

1 June 2026

SERVICE TERMS AND CONDITIONS FOR PILOTAGE

The general terms and conditions of pilotage services provided by Finnpiilot Pilotage Ltd as of 1 June 2026.

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1 PREFACE

Finnpilot Pilotage Ltd (hereinafter Finnpiilot) provides its clients with pilotage services in all compulsory pilotage areas in Finnish waterways. The provision of pilotage services is based on the Pilotage Act, which stipulates the compulsory use of a pilot, the tasks and responsibilities of pilots as well as the rights and responsibilities of the pilotage company.

2 APPLICATION AND VALIDITY OF THE SERVICE TERMS AND CONDITIONS

These service terms and conditions are applicable to pilotage services provided by Finnpiilot in compulsory pilotage areas specified by the Finnish Transport and Communications Agency Traficom (hereinafter Traficom). The valid regulation on compulsory pilotage areas and pilot boarding areas is available from the public Finlex ® online service owned by the Ministry of Justice.

The valid service terms and conditions are published on Finnpiilot's website. These service terms and conditions are valid as of 1 June 2026. Finnpiilot reserves the right to make changes to these service terms and conditions by announcing it on its website no later than one month prior to the changes entering into force.

When sending the first notification of the need for pilotage to the Pilot Dispatch Centre, the client demonstrates its acceptance of Finnpiilot's service terms and conditions. Client means the vessel or its agent in the context of these terms and conditions. The client is responsible for the service fees and other obligations under these service terms and conditions.

3 APPLICABLE LAW

The interpretation of these service terms and conditions is governed by the currently valid Finnish laws.

4 PILOTAGE SERVICE AVAILABILITY

4.1. Service level and pilot dispatch areas

Pilotage services are provided 24 hours a day on every day of the year. The level of the service is measured by the waiting time for the pilot service. The measurement also takes into account the submission of advance notifications in accordance with sections 4.2.1–4.2.4. In the coastal waters, the waiting time is max three (3) hours and in the Saimaa waterways six (6) hours.

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Finnpilot Pilotage Ltd provides pilot services for all vessels requiring pilotage. Pilotage resources are proportioned to correspond with regular traffic.

Pilotage services are provided in all compulsory pilotage areas in Finnish waterways. Compulsory pilotage fairways were increased by the regulation on pilotage obligations and related procedures in Finnish waters issued on the basis of the Pilotage Act (561/2023). When an added fairway or part thereof is an alternative to a previously compulsory pilotage fairway or part thereof, the pilot makes the decision on the use of the fairway or part thereof.

If the person responsible for the navigation and manoeuvring of a vessel holds a Pilot Exemption Certificate (PEC), the vessel shall receive pilotage services when needed, but in the event of delays in the availability of the service, the vessel is not entitled to pilotage fee reductions as specified in section 5.2. A shipmaster sailing with a PEC shall make a pilotage request in accordance with the service terms and conditions as stated in sections 4.2.1–4.2.4.

Finnpilot's Pilot Dispatch Areas are geographically as follows:

1. Bay of Bothnia
2. Bothnian Sea
3. Archipelago Sea
4. Hanko and Helsinki
5. Emäsalo
6. Kotka
7. Saimaa

The Pilot Dispatch Centre's contact information for the purpose of providing advance information and ordering pilotage services can be found on Finnpiilot's website.

All matters relating to the pilotage services and dispatch are stored in Finnpiilot's ERP system.

4.1.1 Conformance to requirements and safety of piloted vessels

Pilotage service availability during the validity of the assistance restrictions

The characteristics of vessels, such as loads on structures and machinery in ice conditions, and the capability of vessels to navigate in ice, are important for the safety of winter navigation. The ice class regulations issued by the Finnish Transport and Communications Agency Traficom aim to ensure that vessels in the Baltic Sea have sufficient capability to navigate in ice to maintain safe and efficient navigation year around to Finnish ports. More detailed instructions on the availability of pilotage services during the validity of the assistance restrictions are given in Appendix 1.

Compliance with recommendation on pilot transfer arrangements

Embarkation and disembarkation of pilots is safe only when the pilot transfer arrangements conform to international regulations. The pilot shall not board a vessel with unsafe pilot embarkation arrangements or

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disembark a vessel with unsafe pilot disembarkation arrangements. More detailed information about situations in which the pilot transfer arrangements do not conform to requirements is depicted in Appendix 2.

Use of floodlights in the Saimaa region

More information on the use and availability of floodlights on vessels navigating the Saimaa channel and the Lake Saimaa region is given in Appendix 3.

Smoking on the bridge of a piloted vessel

According to Finnish law, smoking is prohibited in the indoor areas of buildings, vehicles or similar places that are accessible to the public or employees or accessible to clients for the purpose of providing commercial or public services. Finnish law does not apply to vessels sailing under a foreign flag, but Finnpiilot Pilotage Ltd recommends that Finnpiilot personnel not be exposed to tobacco smoke while working on a vessel.

4.1.2 Safe channel depth

The instructions published by the Finnish Transport and Communications Agency Traficom, namely "Principles and application of channel depths in Finland", take into account both the current water level system and the new N2000 system. The instructions should be applied regardless of the reference level of the chart used. In the instructions, the term channel depth is replaced by the term design draught. Design draught means the planned draught at which the design vessel can use the channel under normal conditions, but which can be deviated from as conditions allow.

The notification of the use of the fairway shall be submitted in accordance with the Vessel Traffic Service Act, a regulation issued pursuant to the Act or other instruction of the authorities. If the notification is submitted late, Finnpiilot reserves 24 hours to process the notification.

4.2 Provision of advance information and ordering of pilotage services

4.2.1 General principles and ordering channels

Vessel agents shall provide the Pilot Dispatch Centre with possible weekly lists of vessels and changes to the information given in the advance notifications. Notifications are submitted using the ordering channels specified on Finnpiilot's website.

The Pilot Dispatch Centre sends an acknowledgement of the order through the same communication channel as was used to place the order. Orders by telephone are not confirmed separately after the call.

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The delivery time for the pilot order will be confirmed either immediately upon receiving the order or as soon as it is known.

If the notified vessel visit is cancelled or there is no longer a need for pilotage, the client shall inform the Pilot Dispatch Centre without delay.

Sections 4.2.2 and 4.2.3 specify the times and information content necessary for the advance notifications and orders of arriving and departing vessels. Section 4.2.4 contains exceptional situations related to the pilot ordering process.

4.2.2 Vessels arriving at Finnish ports

Advance notification

The client shall provide the Pilot Dispatch Centre with advance notification 24 hours and 12 hours prior to the vessel's arrival at the pilot boarding position. If there is a change of more than two hours (2 h) in the arrival time given in the advance notification, the Pilot Dispatch Centre must be informed of the change without delay.

Required details for advance notification

- Name of vessel and IMO number
- The pilot boarding position to be used and ETA (if the vessel will remain anchored offshore upon arrival, this information shall also be provided)
- Port of destination and berth
- Draught when pilotage is commenced (aft and fore draughts)
- ETD from the port (estimation at the time)
- Technical deficiencies affecting pilotage
- Other factors that reduce the safety of pilotage or the pilot
- Information about tugboat use (note: the tugboat cannot be ordered from Finnpilot)
- Air draught
- Billing information

Pilotage orders

The client shall place a binding pilot order with the Pilot Dispatch Centre three (3) hours before the desired starting time for the pilotage of the vessel.

If not all information was given in the advance information, any missing information must be supplied when placing the actual order in order for the pilot request to be accepted.

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4.2.3. Vessels departing from Finnish ports

Advance notification

The advance notification obligation takes effect when the ETD of the vessel is 24 hours. If the vessel will remain in port for less than 24 hours, the advance notification obligation takes effect upon the vessel's arrival at port.

The client must submit advance notifications to the Pilot Dispatch Centre three times a day:

- In the morning between 6 a.m.–12 noon (**at most 12 hours from the previous announcement**)
- In the afternoon between 12 noon–6 p.m. (**at most 8 hours from the previous notification**)
- In the evening from 6 p.m.-12 midnight (**at most 8 hours from the previous notification**)

During the night, between the hours of 12 midnight–6 a.m., the advance notification does not need to be updated if there are no changes to the vessel's timetable or other information affecting the pilotage. The client is, however, responsible for ensuring that the vessel's nighttime plans and other factors that may have an impact on its departure time are reported to the Pilot Dispatch Centre no later than in connection with the afternoon notification update.

The client can choose more specific times for the advance notifications within the aforementioned time windows. If there is a change of more than two hours (2 h) in the departure time given in the advance notification, the Pilot Dispatch Centre must be informed of the change without delay.

Required details for advance information

- Name of vessel and IMO number
- Port of departure and berth
- Pilotage endpoint (e.g., pilot boarding point, anchorage)
- Estimated time of departure (ETD) from the port
- Draught when pilotage is commenced (aft and fore draughts)
- Technical deficiencies affecting pilotage
- Other factors that reduce the safety of the pilotage process or the pilot
- Information about tugboat use (note: the tugboat cannot be ordered from Finnpilot)
- Air draught
- Billing information

Pilotage orders

The client shall submit a binding pilotage order to the Pilot Dispatch Centre two (2) hours before the vessel is due to depart from the port. The pilot ordering channels can be found on Finnpilot's website. As exceptions to this, vessels departing from the Port of Kilpilahti (Sköldvik) shall submit the pilotage request three (3) hours and vessels departing from the port of Hanko one (1) hour before departure.

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If not all information was given in the advance information, any missing information must be supplied when placing the actual order in order for the pilot request to be accepted.

4.2.4 Exceptional situations

Pilot order for Saimaa

A pilot order for the Saimaa Canal must be made 14 days prior to the arrival of the vessel at the pilot boarding position or the date when pilotage services will be needed. A vessel or vessel agent operating in the internal traffic in Saimaa waterways must submit the pilot order 14 days prior to the need for pilotage services.

Use of an unofficial pilot boarding position

If a vessel requests a pilot board in a location other than an official pilot boarding position or port (e.g. anchorage), the vessel agent or vessel shall notify the Pilot Dispatch Centre of its plan one week in advance. Finnpilot Pilotage Ltd evaluates the feasibility of the proposed plan and reserves the right to approve or reject it. If the plan is implemented, the client shall provide safe transportation of the pilot to and from the vessel at its own expense.

4.2.5. Consequences for failure to submit information

The functioning and flexibility of the pilotage services are based on adequate advance information about future pilotage needs concerning specific pilotage areas and pilot stations. On the basis of the advance information, Finnpilot assigns its staff to different pilotage commissions made through the Pilot Dispatch Centre.

If the client fails to provide the information specified in these service terms and conditions (sections 4.2.1–4.2.4), in the manner required or in accordance with the specified timetables, Finnpilot is not obliged to provide that client with the requested pilotage service within the desired time frame. In such cases, the client is not entitled to pilotage fee reductions due to delays.

Finnpilot monitors the submission of advance information and reports any observed deficiencies to the authorities.

4.3 Other pilotage-related services

4.3.1 Examination services

Finnpilot provides examination services in accordance with sections 43–46 of the Pilotage Act: PEC familiarisation voyages, fairway knowledge tests, practical pilotage tests, ship simulator tests (note! the

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client must personally book the simulator). The current information regarding the ordering of examination services can be found on Finnpiilot's website.

4.3.2 Baltic pilotage (Deep sea pilotage)

Current information on ordering Baltic pilotage services is available on Finnpiilot's website.

5 PILOTAGE FEES

In accordance with the Pilotage Act (561/2023), the Board of Directors at Finnpiilot shall determine the unit price, the reduced unit price and other possible commission fees. A fee based on a lower unit price is charged for pilotage in the Saimaa Canal and the Saimaa waterways. The pilotage fees collected in the Saimaa waterways are at a level of 26 per cent of the pilotage fees in the coastal waters.

The fee is based on the tonnage of the vessel in question and the actual distance to be piloted. The pilotage fees are available on Finnpiilot's website.

5.1 Additional information to pilotage fees

Standby fee

If the pilot has prepared for the pilotage as requested in the pilot order but the pilotage does not get underway within an hour of the ordered time, the vessel shall be charged a standby fee until the pilotage begins or the pilot departs from the vessel or the pilot boarding position. The standby fee in Finnish territorial waters is EUR 500 for each new hour beyond the initial hour. The standby fee in the Saimaa Canal and Saimaa waterways is EUR 250 for each new hour.

Upon the request of the client, it is possible for the pilot to wait on the vessel for the next pilotage assignment or for disembarkation from the vessel. The pilot's waiting time aboard the vessel is always agreed on in advance. The possibility for this must be inquired about from the Pilot Dispatch Centre. Finnpiilot decides whether or not pilots may wait aboard a vessel on a case-by-case basis. The standby fee for the agreed period of waiting aboard the vessel as per client request is EUR 250 for each new hour. The price includes the travel expenses and the daily allowance of the pilot.

Example of a situation in which a pilot is asked to wait aboard by the client's request: It is well known that due to high winds, for example, a pilot will not be able to disembark a departing vessel at the specified pilot boarding position. In this case, Finnpiilot and the client can jointly agree that the pilot will remain on the vessel until the next possible boarding position within Finnish territorial waters that allow a safe disembarkation, or will travel with the ship to its next port of call. Finnpiilot will invoice a fee of EUR 250 for each new hour beyond the ordered pilotage period.

Order transfer fee

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If the matter does not concern an order cancellation and the client or client's representative wishes to make a change to a binding pilotage order after the pilot ordering time has expired, Finnpiilot will charge a transfer fee of EUR 500 in Finnish territorial waters. In the Saimaa Canal and Saimaa waterways, the transfer fee is EUR 250.

For the clarity of the billing basis, the client or the client's representative must provide a reason for the change.

Cancellation fee

If the client or a representative of the client cancels pilotage after the pilot ordering time has expired, the vessel will be charged a cancellation fee. A cancellation fee of EUR 1,000 will be charged within Finnish territorial waters and EUR 500 in the Saimaa Canal and Saimaa waterways.

For the clarity of the billing basis, the client or the client's representative must provide a reason for the cancellation.

Increased basic fees

When two pilots pilot the vessel, either according to section 22 of the Pilotage Act or by request, an increased fee of 75 per cent in addition to the basic rate shall be charged.

Pilotage fees for a vessel combination and stock flatboat/float

A pilotage fee shall be charged for the combined tonnage of a tugboat or pusher, and the vessel, barge or similar being towed or pushed, or for an integrated tug barge combination. The pilotage fee for a stock flatboat/float is also determined by tonnage, but the tonnage is understood to be half of the number of cubic metres.

5.2 Pilotage fee reductions

The client is responsible for ensuring that all advance information, as specified in sections 4.2.1–4.2.4, and order timetables are strictly followed.

If the pilotage service cannot be delivered within the agreed time frame, even though the advance notifications and binding pilot order were submitted appropriately, the client is entitled to a pilotage fee reduction.

The pilotage fee reduction is determined based on the duration of the delay in the pilotage service as follows:

In coastal areas

- a wait of more than three but no more than 6 hours: 8% reduction of the standard pilotage fee
- a wait of more than six hours: 16% reduction of the standard pilotage fee

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In the Saimaa region

- a wait of more than six but no more than nine hours: 8% reduction of the standard pilotage fee
- a wait of more than nine hours: 16% reduction of the standard pilotage fee

In chained pilotage assignments in the Saimaa region, the fee reduction is given for all pilotage assignments in the chain.

6 FINNPILOT'S LIABILITY

Finnpilot's liability in terms of pilotage is regulated separately by the Pilotage Act. According to the Act, the maximum amount of liability to compensate for damages caused by pilotage operations is no more than EUR 100,000 per occurrence of damage. Liability for damages requires that the damage be caused intentionally or through gross negligence with the knowledge that such damage would likely be inflicted.

Finnpilot is not liable for any direct or indirect damages incurred by the provision of the pilotage services as specified in these terms and conditions.

Finnpilot will issue the invoice to the party that ordered the pilotage. Any invoice claims will be received and processed through Finnpiilot's electronic system. Instructions for invoice claims can be found on Finnpiilot's website.

7 RELEASE FROM LIABILITY

Finnpilot shall be released from any obligations and liabilities specified in these service terms and conditions if a violation of or failure to fulfil the obligations is based on a force majeure. A force majeure is any unusual event which Finnpiilot could not have anticipated in advance, which is beyond the control of Finnpiilot, or the impact of which could not reasonably have been avoided or prevented. Such an event could be, for example, war, legal provisions or the regulations of authorities, natural catastrophes, weather or ice conditions, an interruption of general traffic, data communications or energy distribution, a breakdown of transport facilities related to pilotage services, labour disputes, fire or other unusual reason that has a similar impact and is beyond the control of Finnpiilot.

8 SETTLEMENT OF DISPUTES

Any disputes arising from the provision of the pilotage service as specified in these service terms and conditions shall be settled by the District Court of Helsinki.

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APPENDICES TO THE SERVICE TERMS AND CONDITIONS

APPENDIX 1 Pilotage during the validity of the assistance restrictions

Ice class regulations ensure the safety and fluency of winter navigation

The characteristics of ships, such as loads on structures and machinery in ice conditions, and the ability of ships to navigate in ice, are important for the safety of winter navigation. The ice class regulations issued by the Finnish Transport and Communications Agency aim to ensure that vessels in the Baltic Sea have sufficient capability to navigate in ice to maintain safe and efficient navigation year around to Finnish ports.

The Finnish Transport Infrastructure Agency has created winter shipping guidelines in co-operation with industry, shipping companies, charterers, seafarers, icebreakers, pilots and vessel traffic services. Stakeholders bear their share of responsibility for Finnish winter navigation and endeavour to carry out their import and export shipments using modern vessels with sufficient engine power, quality ice navigation capabilities and competent crews.

When the ice situation becomes more difficult, the Finnish Transport Infrastructure Agency imposes restrictions on icebreaking assistance if necessary for safety reasons and the functioning of the traffic system.

Pilotage during the validity of the assistance restrictions

According to section 23 of the Pilotage Act, pilots must refuse to pilot a ship or abort pilotage if they consider that starting or continuing the voyage endangers the safety of the piloted ship, the person on board, other vessel traffic or the environment. The pilot may, on the basis of the above-mentioned grounds, refuse to pilot the vessel in winter conditions if the vessel does not have an ice classification in accordance with the assistance restrictions or does not fulfil them on the basis of, for example, its draught, or does not have an exemption granted by the Finnish Transport Infrastructure Agency.

In order to receive pilotage services, a vessel that is not eligible for icebreaking assistance must present Finnpilot with a plan that will ensure the safe movement of the ship through ice. This plan shall include a plan for the safe movement of the ship through an (assistance-restricted IC) area, taking into account the prevailing ice situation, the characteristics of the tugboat to be used for assistance and possible restrictions on the traffic area. When assessing the plan, Finnpilot requires that the equipment necessary for the steering and energy production of the ship are fully operational when the pilotage starts, and that the hull, engine power, equipment and manning of the ship are such that safety is not jeopardised in the prevailing ice conditions. Based on all of the above, Finnpilot will evaluate the proposed plan and decide whether pilotage can be carried out in accordance with the Pilotage Act.

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APPENDIX 2: Embarkation and disembarkation of pilots

Embarkation and disembarkation of pilots

To ensure safe embarkation and disembarkation of its pilots, Finnpiilot Pilotage Ltd gives an amendment to the company Service terms and conditions. The purpose of this amendment is to provide the basic safety requirements for the pilots, pilot boats and the shipmasters to be followed. If the described safe practice in the boarding and landing of pilots by pilot boat is not followed, the pilotage service cannot be provided. However, these requirements on safe operating procedures can be adapted to suit particular locations or circumstances.

In adverse or difficult conditions where there is significant risk to personnel or the pilot boat, the pilot boat operator will make the eventual decision whether to place the pilot boat alongside the ship or to abort the transfer. If conditions during the pilot embarkation are such that they create any risk of injury the attempt shall be abandoned. If the pilot considers the embarkation unsafe for any reason, he or she will not embark the ship until the risk factors have ceased to exist.

If the pilot ladder rigged on the vessel appears to be or is, clearly damaged, unsafe or rigged incorrectly, the pilot shall request the ship to replace or re-rig the ladder; or if necessary, refuse to board or disembark the vessel until a safe means of embarkation/disembarkation is provided. The pilot shall report formally all cases of pilot ladder nonconformity according to the company procedure and the report is further submitted to the Finnish Transport and Communications Agency Traficom (Port State Control authority in Finland).

Ships have a duty to rig their pilot ladders in accordance with The International Convention for Safety of Life at Sea (SOLAS) regulation / 23 and IMO resolution A 1045(27) as amended. A copy of the poster showing IMO requirements and IMPA recommendations – “Required Boarding Arrangements for PILOT” is included as an annex to this document.

Pilot transfer operations are not undertaken on ships that do not fully comply with transfer arrangements described above.

The Pilot shall not embark if there is nobody at the top of the ladder.

The ladder should be rigged and secured at the ship's side or side door as near midships as practical, and on the parallel body of the ship, clear of all overboard discharges. The ladder has to be located so that the pilot boat can lean against the parallel mid-body of the ship from the whole of its length. All steps of the ladder must rest firmly against the ship's side. If a list is unavoidable, the ladder should be rigged on the side opposite to the list, whilst always taking into account the need to make a sufficient lee.

During winter months in conditions where icing occurs special caution must be taken to ensure that the pilot ladders are maintained free of ice and the deck area is not slippery.

Pilot operations are not undertaken with ships that do not comply with the requirements described in this document. This amendment to Finnpiilot Pilotage Service terms and conditions cannot prescribe the safe

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pilot transfer arrangements for every configuration or type of vessel construction. Hence, the safety of the pilot transfer in ships other than merchant ships e.g. naval ships and large yachts may be evaluated case-by-case.

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APPENDIX 3: Availability and use of floodlights in the Saimaa region**SAIMAA CANAL AND LAKE SAIMAA - REQUIREMENTS FOR PILOTED VESSELS**

To ensure safe navigation in Saimaa Canal and lake Saimaa area vessels are required to be fitted with two (2) fully operational searchlights OR one (1) fully operational searchlight and light projectors that show simultaneously both sides of the Canal banks during the whole transit.

Vessels' lighting arrangements are inspected by the pilot in locks Juustila and Mälkiä. Inspection is made by comparing the vessels lighting arrangements to shore based reflectors. If pilot decides that vessels lighting arrangements are inefficient then the vessel is piloted by daylight only.

Vessels are also reminded that according to Finnish Pilotage Act pilot has always the right to request a helmsman. Saimaa area pilots strongly recommend that vessels should be fitted with riverpilot option to steer the vessel.