

# CORPORATE POLICIES



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# Drugs and Alcohol Policy

The summary detailed below defines the Company policy, to which employees are asked to adhere, on drugs (including employee testing), alcohol and customers' procedures.

## Drugs

- The potentially serious and dangerous impact of drug-related incidents must be continuously recognized.
- Employees are prohibited from the possession or use of narcotic substances whilst at work, unless properly prescribed by a medical practitioner.
- Employees who are uncertain whether any prescribed medication may contravene (ii) above should initially consult the QHSE Manager IN CONFIDENCE.
- Employees may use medically prescribed and/or 'over the counter' drugs in therapeutic dosage as long as such drugs do not impair the ability to work and travel safely, and provided that the use of such drugs has been declared to the appropriate management personnel.
- The Company will provide regular and appropriate information to ensure that the basis, content, controls and associated consequences of drug abuse are understood.
- The Company may require employees who are reasonably believed to have a drugs-related problem to undergo medical examination and any subsequent treatment recommended by a doctor.
- The Company also reserves the right to ask its employees to undergo drug testing on a regular or random basis at, or by, an independent medical facility.
- Drug abuse or contravention of this policy may render the employee liable to summary dismissal.

## Alcohol

- The Company does not encourage the use of alcohol.
- The Company may require employees who are reasonably believed to have an alcohol-related problem to undergo medical examination and any subsequent treatment recommended by a doctor.
- Being inebriated at work, at any time or in any location, is considered to be an act of gross

misconduct and will render the employee liable to summary dismissal. "At work" includes travelling to and from a place of work, including to and from overseas assignments, and at all times when assigned to and involved in a field project, even when off duty.

## Local Application of the Policy

- The Management or the QHSE Manager, may also impose more restrictive temporary or permanent conditions, universally or locally, including for example a "zero tolerance" policy, should he consider this to be in the best interest of the Company, or if this is a customer requirement.
- All employees and contractors are required to make themselves aware of any such special conditions and to observe them.

## Customers' Procedures

- Many customers operate prohibited substance search procedures for individuals (and their personal effects) whilst on, entering or leaving their premises/vessels. Additionally, customers may undertake random drug and/or alcohol testing on those who are working on their projects. It is this Company's policy that its employees and contractors must co-operate fully with such customer procedures.
- Should a customer provide verifiable evidence that an employee or contractor has been in possession of a non-prescribed narcotic substance or that their work performance has been impaired through drug or alcohol abuse, it will be considered a breach of Company policy and will render that person liable to summary dismissal or termination of contract.

## Review

This policy will be reviewed and amended as necessary and all changes will be advised to employees at the earliest opportunity.

Francesc Diàñez  
*Managing Director*

**NEXT MARITIME, S.L.U.**

# Health and Safety Policy

## Objectives

The Company's key objective is the prevention of all accidents, injuries and material losses. Great importance is therefore placed on maintaining the health, safety and welfare of employees. In addition, the Company wishes to avoid harm to any other persons with whom employees may have association in connection with its activities, and to avoid damage to their property.

## Responsibility for Compliance

The Managing Director accepts overall responsibility for ensuring that all health and safety matters are efficiently promoted, implemented and managed.

He delegates this responsibility via the QHSE Manager to Operations or Departmental Managers, all of whom are to ensure that all activities for which they are responsible for, are carried out in accordance with statutory requirements, first class working practices, and Company instructions.

## Individual Responsibility

Employees and contractors at all levels are required to co-operate in implementing the requirements of all health and safety laws, recognized safe practices, and Company work instructions. They are to refrain from any action or omission or anything that constitutes a danger to any person and are to be alert to such dangers, advising the Company of situations or practices which may endanger any persons or property.

## Implementation

To implement the Policy, NEXT MARITIME, S.L.U.:

- Maintain a Safety Management System (SMS), which describes how all health and safety matters are to be organized, planned, communicated, managed, documented, audited, reviewed and improved.
- Comply with all laws, regulations and Company standards which affect Company and employee conduct.
- Ensure that all work places are assessed, suitably equipped, and as free as is reasonably practicable from recognized hazards which may have the potential to cause death, injury, illness or material loss.

- Allocate resources and assign responsibilities to meet their objectives.
- Recognize and resolve any conflict between health and safety factors and commercial factors, to the extent that work will not proceed if safe conditions cannot be assured.
- Encourage employees to improve health and safety awareness in their own sphere of activity, to prevent injury to themselves and to other people and to report accidents and hazards to their superiors without delay.
- Hold all supervisory personnel responsible for developing and maintaining safety consciousness among their staff, and for assessing and satisfying their training needs.
- Provide employees and contract staff with suitable safety equipment where appropriate.
- Provide appropriate training to employees.
- Set and adjust performance targets, and measure their progress towards reaching them.
- Require sub-contractors to adopt and work to the same standards as the Company.

## Other Policies.

The Company's policies on the Environment, Drugs & Alcohol, and Quality are issued separately.

## Review

This policy will be reviewed and amended as necessary and all changes will be advised to employees at the earliest opportunity.

Francesc Diàñez  
*Managing Director*

**NEXT MARITIME, S.L.U.**

# Management of Chemical Products (CDI)

## Values

NEXT MARITIME, S.L.U., as ship agent that performs services for owners of chemical ships and for charterers of chemical products, has decided to incorporate to its Quality System the requirements demanded by the Chemical Industry for its logistics suppliers.

To this end, it has defined this policy, which is based on the values of the chemical product transport management system, developed by the "Chemical Distribution Institute - CDI-Mpc", supported by Ship Agent questionnaire.

NEXT MARITIME, S.L.U. supports its business values in procedures and standards that ensure legal and contractual compliance, in relation to:

- The prevention of damages to people during the operations.
- The control of aspects of these operations that cause or may cause a negative impact on the environment.
- The Quality of the Services that are provided, taking into account the demanding requirements of the Chemical Industry, according to the Quality Policy.
- The strengthening of security and protection elements in the facilities and operations.
- Problems that may cause the consumption of alcoholic beverages and / or any hallucinogenic substance that may compromise the state of consciousness, capacity and responsibility on the workplace.

## Objectives and commitments

To carry out these values, NEXT MARITIME, S.L.U. is committed to:

- Have suppliers committed to the prevention of occupational risks.
- Control the risks that affect the worker's health and safety.
- Raise awareness among internal staff to reduce significant environmental aspects as well as the care of environmental impacts in their operations.
- Maintain adequate training levels to minimize the risks of accidents of different types, as well as compliance with regulations and require-

ments established by customers.

- Communicate and adopt guidelines and rules of conduct that have an impact on improving work safety.
- Minimize the possibilities of work accidents.
- Avoid and correct properly possible incidents in the transport of chemical goods.
- Avoid undesirable intrusions in any phase of the logistics chain.
- Avoid the loss of information in any phase of the service.
- Control and document nonconformities, establishing an analysis of the causes as well as the actions for their correction.
- Smoking is prohibited in work spaces. Employees who want to smoke are authorized to leave the building.
- The consumption of alcoholic beverages and / or any hallucinogenic or narcotic substance is prohibited.
- It is prohibited to show up to work habitually in a state of intoxication or drug addiction whenever this negatively affects the work.
- Communicate among the staff and collaborators of the organization, the rules, procedures and guidelines that have an impact on an improvement in security.

The success in the performance of this Policy and the achievements that are intended, consists in the adoption of the following attributes:

**Commitment:** the Management of NEXT MARITIME, S.L.U. ratifying this Policy.

**Participation:** NEXT MARITIME, S.L.U. staff provides ideas for improvement.

**Integration:** the success of NEXT MARITIME, S.L.U. is the success of the collaborating subcontractors.

**Self-discipline:** the objectives are met from the effort and perseverance.

This policy will be reviewed and amended as necessary and all changes will be advised to employees at the earliest opportunity.

Tarragona, October 2021  
Management

**NEXT MARITIME, S.L.U.**

# Quality and Environmental Policy

NEXT MARITIME, S.L.U. is a leading & fully integrated Ship, Logistics & Customs and Agency, providing a full range of Marine Ship Services on a worldwide basis.

NEXT MARITIME, S.L.U. has certificated its activities under the ISO 9001:2015 and ISO 14001:2015 standards.

The NEXT MARITIME, S.L.U. Quality Policy is based on:

- **Maintain a fully updated quality management system, which ensures optimal service delivery.**
- **Maintain a network of trusted partners, in order to meet the needs and expectations of customers, worldwide.**
- **Comply with applicable legislation at all times.**
- **Analyze the organization's environment, to detect risks and opportunities that may arise.**
- **Knowing and meeting the needs and expectations of stakeholders.**
- **Evaluate the opinion of the customers, to know their level of satisfaction and to undertake the necessary improvements, thus obtaining high loyalty shares.**
- **Develop systems of work towards continuous improvement.**
- **Maintain a business position based on obtaining and complying with internationally recognized operational certifications.**
- **Give priority to the use of new information technologies.**
- **Maintain an organizational structure that allows continuous service 24 hours a day 365 a year.**
- **Use resources rationally.**
- **Minimize the environmental impacts in the development of the activity.**
- **Commit to the environmental protection through the implementation of management policies and the awareness of all those involved in the value chain.**
- **Develop proactively in the implementation of policies that contribute to environmental sustainability**

**NEXT MARITIME, S.L.U.** has the appropriate staff, duly trained, and fully involved, to fulfill the commitments made with all stakeholders.

# Trace Code of Conduct

NEXT MARITIME, S.L.U. hereby adopts the following Code of Conduct with respect to all commercial transactions, whether local or international:

**Local and foreign laws:** Neither NEXT MARITIME, S.L.U. nor anyone acting on behalf of NEXT MARITIME, S.L.U. may, directly or indirectly, break or seek to evade the laws or regulations of any country in, through, or with which NEXT MARITIME, S.L.U. seeks to do business. That an illegal act is a “customary business practice” in any country is not sufficient justification for violation of this provision.

**Bribery and facilitating payments:** Neither NEXT MARITIME, S.L.U. nor anyone acting on behalf of NEXT MARITIME, S.L.U. may, directly or indirectly, offer or provide a bribe, and all demands for bribes must be expressly rejected.

Bribery includes any offer, promise, or gift of any pecuniary or other advantage, whether directly or through intermediaries, to a public official, political party, political candidate or party official or any private sector employee, in order that the official or employee act or refrain from acting in relation to the performance of their duties, in order to obtain or retain business or other business advantage.

Neither NEXT MARITIME, S.L.U. nor anyone acting on behalf of NEXT MARITIME, S.L.U. shall offer or make facilitating payments to government officials in order to encourage them to expedite a routine governmental task that they are otherwise required to undertake. NEXT MARITIME, S.L.U. or anyone acting on behalf of NEXT MARITIME, S.L.U. shall have discretion to deviate from this prohibition if he/she believes that there is an immediate threat to his/her or another’s health or safety. The circumstances of such payment must be reported as soon as possible after the event and the payment properly recorded. NEXT MARITIME, S.L.U. recognizes that extortion is widespread and that participation by the business community increases demand for facilitating payments.

**Kick-backs:** Neither NEXT MARITIME, S.L.U. nor anyone acting on behalf of NEXT MARITIME, S.L.U. may offer or accept a “kick-back” of any portion of a contract payment to employees of other parties to a contract or use other vehicles such as subcontracts, purchase orders or consulting agreements to channel payments to government officials, political candidates, employees of other parties to a contract, their

relatives or business associates.

A “kickback” is a particular form of bribe which takes place when a person entrusted by an employer or public function has some responsibility for the granting of a benefit and does so in a way that secures a return (kickback) of some of the value of that transaction or benefit for that person without the knowledge or authorization of the employer or public body to which the person is accountable.

**Conflicts of interest:** NEXT MARITIME, S.L.U. and anyone acting on behalf of NEXT MARITIME, S.L.U. shall avoid any relationship or activity that might impair, or appear to impair, the ability to render objective and appropriate business decisions in the performance of our jobs.

**Political contributions:** Neither NEXT MARITIME, S.L.U. nor anyone acting on behalf of NEXT MARITIME, S.L.U. may make a political contribution in order to obtain an unlawful business advantage. NEXT MARITIME, S.L.U. shall comply with all public disclosure requirements.

**Philanthropic contributions:** NEXT MARITIME, S.L.U. and anyone acting on behalf of NEXT MARITIME, S.L.U. may make contributions only for bona fide charitable purposes and only where permitted by the laws of the country in which the contribution is made. Contributions made in order to obtain an unlawful business advantage are prohibited.

**Extortion:** NEXT MARITIME, S.L.U. and anyone acting on behalf of NEXT MARITIME, S.L.U. shall reject any direct or indirect request by a public official, political party, party official, or private sector employee for undue pecuniary or other advantage, to act or refrain from acting in relation to his or her duties.

**Gifts, hospitality and entertainment:** NEXT MARITIME, S.L.U. and anyone acting on behalf of NEXT MARITIME, S.L.U. shall avoid the offer or receipt of gifts, meals, entertainment, hospitality or payment of expenses whenever these could materially affect the outcome of business transactions, are not reasonable and bona fide expenditures, or are in violation of the laws of the country of the recipient.

**Reporting requirement:** All officers and employees of NEXT MARITIME, S.L.U. and anyone acting on behalf of NEXT MARITIME, S.L.U. shall promptly

report any actual or potential violation of this Code of Conduct, including any instance in which he/she is subjected to any form of extortion or is asked to participate in any way in a bribery scheme, to NEXT MARITIME, S.L.U. senior corporate management, without fear that his/her business relationship or employment will be adversely affected. Reports shall be treated confidentially to the extent possible, consistent with the need to conduct a thorough investigation.

**Company response:** No employee will suffer demotion, penalty or other adverse consequences for not paying bribes even when NEXT MARITIME, S.L.U. may lose business as a result of the employee's refusal to do so. Employees are required to report alleged violations of this Code of Conduct to senior management and no employee will suffer demotion, penalty or adverse consequences for reporting.

NEXT MARITIME, S.L.U. shall, where appropriate, sanction employees, suppliers or other business partners for violations of this Code of Conduct.

**Accounts:** NEXT MARITIME, S.L.U. shall maintain complete and accurate financial records, ensuring that all transactions are properly, accurately and fairly recorded in a single set of books.

**Communications and training:** NEXT MARITIME, S.L.U. agrees to participate in anti-corruption training provided by TRACE, or by a comparable organization, and to make annual training available for all principals and for all key employees involved in sales, marketing, and procurement.

The person whose signature appears below is duly authorized to adopt this Code of Conduct on behalf of NEXT MARITIME, S.L.U. and, if signing on behalf of a company, agrees that this Code shall apply to all officers, employees and representatives of NEXT MARITIME, S.L.U.

I hereby adopt and agree to comply with the TRACE Code of Conduct as outlined above.

I understand that violation of the Code of Conduct will be grounds for immediate revocation of TRACE Certification, if applicable.

Management  
Tarragona, October 2021



# Code of Ethics

NEXT MARITIME, S.L.U. Code of Ethics fits with the Group's operating values.

The main operating values of NEXT MARITIME, S.L.U. are:

- Two-way loyalty of staff to management and management to staff.
- Commitment to quality service.
- Commitment to security matters.
- Commitment to safety matters.
- Commitment to environmental questions.
- Enforcing relationships with stakeholders, mainly customers, suppliers and authorities, through long-term commitments and agreements.

This Code of Ethics reflects these values and acts to preserve them.

## Corporate Ethics

- NEXT MARITIME, S.L.U. respects and abides by the laws of the countries in which it operates.
- NEXT MARITIME, S.L.U. is concerned and has developed policies to enforce:
  - Business ethics.
  - Conflicts of interests.
  - Confidentiality.
- NEXT MARITIME, S.L.U. is concerned and has developed policies to avoid:
  - Use of drugs and alcohol.
- NEXT MARITIME, S.L.U. extremely respects and supports the cultural practices, religions and ways of life, of the citizens of the countries in which it operates.
- NEXT MARITIME, S.L.U. values highly the diversity of its staff and their willingness and capacity to work together to achieve common goals.
- NEXT MARITIME, S.L.U. provides a work environment free of discrimination and harassment based on age, ancestry, color, marital status, medical condition, mental disability, physical disability (including persons infected with the HIV virus or persons with AIDS), national origin, race, religion, sex, sexual orientation or veteran status.

NEXT MARITIME, S.L.U. Staff work together cooperatively in a spirit of trust built on honest communica-

tion, fairness, and an equitable distribution of rewards, and considers that:

- Healthy competition and clear communication are permanently valued, supported and improved.
- Staff members do not seek to gain advantage over each other by devious means such as uttering falsehoods and indulging in malicious gossip.
- Staff members respect the property of NEXT MARITIME, S.L.U. and of their colleagues.
- Managers ensure that all staff members are trained appropriately for their jobs and quality, health and safety standards, security matters and environmental questions are given priority in the workplace.
- Managers support the honest endeavors of all staff to improve themselves.
- Managers recognize that staff members are connected to families and that the well-being of the family has an impact on the ability of a staff member to work effectively.

## NEXT MARITIME, S.L.U.

# Personal data protection policy

Adjusted to

REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND THE COUNCIL of April 27, 2016, regarding the protection of each individual along with the processing of his/her personal data and its free movement.

ORGANIC LAW 3/2018 of December 5, on the PROTECTION OF PERSONAL DATA AND GUARANTEE OF DIGITAL RIGHTS

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## 1. OBJECTIVE AND PURVIEW OF THE POLICY

The objective of this "Policy" is to establish the guidelines that all areas of NEXT MARITIME, S.L.U. have to follow, in terms of protecting our personal data. As specified in RGPDUE 2016/679 and LOPDGDD 3/2018, they are considered "Personal data: any information about a person that can be identified or identifiable. Any person whose identity can be determined, directly or indirectly (...)"

This "Policy" contains the description of the technical and organizational key elements, which are applied to NEXT MARITIME, S.L.U., in order to protect personal data and avoid the risks that could materialize and affect people's rights and freedom.

Everyone has to effectively apply the guidelines established in this Policy regarding data protection must be ensured, so that this self-regulation system ensures that behaviors remain within the guidelines of the "Policy".

The rules of this "Policy" are applied to all workers of NEXT MARITIME, S.L.U. as well as external companies that provide services to NEXT MARITIME, S.L.U., with total independence of their geographical location and the functions in charge.

With the firm purpose of ensuring compliances with current data protection regulations, NEXT MARITIME, S.L.U. will keep this Policy updated and adapted to technological and legislative changes, which may occur in the future.

## 2. POLICY'S DEVELOPMENT

### 2.1 Commitment to data protection

Compliance with RGPDUE 2016/679 and LOPDGDD 3/2018, as well as the current regulations regarding the protection of personal data, are considered a priority and a main objective of data protection.

In all the areas and professional categories in NEXT MARITIME, S.L.U., there is and always will be a commitment to meet the objectives of data protection; in addition to the basic principles and obligations established in this Policy.

The strategy of NEXT MARITIME, S.L.U., in terms of data protection, complies with the basic principles detailed in RGPDUE 2016/679 and LOPDGDD 3/2018. Moreover, it promotes training and awareness on data protection to all its employees.

### 2.2 Basic principles of data protection

The basic principles of data protection defined by RGPDUE 2016/679 and LOPDGDD 3/2018 in force at the time of writing this Policy are:

**Principle of legality:** The processing of personal data will be lawful if it is based on the consent of the interested party or on some other legitimate basis established by law.

**Principle of transparency:** The interested party must be informed, at all times, of all the circumstances related to the processing of their data.

**Principle of loyalty:** Personal data may not be processed for purposes other than those reported.

**Principle of purpose limitation:** Personal data will be collected for specific, explicit and legitimate purposes. Furthermore, it will not be subsequently processed in an incompatible manner with the purpose of its collection.

**Principle of data minimization:** Personal data must be adequate, pertinent and limited to the necessary treatment in relation to the purpose of its collection. This principle and the previous one develop the principle of necessity and proportionality that apply in the DPIA.

**Principle of accuracy:** Personal data must be

accurate, and if necessary, updated, adopting all reasonable measures. Personal data that is inaccurate, regarding the purposes for which they are, shall be deleted or rectified without any further notice.

**Principle of limiting conservation timings:** The personal data will be kept in a way that allows the identification of the interested parties, only for the time that is necessary for the purposes of the process.

**Principle of integrity and confidentiality:** Personal data will be treated in such a way as to guarantee adequate security. This being said, it also includes protection against unauthorized or illegal activity, as well as against its loss, destruction or accidental alteration, through the application of technical and appropriate organizational measures. Personal data can only be accessed by the users, which have been authorized to access them. This personal data may not be communicated to third parties without their authorization.

**Proactive responsibility principle:** NEXT MARITIME, S.L.U. is responsible for the compliance of everything that is related to the data protection regulations and has to be able to demonstrate its fulfillment.

**Data protection from the design and by default:** Within the new treatments (projects, services and products), a DPIA will be carried out prior to the data protection treatment.

## 2.3 Prevention of breaches

The main objective of this Policy, the rules and the procedures that develop it, is to prevent infringements of the rights and freedoms of the interested parties; as well as of the regulations on the protection of personal data.

The reference framework that must be taken into account to meet the objectives will be the RGDUE 2016/679 and the LOPDGDD 3/2018. The two laws are those that establish two groups of offenses: serious and very serious with an economic impact of 2 - 4% of the turnover of the previous year or up to 20,000,000 €.

Serious offenses are summarized in the following activities:

- Inadequate handling of data of minors.
- Inadequate technical and organizational measu-

res.

- Hiring of managers without sufficient guarantees.
- Subcontracting of managers without authorization.
- Non-existence of the record of processed activities
- Not having EIPD when it is mandatory.
- Lack of notification of security breaches.
- Lack of designation of DPD when it is mandatory.
- Lack of the necessary support for the DPD.
- Other serious infringements provided for in the data protection regulations.

Very serious offenses are summarized in the following activities:

- Violation of the basic principles of data protection.
- Illicit treatment.
- Lack of consent.
- Treatment of data for a purpose other than its collection.
- Inadequate treatment of sensitive/confidential data.
- Failure to inform the interested party.
- Violation of the duty of confidentiality.
- Inadequate response to the exercise of rights.
- Transfer of data in a third country without guarantees.
- Incompletion of the obligation to block the data.

## 2.4 Registered data procedures and modules

NEXT MARITIME, S.L.U. has a Treatment Activity Registry (RAT), in which the details of the defined treatments are identified.

## 2. Control of vendors

NEXT MARITIME, S.L.U. maintains an updated record of all providers, who provide the contracted service, process personal data of NEXT MARITIME, S.L.U., or have direct or indirect access. The relationship with suppliers will be regulated by a contract, in compliance with art. 28 RGDUE and art. 33 LOPDGDD, on the stipulations and obligations that the supplier has to comply with.

Suppliers are required to report any direct or indirect subcontracting related to the provision of the service.

## 2.6 Regime and functions of data protection compliances

The Data Protection Compliance is designated in taking into account their professional qualities, their knowledge of data protection, and their ability to perform the functions indicated in the standard.

It is guaranteed that the Data Protection Compliance, in the development of its functions identified in this "Policy", will provide the necessary resources for the development of its functions and access to personal data, treatment operations and continuous training to all staff; in knowledge of data protection legislation.

In the event of a security breach or any other circumstance, in which it is necessary to notify the AEPD, the Data Protection Compliance will collaborate with the DPD.

Interested parties can contact the Data Protection Compliance and ask all questions regarding the processing of personal data and the exercise of rights.

The Data Protection Compliance is obliged to maintain secrecy or confidentiality regarding the performance of its functions.

The Data Protection Compliance has the following regulations:

1. Inform and advise workers, with access to data, on the obligations that affect them by the virtue of the current regulations on the protection of personal data.
2. Supervise compliance with current regulations on the protection of personal data, policies, standards and drawn up procedures.
3. Supervise the assignment of responsibilities and control functions regarding data protection.
4. Support the execution of audits and verifications of compliances in terms of data protection.
5. Give the advice requested for the execution of the basic risk assessment and the DPIA related to data protection. It will supervise its appliance in accordance with the applicable regulations.
6. It will supervise the application of the response procedure to requests for the exercise of rights by the interested party.

7. It will supervise the process of capturing, filing and keeping the compliance tests related to the controls established in the field of data protection.
8. It will supervise the periodic control of the suppliers in terms of data protection and in the process of requesting and receiving guarantees, as proof of compliance with their obligations.

The Data Protection Compliance will carry out its functions, taking into consideration, the risks associated with the processing operations, their nature, the scope, the context and the purposes of the processing.

## 2.7 Audit/verifications of the completion of the data's protection

NEXT MARITIME, S.L.U. carries out continuous monitoring in terms of data protection. Carrying out, whenever it is considered necessary, a compliance verification to assess the probability of risks in terms of data protection, and the impact it would have within NEXT MARITIME, S.L.U., in the case of reifying.

The audit can be internal, external or mixed. It may also include a verification of the existence, suitability and effectiveness of the measures and controls established to prevent the infringement of the rules related to the protection of personal data.

The scope of the audit differs from that of the DPIA. It refers to a specific treatment, while the Data Protection Audit refers to compliance in general with the regulations relating to the protection of personal data.

The Audit report must evaluate the suitability of NEXT MARITIME, S.L.U. to external and internal regulations, identifying their deficiencies and proposing necessary corrective or complementary measures. It must also include the data, facts, observations and evidence on which the conclusions and recommendations proposed are based.

## 2.8 Compliance and validity

The content of this Policy is mandatory for all of NEXT MARITIME, S.L.U.'s staff, and will remain in action until it is modified or replaced.

## **2.9 Related regulations**

This policy is adapted to the following regulations:

- EU General Data Protection Regulation 2016/679.
- Organic law on data protection and guarantee of digital rights 3/2018.
- To the legislative changes that take place in the matter of data protection, as well as the criteria established by the corresponding control authorities.
- The guides, reports and resolutions of the control authorities of the EU Member States
- The Article 29 Working Group.
- The declarations of the Court of Justice of the EU
- The declarations of the National Court, the Supreme Court and the Constitutional Court.

**NEXT MARITIME, S.L.U.**

# Declaration on modern slavery and trafficking in persons

## Statement

Modern slavery is a crime and a violation of fundamental human rights.

It takes various forms, including slavery, servitude, forced and compulsory labor, and human trafficking.

Common to all are the deprivation of liberty of one person by another to exploit them for personal or commercial purposes.

NEXT MARITIME has a zero tolerance approach to modern slavery, which is why it is fully committed to acting ethically and with integrity in all its businesses, as well as in the commercial relationships it maintains.

Likewise, NEXT MARITIME is committed to implementing and enforcing effective systems and controls to ensure that such behaviors do not have a place at any point in the value chain where the company is involved.

NEXT MARITIME is also committed to ensuring transparency in the organization itself and in the approach taken to address modern slavery throughout the different stages of its operations, in line with the British Modern Slavery Act 2015: UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018.

NEXT MARITIME requires the same standards of compliance from all contractors, suppliers and other business partners, who participate in operations carried out.

NEXT MARITIME requires these same standards of compliance in the contracting processes, which include specific prohibitions against the use of forced or compulsory labour, human trafficking, or any person subjected to slavery or servitude, whether they are adults or children.

This policy applies to all persons who work for NEXT MARITIME or on its behalf in any function or responsibility, including employees at all levels, directors, trainees, agents, contractors, external consultants, third party representatives and business partners.

## Purpose.

This policy offers the guidelines that allow compliance with the norms against modern slavery and human trafficking, establishing the measures to prevent these behaviors and designing possible corrective actions.

## Organizational structure, business and supply chains

NEXT MARITIME is a leading international integrated group that provides a wide range of maritime services globally.

NEXT MARITIME provides a global service based on the philosophy of 24/7 permanent attendance.

NEXT MARITIME is an entirely Spanish internationally recognized company, founded in 2010. Its operational headquarters are in Tarragona, the location of the largest petrochemical complex in the country, and one of the largest in southern Europe, which began in 1965.

All the relevant corporate information of the organization is located on the website: [www.nextmaritime.com](http://www.nextmaritime.com)

## Policy on modern slavery and human trafficking

The objective of NEXT MARITIME is to work in collaboration with all its agents, suppliers and business partners, to ensure that they share the fight against modern slavery and human trafficking.

In order to manage this issue, and as part of the hiring processes, specific prohibitions are included on the use of forced, compulsory labor or that derives from trafficking in persons or of any person who is subjected to slavery or servitude, either adult or minor.

NEXT MARITIME requires that the companies with which it contracts also demand these same requirements from their suppliers. Compliance with these guidelines is essential for the evaluation of suppliers

and business partners.

The policy against modern slavery and human trafficking is available to all interested parties on the company's website.

Due diligence processes for slavery and human trafficking.

In order to ensure compliance with the zero tolerance policy regarding modern slavery and human trafficking, NEXT MARITIME maintains the following due diligence processes:

As a provider of maritime services, NEXT MARITIME carries out its activity through qualified personnel and, as such, has solid contracting practices, duly supported by the operational teams in each of the regions where it operates. The controls are adequately in place and include actions to limit the risk of employing anyone who is the object of forced labor or from human trafficking.

Agents and suppliers who provide services on behalf of NEXT MARITIME, must share the values of zero tolerance with respect to modern slavery and human trafficking, forced labor, etc., for which they are required to act with the maximum rigor.

The prevention, detection and reporting of modern slavery anywhere, by NEXT MARITIME or in its supply chain, is the responsibility of all those who work for the organization or under its control. Employees are obligated to avoid any activity that may generate or suggest a violation of this policy. Employees are encouraged to raise concerns about any problem or suspicion of modern slavery and human trafficking at any stage in the provision of the service.

Training: to ensure understanding of the risks of modern slavery and human trafficking in the activity carried out by NEXT MARITIME, training is given to the entire team of professionals who carry out their work or professional activity in the company, delivering to them a copy of this policy and other documentation where this system of action is contemplated.

## **Risks evaluation**

On an annual basis, NEXT MARITIME's risk assessment is updated and reviewed, within the framework of its integrated quality, environment and occupational health and safety system, taking into account zero tolerance with respect to modern slavery, and

human trafficking.

The evaluations carried out conclude that the existence of modern slavery and human trafficking, in the development of NEXT MARITIME's activity, is a moderate risk.

However, NEXT MARITIME recognizes the importance of increasing the awareness of staff and business partners on issues related to modern slavery and human trafficking.

Effectiveness in the fight against slavery and human trafficking.

To evaluate the effectiveness of the actions taken, NEXT MARITIME has established the following controls and indicators:

### **The use of work controls.**

#### **Training given.**

#### **Monitoring, investigation and response to complaints received through existing channels for this purpose.**

#### **The analysis of daily communication with the interlocutors of service partners.**

The management of NEXT MARITIME is committed to updating and improving this policy, in order to ensure the total belligerence of the organization with respect to practices related to modern slavery and human trafficking.

Tarragona  
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