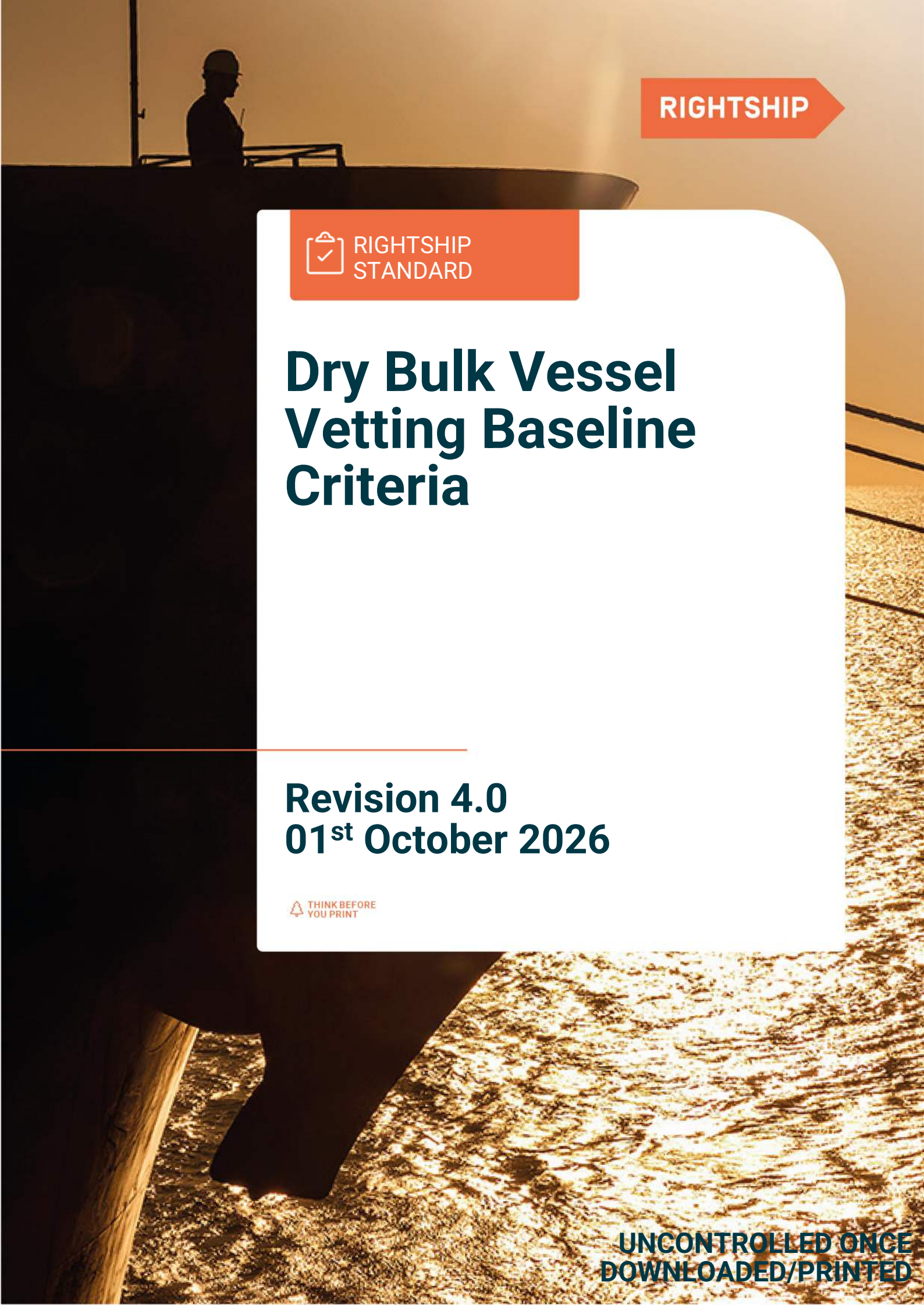




RIGHTSHIP



RIGHTSHIP  
STANDARD

# Dry Bulk Vessel Vetting Baseline Criteria

Revision 4.0  
01<sup>st</sup> October 2026

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## Purpose

This document outlines the RightShip recommended minimum Baseline Criteria for vetting services specific to dry bulk (and general cargo) vessels. These criteria can be customised based on the specific needs and risk profiles of each vetting customer. The tailored requirements are then used to establish final vetting rules, which guide the vetting process and inform vessel recommendations, considering factors such as safety, environmental impact, and crew wellbeing.

## RightShip Vetting Policy

- > There is no RightShip minimum Safety Score. Any vessel may be vetted with a Safety Score between 1/5 and 5/5 and could be positively recommended by RightShip provided that the agreed vetting customer requirements are met.
- > Vessels with a lower Safety Score may require additional vessel vetting checks, which may include completion of a RightShip Inspection before we can consider a positive recommendation to our vetting customers.
- > Vessels with a 0/5 or 1/5 Safety Score are unlikely to be positively recommended until the reason for the score has been investigated and resolved to the satisfaction of RightShip.
- > Vessels with a N/A Safety Score may not be covered by our normal vessel vetting services and may require the provision of additional information and additional checks if a customer requires RightShip to vet a vessel with a N/A Safety Score.

## Checks performed within the vetting process

Checks performed during the vetting process include but are not limited to the following:

- > Full review of the Safety Score including assessment of the veracity of data contributing to its calculated value.
- > Verification, with input from the vessel's DOC Company, of data for missing defects, adverse reports, incidents not yet captured by the Safety Score.
- > Assessment of Port State Control Inspection performance beyond that illustrated by the Safety Score, including status and severity of deficiencies.
- > Review of any missing Port State Control data, for example from Riyadh and Abuja MoU's is captured and uploaded to allow for recalculation of the Safety Score.
- > Assessment of incident performance beyond that illustrated by the Safety Score, including the status and severity of incidents.
- > Assessment of vessel performance based on completed RightShip Inspections beyond that illustrated by the Safety Score, including the status, severity, recurrence and closure of findings.
- > Assessment of the vessel's DOC Company / Technical Managers performance beyond that illustrated by the Safety Score and/or DOC Subscore.
- > Verification of the vessel's current Class status, including the status and validity of key Certificates, Surveys and the presence of any overdue Conditions of Class which might have operational impacts or reveal an unreported recent incident.
- > Open Abandonment of Seafarers case(s) involving the subject vessel, or its associated owning or managing entities.
- > Confirmation that requirements for a RightShip Inspection due to vessel age and/or performance, have been maintained.
- > Review against Vessel or Company Restrictions set by RightShip and/or the vetting customer.
- > Update and assessment of details of recent vessel changes of management or new build deliveries.
- > Checks of current trading status of the vessel, including (but not limited to) In Casualty/Repairing, Laid Up.
- > Assessment of previous vetting history.

## Conditions that always lead to a vessel being recommended as Unacceptable

Binary outcome based on RightShip Baseline Criteria:

- > Vessel age exceeds the RightShip standard.
- > Open Abandonment of Seafarers cases involving the subject vessel.
- > Vessel banned by a Port State Control Authority.
- > Vessel or company restricted by RightShip due to ongoing concerns.
- > An “Unacceptable” last RightShip Inspection.
- > Vessel which exceeds the RightShip Inspection age trigger and does not have a valid RightShip Inspection, or evidence that a RightShip Inspection has been completed or is scheduled.
- > Vessel flagged with a Paris or Tokyo MoU scored flag, which is Very High Risk, if vessel doesn’t hold a valid RightShip Inspection.
- > Vessel flagged with a Paris or Tokyo MoU scored flag, which is on their Blacklist, and combined with a Paris or Tokyo MoU Low or Very Low performing Class Society.

Subject to clarification through the Vetting Process:

- > Vessel which has been De-Classified or Class Suspended as a result of performance and failure to comply with Class requirements.
- > Vessel that is falsely presented.
- > Vessel Operator demonstrating an unwillingness to respond to RightShip during the vetting process.
- > Vessel with overdue Class and Statutory Surveys, overdue Conditions of Class and/or overdue significant memos.
- > Vessel Operator demonstrating unwillingness to undergo a RightShip Inspection due to vessel age and/or performance.
- > Vessel’s Class, Flag, P&I provider, or DOC Company details.

## Conditions that may lead to a vessel being recommended as Unacceptable

In most cases the recommendation of unacceptable will be a result of an accumulation of the risk factors shown below as opposed to one of the items being observed in isolation.

- > Recurrent issues highlighting failures in Safety Management System.
- > Lack of acceptable response to enable satisfactory close out of an incident/adverse report.
- > Cases with the same ship manager where serious incidents have occurred and have not been disclosed.
- > Open Abandonment of Seafarers case(s) involving the subject vessel or operators still under review after a closed Abandonment of Seafarer case(s).
- > Vessels or Companies under review by RightShip due to ongoing concerns.
- > Vessels flagged with a Targeted, Medium to High or High Risk Flag as designated by Tokyo or Paris MoU, if vessel does not also have a valid RightShip Inspection.
- > Excessive number of incidents of any category in a particular time frame.
- > Multiple PSC Detentions over a timeframe – typically 3 such events over 24 months.
- > Excessively high ratios of Deficiencies/PSC Inspection over 24 months, with port averaging taken into consideration.
- > Consistently unacceptable close-outs.
- > Crew Experience and/or length of service falling below industry standards and DOC Company's response suggests a crew change is not imminent.
- > Non-International Association of Classification Societies (IACS) which have been rated as High Risk in published Lists by recognised authorities or bodies.
- > Vessel or Company Restrictions set by the vetting customer.
- > Vessel under the management of a DOC Company which is on any MOU refusal of access or letters of warning list.
- > Vessel holding a RightShip Inspection that was awarded only 3 months validity.

## What would trigger additional Marine Subject Matter Expert Review?

- > Port State Control Inspections with deficiencies with an open status<sup>1</sup> within the RightShip Platform within a given time frame (typically the last 12 months).
- > Port State Control Inspections with deficiencies presenting elevated risk factors regardless of status and/or time frame.
- > Incidents with an open status<sup>1</sup> within the RightShip Platform within a given time frame (typically the last 24 months for Category A & B and 12 months for Category C & D).
- > Incidents presenting elevated risk factors regardless of status and/or time frame.
- > Class Survey Status Report not updated, expired or expiring Certificates/Surveys, investigation into the reason for issuance of Short-Term Conditional Certification, Conditions of Class for operational impacts.
- > Vessels exhibiting unknown details in key areas - Class, Flag, P&I, Ownership and Management details.
- > Recent change of management or new build delivery will normally necessitate completion of a RightShip MOC/VTOP (Management of Change / Vessel Take Over Process) Questionnaire for review during the vessel vetting process.
- > Unscheduled Dry Docking or Repair periods require investigation to ascertain the reasons for such.

<sup>1</sup> Open Status = RightShip has not yet received, assessed and closed the vessel operator's PSC Inspection Closeout Submission or Incident Investigation Report including Root Cause Analysis, Corrective Action(s) and Preventative Measure(s) Plan.

# Vetting Baseline Criteria & Responsibility – Dry Bulk

## Attributes

|   | BASELINE CRITERIA                                                                                                                                                                                                                                                                         | RULES                                                                                                                                                                                                                                                                                                                                                                                             |
|---|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | <p>Any vessel where any of the following attributes are listed as unknown within the RightShip Platform:</p> <ul style="list-style-type: none"> <li>- Name/IMO number</li> <li>- DOC holding company</li> <li>- Classification society</li> <li>- Flag</li> <li>- P&amp;I Club</li> </ul> | <p>Unacceptable.</p> <p>The vessel will remain Unacceptable until RightShip is satisfied that the missing or unknown attributes have been verified, corrected within the RightShip Platform, and supported by acceptable evidence from the relevant source, including the vessel operator, DOC Company, Class Society, Flag State, P&amp;I Club, or other recognised authority as applicable.</p> |

## Port State Control (PSC)

|   | BASELINE CRITERIA                                               | RULES                                                                                                                                                                                                                                                                                                                                                                 |
|---|-----------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2 | Any vessel with 3 or more PSC Detentions in the last 24 months. | <p>Unacceptable.</p> <p>The vessel will remain Unacceptable until RightShip is satisfied that each PSC Detention has been reviewed and closed out, root causes have been addressed, and Corrective Actions and Preventative Measures are effective.</p> <p>A RightShip Inspection will normally be required before any positive recommendation can be considered.</p> |
| 3 | Any vessel with 2 PSC Detentions in the last 24 months.         | <p>Subject to review and may be Unacceptable depending on detention severity, deficiency profile, trend, and close-out quality.</p> <p>The vessel will not be positively recommended until RightShip is satisfied that each PSC Detention has been reviewed and</p>                                                                                                   |

|                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
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|                                                                                  | <p>closed out, root causes have been addressed, and Corrective Actions and Preventative Measures are effective.</p> <p>A RightShip Inspection will normally be required before any positive recommendation can be considered.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 4 Any vessel with 1 PSC Detention in the last 12 months.                         | <p>Subject to review.</p> <p>The vessel will not be positively recommended until RightShip is satisfied that the PSC Detention has been reviewed and closed out, root causes have been addressed, and Corrective Actions and Preventative Measures are effective.</p> <p>A RightShip Inspection may be required depending on detention severity, deficiency profile, close-out quality, and wider vessel or DOC Company performance.</p>                                                                                                                                                                                                                                                                                                         |
| 5 Any vessel with PSC Inspection performance history that is less than adequate. | <p>Subject to review and may be Unacceptable depending on deficiency severity, port deficiency averaging, trend, and close-out quality.</p> <p>The vessel will not be positively recommended until RightShip is satisfied that PSC Inspection performance has been reviewed, root causes have been addressed, and Corrective Actions and Preventative Measures are effective.</p> <p>A RightShip Inspection may be required.</p>                                                                                                                                                                                                                                                                                                                 |
| 6 Any vessel with no PSC Inspection records in the last 24 months.               | <p>Subject to review.</p> <p>The vessel will not be positively recommended unless satisfactory recent independent assurance is available.</p> <p>An acceptable valid RightShip Inspection completed within the last 24 months is normally required. Where a valid RightShip Inspection is not available, evidence of satisfactory recent independent assurance may be considered, including:</p> <ul style="list-style-type: none"> <li>• a recent Flag State inspection with no adverse reports;</li> <li>or</li> <li>• a recent inspection report from a recognised regulatory or industry assurance programme indicating no adverse findings.</li> </ul> <p>Where no such assurance is available, a RightShip Inspection may be required.</p> |

|   |                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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| 7 | Any vessel with PSC Inspection deficiencies in the last 24 months that present a high-risk condition or indicate unresolved structural, machinery, operational, or safety-critical deficiencies. | <p>Unacceptable.</p> <p>The vessel will remain Unacceptable until RightShip is satisfied that the high-risk deficiencies have been corrected. In exceptional circumstances, RightShip may consider class-approved temporary repairs or other risk-control measures where supported by documented conditions, restrictions, monitoring requirements and a defined plan for permanent repair.</p> <p>A RightShip Inspection may be required.</p> |
| 8 | Any vessel, DOC Company, owner, operator, manager, or other associated entity that has evaded, ignored, or departed in breach of a PSC Detention or Port State control order.                    | <p>Unacceptable.</p> <p>The vessel will remain Unacceptable until RightShip is satisfied that the detention breach has been fully investigated, the vessel and associated entities are no longer connected with the circumstances of the breach, and appropriate corrective and preventative actions have been implemented.</p>                                                                                                                |
| 9 | Any vessel submitted for vetting with PSC Inspection deficiencies recorded in the last 12 months that have not been reviewed.                                                                    | <p>Subject to review.</p> <p>PSC Inspection deficiencies in the last 12 months must be reviewed to RightShip's satisfaction. Reviews typically include evaluation of PSC Inspection closeout submission containing deficiency details, explanation, root cause analysis, corrective actions, preventative measures, and any supporting evidence.</p>                                                                                           |

## Incidents

| BASELINE CRITERIA                                                                                                                                                                             | RULES                                                                                                                                                                                                                                                                                                                                                                                                                   |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>10 Any vessel involved in two or more Category A incidents within the last 24 months, unless clear and proven non-fault is established.</p>                                                | <p>Unacceptable.</p> <p>The vessel will remain Unacceptable until RightShip is satisfied that each incident has been reviewed and closed out, including acceptable investigation, root cause analysis, and corrective and preventative actions.</p> <p>A RightShip Inspection will normally be required before any positive recommendation can be considered.</p>                                                       |
| <p>11 Any vessel involved in a Category A or Category B incident within the last 24 months, unless clear and proven non-fault is established.</p>                                             | <p>Subject to review.</p> <p>The incident must be reviewed and closed out to RightShip's satisfaction, including acceptable investigation with description, root cause analysis, corrective actions and preventative measures.</p> <p>A post-incident RightShip Inspection will normally be required depending on incident severity and fault together with close-out quality and any related performance concerns.</p> |
| <p>12 Any vessel involved in a Category C or Category D incident within the last 12 months, unless clear and proven non-fault is established.</p>                                             | <p>Subject to review.</p> <p>The incident must be reviewed and closed out to RightShip's satisfaction, including acceptable investigation with description, root cause analysis, corrective actions and preventative measures.</p>                                                                                                                                                                                      |
| <p>13 Any vessel with recurring incidents over the last 24 months that indicate a common root cause or repeated failure of the safety management system, regardless of incident category.</p> | <p>Subject to review and may be Unacceptable depending on incident pattern, severity, and closeout quality.</p> <p>The vessel will not be positively recommended until RightShip is satisfied that any recurring issue has been investigated, root causes have been addressed, and corrective and preventative actions are effective.</p> <p>A RightShip Inspection may be required.</p>                                |

## Age, CAP & Inspection Requirements

| BASELINE CRITERIA                                                                                                                                                                                                                                                                                                                                                                                                                                                         | RULES                                                                                                                                                                                                                                                                                                                                                                                                        |
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| 14 Any vessel over the age of 30 years.                                                                                                                                                                                                                                                                                                                                                                                                                                   | <p>Unacceptable.</p> <p>Exceptions may be considered on a case-by-case basis for specific trading areas (e.g. Great Lakes) where vessels over 30 years are commonly used, where agreed with the vetting customer and supported by acceptable vessel performance, condition, and inspection history.</p>                                                                                                      |
| 15 Any bulk carrier over 90,000 DWT and 25 years old or over.                                                                                                                                                                                                                                                                                                                                                                                                             | <p>Acceptable only where RightShip is satisfied that the vessel meets the applicable CAP requirement.</p> <p>A RightShip-assigned CAP rating of 2/5 is required for vessels over 25 years of age up to a maximum of 30 years.</p> <p>Where a 2/3 CAP scale applies, a RightShip-assigned CAP rating of 2/3 is required for vessels over 25 years of age up to a maximum of 28 years.</p>                     |
| <p>16 Any vessel without a valid RightShip Inspection, when RightShip Inspection is required due to vessel's age or performance concerns.</p> <p>Note: Performance concerns can relate to specific vessels, entire fleets or specific vessel groups and are typically the result of unsatisfactory performance observed from incident(s), PSC Inspection(s), previous RightShip Inspection(s) or other safety, environmental, reliability or crew welfare indicators.</p> | <p>Unacceptable.</p> <p>The vessel will remain Unacceptable until a valid RightShip Inspection has been completed and found acceptable, or until RightShip is otherwise satisfied that the inspection requirement no longer applies.</p> <p>RightShip Inspection Age Triggers are vessels aged 11 years and above from 01st July 2026 and then vessels aged 10.5 years and above from 20th January 2027.</p> |
| 17 Any vessel where the most recent RightShip Inspection was assessed as Unacceptable.                                                                                                                                                                                                                                                                                                                                                                                    | <p>Unacceptable.</p> <p>The vessel will remain Unacceptable until RightShip is satisfied that the inspection findings have been reviewed and appropriately addressed. A further RightShip Inspection will normally be required before any positive recommendation can be considered.</p>                                                                                                                     |

18 Any vessel where the most recent RightShip Inspection resulted in validity of 3 months or less.

Subject to review and may be Unacceptable depending on the reason for the limited validity and any other performance indicators.

The vessel may not be positively recommended until RightShip is satisfied that the inspection findings, corrective actions, and any related operational or management concerns have been reviewed and appropriately addressed. A further RightShip Inspection may be required.

## Flag, Class & Regulatory Compliance

|    | BASELINE CRITERIA                                                                                                                                                                                                 | RULES                                                                                                                                                                                                                                                                                                                                                    |
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| 19 | Any vessel flagged with a Paris or Tokyo MoU scored flag which is listed as Very High Risk (of the Blacklist).                                                                                                    | <p>Unacceptable.</p> <p>The vessel will remain Unacceptable until RightShip is satisfied that the flag-related risk no longer applies, or that the vessel has been reflagged to arrangements acceptable to RightShip.</p>                                                                                                                                |
| 20 | Any vessel flagged with a Paris or Tokyo MoU scored flag which is on their Blacklist, and combined with a Paris or Tokyo MoU Low or Very Low performing Class Society.                                            | <p>Unacceptable.</p> <p>The vessel will remain Unacceptable until RightShip is satisfied that the combined flag and recognised organisation risk no longer applies, or that the vessel has been reflagged, reclassified, or otherwise brought under arrangements acceptable to RightShip.</p>                                                            |
| 21 | Any vessel flagged with a Targeted, Medium to High or High Risk Flag as designated by Tokyo or Paris MoU.                                                                                                         | <p>Acceptable only where the vessel has a valid RightShip Inspection.</p> <p>Where no valid RightShip Inspection is held, the vessel will not be positively recommended until a RightShip Inspection has been completed and found acceptable, or until RightShip is otherwise satisfied that the flag-related risk has been appropriately addressed.</p> |
| 22 | Any vessel with overdue Class or Statutory Conditions, Certificates, Surveys, or other mandatory requirements.                                                                                                    | <p>Unacceptable.</p> <p>The vessel will remain Unacceptable until the overdue item has been remedied or otherwise accepted by the relevant Class Society, Flag State, or issuing authority, and RightShip is satisfied that the reason for the overdue status has been reviewed and resolved.</p>                                                        |
| 23 | Any vessel with current (in date) Class or Statutory Conditions, Memoranda, recommendations, or other survey findings that may affect safe operation, statutory compliance, trading ability, or vessel readiness. | <p>Subject to review and may be Unacceptable depending on operational or compliance impact.</p> <p>The vessel will not be positively recommended until RightShip is satisfied that the finding has been reviewed, any required action is being appropriately managed, and there is no unacceptable impact on safe operation or readiness to trade.</p>   |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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| <p>24 Any vessel with a classification status other than In-Service or operational status other than In Trading Fleet, including but not limited to laid up, in casualty, under repair, in dry dock, keel laid, detained, arrested, withdrawn from service, or otherwise unavailable for normal commercial operation.</p>                                                                                                                                       | <p>Subject to enhanced review and may be Unacceptable depending on the status and operational impact.</p> <p>The vessel will not be positively recommended until RightShip is satisfied that the reason for the status, any related operational or compliance implications, and the vessel's readiness to trade have been reviewed and resolved. Supporting evidence and/or a RightShip Inspection may be required.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <p>25 Any vessel that has been de-classed, had Class suspended, withdrawn, or otherwise invalidated within the last 24 months, including cases arising from failure to maintain classification standards, non-compliance with Class requirements, non-payment of Class fees, unresolved survey issues, or other circumstances affecting the vessel's valid classification status.</p>                                                                           | <p>Unacceptable.</p> <p>The vessel will remain Unacceptable until RightShip is satisfied that valid Class status has been reinstated or otherwise confirmed, the reason for the de-classing, suspension, withdrawal, or invalidation has been fully explained, and appropriate corrective actions and preventative measures have been implemented. RightShip may require supporting evidence from the relevant Class Society, updated certificates and survey status, confirmation that any required surveys or approvals have been completed, and/or a RightShip Inspection before any positive recommendation can be considered. Where the Class issue is associated with a DOC Company, owner, operator, manager, or other related entity, RightShip may also undertake wider fleet or company-level review.</p>                                    |
| <p>26 Any vessel, DOC Company, owner, operator, manager, or other associated entity found to have failed to notify Flag State and/or Class of matters required under applicable entry, retention, statutory, or classification requirements, including but not limited to incidents, damage, defects, unauthorised repairs, structural issues, machinery failures, or other conditions affecting the vessel's compliance, seaworthiness, or safe operation.</p> | <p>Unacceptable.</p> <p>The vessel will remain Unacceptable until RightShip is satisfied that the matter has been fully disclosed to the relevant Flag State and/or Class Society, the cause and extent of the non-notification has been investigated, and appropriate corrective actions and preventative measures have been implemented. RightShip may require supporting evidence from Flag and/or Class, updated certificates or survey status, confirmation that any required surveys or approvals have been completed, a RightShip Inspection, and/or DOC Company Management Assessment/Audit before any positive recommendation can be considered.</p> <p>Where the non-notification is associated with a DOC Company, owner, operator, manager, or other related entity, RightShip may also undertake wider fleet or company-level review.</p> |

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| <p>27 Any vessel that is confirmed, suspected, or credibly reported to be fraudulently flying, displaying, or claiming the flag or registry status of a State to which it has no valid entitlement.</p>                                                                                                                                               | <p>Unacceptable.</p> <p>The vessel will remain Unacceptable until RightShip is satisfied that the vessel's valid Flag State registration has been confirmed, any fraudulent flag or registry representation has been fully investigated and resolved, and appropriate corrective actions and preventative measures have been implemented. RightShip may require supporting evidence from the relevant Flag State, updated registry certificates, confirmation from Class and/or the DOC Company before any positive recommendation can be considered.</p> <p>Where fraudulent flag representation is associated with a DOC Company, owner, operator, manager, or other related entity, RightShip may also undertake wider fleet or company-level review.</p> |
| <p>28 Any vessel for which RightShip is unable to verify valid Class and/or Flag status, or any vessel that is confirmed to be operating without valid Class and/or Flag registration.</p>                                                                                                                                                            | <p>Unacceptable.</p> <p>The vessel will remain Unacceptable until RightShip is satisfied that valid Class and Flag status has been confirmed, the reason for any absence, withdrawal, suspension, or inability to verify status has been fully explained, and appropriate corrective actions and preventative measures have been implemented. RightShip may require supporting evidence from the relevant Class Society and/or Flag State, updated certificates, confirmation of current classification and registry status before any positive recommendation can be considered.</p>                                                                                                                                                                        |
| <p>29 Any vessel, DOC Company, owner, operator, manager, or other associated entity found to have deliberately contravened applicable international standards, conventions, laws, or mandatory regulatory requirements, including but not limited to IMO, SOLAS, MARPOL, STCW, MLC, Class, Flag State, Coastal State, or Port State requirements.</p> | <p>Unacceptable.</p> <p>The vessel will remain Unacceptable until RightShip is satisfied that the contravention has been fully investigated, the root cause has been identified, and appropriate corrective actions and preventative measures have been implemented. RightShip may require supporting evidence, confirmation from the relevant authority, Class or Flag State verification, a RightShip Inspection, and/or DOC Company Management Assessment/Audit before any positive recommendation can be considered. Where the contravention is associated with a DOC Company, owner, operator, manager, or other related entity, RightShip may also undertake wider fleet or company-level review.</p>                                                  |

30 Any vessel, DOC Company, owner, operator, manager, or other associated entity that deliberately provides RightShip with false, misleading, incomplete, or materially inaccurate information, or deliberately withholds information considered critical to the vetting assessment. This includes, but is not limited to, the non-disclosure of prior incidents, Port State Control outcomes, class or statutory issues, management changes, ownership/control details, sanctions exposure, or other adverse information not otherwise visible to RightShip.

Unacceptable.

The vessel will remain Unacceptable until RightShip is satisfied that the matter has been fully investigated, the information record has been corrected, and appropriate corrective actions and preventative measures have been implemented. RightShip may require supporting evidence, a RightShip Inspection, and/or a DOC Company Management Assessment/Audit before any positive recommendation can be considered. Where deliberate misrepresentation or non-disclosure is associated with a DOC Company, owner, operator, manager, or other related entity, RightShip may also undertake wider fleet or company-level review.

## Human Rights

| BASELINE CRITERIA                                                                                                                                                                                                                                                                                                 | RULES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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| <p>31 Any vessel flagged to a country that has not adopted and ratified the Maritime Labour Convention, 2006 (MLC, 2006), and which does not demonstrate an equivalent level of compliance (for example, through a valid ITF Agreement, voluntary MLC compliance, or internationally recognised labour laws).</p> | <p>Unacceptable.</p> <p>The vessel will remain Unacceptable until RightShip is satisfied that an equivalent level of compliance with MLC, 2006 requirements has been demonstrated, or the vessel is reflagged to a State that has adopted and ratified MLC, 2006 and the vessel holds the applicable MLC certification or equivalent supporting evidence. RightShip may require evidence such as a valid Maritime Labour Certificate, Declaration of Maritime Labour Compliance, valid ITF Agreement, voluntary MLC compliance evidence, Flag State confirmation, or other recognised labour compliance documentation before any positive recommendation can be considered.</p> |
| <p>32 Any vessel and/or company associated with a vessel found to have committed, facilitated, or been directly associated with human rights abuses.</p>                                                                                                                                                          | <p>Unacceptable.</p> <p>The vessel will remain Unacceptable until RightShip is satisfied that appropriate corrective actions and preventative measures have been implemented and, where appropriate/required, the vessel has successfully completed a RightShip Inspection.</p>                                                                                                                                                                                                                                                                                                                                                                                                 |
| <p>33 Any vessel found to have poor living standards, poor working standards, or significant failings in respect of seafarers' rights, welfare, or terms and conditions of employment.</p>                                                                                                                        | <p>Unacceptable.</p> <p>The vessel will remain Unacceptable until RightShip is satisfied that appropriate corrective actions and preventative measures have been implemented and, where appropriate/required, the vessel has successfully completed a RightShip Inspection.</p>                                                                                                                                                                                                                                                                                                                                                                                                 |
| <p>34 Any vessel that is the subject of a current ILO Abandonment of Seafarers case, or which is associated with an owning, managing, or operating entity that is subject to a current ILO Abandonment of Seafarers case.</p>                                                                                     | <p>Unacceptable.</p> <p>The vessel will remain Unacceptable until RightShip is satisfied that the abandonment case has been resolved, affected seafarers have been repatriated and/or compensated as applicable, and appropriate corrective actions and preventative measures have been implemented. Where appropriate/required, the vessel must also have successfully completed a RightShip Inspection. Repeat, or multiple abandonment cases associated with a common vessel, DOC Company, owner, operator, or managing entity may result in continued Unacceptable status or wider company-level review.</p>                                                                |

## Sanctions, Banning's & Geopolitical Risks

| BASELINE CRITERIA                                                                                                                                                                                                                                                                                                                                                                               | RULES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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| <p>35 Any vessel, flag, Registered Owner, Beneficial Owner, DOC Company, Technical Manager, Commercial Operator, Commercial Manager, or other associated entity that is sanctioned, restricted, banned, or otherwise prohibited by recognised authorities or regimes, including but not limited to OFAC, USCG, AMSA, DFAT, the EU, the UK, the UN, or Port State Control Authorities/MoU's.</p> | <p>Unacceptable.</p> <p>The vessel will remain Unacceptable until RightShip is satisfied that the applicable sanction, restriction, ban, or prohibition no longer applies, or that the vessel and all relevant associated entities are demonstrably outside the scope of the applicable measure. RightShip may require supporting documentation, ownership and control verification, sanctions screening evidence, and/or wider company-level review before any positive recommendation can be considered.</p>                                                                                                      |
| <p>36 Any vessel where management, control, ownership, commercial operation, or associated entity details cannot be verified or are refused by the vessel, DOC Company, owner, operator, manager, or other associated party.</p>                                                                                                                                                                | <p>Subject to review and may be Acceptable in cases where incomplete Registered Owner and/or Beneficial Ownership details are identified, provided no other ownership, status, sanctions, control, management, or wider vessel performance concerns are identified.</p> <p>The vessel will remain Unacceptable where RightShip is unable to verify the relevant control, management, or associated entity information to its satisfaction, or where the review identifies sanctions exposure, restricted-party involvement, deliberate non-disclosure, misrepresentation, or other material integrity concerns.</p> |

## Structures, Machinery & Operations

| BASELINE CRITERIA                                                                                                                                    | RULES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>37 Any vessel which has undergone a Class re-assessment of scantlings in an attempt to avoid steel renewals as a result of excessive wastage.</p> | <p>Subject to review.</p> <p>The vessel will not be positively recommended until RightShip is satisfied that the reassessment, structural condition, Class approval, and any related steel renewal requirements have been reviewed and found acceptable. A RightShip Hull Structure CAP may be required, with an acceptable CAP rating of 2/5 or 2/3 as applicable. Note: For further information see <a href="#">RightShip Dry Bulk – Condition Assessment Program – Requirements</a></p> |

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| <p>38 Any vessel known or credibly reported to have been overloaded, loaded beyond approved limits, or operated outside applicable loading, stability, structural, draught, or load line requirements, where subsequent structural assessment, Class review, and any required repairs or approvals have not been completed to RightShip's satisfaction.</p> | <p>Unacceptable.</p> <p>The vessel will remain Unacceptable until RightShip is satisfied that the overloading event has been fully investigated, the vessel's structural condition has been assessed by the relevant Class Society, and any required surveys, repairs, reinforcements, approvals, or operational restrictions have been completed or accepted by Class. RightShip may require supporting evidence from Class and/or Flag State, updated survey or certificate status, cargo/loading records, stability/loading documentation, root cause analysis, corrective actions and preventative measures, and/or a RightShip Inspection or Hull Structure CAP before any positive recommendation can be considered.</p> |
| <p>39 Any vessel found, reported, or credibly suspected to be in poor material condition or to have poor maintenance standards affecting structural, machinery, cargo, safety-critical, or operational systems.</p>                                                                                                                                         | <p>Unacceptable.</p> <p>The vessel will remain Unacceptable until RightShip is satisfied that the poor condition and/or maintenance standard has been reviewed, root causes addressed, and effective corrective and preventative actions implemented. Supporting evidence and a satisfactory RightShip Inspection will normally be required before any positive recommendation can be considered.</p>                                                                                                                                                                                                                                                                                                                          |
| <p>40 Any vessel that has recently undergone substantial alteration, modification, conversion, or extensive repair that may affect vessel structure, machinery, cargo systems, operational capability, certification, or trading readiness.</p>                                                                                                             | <p>Subject to review and may be Unacceptable depending on the nature, extent, and reason for the alteration, modification, conversion, or repair.</p> <p>The vessel will not be positively recommended until RightShip is satisfied that the work has been reviewed, any impact on vessel characteristics, certification, structure, machinery, or safe operation has been assessed, and any related incident, defect, Class, Flag, or statutory matter has been identified and resolved. Supporting evidence and/or a RightShip Inspection may be required.</p>                                                                                                                                                               |
| <p>41 Any vessel found, reported, or credibly suspected to have no effective Planned Maintenance System, or where the system is not being used to control safety-critical, statutory, machinery, structural, cargo, or operational maintenance.</p>                                                                                                         | <p>Unacceptable.</p> <p>The vessel will remain Unacceptable until RightShip is satisfied that an effective Planned Maintenance System is implemented and being used to manage maintenance, defects, overdue tasks, and safety-critical equipment. Supporting evidence and a satisfactory RightShip Inspection will normally be required before any positive recommendation can be considered.</p>                                                                                                                                                                                                                                                                                                                              |

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|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>42 Any vessel found, reported, or credibly suspected to have no effective key shipboard operational procedures or instructions, or where such procedures are not being implemented for safety-critical, statutory, cargo, machinery, or navigational operations.</p> | <p>Unacceptable.</p> <p>The vessel will remain Unacceptable until RightShip is satisfied that effective key shipboard operational procedures are in place, implemented, and being used to control safety-critical operations. Supporting evidence and a satisfactory RightShip Inspection will normally be required before any positive recommendation can be considered.</p> |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

## P&I

| BASELINE CRITERIA                                                                                                                                                                                                                                                                                                                                                                                                    | RULES                                                                                                                                                                                                                                                                                                                                                         |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>43 Any vessel above 8,000 DWT not entered with a P&amp;I Club which is a member of The International Group of P&amp;I Clubs.</p> <p>Or</p> <p>Any vessel of 8,000 DWT and below not entered with a P&amp;I Club which is a member of The International Group of P&amp;I Clubs <u>or</u> a reputable (based on S&amp;P Rating) Non-International Group P&amp;I Club (i.e. demutualised or fixed premium club).</p> | <p>Unacceptable.</p> <p>The vessel will remain Unacceptable until RightShip has verified that the vessel maintains valid entry with:</p> <ul style="list-style-type: none"> <li>- An International Group P&amp;I Club, or</li> <li>- For vessels of 8,000 DWT and below, a reputable non-International Group P&amp;I Club acceptable to RightShip.</li> </ul> |

## Environment

| BASELINE CRITERIA                                       | RULES                            |
|---------------------------------------------------------|----------------------------------|
| 44 Any vessel with a RightShip GHG Rating lower than D. | Better than E highly preferable. |

## Management of Change

| BASELINE CRITERIA                            | RULES                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|----------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 45 Any vessel which is a New Build Delivery. | <p>Required to complete and submit a RightShip Management of Change (MoC) / Vessel Take Over Process (VTOP) Questionnaire up to 1 month from the date of delivery.</p> <p>Unless</p> <p>DOC Company has a valid RightShip DryBMS Verification Assessment which determined that the company has attained at least Advanced Level in DryBMS Subject Area 26.</p> <p>Or</p> <p>If vessel has completed an acceptable RightShip Inspection.</p>                       |
| 46 Any vessel which has changed DOC Company. | <p>Will be required to complete and submit a Management of Change (MoC) / Vessel Take Over Process (VTOP) Questionnaire up to 1 month from the date of change.</p> <p>Unless</p> <p>DOC Company has a valid RightShip DryBMS Verification Assessment which determined that the company has attained at least Advanced Level in DryBMS Subject Area 26.</p> <p>Or</p> <p>If vessel has completed an acceptable RightShip Inspection under the new DOC Company.</p> |

## RightShip & Customer Restrictions

| BASELINE CRITERIA                                                                  | RULES                                                                                                                                                                                                                                                                                                                                      |
|------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>47 Any vessel or company listed on a RightShip or Customer Restricted List.</p> | <p>Subject to the applicable RightShip or Customer restriction.</p> <p>The vessel will not be positively recommended unless the restriction permits the proposed vetting outcome or RightShip is satisfied that the restriction has been removed, waived, or otherwise resolved in accordance with the applicable restriction process.</p> |

## Operator & Vessel Overall Performance

| BASELINE CRITERIA                                                                                                                                              | RULES                                                                                                                                                                                                                                                                                                                                                                    |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>48 Any vessel that fails any of the non-binary Baseline Criteria in this document due to cumulative performance considered to be well below acceptable.</p> | <p>The number and severity of contributing factors (along with the calibre of the DOC Company's investigation and corrective and preventative measures) will be assessed and this will result in either the vessel being deemed 'Not Acceptable' or will require the vessel to be submitted for a RightShip Inspection and subsequently be found to be satisfactory.</p> |
| <p>49 DOC Company found to be generally poor in terms of overall operational and safety performance.</p>                                                       | <p>Will be subject to additional measures, which may include mandating RightShip Inspections across their fleets or technical holds across their managed fleets as deemed appropriate by way of addition to a RightShip Company watchlist and may require the vessel's DOC Company to undergo a Management Assessment/Audit.</p>                                         |
| <p>50 Vessels found to be generally poor in terms of operational and safety performance.</p>                                                                   | <p>Will be subject to additional measures, which may include mandating RightShip Inspections or technical holds as deemed appropriate by way of addition to a RightShip Vessel watchlist and may require the vessel's DOC Company to undergo a Management Assessment/Audit.</p>                                                                                          |

## Information Only Criteria\*

|    | BASELINE CRITERIA                                                                                           | RULES                                                                                                                                                                                                                                            |
|----|-------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 51 | Any vessel operated by a DOC Company without a current Crew Welfare Self Assessment.                        | <p>Information Only with no current impact on vetting outcomes.</p> <p>Vessel DOC Companies are strongly encouraged to complete, submit and periodically update a Crew Welfare Self Assessment to showcase their commitment to Crew Welfare.</p> |
| 52 | Any vessel that has not submitted details of EEDI, EEXI or CII and Energy Saving Measures.                  | <p>Information Only with no current impact on vetting outcomes.</p> <p>Vessel DOC Companies are strongly encouraged to submit details of their vessel's EEDI, EEXI or CII and Energy Saving Measures implemented.</p>                            |
| 53 | Any vessel operated by a DOC Company that has not registered with the Dry Bulk Centre of Excellence (DBCE). | <p>Information Only with no current impact on vetting outcomes.</p> <p>Vessel DOC Companies are strongly encouraged to register as a DBCE Member and complete a DryBMS Self-Assessment on the DBCE DryBMS online portal.</p>                     |

**\* Information Only Criteria** – These items represent criteria which RightShip considers important, but they are not presently part of the RightShip recommended Vetting Baseline. Where any of these criteria are not met, it will be reflected within final vetting outcomes as “For Information Only”, however, vetting customers may wish to consider incorporating such criteria within their bespoke vetting criteria.

## Revisions Log

| Revision Number | Criteria ID | Change Details                                                                                                                                  | Date    |
|-----------------|-------------|-------------------------------------------------------------------------------------------------------------------------------------------------|---------|
| 1               | Preamble    | Minor edits to grammar and typo corrections.                                                                                                    | Jun2023 |
| 1               | Preamble    | Comment around RS Inspection planning.                                                                                                          | Jun2023 |
| 1               | Preamble    | Comment around non-disclosure of adverse events.                                                                                                | Jun2023 |
| 1               | Preamble    | Addition of Tokyo PSC MoU to Flag and RO Performance.                                                                                           | Jun2023 |
| 1               | Preamble    | Amendment to Incident Review time span.                                                                                                         | Jun2023 |
| 1               | 2&3         | Amendment to outcome logic.                                                                                                                     | Jun2023 |
| 1               | 4           | Addition of PSC Port Averaging consideration and timescale correction.                                                                          | Jun2023 |
| 1               | 5           | Addition of PSC Port Averaging consideration. Amendment to outcome logic.                                                                       | Jun2023 |
| 1               | 6           | Addition of alternative paths where there has been no PSC Inspection in the last 24 months.                                                     | Jun2023 |
| 1               | 7           | Addition of a RightShip Inspection trigger. And timescale amendment.                                                                            | Jun2023 |
| 1               | 8           | Clarity over the processing of vessels which have "Jumped" a PSC Detention.                                                                     | Jun2023 |
| 1               | 16&17       | Clarification of RightShip Inspection validity if the DoC Operator changes.                                                                     | Jun2023 |
| 1               | 19&20       | Tokyo PSC MoU added.                                                                                                                            | Jun2023 |
| 1               | 22&23       | Amended to clarify focus is on operational impacts.                                                                                             | Jun2023 |
| 1               | 24,25,26&28 | Clarity over processing of such vessels. Addition of a RightShip Inspection trigger.                                                            | Jun2023 |
| 1               | 29          | Clarity over processing of such vessels and operators. Addition of a RightShip Inspection trigger.                                              | Jun2023 |
| 1               | 30          | Addition of Voluntary MLC.                                                                                                                      | Jun2023 |
| 1               | 31&32       | Addition of a RightShip Inspection trigger.                                                                                                     | Jun2023 |
|                 | 33          | Clarity over repeat cases of Abandonment. Addition of a RightShip Inspection trigger.                                                           | Jun2023 |
| 1               | 34          | Addition of UK and USCG to Sanctions and Bannings.                                                                                              | Jun2023 |
| 1               | 36          | Clarity over application of scantling re-assessment and intent. CAP route added.                                                                | Jun2023 |
| 1               | 38          | Clarity over processing of such vessels. Addition of a RightShip Inspection trigger. Removal of structural basis.                               | Jun2023 |
| 1               | 39          | Clarification of desktop review.                                                                                                                | Jun2023 |
| 1               | 40&41       | Clarity over processing of such vessels. Addition of a RightShip Inspection trigger.                                                            | Jun2023 |
| 1               | 43          | GHG logic clarification.                                                                                                                        | Jun2023 |
| 1               | 44&45       | Change VTOP time span from 12 to 3 months.                                                                                                      | Jun2023 |
| 1               | 49          | Addition of a RightShip Company Audit trigger.                                                                                                  | Jun2023 |
| 1               | 50          | Addition of a RightShip Company Audit trigger. Blacklisted changed to Technical Hold.                                                           | Jun2023 |
| 1               | *           | Human Rights. Crew Welfare Self Assessment Info Only Criteria added.                                                                            | Jun2023 |
| 1               | *           | Environmental. EEXI Info Only Criteria added.                                                                                                   | Jun2023 |
| 2               | 43          | Amendments to reflect GHG 2.0 implementation.                                                                                                   | Dec2023 |
| 3               | Preamble    | Update of Purpose section to reflect transition to the baseline criteria being recommended.                                                     | Jul2025 |
| 3               | Preamble    | Deletion of Confidentiality section.                                                                                                            | Jul2025 |
| 3               | Preamble    | References to Due Diligence replaced with vessel vetting.                                                                                       | Jul2025 |
| 3               | Preamble    | Updates to acceptability criteria for vessels flagged by Paris or Tokyo MoU Blacklisted flags which are Very High, High or Medium to High Risk. | Jul2025 |
| 3               | Preamble    | Inclusion of comment that vessels holding a RightShip Inspection that was awarded only 3 months validity may now be considered unacceptable.    | Jul2025 |
| 3               | 11          | Updated rule guidance in respect to the necessity to complete a post incident RightShip Inspection.                                             | Jul2025 |
| 3               | 16&17       | Updates to the RightShip Inspection age trigger requirements in respect to vetting outcomes and vessels Safety Score.                           | Jul2025 |
| 3               | -           | Inclusion of consideration for cases where the last RightShip Inspection outcome resulted in validity of 3 months or less.                      | Jul2025 |
| 3               | 18,19&20    | Updates to acceptability criteria for vessels flagged by Paris or Tokyo MoU Blacklisted flags which are Very High, High or Medium to High Risk. | Jul2025 |
| 3               | 31          | Inclusion of DOC Company in criteria related to Human Rights abuses.                                                                            | Jul2025 |
| 3               | -           | Inclusion of CII.                                                                                                                               | Jul2025 |

|   |          |                                                                                                                                                                                                   |         |
|---|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------|
| 3 | 44&45    | Inclusion of provision to exempt certain DOC Companies from completion of MOC/VTOP Questionnaire.                                                                                                 | Jul2025 |
| 3 | 46       | Removal of Financial Stability Section.                                                                                                                                                           | Jul2025 |
| 3 | -        | Establishment of Info Only Criteria section.                                                                                                                                                      | Jul2025 |
| 3 | -        | DryBMS Info Only Criteria added.                                                                                                                                                                  | Jul2025 |
| 3 | -        | Renumbering of all criteria to account for additions and removals.                                                                                                                                | Jul2025 |
| 3 | -        | Minor edits to grammar and other minor corrections including all references to DOC Holder, DOC Operator & DOC Manager updated to read DOC Company.                                                | Jul2025 |
| 4 | Preamble | Scope expanded to include general cargo vessels. Vetting policy updated to clarify treatment of 1/5 Safety Scores and N/A Safety Scores.                                                          | Oct26   |
| 4 | Preamble | Enhanced vetting process guidance including consideration of RightShip Inspection performance and DOC Subscore related performance indicators.                                                    | Oct26   |
| 4 | 1        | New vessel attribute criteria introduced covering unknown vessel details and incomplete ownership information.                                                                                    | Oct26   |
| 4 | 2-9      | PSC section comprehensively revised with enhanced detention, performance, high-risk deficiency and close-out assessment requirements.                                                             | Oct26   |
| 4 | 10-13    | Incident criteria restructured to separately address Category A/B and Category C/D incidents, recurring incidents and associated review requirements.                                             | Oct26   |
| 4 | 16       | RightShip Inspection age trigger requirements updated to reflect revised inspection implementation programme.                                                                                     | Oct26   |
| 4 | 19-30    | Flag, Class and Regulatory Compliance section expanded with enhanced requirements relating to vessel status, classification, regulatory compliance, disclosure obligations and misrepresentation. | Oct26   |
| 4 | 34       | Abandonment of Seafarers criteria expanded to include closure expectations and consideration of associated entities.                                                                              | Oct26   |
| 4 | 35&36    | Sanctions and ownership transparency criteria strengthened through inclusion of broader associated entities and verification requirements.                                                        | Oct26   |
| 4 | 37-41    | Structures, Machinery and Operations criteria enhanced with expanded guidance on overloads, vessel condition, modifications, maintenance systems and operational procedures.                      | Oct26   |
| 4 | 44&45    | MOC/VTOP requirements reduced from 3 months to 1 month and exemption criteria expanded to include acceptable RightShip Inspections.                                                               | Oct26   |
| 4 | 46-49    | RightShip and customer restriction, vessel performance and DOC Company performance provisions updated and aligned with current watchlist and restriction processes.                               | Oct26   |
| 4 | 53       | Information Only criteria revised to replace DryBMS Self-Assessment requirement with DBCE registration criteria.                                                                                  | Oct26   |
| 4 | -        | Document extensively reformatted and rewritten to provide clearer baseline criteria, review thresholds, acceptability expectations and closure requirements.                                      | Oct26   |