

Clipper Group Ltd.

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Clipper Group Recycling Policy

If a recycling of a vessel is not carefully planned, the environment and the safety of the workers involved in the recycling might be exposed.

Clipper Group recognizes our responsibility as a significant player in the global shipping industry and has adopted the following recycling policy:

Clipper is committed to ensure that if a vessel fully owned by us is sold for recycling, then:

- We shall be actively involved during the entire recycling process;
- The recycling shall at a minimum adhere to the principles laid down in the Hong Kong Convention (including the preparation of an inventory of hazardous material and a ship recycling plan), even though this convention is not yet ratified and in force;
- We shall approve of the recycling facility used for the recycling;
- We shall inspect the recycling facility in order to verify that the recycling facility is able to carry out the recycling in a safe and environmentally sound manner and in particular have procedures in place to:
 - Control any leakage, in particular in intertidal zones;
 - Handle any harzardous material on impermeable floors with effective drainage systems;
 - Transfer all waste generated from the recycling to waste management facilities authorized to deal with their treatment;
 - Have a robust emergency preparedness and response plan;
 - Provide for worker safety and training, including ensuring the use of personal protective equipment for operations; and
 - Have records on incidents, accidents, occupational diseases and chronic effects.

Yours sincerely, Clipper Group Ltd.

Frank G. Jensen
Partner, Chairman and CEO