Seebald & Associates International

The World's Preeminent Maritime Security Consulting Firm

SCOPE OF WORK FOR SEEBALD & ASSOCIATES INTERNATIONAL

PRODUCTS AND SERVICES

PURPOSE

This Scope of Work defines the services and deliverables that will be accomplished by Seebald & Associates (S&A) in support of our client. This work will fulfill the requirements of the International Ship and Port Facility Security (ISPS) Code, the Maritime Transportation Security Act (MTSA), the Security and Accountability for Every Port (SAFE Port) Act, and their supporting regulations, government agency policies, and guidance issued by applicable authorities. These requirements apply to the owner or operator of the regulated maritime facility.

BACKGROUND

Seebald & Associates is a full-service maritime security firm. We provide the necessary advice, services, and assistance to our clients to ensure that they are in compliance with all U.S. Federal laws as well as International Maritime Organization standards. We are a proven team of former U.S. Coast Guard professionals with over a century of combined experience while serving as Captains of the Port, facility and vessel inspectors, security analysts, and regulatory compliance specialists. Our personal involvement in each project is the hallmark of our consultancy. We solve problems, and we guarantee our work.

DELIVERABLES

FACILITY- CYBERSECURITY – AND VESSEL RELATED ASSESSMENTS, PLANS & AUDITS

Seebald & Associates will conduct assessments and audits of facilities and vessels for compliance with the following regulations:

33 CFR 101 Subpart F
33 CFR 104 Maritime Security: Vessels
33 CFR 105 Maritime Security: Facilities
33 CFR 126 Handling of Dangerous Cargo at Waterfront Facilities
33 CFR 127 Waterfront Facilities Handling Liquefied Natural Gas and Liquefied Hazardous Gas
33 CFR 154 Facilities Transferring Oil or Hazardous Materials in Bulk
33 CFR 155 Oil or Hazardous Material Pollution Prevention Regulations for Vessels
33 CFR 156 Oil and Hazardous Material Transfer Operations
33 CFR 158 Reception Facilities for Oil, Noxious Liquid Substances, and Garbage

FACILITY SECURITY ASSESSMENT

Required by MTSA and 33 CFR 105, every maritime facility owner or operator must conduct an assessment to identify its security threats, vulnerabilities, and consequences. Those involved in the Facility Security Assessment (FSA) must be able to draw upon expert assistance for applicable facility security requirements. The FSA consists of three key steps: documents review, on-scene survey, and analysis/recommendations. The FSA is a critical process that serves as the basis of the Facility Security Plan. Seebald & Associates starts the FSA process with a documents review and an on-scene survey to compile background information. A Seebald & Associates analysis of the facility background information and the on-scene survey will result in recommendations to establish and prioritize the security measures that should be included in the Facility Security Plan. The Seebald & Associates' FSA report will include a full description of facility elements, such as personnel, operations, and logistics, and documents the strengths and weaknesses of existing security measures. Finally, as required by regulations, Seebald & Associates utilizes a Coast Guard-approved Risk-Based Analysis (RBA) methodology to identify critical weaknesses in the existing facility security regime. The scenario-based RBA identifies facility vulnerabilities and impacts as well as prioritizes mitigation actions to reduce the facility's exposure to risk.

FACILITY SECURITY PLAN

As required by 33 CFR 105, the maritime facility's Facility Security Officer (FSO) must develop and implement a Facility Security Plan (FSP). The FSP must be approved by the cognizant Coast Guard Captain of the Port prior to commencing maritime facility operations. Seebald & Associates will draft and submit the FSP to the Coast Guard, and will serve as the facility's representative along with the FSO throughout the FSP submission and approval process. If required, Seebald & Associates will also develop and submit any required amendments to the FSP.

FACILITY SECURITY PLAN AUDITS

Seebald & Associates will conduct an annual audit of the maritime facility's FSP to ensure the facility remains in compliance with federal security regulations. The audit includes a review of the FSA and FSP along with any recommended changes or amendments. The Seebald & Associates auditor will prepare all required documentation for the FSO to remain in regulatory compliance. This includes a confidential full audit report for the FSO and an audit attestation for the government. If required, Seebald & Associates will also conduct a drill and annual exercise of the FSP. In addition to fulfilling federal requirements, the audit will prepare the FSO for the facility's annual Coast Guard inspection.

CYBERSECURITY ASSESSMENT

33 CFR Part 101, Subpart F requires owners and operators of regulated U.S.-flagged vessels, facilities, and Outer Continental Shelf facilities to complete a Cybersecurity Assessment (CSA). Seebald & Associates and our cybersecurity partner, CyberSurv, will conduct a comprehensive qualitative and technical assessment of the organization's digital environment in accordance with 33 CFR 101.650(e)(1) and applicable Coast Guard guidance, including CG-5PC Policy Letter 01-26. The assessment will identify necessary operational and business functions; inventory and categorize internal systems, external dependencies, and interfaces; and evaluate applicable IT, OT, cloud, remote-access, third-party, and AI-enabled systems. The Seebald and CyberSurv team will analyze relevant threats, technical and procedural vulnerabilities, likelihood, operational

impact, and the risk posed by each digital asset; identify priority assets; and classify critical IT and OT systems. Deliverables may include the CSA Report, asset inventory, risk register, compliance determination, prioritized remediation roadmap, and the information necessary to develop or update the Cybersecurity Plan (CSP).

CYBERSECURITY PLAN

33 CFR 101.630 requires the Cybersecurity Officer (CySO) to develop, implement, and verify a Cybersecurity Plan (CSP) that reflects the measures required by Subpart F and addresses the risks identified during the Cybersecurity Assessment (CSA). Using the CSA findings and technical recommendations developed with CyberSurv, Seebald & Associates will prepare a vessel, facility, or OCS facility-specific CSP describing how the organization will satisfy applicable requirements for cybersecurity governance; personnel training; drills and exercises; records and communications; systems and equipment maintenance; account, device, and data security; physical access and network monitoring; incident response and reporting; audits; amendments; and the resolution, mitigation, or documented acceptance of identified vulnerabilities. The CSP may be incorporated into the existing VSP, FSP, or OCS FSP, included as an annex, or submitted as a separate document. Seebald & Associates will support the owner or operator and the CySO throughout the Coast Guard submission and approval process and will prepare required amendments based on subsequent assessments, audits, operational changes, and evolving risks.

RISKGuard 365℠ CONTINUOUS CYBERSECURITY SUPPORT

Seebald & Associates, in partnership with CyberSurv, will provide RiskGuard 365℠ to help maritime facilities and vessel operators maintain continuous cybersecurity hygiene following completion of the Cybersecurity Assessment (CSA) and implementation of the Cybersecurity Plan (CSP). This managed service includes recurring reviews of cloud and remote-access security, identity and privileged-access risks, vulnerability exposure, authentication controls, and other conditions affecting IT and connected OT environments. RiskGuard 365℠ provides documented findings and recommended corrective actions to support ongoing cyber hygiene, operational resilience, CSP maintenance, and preparation for Coast Guard inspections and annual audits required under 33 CFR Part 101, Subpart F. RiskGuard 365℠ supports, but does not replace, the required CSA, CSP, or the owner or operator's regulatory responsibilities.

VESSEL SECURITY ASSESSMENT

MTSA and 33 CFR 104 require a Vessel Security Assessment (VSA), which applies to the owner or operator of a variety of regulated vessels as determined in §104.105. The Company Security Officer (CSO) may use a third party, such as Seebald & Associates, in any aspect of the Vessel Security Assessment if the CSO reviews and accepts the work product. Seebald & Associates will provide the expert assistance that is necessary to fulfill the VSA requirements.

The VSA is a critical process that serves as the basis of the Vessel Security Plan. Seebald & Associates starts the VSA process with a documents review and an on-scene survey to compile background information. The vessel's risks will be determined by analyzing the threats, vulnerabilities, and consequences associated with

security–related incidents affecting the vessel. A Seebald & Associates analysis of the vessel's background and an on-scene survey will result in recommendations to establish and prioritize the security measures that should be included in the Vessel Security Plan. The Seebald & Associates' VSA report will include a full description of vessel elements, such as personnel, operations, and logistics, and documents the strengths and weaknesses of existing security measures.

VESSEL SECURITY PLAN

33 CFR 104 requires the Company Security Officer (CSO) to ensure that a Vessel Security Plan (VSP) is developed and implemented for each vessel. Each VSP must be approved by the Commanding Officer of the U.S. Coast Guard Marine Safety Center. Seebald & Associates will draft and submit the VSP to the Coast Guard, and will serve as the vessel's representative along with the CSO throughout the VSP submission and approval process. If required, Seebald & Associates will also develop and submit any required amendments to the VSP.

VESSEL SECURITY PLAN AUDITS

Seebald & Associates will conduct an annual Vessel Security Plan (VSP) audit to ensure the vessel remains in compliance with federal security regulations. The audit includes a review of the Vessel Security Assessment and VSP along with any recommended changes or amendments. The Seebald & Associates auditor will prepare all required documentation for the CSO to remain in regulatory compliance. This includes a confidential full audit report for the CSO and an audit confirmation for the regulatory authority. If required, Seebald & Associates will also conduct a drill and annual exercise of the VSP. In addition to fulfilling federal requirements, the audit will prepare the FSO for the facility's annual Coast Guard inspection.

FACILITY SECURITY DESIGN

For maritime facilities under development or planning design changes, Seebald & Associates will offer expert advice to ensure the facility is compliant with existing and forthcoming facility security requirements. The facility design support will incorporate facility security into the engineering and logistics planning process to minimize security impacts while bringing a facility into operational status.

FACILITY SECURITY CONSULTING SERVICES

Seebald & Associates will provide the necessary assistance to ensure that the maritime facility is in compliance with all ISPS codes and applicable U.S. laws and regulations. Experts will be available for consultation and offer remedies to any maritime facility challenges.

FACILITY SECURITY TRAINING

Seebald & Associates will provide MARAD-approved and U.S. Coast Guard-accepted 33 CFR 105 training for Facility Security Officers and Personnel with Security Duties. Graduates are certified in compliance with federal training requirements. This training is mandated and the courses are tailored to the maritime facility's operations, personnel, and environment. Seebald and Associates will also deliver Security Awareness training for all other facility personnel, to include employees and contractors routinely working within the facility's regulated areas.

FACILITY WATERWAY SUITABILITY ASSESSMENTS, FACILITY RESPONSE, EMERGENCY, AND OPERATIONS MANUALS AND PLANS

As required by 33 CFR 127, facilities that are being constructed to handle, import or export Liquefied Natural Gas or Liquefied Hazardous Gas cargoes in bulk must conduct a Waterway Suitability Assessment as well as draft and submit for approval to the U.S. Coast Guard an Operations Manual and an Emergency Manual. Seebald & Associates will use the best practices developed from unparalleled experience and success after having successfully written more than 25 of these documents for projects throughout the United States to generate these documents and obtain their Coast Guard approval. Similarly, facilities handling oil and hazardous materials under 33 CFR 154, 155, and 156 must have an approved Pollution Response Plan as well as Emergency and Dock Operations Manuals. Seebald & Associates will utilize lessons learned and best practices from a long record of success in generating these plans and obtaining their approval from the cognizant USCG office to draft and submit all required documents.

PORT AND VESSEL OPERATIONS, EMERGENCY RESPONSE CONSULTING SERVICES

Seebald & Associates will provide assistance and consulting services on port and vessel operations in matters of USCG policy and procedures and regulatory requirements for US flagged vessels as well as in Port State Control. We also have extensive experience in marine pollution response and can provide expert advice on incident and emergency response involving facilities and vessels in the coastal region, US Ports and on inland rivers.

WATERFRONT FACILITIES THAT HANDLE BULK OIL AND HAZARDOUS MATERIALS

Facilities that handle bulk (i.e. via hose/pipeline) oil or hazardous materials that are not liquified or designated as Certain Dangerous Cargos are subject to U.S. Coast Guard regulations found in 33 CFR Part 154 and 156. Seebald & Associates can assist facility operators with meeting these requirements including:

- General safety and environmental compliance, including equipment, lighting, signage, and hose/pipeline testing requirements and alternative testing procedures.
- Coast Guard Operations Manual drafting/submittal
- Coast Guard Facility Response Plan drafting/submittal
- Planning and conducting oil spill exercises
- Coast Guard required Person-in-Charge Training
- Pre-inspection Review/Audit. Seebald & Associates can conduct a review of a facility infrastructure, equipment, procedures, and training prior to a scheduled Coast Guard inspection. This review would normally be conducted in conjunction with a security audit as required by 33 CFR Part 105.

LETTER OF INTENT AND WATERWAY SUITABILITY ASSESSMENTS

Prior to operation, LNG facility operators must prepare a preliminary and follow-on Waterway Suitability Assessment (WSA) to the Captain of the Port. The WSA must address various safety and security risks in the port, risk management strategies, and resource needs.
This requirement applies to new LNG facilities, modifications to existing LNG facilities, and the reactivation of LNG facilities that have been taken out of service. In some cases, the Coast Guard will accept an Operational Risk Assessment in lieu of a full WSA. Note that the Coast Guard approval process to operate (or reactivate) an LNG facility is complex and requires coordination with various federal, state, local, and tribal agencies.

Seebald & Associates has many years of experience conducting WSAs and can work with the facility owner/operator to ensure the document meets all regulatory requirements and reflects a rigorous and accurate assessment of the associated risks.

LNG/LHG FACILITY DESIGN

For maritime facilities under development or planning design changes, Seebald & Associates will offer expert advice to ensure the facility is compliant with existing and forthcoming facility regulatory requirements. The facility design support will work with the engineering and logistics planning process to minimize regulatory impacts while bringing a facility into operational status.

SPECIALIZED RISK ASSESSMENTS

Seebald & Associates will conduct specialized risk assessments on marine transportation facility operations involving hazardous materials, including dispersion modeling and both HAZID and HAZOP analysis.

CERTIFICATES OF ADEQUACY

Waterfront facilities that receive ocean going vessels over 400 gross tons are required to apply for and maintain a Certificate of Adequacy, which demonstrates that the facility can provide oily waste, garbage, and other waste reception services to visiting ships. Seebald & Associates can help facilities apply for and maintain this Coast Guard issued document.

CUSTOMS-TRADE PARTNERSHIP AGAINST TERRORISM (CTPAT)

The U.S. Customs and Border Protection manages a voluntary program to improve security across the entire supply chain. The program includes specific guidance for Port Authorities and Marine Terminals, along with many other entities in the supply chain, such as vessel, rail, air, and highway carriers, importers, and NVOCCs. While the program is voluntary, organizations that don't participate may be subject to increased scrutiny by U.S. Customs and Border Protection, as well as other government agencies, insurance providers, investors, and business partners.

Seebald & Associates can help any organization demonstrate that they are meeting the relevant best practices in the CTPAT program, including submitting the appropriate information to CBP using the CTPAT portal and helping to guide the company through the submittal, certification, and validation stages of the process. Seebald & Associates can also provide training and general guidance on identifying and reducing security risks.

CHEMICAL FACILITY ANTI-TERRORISM STANDARDS (CFATS)

Under 6 Code of Federal Regulations Part 27, certain facilities that handle or store specific "chemicals of interest" are regulated by the Department of Homeland Security and must develop and maintain security plans that meet these requirements. The program is managed by the Cybersecurity and Infrastructure Security Agency (CISA). Seebald & Associates can help facilities develop and submit these plans, conduct audits and training, and provide general guidance on identifying and reducing security risks.

EXPERT WITNESSES

Seebald & Associates will provide expert witness support in matters of vessel and port facility operations.