

Safety and Environmental Assurance (SEA) Management System



Table of Contents

01 Welcome

- 01 A Message from Tom Crowley, Chairman & CEO

02 Crowley

- 02 Purpose and Values
- 03 Safety, Security, Quality and Environmental Policy

03 Overview

- 04 About the SEA Management System and Objectives
- 05 Enabling Elements

04 Governance

- 06 Descriptions and Responsibilities

05 Expectations

- 07 Management System Common Expectations

06 Focus Areas

- 10 Focus Areas
- 11 Safety
- 12 Safety Principles
- 13 Sustainability
- 14 Environmental
- 15 Quality
- 16 Security
- 17 Business Continuity & Emergency Response
- 18 Facilities Management & Office Services

07 Appendix

- 19 Human and Organizational Performance
- 20 Plan-Do-Check-Act (PDCA) Model
- 21 Document Control Structure
- 22 Standards Reference

The Crowley SEA Management System outlines high-level standards and sets our expectations.

The Crowley SEA Management System is how we work to fulfill Crowley's purpose and live out our values of Integrity, Sustainability and Drive. It is the way we work to bravely advance what is possible to elevate people and planet. These expectations align with our ambition of becoming the most sustainable and innovative maritime and logistics company in the Americas.

The foundation for our steady growth, strength and durability is attributed to our people and adherence to fundamental values. Our Management System helps us continue that growth and provides superior service to our customers.

Please take time to review the Management System and reflect on how it is implemented in your work area.

Crowley management is responsible and accountable to communicate the Management System objectives and expectations to their teams and carry them through their operations.

If you have questions or comments on the Management System, please contact the relevant Safety and Environmental Assurance team member [here](#).



Tom Crowley
Chairman and CEO

Crowley's Purpose and Values

Together, our Purpose and Values guide the decisions we make, and they inform how we interact with each other and our partners.

OUR PURPOSE

Bravely advancing what is possible to elevate people and planet.

OUR VALUES



Integrity

We built our name on doing what is right. As our company evolves to meet a changing world, integrity remains our North Star. At Crowley, we stand up for the safety and welfare of our people in everything we do.



Sustainability

Sustainability starts with our people and practices, and extends to our solutions, partners and the entire planet in an unceasing dedication to workplace safety, ethical hiring practices and community involvement.



Drive

We are passionate about progress. Through constant innovation and investments in the future, we deliver exceptional experiences. We take personal responsibility for our safety and well-being.



Safety is essential to each of our values and everything we do at Crowley

We all are empowered with the right and obligation to **Speak Up for Safety** — our evolved safety mantra that reflects the truth that when we all stay engaged and proactive, we create a safer, more effective environment for everyone.

When we Speak Up for Safety, we reaffirm our dedication to protecting our employees, partners and communities as a crucial component to operational excellence and business success.

Safety, Security, Quality and Environmental Stewardship Policy

Crowley is committed to protecting our people, our communities and the environment. We go beyond compliance to operating under the highest quality standards. This policy encapsulates this commitment by Crowley leadership and employees to achieve these priorities.

Please remove and replace any posted copies of the previous version with the [new policy dated June 2025](#).

The Crowley Management System establishes a framework of standards for Crowley companies to use to satisfy customer needs and comply with safety and health, security, quality and environmental requirements.

Crowley companies and employees will meet the Management System standards, continually improve performance of their Management Systems, prevent pollution, eliminate incidents and accidents and exercise integrity in all aspects of their work.

TO FULFILL THIS COMMITMENT, CROWLEY COMPANIES AND EMPLOYEES WILL:

1. Speak up, stay engaged, and follow procedures to ensure the safety and security of employees, business partners, environment and company assets.
2. Exercise stop work authority if safety is compromised.
3. Identify, assess and manage risks to businesses and the corporation as a whole.
4. Provide a high level of service to our customers.
5. Conduct operations in accordance with Crowley policies and procedures, and with customer and regulatory requirements.
6. Minimize impacts on the environment by procuring and using sustainable resources and services, and by reducing emissions from Crowley activities.
7. Plan for long-term sustainability of the Corporation and provide value to stakeholders.
8. Engage with companies in the Crowley supply chain to ensure alignment with our purpose and values.

At Crowley, our priority is to achieve no harm to people, property, or the environment.

Thomas B. Crowley, Jr.
Chairman and CEO, Crowley Corporation
June 2025

About the SEA Management System

The Crowley SEA Management System is a framework of governance expectations that standardizes the focus areas of safety, environmental, sustainability, quality, security, business continuity, emergency preparedness, facilities management and office services. The system connects our people, processes, technology and equipment in ways that empower us to fulfill our compliance, customer and internal commitments most effectively.

SEA Management System Objectives

- Identify, manage and mitigate hazards and associated risks to the corporation by meeting or exceeding our compliance obligations.
- Ensure systems are in place to proactively build physical and psychological safety while reducing incidents and injuries.
- Plan for, detect, respond to, recover and learn from operational disruptions.
- Assess and manage sustainability impacts including environmental, social and governance (ESG) aspects.
- Drive innovative systems and solutions that exceed stakeholder expectations.
- Manage facilities in accordance with stakeholder needs.

Enabling Elements

LEADERSHIP AND CULTURE

Crowley leaders engage with employees, utilizing the Management System, to demonstrate their commitment to upholding our core values in line with the Management System expectations. These leader actions will build a sustainable culture of high performance and innovation.

STAKEHOLDER ENGAGEMENT

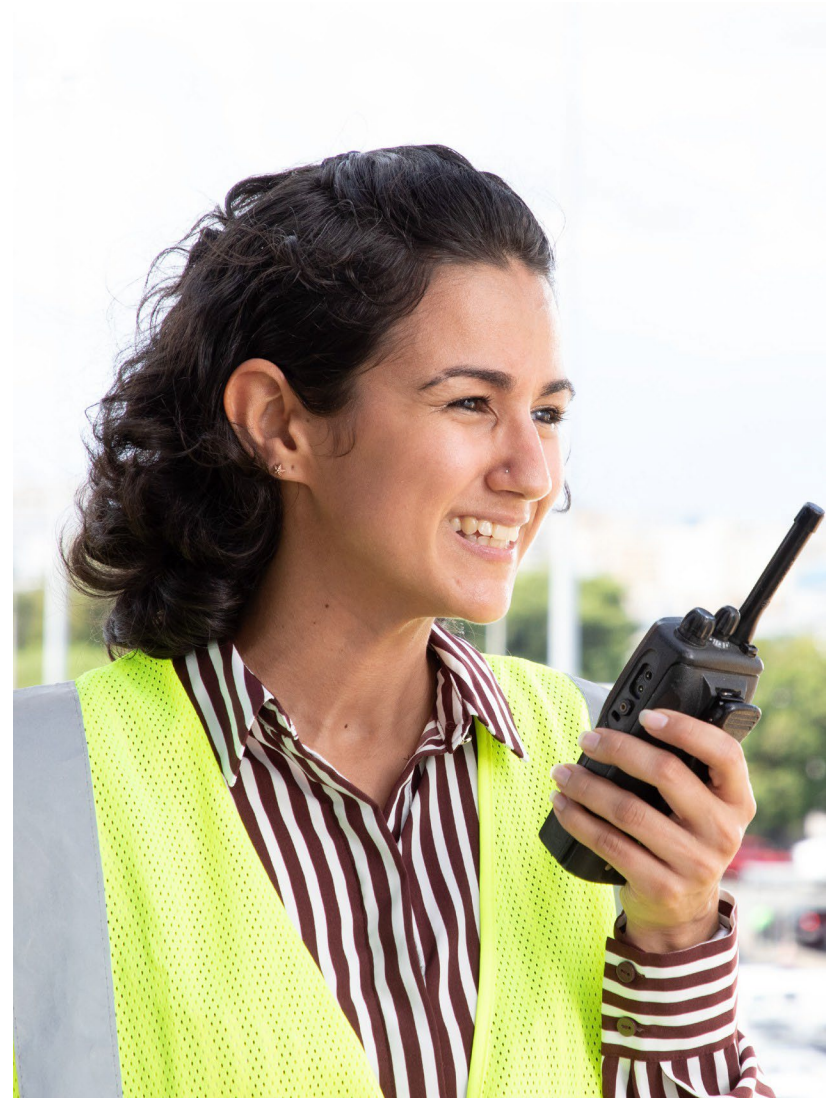
Stakeholder engagement enables the Management System to align with the goals and interests of our employees, customers, vendors, government agencies, non-governmental organizations and our communities where we live and work.

COMMON EXPECTATIONS

Our Management System sets common expectations that guide our companies to implement, maintain and assure effective and sustainable programs.

CONTINUAL IMPROVEMENT

We utilize the Plan-Do-Check-Act (PDCA) model throughout our Management System activities, such as management reviews, risk assessments, action plans, etc., to continually improve our Management System. (See Appendix for information on the PDCA model.)



Governance

CROWLEY BOARD OF DIRECTORS

Direct the affairs of the organization

- Oversee strategic and business planning
- Monitor overall corporate performance
- Review enterprise risk matters and mitigation plans

SAFETY AND ENVIRONMENTAL ASSURANCE LEADERSHIP

Assess and oversee the health of the Management System and provide focus area leadership

- Approve Management System strategy, priorities and changes
- Align procedures and processes with corporate policies and strategic direction
- Provide adequate resources to implement Management System programs
- Lead and participate in Management System programs
- Regularly review Management System performance and effectiveness

SENIOR LEADERSHIP

Develop company strategies and policies in managing the organization

- Oversee performance and effectiveness of the Management System
- Provide expertise in each focus area for oversight, compliance, direction, integration, coordination and monitoring
- Guide business on Management System planning
- Guide business on Management System processes and standards
- Align and engage workforce on values and culture

BUSINESS LEADERSHIP

Steward the Management System within the business unit levels

- Align procedures and processes with corporate policies and strategic direction
- Provide adequate resources to implement Management System programs
- Lead and participate in Management System programs
- Regularly review Management System performance and effectiveness

Management System Common Expectations

The management system organizes our business expectations in these critical areas to aid our ambition of becoming the most sustainable and innovative maritime and logistics company in the Americas.

COMMON EXPECTATIONS

- Compliance with Legal, Regulatory and Other Requirements
- Risk Management
- Management System Programs
- Management of Change
- Resources, Infrastructure and Work Environment
- Maintenance of Vessels, Vehicles and Equipment
- Continual Improvement
- Business Continuity and Emergency Preparedness
- Data Collection, Measurement and Analysis
- Vendor Management
- Incident Reporting and Investigation
- Competencies, Learning and Performance

COMPLIANCE WITH LEGAL, REGULATORY AND OTHER REQUIREMENTS

Identify, understand and comply with all applicable external and internal requirements. This includes regulations, laws, Crowley policies and customer requirements. Assess risks and opportunities related to legal, regulatory and customer requirements.

Communicate changes in these requirements at the appropriate levels. Report any confirmed or suspected noncompliance issues in a timely manner and manage corresponding action plans.

RISK MANAGEMENT

Assess and manage risks through documented prioritization matrix and develop adequate programs to safeguard and protect our business. Evaluate risks across the business portfolio, including risks related to people, property, processes, environmental, security, cybersecurity and other reputational areas that may impact our business, including risks to communities impacted by our business footprint.

Expectations

MANAGEMENT SYSTEM PROGRAMS

Identify, assess and document operational, health, safety, security, environmental and preparedness requirements, hazards and the associated risks for our operations and processes. Establish and execute appropriate controls and Management System programs to address prioritized risks. Review program performance at regular intervals to determine effectiveness, evaluate trends, establish new priorities and plan program enhancements.

These reviews may include:

- Audits to verify Management System functionality and provide assurance of expectations compliance and appropriate risk management.
- Management reviews that consider system performance, effectiveness and trends.
- Application of lessons learned for continual improvement of risk-based Management Systems.

MANAGEMENT OF CHANGE

Manage planned changes to ensure the integrity of the Management System is maintained prior to implementation. Evaluate known risks, establish controls, update documentation, communicate in a timely manner and train affected employees.



Expectations

RESOURCES, INFRASTRUCTURE AND WORK ENVIRONMENT

Determine and provide the necessary resources, infrastructure, and work environment to establish, implement, maintain and continually improve the Management System.

MAINTENANCE OF VESSELS, VEHICLES AND EQUIPMENT

Maintain vessels, vehicles, and equipment following documented procedures, guidelines, OEM recommendations and regulatory requirements.

CONTINUAL IMPROVEMENT

Apply process improvement and Management System methodology and tools to meet organizational goals, reduce costs, accelerate innovation and enhance overall quality of service and workplace safety.

EMERGENCY PREPAREDNESS AND BUSINESS CONTINUITY

Plan for and respond to emergency and crisis situations affecting personnel, assets, environment, communities and business operations. Maintain and activate a response structure through business level Incident Management Teams (IMT), supported by a Corporate Crisis Management Team (CCMT), if required, serving as a liaison between local and federal authorities.

DATA COLLECTION, MEASUREMENT AND ANALYSIS

Establish and manage focus area performance measures composed of primarily leading indicators. Performance results are analyzed, with appropriate action taken to drive continual improvement.

VENDOR MANAGEMENT

Evaluate and manage risks from contracted product or service providers.

INCIDENT REPORTING AND INVESTIGATION

Identify, report, mitigate, and investigate incidents, analyze causal factors and trends, correct deficiencies and share and implement relevant lessons learned to prevent recurrence.

COMPETENCIES, LEARNING AND PERFORMANCE

Develop and maintain qualification and skills standards for roles critical to Management System performance, incorporating role-based competencies. Establish practices by which knowledge is shared to promote learning throughout the organization. Evaluate human performance issues to determine appropriate system or training improvements to reduce the risk of errors. Identify causal factors and trends, correct deficiencies and share and implement relevant lessons learned to prevent recurrence.

Focus Areas



SAFETY

Provide a safe and healthy working environment for our employees, partners and stakeholders.

- Safety Planning and Operations
- Monitor and Measure
- Continual Improvement
- Safety principles



SUSTAINABILITY

Assess and manage environmental, social and governance impacts:

- Material Issues
- Action Planning
- Monitor and Measure
- Crowley Impact



ENVIRONMENTAL

Minimize our environmental footprint through compliance with requirements and programs to manage significant impacts.

- Environmental Compliance Planning and Operations
- Monitor and Measure
- Continual Improvement



QUALITY

Assure the quality and integrity of systems through innovative management solutions. Regularly assess performance and identify opportunities to realize efficiencies and improve stakeholder satisfaction:

- Customer Satisfaction
- Quality Management Programs
- Assurance Programs
- Policy and Procedure Management
- Management Reviews



SECURITY

Protect the people and assets in our care through effective risk assessment, planning, mitigation and continual improvement tactics.

- Physical Security
- National Industrial Security Program
- Cybersecurity



BUSINESS CONTINUITY

Prepare and protect our employees, facilities and business processes against emergencies or disruptions:

- Business Continuity
- Emergency Response



FACILITIES MANAGEMENT & OFFICE SERVICES

Manage facilities in accordance with stakeholder needs.

- Real Estate Management
- Facilities Project Management
- Preventive Maintenance
- Office Services

Safety

In line with our priority of no harm to people, property and environment, we take a proactive approach and incorporate robust layers of defense with the goal of identifying and managing hazards and reducing risk before incidents occur.

Everyone at Crowley has the responsibility and the authority to speak up for safety and stop a job or task if they identify an unsafe activity, uncontrolled hazard or unmitigated risk.

Our safety principles and related programs, processes and practices include:

SAFETY PLANNING AND OPERATIONS

- Strive to keep people, property and the environment safe and free from harm.
- Develop and execute programs and control of work practices to manage risk in accordance with regulations and standards.
- Establish procedures for reporting, recording, analyzing, and investigating incidents and near misses.
- Take personal accountability for safety.
- Assess and focus on personal safety by using tools such as personal safety checks.
- Promote safe work practices, ensure health, safety, process and operational hazards are identified and safeguards are in place to effectively manage risk.
- Utilize comprehensive processes to analyze our operations and tasks utilizing tools including Job Safety Analysis (JSA), Job Loss Analysis (JLA), Risk Assessment and Management of Change.

MONITOR AND MEASURE

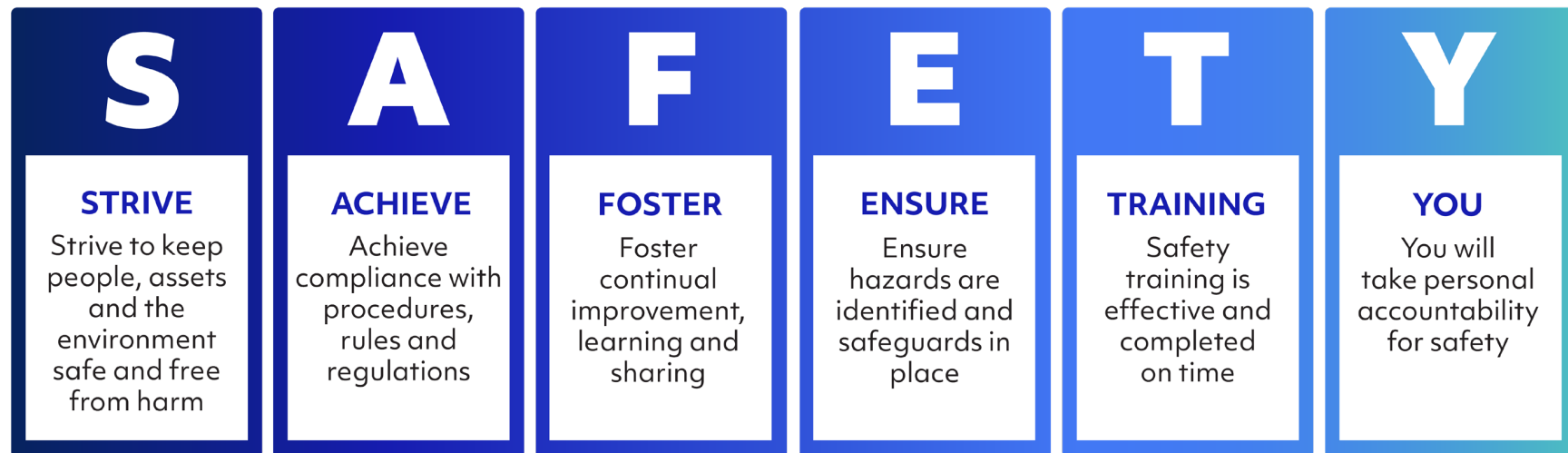
- Achieve compliance with procedures, rules and regulations.
- Conduct periodic safety meetings and Management System reviews that evaluate performance of safety programs and drive continuous improvement.
- Investigate and identify causal factors related to incidents and develop corrective actions to prevent reoccurrence.
- Collect reliable and accurate safety data to enable regulatory and customer reporting and internal analysis.
- Analyze and trend identified hazards from incidents, near miss and hazard recognition reporting.
- Analyze data to predict hazards and draw insights into our safety culture, supporting adoption of leading indicators.

CONTINUAL IMPROVEMENT

- Foster continual improvement, engagement, learning, and sharing based on the HOP Principles. (See Appendix for more information).
- Maintain open communication and dialogue by implementing worksite safety engagement conversations and/or peer to peer safety observation programs.
- Conduct periodic safety culture surveys and develop action plans based on the results.
- Verify that safety training is effective and completed on time.
- Empower our employees to identify and mitigate hazards and respond to emergency situations by providing appropriate training and conducting regular drills.
- Leverage theoretical and experiential learning models using leading edge concepts on human performance in operational settings.

Safety Principles

As we strive to ensure every person works in a safe environment and limits risk, our Safety Principles provide our people and partners with the vehicle to advance safety as a core focus and align expectations for all levels of the organization. They unify Crowley under a common direction proactively for safety and compliance and foster a culture of learning through continual improvement.



Sustainability

We are on a mission to become the most sustainable and innovative maritime and logistics company in the Americas. We are tenaciously pursuing our ambitions through a holistic, ground-up approach. It begins with our people-centric practices: an unceasing dedication to workplace safety, ethical hiring practices and community involvement. It continues with our solutions, which will help stakeholders exceed their goals safely and sustainably. It extends to our planet through investments in technologies that decrease emissions and increase our positive impact on society. And as our reputation as a sustainability leader grows, we will set the standard to which others aspire.

MATERIAL ISSUES

Crowley identifies priority sustainability issues through a formal materiality process engaging internal and external stakeholders. Material issues form the basis for the focus and strategy of the sustainability program. Crowley will reassess materiality on a 3-to-5-year cadence to ensure alignment with business needs.

DECARBONIZATION

Crowley has set a goal to be net zero by 2050 across all three scopes of emissions, which encompasses our operational footprint, electricity usage and value chain. The sustainability team is responsible for maintaining a corporate-wide greenhouse gas inventory in alignment with industry standards, with results published annually in Crowley's sustainability report.

ACTION PLANNING

The sustainability team will collaborate with business units and corporate functions to define actions for their operational activities in alignment with Crowley's sustainability goals and material issues.

MONITOR AND MEASURE

Progress toward Crowley's sustainability goals will be measured against key metrics applicable to each material issue. Business units and corporate functions will support data collection as needed to measure performance. Performance data will be shared openly with internal stakeholders across the organization and may be published publicly in Crowley's annual sustainability report or other sustainability disclosures.

CROWLEY IMPACT

Employees are encouraged to participate in our engagement platform Crowley Impact, which provides opportunities to increase awareness of and contribute to our sustainability goals across environmental, social, and governance issues.

Environmental

Crowley businesses conduct a diverse scope of operations across a broad range of geographies. To achieve our priority of no harm to the environment, we will minimize our impact on the environment by complying with all applicable regulatory requirements and implementing processes and programs to manage environmental aspects associated with our operations.

Our environmental safety programs, processes and practices include:

ENVIRONMENTAL COMPLIANCE PLANNING AND OPERATIONS

- Identify, assess, and ensure compliance with all international, federal, regional, state, and location specific regulations as well as company and customer requirements applicable to our operations.
- Topics to consider when identifying these requirements may include but are not limited to requirements surrounding air quality; water quality; soil/land quality; waste generation, management and disposal; biodiversity protection; and consumption of energy and/or resources.
- Develop and implement environmental compliance programs, processes, work practices and regulatory plans that enable employees to safely perform their duties in an environmentally responsible manner.
- Ensure our employees understand regulatory requirements and best practices to ensure compliance, mitigate hazards and respond to emergency situations by providing appropriate training and conducting regular drills.

MONITOR AND MEASURE

- Achieve compliance with procedures, rules and regulations.
- Perform required inspections, sampling and analysis as required.
- Review and evaluate performance of environmental compliance programs as a component of Management System reviews.
- Investigate and identify causal factors related to incidents and develop corrective actions to prevent reoccurrence.
- Collect reliable and accurate data to enable regulatory compliance, customer reporting and internal analysis.

CONTINUAL IMPROVEMENT

- Minimize impacts on the environment by implementing programs that go beyond meeting baseline regulatory or customer requirements.
- Identify and assess environmental issues associated with our operations. Document processes for the assessment, prioritization and periodic review of the identified issues and the associated aspects and impacts.
- Implement programs to address high priority environmental issues focused on minimizing the effects of the associated aspects and impacts.

Quality

Quality is the foundation of everything we do. We ensure the integrity of our systems through proactive management, continuous improvement and a culture of accountability. Our approach integrates performance monitoring, stakeholder engagement and a commitment to learning – ensuring that quality is not just maintained but continuously elevated.

EFFICIENCY THROUGH QUALITY

We enhance value and performance by embedding efficiency into our quality practices. This includes:

- Setting measurable goals and performance targets
- Applying continuous improvement methodologies (e.g., Lean, Six Sigma)
- Monitoring process effectiveness and trends
- Maintaining clear, documented procedures to support consistent execution

CUSTOMER SATISFACTION: A Core Quality Metric

Customer satisfaction is a critical measure of our quality performance. We actively gather and analyze customer feedback to understand expectations, resolve concerns and identify opportunities to exceed expectations. This insight directly informs our improvement initiatives.

MANAGEMENT REVIEWS: Driving Strategic Oversight

We conduct formal management reviews at least annually to evaluate the overall performance and effectiveness of our Management System. These reviews assess key trends, identify areas for improvement and ensure that our policies, objectives and targets remain aligned with organizational goals and stakeholder expectations.

SEA MANAGEMENT SYSTEM AUDITS: Ensuring Compliance and Conformance

Our SEA Management System is audited regularly across all functions to verify compliance with regulatory requirements and conformance with internal standards.

Findings are addressed promptly to prevent recurrence and to strengthen system integrity.



Security

Crowley is committed to providing a secure work environment for all employees, protecting company assets and customer assets in our care and protecting the company's reputation.

TRAVELER SECURITY

Ensure safety, security and duty of care for all employees traveling on Crowley business.

GLOBAL ACCESS CONTROL

Maintain a global access control system protecting Crowley employees and facilities, conduct audits for inappropriate or unauthorized access and assist in investigations as required.

SECURITY PLANS

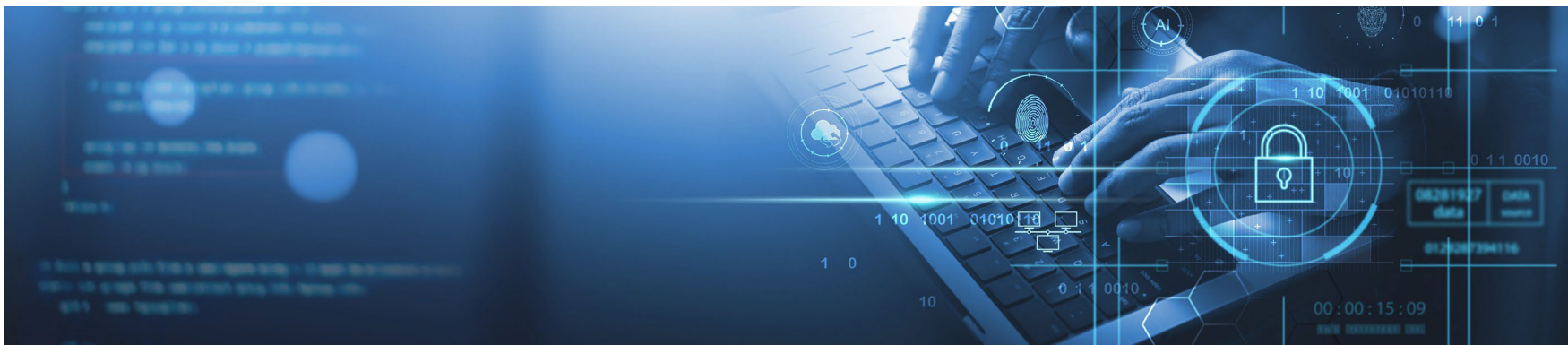
Ensure security plans are implemented, maintained and continually improved in compliance with regulatory and other requirements applicable to the operation.

NATIONAL INDUSTRIAL SECURITY PROGRAM (NISP)

Ensure program is effectively maintained to safeguard classified information while executing work on contracts, programs, bids or research and development efforts.

CYBERSECURITY AND INFORMATION SECURITY

Ensure that systems are compliant with the expectations of Information Systems Management System (ISMS), Cybersecurity Maturity Model Certification (CMMC) and applicable compliance obligations.



Business Continuity and Emergency Response



We are committed to safeguarding our employees, maintaining the functionality of our facilities, and ensuring the integrity of our business processes through disruptive incidents or disasters. To achieve this, we integrate business continuity (BC) and emergency response (ER) planning into a unified corporate resilience strategy that emphasizes both immediate response and long-term operational recovery.

Our integrated approach, led by the Corporate Crisis Management Team (CCMT) and Incident Management Teams (IMTs) from our facilities and business units, enables a coordinated response, ensuring safety, operational continuity and clear communication with stakeholders. By adhering to internal and industry standards and continuously improving, we ensure readiness and resilience during disruptions.

BUSINESS CONTINUITY (BC)

Our business continuity efforts ensure that critical operations can continue or be quickly restored after any disruption. Crowley's approach aligns with established industry standards (DRI International and ISO 22301) and best practices, concentrating on identifying risks, assessing potential impacts, and developing recovery strategies. We prioritize operational resilience by identifying essential business functions and creating recovery strategies to minimize downtime and ensure uninterrupted services to our clients.

A core component of BC is our IT Disaster Recovery (ITDR) planning, which addresses the protection of our data, proprietary systems, and IT infrastructure. Crowley follows standards like ISO/IEC 27031 and NIST SP 800-34 to secure and restore our critical digital assets in the event of cyberattacks, data loss or system failures, ensuring swift recovery and continued business performance.

EMERGENCY RESPONSE (ER)

Our emergency response framework ensures a rapid, organized and efficient reaction to crises, with a focus on protecting life, stabilizing incidents and minimizing damage. This process follows the Incident Command System (ICS) structure, which assigns clear roles and responsibilities across our IMTs at both the facility and corporate levels.

By integrating ICS into our BC and ER plans, we standardize response actions across the company, promoting efficient resource allocation, quick decision-making and clear communication. This structure helps streamline coordination between local and corporate response teams, facilitating an organized response to incidents of any scale.

With our integrative approach, we navigate disruptions by minimizing downtime and ensure the seamless provision of services to our clients. In this way we maintain the company's dedication to robust crisis management strategies and uphold our corporate values of Integrity, Sustainability and Drive.

Facilities Management and Office Services

Crowley provides facilities management and office services that emphasize functionality, comfort, safety, sustainability and efficiency. Our comprehensive approach ensures that buildings, grounds, and infrastructure are well-maintained and operate seamlessly. We prioritize creating a comfortable environment for our stakeholders, adhering to safety standards, minimizing environmental impact and optimizing operational effectiveness.

- Provide enterprise-wide professional real estate services for the acquisition and disposal of real estate property including purchase, sale, new lease, lease termination and sublease opportunities. Provide management of property leases including tracking of critical dates.
- Provide planning, management and oversight of construction and maintenance projects.
- Conduct preventive maintenance on building systems to ensure fewer interruptions to business operations, longer asset life, increased workplace safety and compliance with OSHA.
- Emergency corrective maintenance repairs are prioritized to reduce impact on business operations and resolve health/safety threats.

- Oversee the activities of external vendors that deliver essential products and services for Crowley's operations, ensuring adherence to quality standards and safety regulations.
- Provide corporate mail services, manage space planning, oversee reprographics, and facilitate records retention services.



Human and Organizational Performance

Human and Organizational Performance (HOP) is an operating philosophy that acknowledges human error as a natural part of life. HOP builds our learning culture by engaging workers to continually improve processes and systems, fostering workplaces that are more efficient, resilient and safe.

HOP BELIEFS

- Workers do not cause failures; they trigger latent conditions that lie dormant in an organization.
- Safety is not the absence of failure; it is the presence of controls in a system that allow failure to exist without adverse consequences.
- Learning is key to prevent future recurrence.

HOP PRINCIPLES				
People Make Mistakes	Blame Fixes Nothing	Context Drives Behavior	Learning is Vital	Response Matters
<p>People do not intend to make mistakes. It is usually the systems, processes and the work environment that create the opportunity for mistakes to occur.</p> <p>Everyone's role is to create an environment every day where people can fail safely.</p>	<p>Blame is considered the enemy of understanding and open communication. It can destroy trust in leaders and within teams. Instead, focus on learning the context that allowed the event to occur in the first place.</p>	<p>Context is the circumstances that form the setting for an event such as fatigue, stress, operational demands and working environment. The types of questions we ask are crucial to better understand the context which drive behaviors.</p>	<p>Curiosity, intent to learn, and lack of bias allows information to flow as we ask questions. Our greatest tool in building a resilient system is our people who explain how work is done and identify weaknesses in the process.</p>	<p>A bad response can destroy trust, sink morale, and derail continual improvement. If our attitude is one of empathy, encouragement, and a drive to understand and improve the environment we work in, our employees will respond with trust and engagement.</p>

Plan-Do-Check-Act (PDCA) Model

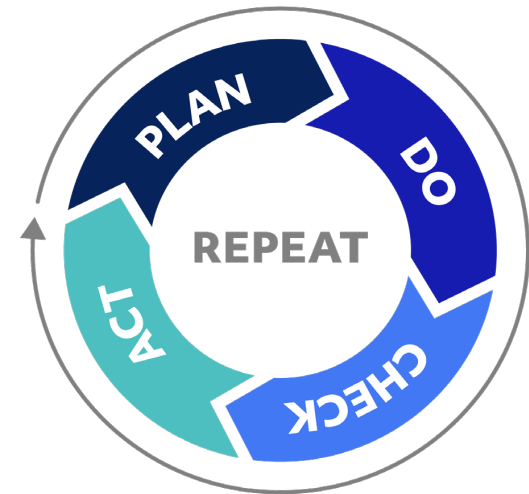
HOW THE MODEL WORKS

PLAN: Establish the objectives of the System and its processes and the resources needed to deliver results in accordance with regulatory and customer requirements and Crowley policies. The planning phase identifies risks and opportunities, along with how we might address them.

DO: Implement what was planned.

CHECK: Monitor and, where applicable, measure processes and the resulting products and services against policies, objectives, requirements and planned activities, and report the results.

ACT: Take actions to improve performance as necessary.



WHEN YOU MIGHT USE IT

- Starting a new project
- Developing a new or improved design of a process, product or service
- Defining a repetitive work process
- Planning data collection and analysis to verify and prioritize problems or root causes
- Implementing any change
- Working toward continuous improvement

Checking performance and planning improvements are part of our normal business operations. Think of activities where you see PDCA at work. Some might include:

- Strategy sessions
- Team brainstorming
- Process engineering
- Management meetings
- Performance reporting
- Developing goals and objectives

Document Control Structure

Crowley's document control structure ensures consistency, clarity and alignment across our organization.

POLICIES

Policies provide overarching governance for the Crowley Management System. They define high-level requirements that guide our operations and decision-making. Examples include:

- SEA Management System
- Code of Conduct

These policies apply company-wide and reflect our core values and strategic direction.

PROCEDURES

Procedures describe how we implement policies in our day-to-day operations. They outline responsibilities and processes within departments or business units.

- Some corporate procedures apply to all employees.
- Business-specific procedures support unique operational needs.

SUPPORTING DOCUMENTS

Supporting documents provide detailed guidance and tools to help implement policies and procedures effectively. These include:

- **Job Aids, Guidelines and Work Instructions** – Step-by-step instructions or best practices for performing tasks
- **Forms, Templates and Checklists** – Standardized tools to ensure consistency and compliance
- **Matrices, Glossaries and Reference Manuals** – Resources that clarify roles, terminology and technical details
- **Visual Aids** – Blueprints, diagrams and photos that support understanding

These materials may be developed internally or provided by customers, vendors or other external sources.

Standards Reference

Crowley Management System

Page	Title	ISM Code	ISO 9001: 2015	ISO 14001: 2015	ISO 27001: 2022	ISO 45001
5-7	Crowley Management System	1.2	4.4	4.4	4.4	4.1
6-12	Management System Framework	1.2	4.4 7.5	4.4 7.5	4.4 7.5	4.1 4.2
2	Purpose Statement / Core Values	2.1 2.2	4.4 5.1 5.1.1	4.4 5.1 5.1.1	4.4 5.1	4.2
3	Safety, Security, Quality, & Environmental Policy	2.1 2.2	5.2 5.2.1 5.2.2 5.7.1	5.2	4	4.2
1-6	Commitment, Roles, Responsibility and Authority	1.4.3 3.2 5	5 7.1	5 7.1	5 7.1	4.4.1
3-7, 9-12, 19	Communication and Feedback Channels	1.4.3 6.4 6.6	5.1 8.2.1 5.2.2 9.1.2 7.4	5.1 7.4 5.2 9.1.1	5.1 5.2 7.4	4.4.3
6,9,11, 18	Resource Management, Infrastructure and Work Environment	3.3 7	4.4.1 6.3 5.1.1 7.1 5.3 8.1	4.4 6.2.2 5.1 7.1 5.3 8.1 6.1.2	5.1 6.2 6.1.1 7.1	4.3.1 4.4.1 4.4.6
8-11, 14	Training: Invest in Our People	6.1 6.4 6.2 6.5 6.3 6.7	7.2 7.3	7.2 7.3	7.2 7.3	4.4.2
7	Legal and Other Requirements	6.4 3.2	5.1.2 8.2	6.1.3 9.1.2	4.2	4.3.2 4.5.2

Standards Reference

Safety and Health / Security

Page	Title	ISM Code	ISO 9001: 2015	ISO 14001: 2015	ISO 27001: 2022	ISO 45001
16-17	Emergency Preparedness, Response and Business Continuity	1.4.5 8		8.2		4.4.7
2-4, 11-12, 19	Safety Culture	1.2 2.1 1.4 2.2				4.3.3
11-12	Safety and Loss Prevention	7 9				4.3.1
16	Security	1.2 7 1.4.5 8				

Environmental

Page	Title	ISM Code	ISO 9001: 2015	ISO 14001: 2015	ISO 27001: 2022	ISO 45001
3-4, 14	Minimizing Environmental Impact	1.2 1.4.1 7		6.1.2 6.1.3 6.2		
14	Environmental Requirements Implementation	2 7 4 8.2		4.4 6.1.1 5.3 8.1		
14	Environmental Impact Assessment and Management			5.2 9.1 6.1.4 9.2		

Standards Reference

Quality Assurance

Page	Title	ISM Code	ISO 9001: 2015		ISO 14001: 2015		ISO 27001: 2022		ISO 45001
15	Quality Introduction	1.2.2.3 1.2.3.1	5.1 5.3 6	7 8.2 9.1	5.1 6 9.1	7 9.1	5.3 6 7	8.2 8.3 9.1	
15	Quality Management System Objectives	1.2	4.1 4.2 4.4 6.1	6.2 7 8.1 8.4	4.1 4.2 4.4 6.1	6.2 7 8.1	4.1 4.2 4.4 6.1	6.2 6.1.3 7 8.1	
15	Customer Focus and Services		4.2 5.1.2 5.3 8.2.1 8.2.3 8.4	8.5.3 8.5.5 8.7 9.1.2 10.2	4.2		4.2 5.3		
15	Identification and Traceability, Customer Communications		5.1.2 7.4 8.2	8.2.1 8.5.2 8.5.3	7.4 9.1.1		5.1 7.4		4.4.3
9	Maintenance of Vessels, Vehicles and Equipment	10 10.2 11.1	6 7.1.5 8.1	8.2 8.5.1	6 7 8.1	9.1 9.1.1	6 8.1	8.2 8.3	4.3.1f 4.3 4.4
9	Procurement		8.4 8.6	8.7 10					
9	Data Collection, Measurement and Analysis	9.1 12.2	7.1.5 8.6	9.1.1 9.1.3	9.1		6.1.2 9.1		4.5
5, 8-9, 11-14	Continual Improvement Process	1.2.2.3 9 1.2.3.1 12	7.4 9.1.1 9.2	9.3 10	7.4 9.1.1 9.2	9.3 10	7.4 9.1.1 9.2	9.3 10	

Standards Reference

Quality Assurance

Page	Title	ISM Code	ISO 9001: 2015	ISO 14001: 2015	ISO 27001: 2022	ISO 45001
8, 11	Management of Change	11.2.2	5.3 8.1 6.1 8.2.4 6.3 8.5.6	6.1.1 8.1 6.1.2 9.3	5.3 8.1 6.1 8.2	4.3.1g 4.4.6 4.6
21	Document and Record Control	11	7.5 8.3.5 4.3 8.3.6 4.4.2 8.4.1 5.2.2 8.5.1 6.2.1 8.5.2 7.1.5.1 8.5.3 7.1.5.1 8.5.6 7.2 8.6 8.1 8.7.2 8.2.3 9.1.1 8.2.4 9.2.2 8.3.2 9.2.2 8.3.2 9.3.3 8.3.4 10.2.2	7.5 7.4.1 4.3 8.1 5.2 8.2 6.1.1 9.1.1 6.1.2 9.1.2 6.1.3 9.2.2 6.2.1 9.3 7.1 10.2	7.5 8.1 4.3 8.2 5.2 8.3 6.1.2 9.1 6.1.3 9.2 6.2 9.3 7.2 10.1	4.4 4-5 4.54
9, 11, 14-15	Nonconformance	1.4.4 9.1	8.7 9.2 10.2	9.1.2 9.2 10.2	9.2 10.1	4.5.3.2
9, 11, 14-15	Corrective and Preventive Action	9.2	9.2 9.3.2 10.2	9.2 9.3.2 10.2	9.2 9.3 10.1	4.5.3.2
5, 8, 15	Review of the Management System	1.4.6 4 9 5.1.5 12.2	9.3	9.3	9.3	4.5.3.2