Environmental, Health and Safety Management Plan

Updated: May 2026

This document was approved by Hudson Shipping Lines' Board of Directors and is publicly available on our website. All employees are informed about the contents of this document.

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1. Overview and Scope

This Environmental, Health and Safety Management Plan (the “Plan”) establishes the framework used by Hudson Shipping Lines, Inc., its branches and its wholly owned subsidiaries (collectively, “Hudson” or the “Company”) to manage environmental, occupational health and workplace safety risks.

The Plan applies to Hudson employees, officers, directors, temporary personnel and consultants, and to Hudson-controlled offices, worksites and activities. Contractors, visitors and other third parties must comply with the applicable provisions of this Plan while performing Hudson-related work or entering a Hudson-controlled site.

At customer, supplier, port, terminal, warehouse, vessel or other third-party locations, personnel must also comply with applicable site rules and emergency procedures. Where requirements differ, the more protective lawful requirement will generally apply. Conflicts must be referred to management or the Legal Department.

Hudson primarily charters and provides commercial, logistics and supply chain services. Unless Hudson has expressly assumed operational control, vessel owners, operators, managers, carriers and facility operators remain responsible for their statutory safety and environmental management systems. Hudson will use reasonable contractual and commercial controls to address material EHS risks within its influence.

The Plan is informed by recognized management system principles, including ISO 45001 and ISO 14001, but does not represent that Hudson is certified to either standard.

2. EHS Policy Commitments

Hudson is committed to protecting people, preventing pollution and conducting its activities responsibly. Hudson will not knowingly compromise environmental, health or safety requirements for commercial or operational convenience.

Hudson will:

- comply with applicable EHS laws, regulations, permits, licenses, contractual requirements and site rules;
- identify hazards and environmental aspects, assess risks and impacts, and implement appropriate controls;
- provide safe systems of work, appropriate equipment, training, information and supervision;
- consult with employees and encourage timely reporting of hazards, near misses, incidents and environmental concerns;
- provide personnel with authority to stop or decline work in good faith where they reasonably believe there is an imminent risk of serious harm;
- prepare for emergencies and maintain practical response arrangements appropriate to each controlled workplace;
- investigate incidents, determine contributing and root causes, and track corrective actions to completion;
- consider EHS performance when selecting and monitoring relevant contractors and service providers; and
- set objectives, monitor performance and pursue continual improvement.

3. Roles and Responsibilities

3.1 Board and Senior Management

The Board of Directors provides oversight of this Plan. Senior management is responsible for establishing expectations, providing appropriate resources, reviewing material incidents and performance, and reinforcing a culture in which EHS concerns may be raised without retaliation.

3.2 EHS Lead or Designated Manager

Management will designate an EHS Lead or other responsible manager to coordinate implementation of the Plan. Responsibilities include maintaining the risk and action registers, coordinating training and inspections, monitoring performance, supporting incident investigations and escalating material issues.

3.3 Managers and Supervisors

Managers and supervisors are responsible, within the scope of their authority, for:

- planning work so that hazards and environmental impacts are identified and controlled;
- providing competent supervision, appropriate instructions and required personal protective equipment;
- consulting affected personnel before material changes to work or controls are implemented;
- ensuring that incidents and near misses are reported, investigated and addressed;
- confirming that contractors and visitors receive appropriate site information; and
- promptly escalating material EHS risks, regulatory issues and overdue corrective actions.

3.4 Employees and Other Personnel

All personnel must:

- take reasonable care for their own health and safety and that of others;
- follow applicable procedures, instructions, permits and site rules;
- use equipment, safety devices and personal protective equipment correctly;
- perform only work for which they are authorized, trained and fit;
- immediately report hazards, incidents, near misses and environmental releases; and
- cooperate with investigations, training, inspections and corrective actions.

No person will be retaliated against for raising an EHS concern, reporting an incident or stopping work in good faith.

4. Risk and Environmental Aspect Management

4.1 Identification and Assessment

Hudson will identify occupational hazards and environmental aspects associated with its controlled activities, including routine and non-routine work, business travel, site visits, equipment, substances, contractors, emergency conditions and planned changes.

Significant hazards, risks, environmental aspects and controls will be recorded in a risk register or other appropriate controlled record. Assessments must consider existing controls, likelihood, potential severity, persons or environments affected, legal or contractual obligations and reasonably foreseeable abnormal or emergency conditions.

4.2 Hierarchy of Controls

Risks must be eliminated so far as reasonably practicable. Where elimination is not practicable, controls will be selected in the following order:

- elimination;
- substitution;
- engineering or physical controls;
- administrative controls, procedures, permits, training and supervision; and
- personal protective equipment.

Controls must identify a responsible owner and, where implementation is not immediate, a target date and interim precautions. The effectiveness of controls must be reviewed after implementation and following relevant incidents or changes.

4.3 Stop-Work Authority

Personnel may stop or suspend work where they reasonably believe there is an imminent risk of serious injury, illness, environmental harm or material property damage. Work may resume only after the concern has been assessed and appropriate controls have been implemented.

5. Operational Controls

5.1 Workplace Access, Security and Visitors

Access to Hudson-controlled workplaces will be limited to authorized persons. Visitors and contractors must comply with sign-in, escort, identification, emergency and site-safety requirements. Security threats, suspicious behavior and access-control failures must be reported promptly.

5.2 Personal Protective Equipment

PPE will be selected based on the risk assessment and applicable standards. Hudson will provide required PPE to employees, together with instruction on its correct use, fit, care, maintenance and replacement. PPE is a final line of defense and does not replace more effective controls.

5.3 Plant, Equipment, Vehicles and Driving

Plant, tools, equipment and vehicles used for Hudson-controlled work must be suitable, maintained and inspected as appropriate. Operators must hold required licenses or demonstrated competency. Personnel must comply with applicable driving, seat-belt, mobile-device, journey-management and site-traffic rules.

5.4 Hazardous Substances

Hazardous substances must be approved, labeled, stored, handled, transported and disposed of in accordance with applicable law, safety data sheets and site procedures. Inventories and exposure records will be maintained where required, and spill-control materials will be provided where reasonably necessary.

5.5 Housekeeping and Ergonomics

Work areas, walkways and emergency exits must be kept reasonably clean and unobstructed. Office and remote-work risks, including ergonomics, electrical safety, slips, trips and manual handling, must be addressed through practical controls and employee guidance.

5.6 Fitness for Work

Personnel must report fit for duty and must not work while impaired by alcohol, illegal drugs, misuse of medication, fatigue, illness or another condition that creates an unacceptable risk. Testing or medical evaluation may be required only in accordance with applicable law, contractual requirements and Company policy.

Work schedules and travel arrangements should be planned to manage fatigue. Personnel must report when they are too fatigued to perform work safely.

5.7 Psychosocial Health and Respectful Workplace

Hudson will consider psychosocial hazards that may affect health and safety, including excessive workload, fatigue, bullying, harassment, violence, isolation and unclear responsibilities. Concerns will be addressed under this Plan and the Company's applicable employment, harassment and reporting policies.

6. Emergency Preparedness and Response

Each Hudson-controlled location must maintain emergency arrangements appropriate to its activities and risks. At third-party sites, personnel must follow the host site's emergency procedures unless doing so would create an immediate danger.

Emergency arrangements should address, as applicable:

- fire, evacuation and assembly points;
- medical emergencies and first aid;
- severe weather, natural disasters and utility failures;
- spills, releases and environmental incidents;
- security threats, violence and unauthorized access;
- vehicle or transportation incidents; and
- business continuity and emergency communications.

Emergency contacts, evacuation information and first-aid resources must be communicated and kept current. Drills will be conducted where required or appropriate, and lessons learned will be documented.

7. Incident and Near-Miss Management

7.1 Immediate Reporting and Response

All injuries, illnesses, near misses, unsafe conditions, property damage, security events and environmental incidents connected with Hudson-controlled work must be reported promptly to a supervisor or the designated EHS contact. Serious incidents must be escalated immediately to senior management and the Legal Department.

The first priorities are to protect people, obtain emergency assistance, control ongoing hazards, prevent further harm and preserve relevant evidence. Personnel must not admit liability or communicate externally unless authorized.

7.2 Investigation and Corrective Action

Incidents will be investigated at a level proportionate to their actual and potential severity. Investigations should identify immediate, contributing and root causes rather than focusing only on individual error.

The incident record should include:

- what occurred, when and where;
- persons, equipment, substances and environmental receptors involved;
- immediate response and containment measures;
- evidence reviewed and persons consulted;
- causal factors and control failures;
- corrective actions, owners and completion dates; and
- required internal, client, insurer or regulatory notifications.

7.3 Regulatory and Other Notifications

The Legal Department or its designee will determine whether notice must be provided to a governmental authority, client, insurer, landlord, vessel owner or other party. Applicable reporting deadlines must be verified for the jurisdiction and incident.

8. Consultation, Training and Competency

Hudson will consult employees on EHS matters that may materially affect them. Consultation may occur through safety meetings, toolbox talks, briefings, risk assessments, inspections, surveys or direct discussion.

Personnel must receive induction and role-appropriate EHS training before performing work that requires specific knowledge or competency. Refresher or additional training will be provided when risks, procedures, equipment, laws or responsibilities change.

Where work requires a license, qualification or demonstrated competency, the responsible manager must verify and document the requirement before authorizing the work. Training and competency records will be maintained in accordance with Section 13.

9. Contractors and Third Parties

EHS risks will be considered when selecting, onboarding and monitoring contractors and other third parties whose work may materially affect people or the environment.

Depending on risk, Hudson may require:

- evidence of licenses, insurance, qualifications, training and relevant EHS procedures;
- disclosure of material incidents, enforcement actions or unresolved corrective actions;
- site induction, risk assessments, safe-work procedures or permits;
- prompt incident and environmental reporting;
- cooperation with investigations, inspections and audits; and
- corrective action, suspension or removal for material noncompliance.

Contractors remain responsible for their personnel and subcontractors. Hudson's oversight does not relieve a contractor, vessel owner, operator, carrier or facility operator of its legal or contractual obligations.

10. Environmental Management

10.1 Environmental Commitments

Hudson will identify and manage significant environmental aspects within its control or influence and will seek to prevent pollution and improve environmental performance. Relevant considerations include air emissions, greenhouse gas emissions, energy and fuel use, water, waste, hazardous materials, spills, noise, biodiversity and community impacts.

10.2 Waste and Resource Use

Waste must be minimized where practicable and managed in accordance with applicable requirements. Hazardous or regulated waste must be handled by appropriately qualified personnel and authorized contractors. Hudson encourages practical reduction, reuse and recycling of materials and responsible use of energy, water and other resources.

10.3 Spill Prevention and Response

Activities involving fuels, oils, chemicals or other potentially polluting materials must include appropriate storage, secondary containment, handling and response measures. Spills and threatened releases must be reported and controlled promptly.

10.4 Maritime Environmental Considerations

Hudson supports compliance with applicable International Maritime Organization requirements and considers vessel environmental performance in chartering and commercial decisions where reasonably practicable. Hudson may use recognized maritime performance information, including RightShip data, and may include environmental requirements in charter parties and service agreements.

The use of fuels, exhaust gas cleaning systems and other vessel technologies will be evaluated in light of applicable law, port restrictions, contractual requirements and environmental impacts. Unless Hudson has expressly assumed operational control, the vessel owner or operator remains responsible for statutory vessel compliance and operation.

11. Performance Monitoring, Inspections and Audits

Hudson will monitor EHS performance using measures appropriate to its activities. Measures may include:

- injuries, illnesses, incidents and near misses;
- environmental incidents, spills and regulatory noncompliance;
- hazards reported and corrective actions completed or overdue;
- training, competency and induction completion;

- workplace inspections, audits and management reviews;
- contractor EHS performance; and
- relevant energy, emissions, waste or resource-use information where reasonably available.

Hudson-controlled workplaces will be inspected at a frequency appropriate to their risk. Findings must be documented, assigned to responsible owners and tracked to closure. Material overdue actions must be escalated.

The Plan and supporting controls will be audited periodically, and at least annually at a management-system level. Audit scope and frequency may be adjusted based on incidents, regulatory changes, business changes and prior findings.

12. Management of Change

Before implementing a material change to facilities, equipment, technology, services, work methods, staffing, contractors, locations or legal requirements, the responsible manager must assess potential EHS impacts.

The review should identify required risk assessments, permits, training, procedures, communications, emergency arrangements and approvals. Temporary changes must also be controlled and reviewed.

13. Records and Document Control

The current approved version of this Plan and related forms, procedures and registers will be maintained as controlled documents. Obsolete versions must be removed from active use or clearly marked as superseded.

EHS records must be accurate, protected from unauthorized alteration and accessible to authorized personnel. Records will be retained in accordance with the Company's document retention requirements, applicable law, contractual obligations and any legal hold. Unless a longer period applies, inspections, training records, incident records and corrective-action records should generally be retained for at least five years.

Medical, exposure and other sensitive personal information must be handled confidentially and separately from general EHS files, with access limited to authorized personnel.

14. Review, Approval and Acknowledgment

This Plan will be reviewed by Hudson's Board of Directors and Corporate Social Responsibility team at least annually and more frequently following a material incident, significant organizational change or relevant legal or operational development.

Next scheduled review: May 2027

Read and approved by:
Board of Directors
Hudson Shipping Lines Incorporated
May 2026

This Plan may be amended from time to time with or without notice by the Company.

ANNEX A

MINIMUM EHS TRAINING TOPICS

Hudson will maintain a role-based training matrix or equivalent record identifying required training, frequency and method of delivery. The following topics should be included where relevant to the role, location and activities:

- Company and site induction;
- hazard identification, risk assessment and stop-work authority;
- incident, near-miss and environmental reporting;
- emergency procedures, evacuation and first aid awareness;
- personal protective equipment;
- manual handling, ergonomics and office safety;
- vehicle, travel and journey-management safety;
- hazardous substances and spill response;
- fatigue and fitness for work;
- contractor and visitor controls;
- respectful workplace and psychosocial health; and
- environmental responsibilities, waste management and pollution prevention.

Training effectiveness should be evaluated through discussion, observation, testing, competency assessment, inspection results or other reasonable means. Training records must identify the topic, participant, date and delivery method.