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## Section 2 : Company Policies

The top management of the Company has adopted a Policy of operating its “Ship Management Activity” business under the provision of a comprehensive Safety, Environmental Protection and Health, (SHE), implemented and operated to the requirements of ISM Code. It is company policy to continuously operate to these requirements, as would apply to it and where required (both as mandatory and value addition) have the systems certified by Accredited Certification bodies.

The Top Management has ensured that it's Policies:

- are appropriate to the purpose, nature and scale of its business.
- covers all activities undertaken by the Company.
- includes commitments to comply with applicable requirements
- has provisions to continually improve the effectiveness of its Management Systems.
- provides for a framework for setting and reviewing its objectives.

The management ensures that all its policies are communicated, understood, implemented and maintained at all levels of the shore-based and shipboard organization, and to all persons work for or on behalf of the Company, and that they are reviewed at Management Review meetings for their continued suitability.<sup>1</sup>

Each of the company's policies is implemented in practice through the application of formal procedures and instructions and reviewed through processes described therein.

The policies are duly signed by top management.

### 2.1 Mission and Vision Statement<sup>2</sup>

#### Mission

To assist responsible and demanding customers achieve their business objectives through our professionalism, dedication, enthusiasm and responsiveness.

#### Vision

To be the leader in Quality Shipmanagement

#### Our Goals

**Safety** : our first priority is the safe operation of the vessels we manage, with no injuries, loss of life, and damage to property or the environment.

**Human resources** : to be the employer of choice for competent seafarers and office staff.

**Customer satisfaction** : to meet and exceed the expectations of our customers.

**Service coverage** : to provide excellent value added services globally for all our customers' needs.

**Financial** : to continuously improve our results in a sustainable manner.


#### Our Values, We value :

**Our people** by respecting the individual, treating them fairly and providing opportunities for continuous learning and development.

**Our business partners** and adhere to the highest ethical standards.

<sup>1</sup> ISM Code Sect 2.2

<sup>2</sup> TMSA 1.1 a

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**Our independence** as Public owned company with long term focus and commitment to shipping industry.

**Good reputation** of Company.

**Entrepreneurial approach** coupled with rigorous risk management.

**Service orientation** and **reliability** through focusing on excellent service to our customers.

**Our Principles, We :**

- systematically manage risks.
- continuously define, monitor and improve performance.
- reward results.
- are cost conscious.
- meet our commitments.
- encourage initiative and innovation.
- promote team work and streamlined business processes.
- take pride in cultural diversity and benefit from our global structure.
- provide a modern and stable work environment so that all employees can contribute to the best of their abilities.
- are socially responsible.

## **2.2 Business Policy (Financial / Ethics)**

The Company recognizes and acknowledges that the purpose of a contract for full shipping is to provide a beneficial and profitable relationship for the Company and the Client.

The Company shall not tender for, or secure any contract, if the resources of the Company are known, or expected to be insufficient to comply with the requirements of the contract, or to meet existing and expected regulatory requirements.

The Company shall not knowingly participate in any illegal activities of the client, his agents and/or his representatives. Neither shall the Company enter into agreements or contracts that would involve the Company, its agents and/or representatives, in unsafe acts or practices.

The Company shall allocate its resources to provide “satisfaction of service” to each client.

The Company shall advise the client of any possible conflict of mutual or third party interest that may arise as a result of the terms and conditions expressed within the proposed or enacted contract.


The Company shall always respect and protect the confidentiality of each client’s business, subject to legal, recognized, and accepted standards of industry. In doing so, the person appointed by the management, as documented in the procedures, will detail and promulgate the individual client requirements to responsible staff.

The Company will always adhere to sound and proper accounting principles in the management of cash or funds made available by the client as a result of, or in addition to, the terms and conditions of the contract.

### **Relations with Seafarers**

Company recognizes the importance of the quality of employed seafarers, values those seafarers and considers them as part of the Company Team. All seafarers and office staff are part of the worldwide Team of Company employees. All new applicant seafarers are treated equally and any employment offered is only dependent upon experience and previous employment history.

It is a strict policy applicable in all our offices, and equally applicable to any external agencies recruiting for the us, that no payments in cash or gifts shall be solicited or accepted from any seafarers joining or wishing to join the groups vessels.

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### 2.3 Shipboard & Shore-side Occupational Health, Safety and Environmental Policy<sup>3</sup>

The Company recognises that occupational health, safety and environmental (OHSE) management is essential in order to achieve the Company's operating objectives. We are committed to prevention of injury and ill health and continual improvement in OHSE performance.

Our Occupational Health, Safety and Environmental Policy provides the framework for setting and reviewing OHSE objectives and targets. It is based on the requirements of :

- The ISM Code
- Industry Standard
- TMSA
- OCIMF/SIRE
- CDI

Our objectives are:

- To achieve zero spills, zero accidents and zero incidents<sup>4</sup>
- To establish and access safeguards against all identified risk<sup>5</sup>
- To continuously improve safety management skills of personnel ashore and aboard ship, including preparing for emergencies related both to safety and environmental protection.<sup>6</sup>
- To develop a sense of personal responsibility in all personal towards health, safety and environmental protection.

#### Implementation :<sup>7</sup>

The prime responsibility for implementing this policy lies with line management (supervisory positions). To achieve this, the commitment and involvement of all Company personnel is required. Onboard ship, Senior Officers and visiting shore management must lead by example and comply with all safety practices and procedures including at all times wearing the correct PPE.<sup>8</sup>

The Company will comply with all relevant national and international OHSE legislation, and regulations, and take into account all industry guides and codes of practice.<sup>9</sup>

When considering new business or work methods, full account will be taken of all relevant health, safety and environmental aspects to ensure that the standards required by this Policy are maintained.

All work will be properly supervised with safety and environment protection forming an integral part of all planning and procedures. Necessary information, instruction and training will be given a necessary to ensure the health and safety at work of all employees.

The Company is committed to improving health safety performance and will respond positively to recommendations, from both shore and sea staff, that identifies changes in policy, practices or equipment necessary to improve standards.

All incidents of a serious or potentially serious nature will be investigated and recommendations communicated through line management where appropriate.

<sup>3</sup> ISM Code sect 1.2, 2.1, 1.4

<sup>4</sup> ISM Code 1.2.1, 1.2.2.1


<sup>5</sup> ISM Code 1.2.2.2

<sup>6</sup> ISM Code 1.2.2.3

<sup>7</sup> ISM Code 2 TMSA 9A 3.2.1

<sup>8</sup> TMSA 9A 3.2.1

<sup>9</sup> ISM Code 1.2.3,

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Management will strive to ensure that purchase and supply activities are continuously improved with respect to environmental protection. This includes waste reduction methods such as: <sup>10</sup>

- Bulk purchasing to reduce packing
- Recycling initiatives
- Using non-disposable equipment

Management will use its best endeavors to ensure that contractors work on their behalf apply standards compatible with this Policy.

This Policy will be communicated to all employees and contractors<sup>11</sup>, in order to ensure they are aware of their OHSE obligations, it will also made available to the public, it will be reviewed on a regular basis to be updated or revalidated as appropriate.

## 2.4 Quality Policy

Our Company is engaged in the business of Shipping, and this Policy applies throughout the organization.

The implementation of this policy is underpinned by the full support of the senior management executive.

Our Quality System is based on the requirement of industry standard, and includes a framework for establishing and reviewing quality objective.

To implement this policy we shall focus on the needs of our business with particular reference to consistently meeting and exceeding our customer's requirement and our statutory obligations.

Our quality management system will provide mechanics for detecting system shortfall and for stimulating process improvements.

### Our Company will :

- adopt procedures and discipline to ensure that the system is effectively implemented and in line with our organizational goals and expectation;
- undertake relevant skills training and conduct appropriate quality awareness training;
- establish responsibilities for quality and communicate these responsibilities clearly to all employees;
- check the effectiveness and ongoing relevance of the policies and procedures by initiating regular reviews and;
- regular review the needs and expectations of our customers and initiate continuous improvement activities to meet these expectations.

## 2.5 Shipboard Drug & Alcohol Policy

The Company's Shipboard Drug and Alcohol Policy comply with the recommendations contained in OCIMF's "Guidelines for the Control of Drug and Alcohol On Board Ship" <sup>12</sup>


With regard to Alcohol, this Policy is based on the following:

- Consumption of alcohol limited to beer, wine and similar alcohol beverages with an alcohol content of less than 17%
- 1 hour of abstinence for each unit of alcohol consumed.

<sup>10</sup> TMSA 10A 2.3

<sup>11</sup> TMSA 10.1.1, ISM Code 2.2

<sup>12</sup> TMSA 3 1.4

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- Total abstinence from alcohol for 4 hours prior to period of schedule responsibility, i.e watch keeping duties, port arrival/departure etc.
- Flag, Port or Coastal State requirements, or Policies of Owners, Charterers, or other interested parties which exceed the requirements of this policy shall be adhered to as if included in this Policy.
- It is accepted that many of the company's vessels will in fact be the "dry", with respect to alcohol consumption, due to policies of charterers.

In addition, The company comply with the recommendations contained in STCW Manila amendment Reg. Section A-VII/1 Fitness for duty set a blood and breath alcohol limit as follows;

Alcohol in the blood limit of not greater than 0.05% blood level (BAC) alcohol content 50 ml. of alcohol in 100 ml. or

Alcohol in the breath limit of not greater than 0.25 mg/l. 25 microgrammes of alcohol in 100 ml. or a quantity of alcohol leading to such alcohol concentration for matters, officers and other seafarers while performing designated safety, security and marine environmental duties.

The Company maintains a system based on breathalyses with periodic, random and post incident testing to monitor the effectiveness of this Policy.

Any form of drug, with the exception of over-the-counter medicines and prescribed drugs, are totally banned from Company managed vessels. Personnel on prescribed drugs must declare this fact to the Master upon joining the vessel, or upon prescription if prescribed during the period of service onboard.

The Master if on prescribed drugs must declare this fact to the company prior joining the vessel, or upon prescription if prescribed during the period of service onboard.

This Policy is monitored on board all vessels by the Master. In addition, Officers and Ratings undergo screening carried out during routine medical examinations.

Officers and Ratings are subject to unannounced random tests conducted by qualified personnel to Port State and Owner's requirements.

## **2.6 Speaking Up Policy**

The following policy is addressed to all our Company vessels and all other relevant people.

The Top Management of our Company is committed to a free and open culture in dealings between its management, employees, customers, suppliers and all people with whom the Group engages in business relations.

The Board recognises that effective and honest communication is essential to maintain our business values and to ensure that instances of business malpractice are detected and dealt with.

### **Purpose**


The purpose of this policy is to encourage everyone, whether they are employees, agency staff, agents, contractors, suppliers or customer of the Group, to report any business misconduct without risk to themselves.

### **Policy**

This policy will apply in cases where you genuinely and in good faith believe that business misconduct is occurring, has occurred or may occur within the Company.

Below are some examples of business misconduct:

- A criminal offence
- A person not complying with any legal obligation

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- The use of deception to obtain an unjust or illegal financial advantage for the business unit or personally
- A miscarriage of justice
- Danger to the health and safety of an individual
- Damage to the environment
- A fundamental breach of internal control
- Intentional misrepresentation directly or indirectly affecting financial statements
- Serious non-professional or non-ethical behavior including harassment and bullying,
- Deliberate concealment of information relating to any of the above.

This policy is separate from the grievance procedure as detailed in the documented management system.

### **Procedure**

You should, in the first instance, raise the matter with your immediate superior, Master or Department Head, or if you do not feel this is appropriate, your management representative / DPA.

All instances of speaking up will be forwarded to the Managing Director, who will advise the respective Fleet Director (FDR) and the Head of Department.

Should you feel unable to talk to your immediate superior, Master or Department Head, or management representative / DPA, then you should contact the Managing Director who will treat the matter in confidence:

### **Investigation**

Once an allegation of business malpractice is made the Managing Director will agree an appropriate investigation plan with concerned shore staff and will endeavor to respond to you within 10 work days setting out what further investigation, if any, is planned.

Once the investigation is complete it will be reviewed by the MD and you will be advised of the results of the investigation as well as any corrective actions which are being taken.

The Company is committed to running its operations without misconduct and expects its employees and other stakeholders to share this objective. However the Company also recognizes that speaking up can be a potentially sensitive issue. If you believe that you are being penalized in any way for speaking up, or if you do not have a satisfactory response to your disclosure you should write to the Managing Director setting out the facts.

### **Safeguards**


If requested we will take all reasonable steps to protect your anonymity. However you should be aware that action taken as a result of your disclosure may lead to your identity needing to be revealed.

Any employee speaking up is protected against adverse employment actions (i.e. dismissal, demotion, suspension, harassment or other forms of discrimination) for raising allegations of business misconduct. An employee speaking up is also protected even if the allegations prove to be incorrect or unsubstantiated, provided the disclosure is made in good faith and where it is believed the information and any allegation in it are true.

### **Disciplinary Action**

If any allegation of business malpractice is substantiated, appropriate disciplinary action will be taken against the responsible individual(s), up to and including termination of employment.

Furthermore, acts of retaliation or victimization against an employee for speaking up will result in disciplinary action being taken against the perpetrator, up to and including termination of employment.

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The malicious use of the Speaking Up policy will result in disciplinary action up to and including termination of employment.

## 2.7 Company Security Policy

It is the policy of the Company to provide a secure work environment, by establishing and maintaining the required security measure to prevent unlawful acts against ships, which endanger the safety and security of persons and property on board company ships.

Company objectives are to:

- a) Provide security procedures and practices for ship operations to protect the security of ports and the wide community.
- b) Establish safeguards to reduce the risk to crew, supernumeraries and port personnel on board company ships.
- c) Continuously improve the security skills and awareness of company personnel ashore and onboard ship.
- d) Prepare contingency measures for emergencies relating to possible security incident.

These objectives will be achieved by:

- i) A Ship Security Assessment and a Ship Security Plan specific to each individual ship.
- ii) Comprehensive training for company personnel.
- iii) Actively promoting security awareness amongst company personnel and circulating security updates and intelligence.
- iv) Regular documented reviews and internal audits of security procedures and plans, in order to allow for constant update and improvement to the plan.

All employees are expected to comply with the required procedures within the Ship Security Plan and should be familiar with the relevant security duties required of them and the measures required protecting the ship from any unlawful act. The company shall ensure that the company security officer, the Master and the ship security officer are given the necessary support to fulfill their duties and responsibilities in accordance with Chapter XI-2 of the 1974 SOLAS Convention and ISPS code.

It is the aim of the Company to provide a secure work environment for all employee's and contractors.

The Company policy is to protect people, assets, and operations, from risk of injury and loss or damage from criminal, hostile or malicious acts.

All employees and contractors are expected to comply with the Company security measures, and act at all times within the law.