Vertom

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Corporate Health, Safety, Security & Environment (HSSE) Policy

CEO statement & endorsement

"As Chief Executive Officer of the Vertom Group, I fully endorse this HSSE Policy.

It reflects our commitment to safe, responsible, and sustainable operations across the entire organization. Clear standards and consistent implementation are essential for how we work."

Endorsed by:

Name: **A.A.H. de Jong**
Title: **Chief Executive Officer - Vertom Group**
Date: 30th of January 2026

This policy is formally endorsed by the Chief Executive Officer. Signed originals are retained in accordance with Vertom Group's document control procedures.

Introduction

The Vertom Group and its affiliated companies ("the Group") are committed to providing a safe, healthy, secure, and sustainable working environment for employees, contractors, partners, and the communities in which we operate. Protecting people and the environment is regarded as essential for business continuity, operational excellence, and stakeholder trust.

The HSSE Policy acknowledges the United Nations Sustainable Development Goals (UNSDGs) as guiding principles for responsible business conduct. The most relevant are SDG 3 – Good Health & Well-Being, SDG 8 – Decent Work & Economic Growth, and SDG 13 – Climate Action. These references are aspirational in nature and do not create binding obligations beyond the requirements of applicable law.

The Group is committed to ensuring that its HSSE management systems are designed and maintained to achieve compliance with applicable international, regional, and national laws, standards, and recognized industry practices.

Scope

This policy applies to all the Vertom Group employees, contractors, suppliers, business partners, and affiliated companies worldwide. All parties working with or on behalf of the Vertom Group are expected to comply with this policy as a condition of their engagement.

Our Commitment

At the Vertom Group, we are committed to:

Protecting people
Preventing workplace injuries, illnesses, and incidents by eliminating or controlling hazards and supporting the physical and mental well-being of employees and contractors.

Safe & healthy workplaces
Providing and maintaining safe systems of work, equipment, and facilities. Ensuring employees receive appropriate training, supervision, and protective equipment. Conducting regular risk assessments and implementing mitigation measures.

Security of people & assets
Protecting staff, visitors, information, and property against threats or malicious acts. Embedding a culture of vigilance and preparedness across all operations. This also includes measures to protect critical digital infrastructure related to operations, in coordination with the Vertom Group's Cyber Security & IT Continuity Policy.

Environmental stewardship
The Vertom Group is committed to minimizing emissions, discharges, and waste generation, using energy responsibly, and promoting sustainable practices in line with SDG 13 – Climate Action. Protecting marine ecosystems and biodiversity is a central part of our operations, ensuring that trade is conducted without compromising the health of oceans. As an absolute minimum, the Vertom Group complies with all applicable environmental laws and regulations. In addition, the Vertom Group aims to contribute to international and regional sustainability goals, including the International Maritime Organization's target of achieving net-zero greenhouse gas emissions by 2050, and European initiatives such as the EU Emissions Trading System (ETS) and FuelEU Maritime.

Fair & safe work practices
Promoting decent work conditions and safeguarding labor rights (SDG 8). Encouraging innovation in safety and sustainability practices.

Protecting people

Substance use & wellbeing

Drugs & substance abuse
The possession, supply, or use of unauthorized drugs is strictly prohibited. Reporting to work under the influence of drugs or other illicit substances is forbidden. Prescription drugs may only be used with a valid prescription and must be reported to the responsible manager where they could impact work performance or safety.

Alcohol
Alcohol consumption is not permitted during working hours, business travel, or when representing the Vertom Group, except at approved company events where limited consumption may be allowed, provided this is lawful in the country concerned and does not compromise safety, health, professional conduct, or compliance with company policies. Any permitted alcohol consumption must be responsible and in accordance with applicable local laws and regulations.

Smoking
The Vertom Group maintains smoke-free workplaces. Smoking or vaping is only permitted in designated areas during breaks, provided it does not interfere with work activities.

Preventive & corrective actions
Preventive and corrective actions, including testing where substance use is suspected, are conducted strictly in line with applicable labour and privacy laws and the principle of proportionality. Violations may result in disciplinary measures up to and including termination of employment.

Emergency preparedness & emergency response staff
The Vertom Group maintains emergency response procedures at all locations to ensure a timely, effective, and coordinated response to incidents and emergencies. Adequate numbers of trained first aiders and emergency response personnel are appointed and maintained, and regular drills, such as evacuation, fire, spill, and medical emergency exercises, are conducted to test preparedness and reinforce awareness.

Lessons learned from incidents, drills, and exercises are systematically reviewed and integrated into procedures to strengthen emergency readiness and continuous improvement. All emergency response arrangements comply with applicable maritime and occupational safety legislation and are reviewed periodically in line with regulatory requirements and recognized best practices.

Responsibilities

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The Divisional Board of Directors retains ultimate accountability for HSSE performance across the group. The Group QHSE Manager and Group Legal Counsel provide oversight to ensure that corporate HSSE standards are applied consistently and in compliance with applicable laws and regulations. Local management is responsible for implementation, training, and compliance monitoring within their operations. Employees and contractors must follow HSSE rules, report unsafe conditions, and contribute to continuous improvement. Suppliers and partners are required to meet Vertom's HSSE standards as a condition of doing business.

Implementation framework

Plan–Do–Check–Act (PDCA)

Vertom applies the Plan–Do–Check–Act (PDCA) principle for continuous improvement:

Plan

Identify HSSE risks, set objectives, and prepare emergency response measures.

Do

Implement safe systems of work, compliance management, and contractor engagement.

Check

Monitor performance through audits, inspections, and reporting.

Act

Learn from incidents, audits, stakeholder feedback, and regulatory changes, share lessons learned, and continually improve HSSE systems.

Monitoring, review & document control

Monitoring & review

This policy is reviewed at least annually by the Board of Directors in consultation with senior management, or earlier where legal, regulatory, or business developments so require. Compliance is monitored through audits, investigations, and follow-up of cases. Findings are used to strengthen controls and improve awareness. Lessons learned from incidents, external assessments, and stakeholder feedback are integrated into the management review process to ensure continued effectiveness, legal compliance, and alignment with best practices.

Document control

All HSSE documents, including policies, procedures, guidelines, and records, are managed within the group's corporate Quality Management System to ensure integrity, accuracy, and accessibility. Each document carries a unique identifier, version status, and controlled distribution. When updates are issued, only the current version is valid while previous versions are archived and clearly marked as superseded. Changes follow a formal review and approval process, with proper communication to relevant stakeholders. Local entities may maintain supporting documentation provided that these remain aligned with the corporate HSSE implementation framework. Through this structured approach, Vertom safeguards consistency, accountability, and continuous improvement in document management.