial requirements

In case a charterer/cargo owner has any specific requirements, the Service Provider's compliance will be examined in this section.

Annex – 1 Management System Certificates

In this section, additional documents are presented which have been referenced in the main body of this report. Such documents may include company certificates/accreditations.

Annex – 2 Policies

Policies such as the Quality, Environmental and Security policy are presented.

Annex – 3 Quality Assurance Questionnaire

The complete Quality Assurance Questionnaire as prepared by DYNAMARINe is presented.

Annex – 4 OSIS Report

The OSIS report is presented which includes information as registered at the OSIS database with respect to the performance of the STS Service Provider.

Annex – 5 Documents Examined

This part of the Annex, has a complete list of all the examined documents which are checked for consistency purposes.

Annex – 6 Photos

Selected Photos will be attached showing an overview of the facilities, maintenance practices and the condition of the equipment.

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