



**ELITE
SHIPPING & TRADING
FZC**

COMPANY MAIN MANUAL

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01 Apr 2025

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Prepared by:
QHSE Department

Approved by:
Managing Director

Issued by:
QHSE MANAGER

COMPANY MAIN MANUAL

Integrated Management System



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COMPANY MAIN MANUAL - CORRECTION SHEET

It is the responsibility of the Master and of paramount importance that this manual is maintained up-to-date always. Evidence of this is to be shown by completing the document serial correction sheet below.

When changes/correction sheets are received from the Head Office, it is the responsibility of the Master that all obsolete documents/pages for which revision is received are promptly removed and destroyed.

If any of the holders of this manual become aware of any necessary changes, omissions, or errors, they should notify the Head Office.

DOCUMENT SERIAL CORRECTION SHEET

REVISION NO.	ISSUE DATE	CORRECTED PAGES	DATE INSERTED	INITIALS
01	30/04/25	Complete Manual	30/04/25	Capt. Pourus K



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VERIFICATION CHART

VERIFIED THAT READ AND UNDERSTOOD

[illegible]

Note: It is deemed that the ship's staff must read this Manual.



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CHAPTER 01 – COMPANY INFORMATION

1.1 Purpose / Scope

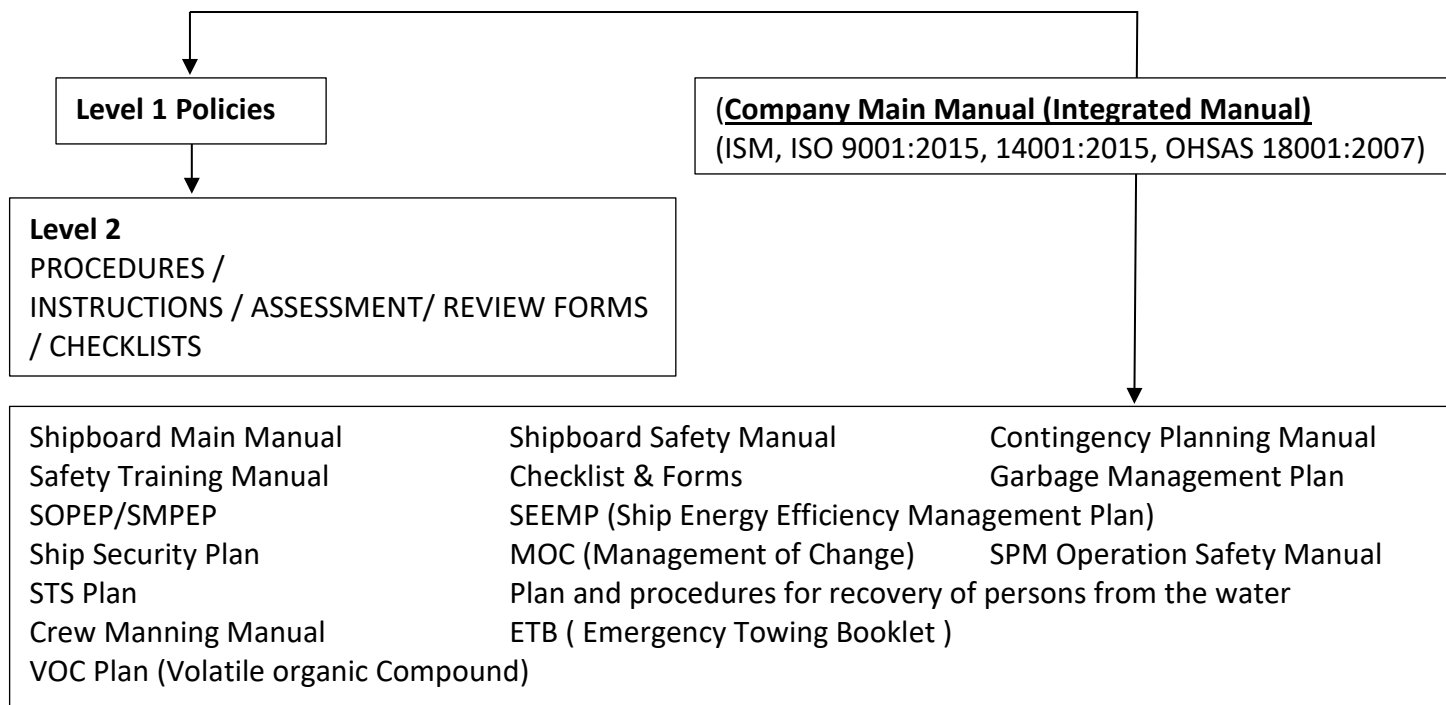
GLORY INTERNATIONAL FZ-LLC (ISM/TECHNICAL SHIP MANAGEMENT & CREW MANAGEMENT)

The objective of the “Integrated Management System” is to ensure safety of life at sea, prevention of human injury or loss of life, avoidance of damage to the environment to the Marine Environment, and to property. The Ship Management/Crew management/Shore Management & staff are based on the International requirements as per ISM/STCW 2010/MLC2006/ISO9001,14001 & OHSAS and Statutory and Regulatory stipulations laid down under Merchant Shipping and local legal requirement.

Hence, this Clause is excluded. does not have any process within the organization which required to be validated whose deficiency become apparent only after the application of service rendered; hence currently this clause is not applicable. **GLORY INTERNATIONAL FZ-LLC** does not undertake any design and/or development activities.

1.2 Structure of the safety management system & integrated management system

A brief overview of the Integrated Management is given below: -



1.3 Fleet Information

Operator Office GLORY INTERNATIONAL FZ-LLC



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BUSINESS CENTER, RAKEZ,
RAK, UAE
E-MAIL : ops@gloryintl.net

Type of company SHIP MANAGERS / OPERATOR
Type of vessels OIL / CHEMICAL TANKERS
Trading areas WORLD WIDE

1.4 Office organization

Refer Annex IV

1.5 Context of the organisation

1.5.1 Understanding the organization & its context

GLORY INTERNATIONAL FZ-LLC purpose is to ensure safety of life at sea, prevention of human injury or loss of life, avoidance of damage to the environment to the Marine Environment, and to property.
In doing so, **GLORY INTERNATIONAL FZ-LLC** recognise that this can only be achieved by managing any situation that can influence, either internally or externally the way we deliver our service.

The External Influences can be found in the Organisational Assessment in the Risk Assessments Module. The Assessment deals with the Legislative, Economic, Social / Cultural, Technological, Environmental and Competition risks. This assessment is reviewed annually or whenever a major change to an internal or external influence occurs.

The Internal Influences can be found in the Process-driven Risk Assessments in the Risk Assessments Module. The following Internal and external influences have been summarised from the risk assessments and is Compliant.



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Context	Context Description	Negative Influence	Positive Influence
External	Legislation Changes	Open to liability and negative image	Positive image of organisation
Internal	Employee perception and reputation	High expectations	Influences culture and client company reputation internally and externally

1.5.2 Understanding the needs and expectations of interested parties

The following expectations have been identified for both internal and external stakeholders.

Type	Stakeholders	Expectations
External	Ships Charterers, Receivers Suppliers	<ul style="list-style-type: none">• Consistent and fair approach to voyage.• Fairly reimbursed for services or products.
Internal	Shareholders	<ul style="list-style-type: none">• A suitable return on investment.• Verification of competent and suitable decision making within the organisation.



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1.5.3 Determining the scope of the QMS

This manual provides guidance on how **GLORY INTERNATIONAL FZ-LLC** manage their activities in a safe and effective manner whilst minimising our effects on the environment.

The document is applicable to the following **GLORY INTERNATIONAL FZ-LLC** activities:

“ISM / SAFETY MANAGEMENT SYSTEM”

These controls will be implemented and followed on our operations which occur both in the UAE and abroad. Company procedure/plan and policies outlining the main processes within **GLORY INTERNATIONAL FZ-LLC** and how they interact.

1.5.4 The Management System and process.

GLORY INTERNATIONAL FZ-LLC manages all internal processes using a cloud-based system called xxxxx

The management system processes into specific module. The module details what is required to maintain compliance with the **GLORY INTERNATIONAL FZ-LLC** internal processes to meet the expectations of both internal and external influences.

The processes address all activities including operational, strategy, environmental and occupational health and safety.

1.5.5 System Implementation

All inputs have been identified and or process specific procedures.

Required outputs have been detailed in the procedures that govern the module and the system processes.

Any processes that require indicators to validate that a process has been correctly implemented are either automated with the is Compliant Reporting function or reviewed during periodical process audits.

Responsibilities necessary to implement the above processes are detailed in the GLORY INTERNATIONAL FZ-LLC procedures, responsibilities matrix and live system actions.

Resource gaps will be highlighted and rectified during management team meetings and process reviews.

All risks and opportunities are addressed at a strategic level in the process driven risk assessments located in the is Compliant Risk Assessments Module.

All processes are subsequently reviewed and assessed for effectiveness on a periodical basis.

1.5.6 System Validation – Qualification waiver

Managing Director has the authority to waive the qualifications and age bar of any below mentioned posts basis his judgement.



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CHAPTER 02 – COMPANY OBJECTIVE AND POLICY

2.1 STATEMENT OF OCCUPATIONAL HEALTH, SAFETY AND ENVIRONMENTAL POLICY

GLORY INTERNATIONAL FZ-LLC will always take the responsibility to provide healthy and safe working conditions, it will establish and maintain safe and pollution free operating practices complying with International and National Regulations, Standards, and Requirements.

All employees of **GLORY INTERNATIONAL FZ-LLC** are expected to comply with Health, Safety & Pollution Prevention Regulations, follow Safe Operating Procedures always and to take all necessary precautions to protect themselves, their colleagues, the ship and its cargo, and the environment.

GLORY INTERNATIONAL FZ LLC is Committed to: **“ZERO INCIDENT& ZERO SPILLS”**

- Believe that with active management commitment, support and accountability, work related injuries can be prevented by promoting and encouraging high safety standards.
- Require the commitment of all personnel, both shipboard and shore based, to protection of health, safety and environment.
- Employ personnel that have the required skills and experience, and provides support, training and development where necessary or appropriate.
- Require regular inspections of equipment, review of procedures and training seminars for personnel ashore and onboard ships to ensure continual improvement of Safety & Environmental Management skills, including preparation for Emergencies related both to Safety & Environmental Protection.
- Use its best endeavours to prevent and minimise accidents.
- Provides instructions and practical advice to ensure vessels are operated in compliance with National, International Requirements as well as Rules by Classification Society & Other requirements
- Require that all contractors working on its behalf comply with and follow the Health, Safety and Environmental Protection Standards.
- Take all measures and NO SHORT CUTS for good and safe management of ships.
- Believe that SAFETY SAVES AND GREED KILLS.

The company carries out a systematic risk assessment and management of its various maritime operations.

Our policy is to provide and maintain safe and healthy working conditions, equipment and systems of work for all employees. We also accept our responsibility for the health and safety of other people who may be affected by our activities.

- Therefore, the company accepts the responsibility: -
 - i) To provide and maintain safe and healthy working conditions on their premises and Ships of clients, taking account of relevant statutory requirements.
 - ii) To provide such training and instruction as may be relevant to their operations to assist employees to perform their work safely and efficiently.
 - iii) To make available such safety devices and protective equipment as may be appropriate and to secure the supervision of their use.



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- iv) To maintain a continual interest in health and safety matters applicable to the activities in which they are involved and for management to set an example in safe behaviour.
To ensure that all employees are aware of their responsibilities with regards to environmental matters.
- Employees of the company have a duty to co-operate in this objective: -
 - i) By working safely and efficiently.
 - ii) By properly using safety devices and protective equipment provided and by meeting statutory obligations.
 - iii) By reporting incidents which have led or may lead to injury or damage.
 - iv) By adhering to company procedures and observing instructions designed to contribute to the protection of health and safety.
 - v) By co-operating in the investigation of accidents with the object of introducing measures to minimise the possibility of recurrence.
 - vi) By ensuring that all environmental issues are addressed i.e. recycling etc.

Signed By **Managing Director**

2.2 STATEMENT OF DRUG AND ALCOHOL POLICY

GLORY INTERNATIONAL FZ-LLC believes in DRUG & ALCOHOL-FREE ships. No ship under the Management is allowed to carry any alcohol or drugs, unless they are prescribed by a medical expert or they are part of the cargo.

In following this policy, **GLORY INTERNATIONAL FZ-LLC**:

- Takes into consideration, the “Guidelines for the Control of Drugs and Alcohol Onboard Ship”, issued by OCIMF.
- Blood Alcohol Level above 0.04% is not allowed at any given time.
- Have banned all un prescribed drugs, including MARIJUANA, COCAINE, OPIATES, PHENCYCLIDINE, AMPHETAMINES and HEROIN, from their managed vessels.
- Control through the Master the issue and use of all medical supplies on board the vessels they manage.
- Will **DISMISS** instantly anybody
 - using banned substances on board the vessel
 - caught in possession of banned substance
 - found to have been instrumental in bringing banned substances on board the vessel
- Will take disciplinary action, including dismissal, against anybody consuming banned substances while onshore leave from the vessel or during a period of 24 hours prior to signing on the vessel at the commencement of their service with the vessel.
- Will take disciplinary action, including dismissal, against anybody found under the influence of alcohol while at work.

Signed By **Managing Director**



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2.3 STATEMENT FOR THE ULTIMATE AUTHORITY OF THE MASTER

On behalf of the Owners of the ships which they manage

GLORY INTERNATIONAL FZ-LLC gives the ultimate authority to the Master of the vessel on matters affecting the safety of the ship, her crew, her cargo and the environment.

GLORY INTERNATIONAL FZ-LLC gives ultimate authority to the Master for taking all necessary steps and precautions to prevent accidents and to minimise the consequences of accidents that could affect the ship, her cargo, and the environment.

No employee of **GLORY INTERNATIONAL FZ-LLC**, it's agencies or agents shall have authority to override the master's decision in the performance of this responsibility mentioned above. To the extent that any policy or procedure of the Owners or the Managers shall conflict with the ultimate authority of the Master, such Policy or Procedure shall be invalid.

GLORY INTERNATIONAL FZ-LLC would not let any commercial consideration ever interfere with the ultimate authority of the Master and his responsibilities and the decisions for the safety of the ship, her crew, her cargo and the environment.

GLORY INTERNATIONAL FZ-LLC would not let any commercial consideration ever interfere with the ultimate authority of the Master and his responsibilities and the decisions for the Security of vessel.

Where ever there is any conflict between Safety and Security of the vessel, Master has Ultimate authority to decide and act as per his prudent judgement.

Signed By **Managing Director**

2.4 SECURITY POLICY STATEMENT

OBJECTIVE

The objective of information security is to ensure the business continuity of GLORY INTERNATIONAL FZ-LLC and to minimize the risk of damage by preventing security incidents and reducing their potential impact.

Company Policy (Ref. ISPS Part A 6.1)

The MANAGING DIRECTOR and the Management of GLORY INTERNATIONAL FZ-LLC is fully committed to the security of Ships, Ports, Cargo and Personnel. By this policy GLORY INTERNATIONAL FZ-LLC commits itself and the resources within its control to treat security as an issue of prime importance.



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This ship security plan contains policies and procedures to promote the security of the Vessels. The plan responds to the International Maritime Organisation's (IMO) draft amendments to Safety of Life at Sea (SOLAS) Chapter XI-2 and Part A and Part B (Clause 8.1-13.8) of the ISPS Code (Measures to enhance Maritime security). The Company will ensure that the Company Security Officer, the Master and the Ship Security Officer are given the necessary support to fulfil their duties and responsibilities in accordance with Chapter XI-2 of the 1974 SOLAS Convention as amended.

The Master has the overriding authority and responsibility to make decision regarding the security of the ship and to request the assistance of the company or of any Contracting Government as may be necessary. The Master will not be constrained by the Company, Charterer or their agents in matters related to security. He is fully authorized to deny access to persons, their effects and refuses to load cargo if he feels security is compromised with.

All crewmembers shall review the plan's contents, supporting bills, and the security instructions developed to implement this plan.

Only the Company Security Officer (CSO) is authorized to release security information to the Master, Ship Security Officer (SSO), and Port Facility Security Officer (PFSO). Unless approved by the Master or SSO, internal and external communications from the ship regarding security measures, threat analyses, intelligence information and planned responses are not to be discussed with anyone on shore or to other members of the crew.

The Company Security Officer may delegate duties to be performed by the Ship Security Officer.

As required by the IMO, the name of the person or organization who appoints the members of the crew or other persons employed or engaged on board the ship in any capacity on the business of the ship is:

Managing Director of GLORY INTERNATIONAL FZ-LLC.

All ship personnel are to:

- Assist the Ship Security Officer (SSO) and report security violations.
- Assist the SSO with the implementation of ship security drills and reporting discrepancies in those drills.

QHSE Manager has been appointed as Company Security Officer by MANAGING DIRECTORS.

C.S.O. 24 hours Mobile Phone: +971 50 5518509

Signed By **Managing Director**

2.5 CODE OF ETHICS AND COMPANY POLICY

Our ethical principles are the values that set the ground rules for all that we do as employees of **GLORY INTERNATIONAL FZ-LLC**. As we seek to achieve responsible safety Management success, we will be challenged to balance these principles against each other, always mindful of our promise to shareholders that we will achieve success.

The Ethical Principles Are:



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HONESTY: We will not say things that are false. We will never deliberately mislead. We will be as candid as possible, openly and freely sharing information, as appropriate to the relationship.

PROMISE-KEEPING: We will go to great lengths to keep our commitments. We will not make promises that can't be kept, and we will not make promises on behalf of the Company unless we have the authority to do so.

FAIRNESS: We will create and follow a process and achieve outcomes that a reasonable person would call just, even handed and non-arbitrary.

RESPECT FOR OTHERS: We will be open and direct in our communication, and receptive to influence. We will honour and value the abilities and contributions of others, embracing the responsibility and accountability for our actions in this regard without any discrimination related to Religion, sex & race.

COMPASSION: We will maintain an awareness of the needs of others and act to meet those needs whenever possible. We will also minimize harm whenever possible. We will act in ways that are consistent with our commitment to social responsibility.

INTEGRITY: We will live up to GLORY INTERNATIONAL FZ-LLC ethical principles, even when confronted by personal, professional and social risks, as well as economic pressures."

Core Values

We recognize the importance of credibility, integrity and trustworthiness to our success as a business. We are committed to upholding high ethical standards in all our operations, everywhere in the world. We believe in the principles of honesty, fairness, and respect for individual and community freedoms.

Living up to the letter and the spirit of this commitment is not always an easy task. As a large and diverse corporation working globally, we recognize that while there is some level of agreement the world over on what constitutes honest and ethical business practice, there can also be valid differences of opinion.

In our working lives, we often experience situations where the 'right thing to do' is not immediately apparent. Loyalties -- to our fellow employees, to managers, customers and suppliers, to our families, our communities, the environment, the corporation, and to ourselves -- may seem to conflict. When we're faced with a complicated situation, it can be difficult to decide where the ethical path lies.

Signed By **Managing Director**

2.6 ENERGY MANAGEMENT AND CONSERVATION POLICY

The purpose of the Shipboard Energy Efficiency Management Plan (SEEMP) is to establish procedures for



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GLORY INTERNATIONAL FZ-LLC to improve the energy efficiency of a ship's operation.

GLORY INTERNATIONAL FZ-LLC honours its commitment to protect people and the environment by tracking and analysing energy consumption on vessels, using lessons learned and best practices, to improve energy efficiency while reducing emissions.

It is **GLORY INTERNATIONAL FZ-LLC** Policy that vessels are always operated, and marine operations conducted as efficiently as possible, consistent with safe and reliable operations.

Increased energy efficiency remains the cheapest and most abundant form of new energy available today. SEEMP lays the foundation to put processes in place to optimize operational processes and improve profitability through the efficient use of people and assets. It is a resource guide for all personnel to increase energy efficiency in vessel systems and operational processes.

The Management ensured the energy conservation and endorses the concept that it is everyone's responsibility to ensure every reasonable effort is made to conserve energy and natural resources while exercising sound financial management.

The importance of adopting an energy management and conservation policy is recognized to administer the program. The implementation of this policy will be the joint responsibility of the MANAGING DIRECTORS & staff (Ship/Shore).

Signed By **Managing Director**

2.7 MISSION AND VISION STATEMENT

Our Values

The **GLORY INTERNATIONAL FZ-LLC** believes that continuously striving to excel at the following core set of values will lead to long-term growth, enhanced ability & profitability to serve our clients.

Act with Honesty and Integrity - It is expected of all employees to take personal responsibility for their standard of behaviour and for the decisions they make every day. Honesty and Integrity must always be at the core of those decisions. Both attributes are held in the highest regard at **GLORY INTERNATIONAL FZ-LLC** and will always guide us to "Do the Right Thing."

Constantly Focus on Safety and Quality - Safety is paramount to our Company. Ensuring a safe work environment for our employees, clients, partners & Environment is the expectation. We believe that a focus on Safety contributes to overall Quality. All **GLORY INTERNATIONAL FZ-LLC** employees work toward producing the highest quality work, both in the field and within our offices.



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Provide Professional and Technical Excellence - Providing Professional and Technical Excellence to our clients is at the root of what we do. Continually improving our employees' skills allows us to deliver on this core value. By constantly providing professional and technical excellence and continually improving our abilities, we create the opportunity for our employees to grow and advance within our Company.

Promote a Cooperative Team Environment – Arum's goal is to collaborate with all team members associated with our projects including clients, partners, subcontractors, sub-consultants, vendors, regulatory authorities and employees throughout all levels of our Company. Working in such an environment allows the Company to make informed and efficient resolutions to even the most complex issues.

Respect for our Employees, Clients, Partners, Vendors and Subcontractors - Treating others with respect allows us to demonstrate the professionalism that is expected by co-workers and clients. Respect helps to facilitate and encourage a cooperative team environment and collaboration that is necessary to provide excellent service to our clients.

Cultivate Long-Term Relationships with our Clients - We believe that every project is an opportunity to develop a long-term relationship with our clients. By constantly delivering what we do and adhering to our core values, we forge long-term relationships that provide ongoing work throughout time.

Our Mission

To keep our customers always satisfied by providing them the HIGHEST QUALITY, SAFETY, ENVIRONMENTALLY FRIENDLY, ENERGY EFFICIENT AND ECONOMICAL MANAGEMENT AND OPERATION of their ships, in accordance with their needs and expectations and in full compliance with International and National Legislation, as well as other industry standards and guidelines,

WE RECOGNISE ZERO INCIDENTS, ZERO SPILLS AND NO HARM TO THE ENVIRONMENT AS OUR LONG TERM GOAL & ARE FULLY COMMITTED TO ENSURE COMPLIANCE OF SAME.

We are in process to expand our market presence to become one of the most recognized Ship Management company in Shipping world. We are our clients most trusted provider of these professional services by consistently exceeding their expectations and bringing the highest value to each relationship that is developed. In pursuit of this Mission and in support of its Values, we:

*Provide the highest quality service to our clients by combining highly-skilled team members with our proven methodology.

*Strive to support our projects with the latest technology to ensure we take advantage of the efficiency and accuracy that it offers.

*Consistently improve our deliverables to our clients and add value to organization.

* Forge lasting relationships with our clients by listening and addressing needs in a manner which will allow, as well as us, to be successful.

*Support our employees in a way that fosters learning, growth and recognition for superior performance.

*Operate profitably to support our organization and its shareholders.

Our Vision

GLORY INTERNATIONAL FZ-LLC take a partnership approach to help promote sustainable and economic growth of communities. Through our professional expertise in Shipping & engineering, we guide and support our



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clients so that can make a difference in shipping world. We work tirelessly to ensure that our projects are mutually successful for all and endeavour to forge relationships that stand the test of time. Our contribution to the improve environment, our work allows our clients to innovatively provide services to people around the world safer, faster, cleaner and more economically than ever before.

To BE THE BEST, by continually developing and improving our long-lasting expertise, through innovative and pioneering solutions, AIMING ALWAYS FOR PERFECTION AND EXCELLENCE in the management and operation of ships

Signed By **Managing Director**

NOTE: All Company Policies must be reviewed during management review meeting.

2.8 APPLICATION

In implementing these policies, reference is drawn to “**Shipboard Safety Manual**”, “**Contingency Planning Manual**”, and “**Shipboard Main Manual**”. These policies are to be implemented and maintained at all levels of the organisation, both ship-based as well as shore based.

2.9 QUALITY POLICY STATEMENT

GLORY INTERNATIONAL FZ-LLC accepts responsibility for the complete satisfaction of its customers & ISM requirements. We exercise this responsibility through adequate training of our Shore Based & Shipboard employees, adherence to proven procedures, total commitment meeting and exceeding customer requirements, and maintaining a company culture that fosters continual improvement. Our objective is to deliver defect free services on time & every time.

QUALITY POLICY

The quality policy is established by top management and is approved by the management ensures that the documented quality policy:

- Is appropriate to the purpose of **GLORY INTERNATIONAL FZ-LLC**.
- Includes a commitment to meeting requirements and to continuing improvement of the quality system per the Continual Improvement Procedure;
- Provides a framework for establishing and reviewing quality objectives;
- Is communicated and understood at appropriate levels of the organization per the Training Procedure, and in addition it is posted throughout visible areas of the company;
- Is reviewed for continuing suitability per the Management Review Procedure.



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2.10 GENERAL REQUIREMENTS

GLORY INTERNATIONAL FZ-LLC has developed, documented, implemented and maintains its Integrated Management system in accordance with the requirements of ISO 9001,14001, OHSAS 18001.

GLORY INTERNATIONAL FZ-LLC Integrated Management system is based upon a “process approach” to quality management and:

- a) Identifies the processes needed for the quality system & ISM
- b) Determines the sequence and interaction of these processes. (See Table 1)
- c) Determines criteria and methods required to ensure the effective operation and management of these processes;
- d) Ensures the availability of resources and information necessary to support the operation and monitoring of these processes;
- e) Monitors, measures and analyses these processes, and implements actions necessary to achieve planned results and continual improvement.

GLORY INTERNATIONAL FZ-LLC continually maintains and improves these processes in accordance with requirements of ISO 9001,14001, OHSAS 18001, Integrated management systems – Requirements.



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CHAPTER 03 – COMPANY RESPONSIBILITIES AND AUTHORITY, LEADERSHIP & COMMITMENT

GLORY INTERNATIONAL FZ-LLC is responsible for the operations of all vessels mentioned in the Fleet Information.

GLORY INTERNATIONAL FZ-LLC place a great deal of emphasis on leadership within the management team by having active roles in both operational, Technical, HSQE and strategic parts of the business. Due to the nature of the management system, all management actions can be traced back to originator and actionee. In addition to this all actions are automatically allocated to the relevant processes, thus enabling the management team to monitor the areas of the business that are performing well and those that require improvement.

3.1 Authority of Waiver

Managing Director has the authority to waive the qualifications and age bar of any below mentioned posts basis his judgement.

3.2 Contact numbers of Glory International FZ - LLC staff

TITLE	OFFICE	MOBILE
MANAGING DIRECTOR	+9714 3366906	+971 55 2171115
ADMIN EXECUTIVE	+9714 3366906	+971 57 244103
HSQE MANAGER	+9714 3366906	+971 50 210 4174
DPA	+9714 3366906	+971 52 681 2924
CSO	+9714 3366906	+971 50 806 8349
ALTERNATE DPA	+9714 3366906	+971 52 681 2924
ALTERNATE CSO	+9714 3366906	+971 50 806 8349
OPS/HR/CRWING MANAGER	+9714 3366906	+971 50 4724234
TECHNICAL MANAGER	+9714 3366906	+971 50 209 5330
TECHNICAL SUPERINTENDENT	+9714 3366906	+971 50 741 9869
ACCOUNTS DEPTT.	+9714 3366906	+971 50 5183249
OPS/ HR/CREWING EXECUTIVE.	+9714 3366906	+971 52 6813071
PURCHASE DEPTT.	+9714 3366906	+971 54 5838120
HSQE EXECUTIVE	+9714 3366906	+971 50 8072036
TECH COORDINATOR	+9714 3366906	+971 50 8071879
RECEPTIONIST	+9714 3366906	+971 57 244103

EMERGENCY HEADQUARTERS

04 3366906 / +971 502104174 / +971 52 681 2924/ +971 50 806 8349

Email: ops@gloryintl.net / sqm@gloryintl.net / tech@gloryintl.net



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3.3 Office organisation (shore-based personnel)

3.3.1 JOB TITLE : MANAGING DIRECTOR (M.D.)

SUPERVISES : Operations, Tech. Dept, Crewing Dept, Chartering, Sale & Purchase Of Ships, QHSE Dept (DPA/CSO), Purchase, Admin & Accounts Dept.

QUALIFICATIONS : Master Mariner or Chief Engineer or equivalent degree from Marine university, strong knowledge in shipping. Sea Experience of at least 5 years. Owner or his appointed representative having sole powers to manage the company as per international trading standards complying with National and International legislations, as applicable.

RESPONSIBILITIES & AUTHORITY

- The M.D. is the overall In-charge for all vessels and the office.
- All shore-based Department Head Report directly to him.
- He controls the Administration Deptt, Operations, Technical Dep't, QHSE Dep't and the Accounts Representative.
- He prepares, finalises and monitors implementation of Company's Annual budget for all vessels and office.
- He is the final approving authority for all stores, spares, expenses for vessels and office.
- He handles all matters relating to Sale and Purchase of vessels.
- He handles all matters relating to Chartering to vessels.
- He handles all matters relating to movement of cargo.
- He provides adequate resources and shore-based support to enable the, Designated Person Ashore (DPA) and CSO to carry out his functions.
- He guides Safety & Quality manager in all matters relating to Claims (General and Cargo) and all matters relating to P & I, H & M and other Insurance.
- He approves and finalises the selection of shore staff and Master and Ch/Eng for all vessels.
- To Evaluate and put his notes on master's Evaluation Report after all department suptds have made their observations.
- To finally brief and debrief master's and Chief Engineers Basis Personnel Evaluation Report
- To audit different departments in office. Frequency of these audits shall not be more than 12 months.
- To monitor that the deficiencies/ observations of the audits are followed up and completed.
- To conduct annual Management review by gathering inputs from master's review and attending superintendent's reports



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- The M.D. are responsible for ensuring that the strategy and organisation of Sample Limited is defined and implemented to ensure effective implementation of the Environmental Management System
- The M.D. will direct Assistants to undertake supporting tasks whenever required to supplement the administrative duties of the company

3.3.2 JOB TITLE : OPERATIONS MANAGER / CREWING MANAGER / HR

ACCOUNTIBILITY : Managing Director

SUPERVISES : All Vessels - Master and Ch/Eng.
On Shore Operations / Crewing & HR Department

QUALIFICATIONS : Master Mariner/CH. Engineer or equivalent degree from Marine university
At least experience of 4 years sea time.
Good command in working language i.e. English.
Knowledge of various charter parties, pre-fixture and post fixture operations,
Crewing & human resource
Good working knowledge of computer

RESPONSIBILITIES & AUTHORITY

- To arrange for pre-fixtures of vessels
- To monitor and supervise all matters relating to ship movement and cargo operations.
- To ensure prompt corrective action taken on protest(s) received from third parties.
- To control and manage all bunkering requirements of the ships to ensure that ships are never deficit of bunkers for any voyage
- To handle all matters related to post fixture operations of vessel.
- To maintain data bank of all brokers for cargo fixtures.
- To verify that all ships are performing within charter party terms and conditions.
- In-charge of Crew selection for the vessels.
- Responsible, in a complementary manner, to the M.D. duties and reports to the later about the company performance. The General Manager is legally liable for the company, and in this regard, must oversee the compliance of all legal requirements that affect the company businesses and operations.
- To ensure Business development & marketing of company.
- He provides necessary operational support to the Masters of all vessels in carrying out their duties.



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3.3.3 JOB TITLE : TECHNICAL MANAGER

ACCOUNTIBILITY : MANAGING DIRECTOR

SUPERVISES : Marine and Technical Superintendents / MASTER and CH.ENG /
ON SHORE - TECH. ASST

QUALIFICATIONS : Chief Engineer or equivalent degree from Marine university
Sea Experience at least 5 years
Shore Experience at least 3 years.
Good command in working language i.e. English.
Knowledge of dry docking, major conversions, major Afloat repairs
Good knowledge of survey requirements
Good working knowledge of computer

RESPONSIBILITIES & AUTHORITY

- Maintain surveys of class and flag state
- Maintain ships to acceptable Company Standards for providing vessels cargo-worthy of meeting all operational requirements.
- To motivate and direct staff under them to achieve acceptable professional standards in maintenance, repairs, cargo worthiness, safety and regulatory matters and to control activities concerning quality.
- To maintain acceptable Safety and Pollution Prevention standard onboard vessels for protection of environment, vessel and crew.
- To coordinate activities between Office and Vessels for efficient operation of the ships.
- To prepare, obtain and evaluate price quotations, supervise quality of work, negotiate settlements and prepare final Report for all repairs, refits and dry docks.
- To monitor and control maintenance and expenses of all vessels.
- To report to M.D. and keep him regularly updated on status of all vessel.
- To maintain all ship supplies, materials, spares, services, repairs or any other requirement within the guidelines approved by the M.D.
- To provide necessary support to Masters of all vessels for carrying out their duties.
- To monitor bunkers (F.O & D.O) and Lube Oil Consumptions of all vessels.
- Monitor performance and all machinery parameters via Noon Reports etc.
- Monitor Vessel's Quarterly Inspection Reports of all vessels and follow up as per company's guidelines.
- To have all details of repairs or any other major jobs from vessels using company's form **E-017** and compile list of major work(s) to be carried out by updating form **E-018**.
- To liaise with M.D. and prepare dry-docking budget well in advance.



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3.3.3A JOB TITLE : TECHNICAL SUPERINTENDENT

ACCOUNTIBILITY : TECHNICAL MANAGER & MANAGING DIRECTOR

SUPERVISES : ALL VESSELS- MASTER/CH/ENG/ ON SHORE -TECH. ASST

QUALIFICATIONS : Chief Engineer or 2nd Engineer or equivalent degree from Marine university
Sea Experience at least 3 years
Good command in working language i.e. English.
Knowledge of dry docking, major conversions, major Afloat repairs
Good knowledge of survey requirements
Good working knowledge of computer

RESPONSIBILITIES & AUTHORITY

- Maintain surveys of class and flag state
- Maintain ships to acceptable Company Standards for providing vessels cargo-worthy of meeting all operational requirements.
- To motivate and direct staff under them to achieve acceptable professional standards in maintenance, repairs, cargo worthiness, safety and regulatory matters and to control activities concerning quality.
- To maintain acceptable Safety and Pollution Prevention standard onboard vessels for protection of environment, vessel and crew.
- To coordinate activities between Office and Vessels for efficient operation of the ships.
- To prepare, obtain and evaluate price quotations, supervise quality of work, negotiate settlements and prepare final Report for all repairs, refits and dry docks.
- To monitor and control maintenance and expenses of all vessels.
- To report to M.D. and keep him regularly updated on status of all vessel.
- To maintain all ship supplies, materials, spares, services, repairs or any other requirement within the guidelines approved by the M.D.
- To provide necessary support to Masters of all vessels for carrying out their duties.
- To monitor bunkers (F.O & D.O) and Lube Oil Consumptions of all vessels.
- Monitor performance and all machinery parameters via Noon Reports etc.
- Monitor Vessel's Quarterly Inspection Reports of all vessels and follow up as per company's guidelines.
- To have all details of repairs or any other major jobs from vessels using company's form **E-017** and compile list of major work(s) to be carried out by updating form **E-018**.
- To liaise with Technical Manager and prepare dry-docking budget well in advance.

3.3.3B JOB TITLE : MARINE SUPERINTENDENT



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ACCOUNTIBILITY : TECHNICAL MANAGER & MANAGING DIRECTOR
SUPERVISES : ALL VESSELS- MASTER/CH/ENG/ ON SHORE -TECH. ASST
QUALIFICATIONS : Chief Engineer or 2nd Engineer or equivalent degree from Marine university
Sea Experience at least 3 years
Good command in working language i.e. English.
Knowledge of dry docking, major conversions, major Afloat repairs
Good knowledge of survey requirements
Good working knowledge of computer

RESPONSIBILITIES & AUTHORITY

The **Marine Superintendent** is responsible for ensuring vessel compliance with regulatory requirements, safe and efficient cargo operations, crew competency, and overall deck and bridge management. Acting as the **primary liaison between the vessel and the company**, they ensure operational and safety standards are upheld.

- Monitor and maintain the validity of all flag state, classification society, and statutory certificates.
- Arrange timely surveys, audits, and renewals while ensuring compliance with IMO, SOLAS, MARPOL, ISM, ISPS, and MLC regulations.
- Prepare vessels for PSC inspections, flag state inspections, vetting inspections, and external audits.
- Ensure all cargo and statutory documentation, including logbooks and manuals, are in order.
- Provide technical and operational assistance for cargo handling, stability management, ballast operations, and cargo securing.
- Ensure proper cargo documentation, including bills of lading and manifests.
- Monitor deck maintenance, hull integrity, and weather-tight closures to maintain seaworthiness.
- Oversee maintenance of lifesaving, firefighting, and bridge navigational equipment, ensuring compliance with survey requirements.
- Conduct interviews and assessments for new officers and deck crew.
- Provide training on navigation, cargo handling, PSC preparedness, and emergency response.
- Arrange regular crew training sessions and ensure officers meet competency requirements.
- Conduct annual ship visits to assess crew performance, morale, and compliance.
- Act as the primary support contact for Masters on operational and regulatory matters.
- Ensure requisitions for deck stores, navigational charts, and essential supplies are properly vetted and delivered.
- Monitor vessel bunker and lube oil requisitions and consumption reports.
- Conduct annual ship visits and inspections to ensure compliance with operational standards.
- Verify navigational audits and passage plan adherence.
- Prepare vessels for PSC and other inspections, minimizing deficiencies.
- Ensure ISM, ISPS, and MLC compliance audits are successfully completed.
- Act as the primary liaison between the ship and office, ensuring efficient communication.



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- Monitor and review Noon Reports and provide management with regular updates on vessel operations.
- Submit reports on vessel visits, highlighting findings and corrective actions.
- To liaise with Technical Manager and prepare dry-docking budget well in advance.

3.3.4 JOB TITLE : QHSE MANAGER - DPA/CSO

ACCOUNTIBILITY : MANAGING DIRECTOR

QUALIFICATIONS : Master Mariner or bachelor's in quality management
Good Knowledge & Certified training Courses of ISM, ISPS Code (DPA/CSO/PFSO) & Integrated Management System Internal auditor course. (DPA-to be qualified as per MSC/MEPC.7/Circ.6)
If Master Mariner, then at least 4 years Sea experience.
If Bachelor in QM, then at least 3-year shore-based experience.
Good command in working language i.e. English.
Knowledge of Current shipping rules and regulations
Good knowledge of Health, Safety, Quality & Environment management
Good working knowledge of computer

RESPONSIBILITIES & AUTHORITY

- **Appointed as Designated Person Ashore (DPA) and Company's Security Officer (CSO) & by M.D.**
- Responsible to communicate directly to any authority on matter of Ships and organisation.
- To ensure the safe operation of each ship and to provide a link between the Company and those on board, every Company, as appropriate, should designate a person or persons ashore having direct access to the highest level of management. The responsibility and authority of the designated person or persons should include monitoring the safety and pollution prevention aspects of the operation of each ship and ensuring that adequate resources and shore-based support are applied, as required.
- Upgrading and maintaining Integrated manual (CMM)& SMS Manual as per latest international rules and regulations
- Evolving procedures to ensure that the QHSE management system is easily understood and implemented by shipboard staff
- Following up with all the QHSE related deficiencies
- Evolving procedures to ensure that the incidents do not re occur
- To train the crew on board
- To conduct ISM audit of each ship at least once every 12 months
- Upgrading and maintaining Ship Security manuals as CSO.
- To conduct audit for SSP effectiveness
- To follow up any P&I and H&M related cases under the guidance of M.D.



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- To ensure that all company ships meet Statutory and Regulatory requirements of appropriate National Authorities, International Regulatory bodies and Classification Societies. To ensure that Company ships have valid Certificates with Endorsements and undergo necessary Surveys as required. Furthermore, to monitor and implement applicable new Regulatory Requirements.
- To ensure that vessels maintain all safety related equipment's in good order with the support of technical depth
- To provide adequate support to shore staff to understand and follow ISM/ISO9001/14001 & OHSAS 18001 policy of company.
- To prepare office and ships for ISM / ISO audits and other external audits and help M.D.in Office
- To ensure necessary processes are established, implemented and maintained; report to executive management on how well the system is performing and what improvements are needed; and promote awareness throughout the company of the QMS and the customer requirements it was designed to meet.
- To ensure that an EMS compliant with ISO-14001 & OHSAS18001 requirements is implemented and maintained and must provide regular reports on its performance to executives, emphasizing continual improvement.
- To ensure that navigational standard is maintained on board vessel by regularly reviewing navigational practices/procedure and by adopting improve navigational practices, equipment, training & procedures.

To be contacted:

In case of any emergency relating safety, security and environment.

In case of any accident or any other incident resulting in 3rd party claims

3.3.5 JOB TITLE : HR EXECUTIVE

ACCOUNTIBLTY : OPERATIONS MANAGER/CREWING MANAGER/HR

QUALIFICATIONS : Graduate in any stream
Good command in working language i.e. English.
Good working knowledge of computer
Good understanding of crew's problems

RESPONSIBILITIES & AUTHORITY

- To screen the Crewing Agencies and appraise Ops. Manager of performance of Crewing Agencies
- To ensure that Crewing Agency is taking services of approved Doctors and Quality controlled laboratories
- To screen all the resumes sent by crewing agents
- To ensure that crew possess all the licenses as per STCW'2010 requirements and the certificates will remain valid for full term of crew's employment
- To ensure all crew are in good health prior joining vessel (As per ILO convention)
- To ensure that all crew are screened for banned drugs (as per OCIMF Guidelines) prior joining vessel



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- To ensure all new masters are pre-vetted by him over phone and approved by Ops Manager & M.D.
- To ensure All new Ch Engr's and 2nd Engr's are pre-vetted by Tech Suptd and approved by M.D.
- To maintain the personnel evaluation reports
- To ensure masters and chief engineers are briefed prior joining the vessel
- To monitor and control all aspects relating to Health/Medical on Board the vessel
- To ensure that seafarers get hygienic and balanced diet during their stay on board vessels
- To ensure that seafarers get habitable accommodation facilities as per ILO convention
- To ensure that enough entertainment material is supplied to seafarers

3.3.6 JOB TITLE : PURCHASE EXECUTIVE

ACCOUNTIBILITY : TECHNICAL MANAGER & SUPERINTENDENT

QUALIFICATIONS : Graduate or equivalent degree from university
Good command in working language i.e. English.
Knowledge of Shipping terms
Good working knowledge of computer
Knowledge of Purchase & Inventory module

RESPONSIBILITIES & AUTHORITY

- Ensuring that suppliers are vetted for their previous history prior accepting in company's system
- Ensures that all stores, spares requested by ships is processed adequately by taking more than one quotation
- Ensuring quality of stores as per company's standards
- Maintaining service records of various suppliers by getting feedback from ships and other clients
- Ensuring smooth connection of stores to vessels with support of operation department

3.3.7 JOB TITLE : ADMIN / EXECUTIVE SECRETARY

ACCOUNTIBILITY : M.D.

QUALIFICATIONS : Graduate degree from reputed university
Good command in working language i.e. English.
Knowledge of Shipping terms
Good Media management qualities
Good working knowledge of computer

RESPONSIBILITIES & AUTHORITY

- Provide logistic support to the office staff
- Arrange the hardware required for the office
- Arrange for frequent maintenance of office equipment's



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- Maintain dossier of individual employee which shall contain
 - Curriculum Vitae
 - Contract Letter
 - Passport copy
 - Annual performance monitoring reports by M.D.
- Arrange for health facilities of office staff
- Maintain good PR with clients

3.3.8 JOB TITLE : ACCOUNTS MANAGER

ACCOUNTIBILITY : M.D.

QUALIFICATIONS : C.A. or equivalent degree in commerce from university
Good command in working language i.e. English.
Knowledge of Shipping terms
Good working knowledge of computer
Good working knowledge of Tally Accounting software
Minimum 3yrs experience in accounts department

RESPONSIBILITIES & AUTHORITY

- Manage all matters relating to accounts of the Company within the guidelines provided by the MD.
- Manage matters relating to payment of Invoices for Supplies etc after final approval by the MD.
- Manage salary of Office staff and all seafarers on board company's fleet
- Manage Petty cash given to Executive Secretary and Technical Department
- Advise M.D. of Average Collection period and Average Payment Period, Debt Ratio, Return on Total Assets (ROA) of company and Net Profit Margin of the company

3.3.9 JOB TITLE : ACCOUNTS EXECUTIVE

ACCOUNTIBILITY : ACCOUNTS MANAGER

QUALIFICATIONS : Bachelor of Commerce or equivalent degree from university
Good command in working language i.e. English.
Knowledge of Shipping terms
Good working knowledge of computer
Good working knowledge of Tally software
Minimum 2yrs experience as accounts assistant

RESPONSIBILITIES & AUTHORITY

- Update all entries in Daily Journal
- Ensure Invoices/ delivery notes are in conformance with LPO raised by office



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- Prepare payment of Invoices for Supplies etc after final approval by the MD
- Prepare salary of Office staff and all seafarers on board company's fleet
- Notify Accounts manager of any discrepancies observed in any accounts

3.3.10 JOB TITLE : OPERATION/ MANNING EXECUTIVE

ACCOUNTIBILITY : OPERATIONS MANAGER/CREWING MANAGER/HR

QUALIFICATIONS_ : Graduate in any stream
Good command in working language i.e. English.
Knowledge of Shipping terms
Good working knowledge of computer
Good typing speed 45 – 50 wpm
Minimum 1-year experience as secretary

RESPONSIBILITIES & AUTHORITY

- To screen and short list suitable candidates for various categories onboard for selection/ interview by Manning Manager.
- To arrange supply of provisions and drinking water to all vessels under instructions from the Manning Manager.
- To appoint agents, arrange tugs, FW, bunkers, pilots etc. as instructed by the Operations Manager.
- To arrange for Medical visits for ships crew as directed by the Manning Manager.
- To keep proper records of all crew on board and on leave.
- To prepare and update proposed three monthly crew change list and submit same to the Manning Manager.
- To update crew-lists and ship's crew records as and when changes occur
- To ensure all joining crews have valid "Certificate of Competency" as per STCW'2010 convention for their rank, valid CDC and valid Passport. This validity should last till the end of the crew's contract period.
- To ensure all crew members sign their contract on joining vessel.
- To keep all files maintained in the Operations/ Manning Department (See CMM Appendix I)
- To make necessary arrangement for all ships and office staff flight booking under the guidance of the Manning Manager.

3.3.11 JOB TITLE : TECHNICAL ASSISTANT/COORDINATOR

ACCOUNTIBILITY : TECHNICAL MANAGER & SUPERINTENDENT

QUALIFICATIONS : Graduate in any stream
Good command in working language i.e. English.
Knowledge of Shipping terms



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Good working knowledge of computer
Good typing speed 45 – 50wpm
Minimum 1-year experience as secretary

RESPONSIBILITIES & AUTHORITY

- To maintain Technical Library including Plans/ drawings of all vessels.
- To work as directed by Technical Superintendent and provide him with the required logistic support during repairs etc. on vessels.
- To keep all files in the Technical Department (See CMM Appendix I) updated.
- To prepare Lube oil consumption record of all vessels
- To update Tech Spud with CLO and LO monitoring every week
- To advise Purchase department about any requirements of vessel
- To maintain Drydock records of vessels
- To update Technical Suptd about vessels' movements by reading through messages and advising him of any defects
- Compile the L.P.O.s for approval of M.D. Once M.D. approves the LPOs, same to be faxed to supplier.
- Once Invoice(s) are received, same to be attached to original LPO and presented to M.D. for approval. After M.D.'s approval, these invoices to be handed over to Accounts department.
- Assist Tech Suptd in paperwork
- Send messages to vessels as instructed by Tech Suptd.

3.3.12 JOB TITLE : QHSE EXECUTIVE

ACCOUNTIBILITY : QHSE Manager

QUALIFICATIONS : Graduate in any stream or shipping related education.
Good command in working language i.e. English.
Knowledge of Shipping terms
Good working knowledge of computer
Minimum 1-year experience as secretary

RESPONSIBILITY & AUTHORITY

1. Update of Ship's Certificates

1. Update all certs as per form **D-041**.
2. Contact the Classification society at least 15 days in advance after having informed QHSE Manager. Follow up with class and update them with ETA and contacts of Vessel & agent. Inform master of vessel also that survey will be carried out.
3. After the survey is completed, follow up with the surveyor and find out if any deficiencies observed.



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4. Inform concerned dep't and get evidentiary proof that the deficiencies have been removed. This documentary proof must be sent to the class.

5. Collect the certs from classification society(es).

6. Scan the certs and put in the correct folder in "QHSE Docs", copies to be kept in file "Tech-06"

7. Send original certs to the vessel with Advice of enclosure **D-042**

2. Update the list of Oil Major inspection

1. Makes Table of all ships showing date and place of Oil Major Inspection done. Expiry of SIRE reports is 6 months from last inspection date.

2. Send message to Oil Major for invitation of next vetting survey at least 15 days prior expiry of last inspection validity. (Inform QHSE Manager before sending the invitation).

3. Update Oil Major with ETA and contacts of Vessel & agent.

4. Scan and send this report to all depts. for their corrective action. Take the feedback from the dep't concerned. Update list of corrective action file.

5. After receipt of the SIRE report from Oil Major. Hand over same to QHSE Manager for uploading Operator's comments on SIRE.

6. Once, QHSE Manager has uploaded SIRE report with Company's comments.

3. Compile all deficiencies of vessels

1. Compile the photos of deficiencies from all vessels.

2. Give to QHSE Manager for comment

4. **Generate letter from QHSE** which will ensure that corrections to Company's manuals are properly done by all ships. Maintain the record of same.

5. Maintain all deficiencies in the File. At the end of each month, take comments from each concerned dep't against deficiency. Idea is to generate the database of deficiencies which will be helpful in disseminating the recurring problem area and management can take corrective action.

6. Maintain the record of Rest Hours. Check through some of samples to see for any violation of Rest Hours rules.

7. Remind non-compliant vessels to send all QHSE forms as per our Index list of Forms/ Checklist.

8. Renewal of P&I Blue card for all vessels.

9. Arrange mail folder of QHSE Manager in his absence.

10. Briefing/ Debriefing form shall be maintained for any Master/ Ch Engr.

3.4 Interrelation Matrix / Communication

3.4.1 Internal interrelation Ship/Office

Subject	QHSE	Tech. Dept	Operation / Manning	Purchase	Accounts
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H & M Damage	X	X	X		
Crew			X		
Medical/Injuries	X		X		
Distress/Peril	X	X	X		
Cargo			X		
Loading/Discharging			X		
Certificate and Class	X				
Maintenance		X			
Spare Parts		X		X	
Consumable		X	X	X	
Provision			X	X	
Bunkers			X	X	
Activity Plan (Tech, QHSE & Oprn)	X	X	X		
Budget		X	X	X	X
Claims, General	X		X		X
Cargo Claims	X		X		X
Security	X				
Safety	X				

Operation Department & QHSE Department will take control of both department in absence of either. In Technical Department “Superintendent” & “Technical Manager” will take control in absence of either. In Each department 2 or more persons has appointed, and one will be taking control in absence of other colleague.

When organization changes occur, those responsible for supervising or managing the function(s) undergoing change must be also responsible for clear and explicit reassignment of this accountability. And MOC procedure to be followed.

3.4.2 External interrelation Ship/Shore

Subject	Agent	Chrts	Port Auth.	Under Writers	RCC	Flag State	Class
H&M Damage	X	X	X	X		X	X
Crew, General	X						
Medical/ Injuries	X		X	X			
Distress/Peril	X				X		
Security	X		X		X	X	
Cargo, General	X	X					
Load/Discharge	X	X					
Certificates/ Class	X						X



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Maintenance, General	X						X
Spare Parts	X						
Consumables	X						
Provision	X						

Information	Internal Communication	External Communication
QHSE Impacts and Risks	QHSE Manager	QHSE Manager
Contractual Matters	Managing Director	Managing Director
Improvement Opportunities	QHSE Manager	QHSE Manager
Company News (Internal)	Admin Executive	Managing Director
Financial Information	Finance Manager	Managing Director
Performance Indicators	Technical manager	Managing Director
Incidents / Issues	QHSE Manager	QHSE Manager

3.5 General Policy

GLORY INTERNATIONAL FZ-LLC communicates all matters regarding the effectiveness of the QHSE systems to the entire organization. This includes QHSE requirements, objectives, and achievements as well as product and process performance.

3.5.1 Internal Communication

3.5.1.1 Communication of QHSE Information

Internal communication within **GLORY INTERNATIONAL FZ-LLC** regarding the **QHSE system** is carried out through:

- **CMM Manuals**
- **Procedures & Work Instructions**
- **Specifications**
- **QHSE Records & Reports**
- **On-the-job Training & Formal Instruction**
- **Quality & Safety-related Meetings**

3.5.1.2 Responsibilities for Internal Communication

- The **QHSE Manager** is responsible for:
 - Ensuring that **information about QHSE performance** and the **effectiveness of the QHSE system** is **reported to management**.



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- Coordinating the **distribution of all applicable documents, reports, and records** to appropriate functions.

3.5.1.3 Two-Way Communication Process

Internal communication within the company follows a **two-way approach**:

a) Management to Organization

Management communicates **QHSE policies and objectives** through:

- **QHSE Policy & Objectives**
- **Customer & Regulatory Requirements**
- **Service & Process Specifications**
- **Verification & Validation Requirements**
- **Instructions for Implementing & Using the QHSE System**

b) Organization to Management

The organization provides feedback to management on:

- **Customer satisfaction levels & expectations**
- **Service & process quality performance**
- **Opportunities for improvement**
- **Effectiveness of the QHSE system**
- **Operational concerns & HSE compliance updates**

3.5.2.0 Communication Meetings

3.5.2.1 Structured Meetings for QHSE Communication

- **4 monthly communication meetings** are conducted to ensure proper communication between management and the organization.
- These meetings allow the organization to **report on QHSE-related issues and activities** while management **reviews performance and formulates policies for improvement**.
- The **QHSE Manager** is responsible for coordinating structured communication meetings.

3.5.2.2 Management Reviews

- **Annual management review meetings** serve as a platform to:
 - Assess the **status of QHSE issues**.
 - Implement **policy directives for quality system improvements**.
 - Ensure **regulatory and customer compliance**.
- **Reference:** Management Review Procedure (**Annual Review**).

3.5.3.0 Customer Communication

3.5.3.1 Engagement with Ship Owners (Customers)

- The **QHSE Manager (DPA)** actively participates in **regular meetings with Ship Owners (customers)**.
- These meetings cover:
 - **Commercial & Operational Performance Indicators**
 - **HSE Critical Aspects**
 - **Regulatory & Compliance Updates**



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- Feedback Collection & Service Improvement

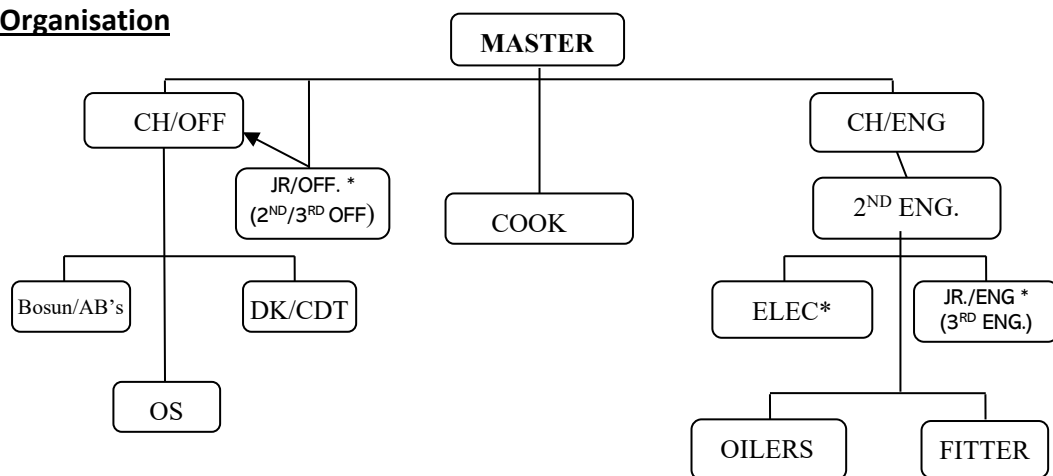
3.5.3.2 Customer Complaints & Resolution

- Zero customer complaints is a QHSE objective.
- Customer complaints are documented, investigated, followed up, and closed to ensure service improvement.
- Reference Forms:
 - SQM-O-007 (Customer Complaint Report)
 - SQM-O-008 (Complaint Investigation Form)
 - SQM-O-009 (Complaint Closure Report)

3.6 Organization Plan – Shore & Vessel

Organisational Plan & Chart as per Chapter 1 ,1.4 OFFICE ORGANIZATION

Vessel Organisation



* As Applicable.

The duties of the Master and Officers/Engineers are detailed in Shipboard Main Manual Chapter 2,3 and 4.

COMPLIANCE CHECKLIST – CONTINUAL COMMUNICATION



Internal Communication

- Ensure QHSE information is communicated via manuals, procedures, reports, and training.
- Verify that the QHSE Manager reports system effectiveness to management.
- Confirm two-way communication is in place between management and the organization.



Communication Meetings

- Conduct monthly QHSE communication meetings.
- Ensure annual management reviews address QHSE performance.
- Document meeting outcomes and implement necessary quality improvements.



Customer Communication & Feedback



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- ☐ Conduct **regular meetings with Ship Owners (customers)**.
- ☐ Ensure **customer complaints are documented, investigated, and resolved**.
- ☐ Maintain records using **SQM-O-007, SQM-O-008, and SQM-O-009**.

CHAPTER 04 – DESIGNATED PERSON ASHORE (DPA)

4.1 Appointment of Designated Person Ashore

- The **Board of Directors** of **GLORY INTERNATIONAL FZ-LLC** appoints the **Designated Person Ashore (DPA)**.
- The **QHSE Manager** has been designated as the **DPA** for **GLORY INTERNATIONAL FZ-LLC**.
- Contact details of the **DPA** are available in **Chapter 3, Section 3.2 – Contact Numbers of PT Staffs**.

4.2 Functions of the Designated Person

- The **DPA's job description** is detailed in **Chapter 3, Section 3.3.4** of this Manual.
- Responsibilities include:
 - **Ensuring effective implementation of the Safety Management System (SMS)**.
 - **Monitoring vessel operations to ensure compliance with safety regulations**.
 - **Serving as the key link between shore management and ship operations**.
 - **Providing guidance to shipboard personnel on safety and quality issues**.
 - **Ensuring proper reporting and follow-up on non-conformities, accidents, and near-misses**.

4.3 Provision of Resources

The **Managing Director (MD)** of **GLORY INTERNATIONAL FZ-LLC** is responsible for:

- **Providing adequate resources and shore-based support to the DPA**.
- **Ensuring financial, infrastructure, and personnel resources are available for DPA operations**.
- **Maintaining compliance with ISM Code requirements**.
- Refer to **Chapter 3, Section 3.3.1 – Responsibilities of MD** for additional details.

4.3.1 Commitment to Resource Allocation

GLORY INTERNATIONAL FZ-LLC is committed to providing:

1. **Sufficient resources to implement and enhance the quality system**.
2. **Support for customer satisfaction initiatives**.
3. **Adequate staffing, training, and equipment for the effective operation of the Safety Management System (SMS)**.



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4.4 General Resource Requirements

The required resources for **implementation and improvement** of the **quality system**, and for **enhancing customer satisfaction**, may include:

- **Suppliers**
- **Information systems**
- **Infrastructure**
- **Work environment**
- **Financial funds**

The **primary method** for **determining and communicating resource requirements** is through **management reviews of the quality system**.

Refer to the **Management Review Procedure** for detailed guidelines.

4.4.1 Responsibilities for Resource Determination

- The **QHSE Manager** and **all management personnel** impacted by the **Integrated Management System** are responsible for:
 - **Assessing resource needs** for system implementation and improvement.
 - **Ensuring adequate resource allocation** to meet **quality and customer satisfaction objectives**.

4.4.2 Provision of Resources

- **Top management** holds the **ultimate responsibility and authority** for the provision of resources.
- **Resources must be aligned with designated activities and integrated into process planning.**
- **Resource allocation must be aligned with specific activities**, which may include:
 - **Personnel assignments**
 - **Space or equipment allocation**
 - **Training initiatives**
 - **Procurement planning**
 - **Budgetary approvals**

The **allocation process** must be documented in:

- **Quality manuals**
- **Operational procedures**
- **Meeting minutes**
- **Memoranda or any other official documentation**
- **Verbal approvals for resource allocation must be formally recorded** for tracking and verification.

COMPLIANCE CHECKLIST – DESIGNATED PERSON ASHORE

✓ DPA Appointment & Responsibilities

- ☐ Ensure the **DPA is formally appointed by the Board of Directors**.
- ☐ Verify **DPA responsibilities align with Chapter 3, Section 3.3.4**.
- ☐ Maintain **current contact details of the DPA**.

✓ Provision of Resources for DPA

- ☐ Confirm **MD provides adequate shore-based support** for the DPA.
- ☐ Allocate **sufficient financial and logistical resources** to enable **effective safety management**.



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- ☐ Conduct **periodic evaluations of DPA resource adequacy.**

☒ **Quality System Resource Requirements**

- ☐ Ensure **the DPA has full access to company resources to implement safety policies.**
- ☐ Verify **training programs and operational procedures support the DPA's function.**
- ☐ Document **all resource allocation decisions for DPA functions.**

☒ **General Resource Management**

- ☐ Conduct **management reviews to assess resource needs.**
- ☐ Ensure **top management approves and provides necessary resources.**
- ☐ Maintain **proper records of resource allocation.**

☒ **Continuous Improvement**

- ☐ Monitor **effectiveness of allocated resources.**
- ☐ Adjust resource planning based on **management review feedback.**
- ☐ Align resource provision with **customer satisfaction and quality improvement goals.**



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CHAPTER 05 – MASTER’S RESPONSIBILITIES AND AUTHORITY

5.1 Master’s Overriding Authority

- The Master holds **ultimate authority** onboard the vessel.
- This authority is clearly stated in the **Statement of the Ultimate Authority of the Master** (Refer to Section 2.3 of this Manual).
- In any situation affecting safety, security, or environmental protection, the **Master’s decision is final**.

5.2 Implementation and Maintenance of the SQMS

The Master is responsible for ensuring compliance with the **Safety & Quality Management System (SQMS)** by:

- **Implementing** the Company’s **Safety and Environmental Protection Policy**.
- **Maintaining** and **enforcing** the policy.
- **Issuing clear and understandable orders** to the crew.
- **Verifying SQMS implementation** through routine checks.
- **Reviewing the SQMS** before the end of contract and submitting the **Master’s Review** to the office **at least one month before sign-off**.

Reference Documents:

- Responsibilities of Shipboard Personnel (Shipboard Safety Manual, Section 2.06.2)
- Master’s Duties & Responsibilities (Shipboard Main Manual, Chapters 2 & 3)

5.3 Master’s Verification Responsibilities – Check all the form numbers to correlate

The Master must verify that:

- The SQMS is being implemented effectively.
- Deficiencies are reported to shore-based management.
- The following records are maintained for verification:

Mandatory Verification Forms & Records

1. Safety Compliance:

- Safety Committee Meeting (Form D-001)
- Monthly Status of Critical Equipment (Form D-039)
- Yearly Planned Drill Schedule (Form D-014)
- On Board Drills Record – Annual (Form D-015A)
- Drill Report (Safety) (Form D-016A)
- Record of Safety Appliances (LSA/FFA Manuals)



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- Accident/Incident/Near Miss Report (Form D-005)
- Analysis of Incident, Accident, Injury (Form D-006B)

2. Work Permits & Crew Management:

- Work Permits: Hot Work (D-011A), Cold Work (D-011B), Enclosed Space Entry (D-012A)
- Personnel Evaluation (Form D-050A)
- Master's Review of SQMS (Form D-002)
- Initial Safety Familiarization (Form D-051A-D)
- Master's Hand Over (Form D-003)
- Crew Matrix (Form D-044)
- Working/Resting Hours (Form D-043)
- Unannounced Alcohol Test (Form D-045)

3. Operational Checks:

- Sea Passage Plan (Form D-009)
- Port Passage Plan (Form D-010)
- Arrival/Departure Checklists (Form D-058-1, D-058-2)
- Change of Bridge Watch (Form D-060)
- Compass Error Log (Form D-056)
- GPS Log (Form D-057)
- Ballast Space Monitoring (Form D-017A, D-017B)
- Ship's Certificates – Record of Validity (Form D-041)

4. Emergency & Safety Procedures:

- Master-Pilot Exchange (Form D-049)
- List of Port Emergency Contacts (Form D-046)
- Bridge Standing Orders
- Master's Night Orders

5.4 Additional Master's Responsibilities

- Ensure daily **Deck Log Book** verification to monitor vessel operations.
- The above **list is not exhaustive**, and additional checks may be required based on operational needs.

COMPLIANCE CHECKLIST – MASTER'S RESPONSIBILITIES

✓ Authority & Decision Making

- ☐ Confirm that the **Master's Overriding Authority** is upheld in all safety, security, and environmental matters.
- ☐ Review the **Statement of Ultimate Authority of the Master** (Manual Section 2.3) and ensure all senior officers acknowledge it.

✓ SQMS Implementation

- ☐ Implement the **Safety and Environmental Protection Policy** by issuing clear orders and ensuring crew understanding.
- ☐ Conduct a **monthly review of SQMS procedures**, documenting findings in the **Master's Review (Form D-002)**.



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- ☐ Issue **crew orders in writing** and verify comprehension through **daily briefings or toolbox talks**.
- ☐ Conduct a **random review of SQMS compliance** by checking crew adherence during operations.

✓ **Verification & Record-Keeping**

- ☐ Before sign-off, review the **SQMS** and submit the **Master's Review (Form D-002)** one month in advance.
- ☐ Conduct **Safety Committee Meetings** as per schedule, ensuring discussions are documented in **Form D-001**.
- ☐ Verify that all **work permits** (hot work, enclosed space entry, etc.) are completed and signed before work begins.
- ☐ Ensure **critical equipment status reports** (Form D-039) are up to date, cross-checking with engineers.
- ☐ Daily verify **Deck Log Book** entries to confirm operational compliance.

✓ **Crew & Operational Compliance**

- ☐ Conduct **Initial Safety Familiarization** for new crew members and ensure they sign off on the **Familiarization Forms (D-051A-D)**.
- ☐ Verify that **working/resting hours (Form D-043)** are being followed by cross-checking logs.
- ☐ Conduct **unannounced alcohol tests (Form D-045)** using an onboard breathalyzer and record results.

✓ **Incident & Emergency Preparedness**

- **Accident, Near Miss & Injury Analysis:**
 - ☐ **Step 1:** Gather all available incident reports (**Form D-005**).
 - ☐ **Step 2:** Interview involved crew and witnesses, documenting their statements.
 - ☐ **Step 3:** Review relevant safety procedures and work permits to identify lapses.
 - ☐ **Step 4:** Cross-check past incidents to identify repeated trends using **Form D-006B**.
 - ☐ **Step 5:** Prepare a **preventive action plan** and track implementation using **Form D-006A**.
- Conduct and record **all emergency drills:**
 - ☐ Verify entries in **Drill Report (D-016A & D-016B)**.
 - ☐ Ensure drills are recorded in the **Deck Log Book**.
 - ☐ Compare drill performance against **planned drill schedules (D-014)**.
- Maintain **Port Emergency Contact List (Form D-046)** and verify it is accessible in the bridge and engine room.



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CHAPTER 06 – HUMAN RESOURCE MANAGEMENT

6.1 Selection Criteria for Crewing Agents

To ensure efficient recruitment of seafarers, crewing agents must meet the following criteria:

- **Certification:** Must be certified by the local marine administration or an equivalent governmental authority.
- **Database:** Must maintain a large databank of certified and experienced seafarers.
- **Medical Compliance:**
 - Doctors used by the crewing agency must be **approved by local marine authorities**.
 - Medical laboratories used must also be **approved by the same authorities**.
- **Verification of Records:** If feasible, past records should be checked with at least **three clients**.
- **Performance Monitoring:**
 - The **Manning Manager** and **Managing Director (M.D.)** will assess performance based on the **evaluation of supplied seafarers**.
 - If deviations in qualifications occur, the **M.D. must take immediate remedial action**.
- **Annual Vetting:** Due to fleet size, annual vetting of crewing agencies is **not required**, but key ranks (Master, Chief Engineer, Chief Officer, AB, and Cook) are sourced from known pools.

6.2 Recruitment Procedure for Ship's Personnel

The **recruitment process** follows a structured workflow:

1. **Requirement Submission:** Personnel requirements sent from the company (PT) to the crewing agent.
2. **Crew Selection:**
 - The agent submits at least **three candidate CVs** per position.
 - All documents (certificates, passports, seaman book, yellow fever vaccination) must be **verified and authenticated**.
3. **Approval & Confirmation:**
 - The **Manning Manager**, in consultation with the **Technical Superintendent**, selects the most suitable candidate.
 - **Senior staff selection requires M.D. approval or Crewing manager along with a Marine/Technical Superintendent**.
4. **Medical Clearance:**



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- The selected candidate undergoes a **medical examination** through an approved medical facility.

5. Joining Process:

- **Master and Chief Engineer** join via **Dubai Office**, whenever feasible.
- **All other ranks join directly** on board.

6.3 Change of Crew

The **Master's Responsibility** before releasing an outgoing crew member:

- **Verification:**
 - Ensure **incoming crew** possess **valid certificates** and documents.
 - If any shortcomings exist, **report to the office** and **do not release outgoing crew** until resolved.
- **Familiarization:**
 - Provide **Initial Safety Familiarization (Form D-051A)** upon arrival.
 - Conduct a **safety tour** with a **delegated Safety Officer** using **Checklist D-051B**.

6.4 Briefing & Debriefing of Masters and Chief Engineers

- **Briefing:**
 - All joining **Masters and Chief Engineers** must be routed via **Dubai office** for **pre-joining briefings whenever feasible**.
 - They must meet each department for a **comprehensive vessel briefing**.
- **Debriefing:**
 - Whenever feasible, debriefing is conducted post-contract to gather insights for ISM system improvements.

6.5 Promotion Policy

- **Internal Promotion First:** Preference is given to **existing staff** before hiring externally.
- **Promotion Criteria:**

Chief Officer to Master:

- **Age:** Below **45 years**.
- **Experience:** Minimum **3 years as Chief Officer**.
- **Performance:** At least **4 positive appraisals** from Masters.
- **Recommendations:** Minimum **3 different superintendents**.

2nd Engineer to Chief Engineer:

- **Age:** Below **45 years**.
- **Experience:** Minimum **3 years as 2nd Engineer**.
- **Technical Competency:** Experience on similar engine types.
- **Performance:** At least **4 positive appraisals** from Masters/Chief Engineers.
- **Recommendations:** Minimum **3 different superintendents**.

- **Promotion Process:**

1. Manning Manager forwards recommendations to **M.D. for approval**.
2. Upon approval, **notification sent to vessels and staff**.



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3. The promoted officer joins as soon as a **vacancy arises**.
4. The **probation period** is **3 months**, with direct supervision and evaluation.
 - **Supervised Transition:**
 - The newly promoted **Master/Chief Engineer** will have a **10-day overlap** or **one full voyage under supervision**.
 - A **superintendent must audit the vessel** to ensure safe transition either remote or physical.

6.6 Performance Appraisals

- **Crew Appraisals:**
 - Conducted using **Form D-050A**.
 - **Master appraises deck crew**, and **Chief Engineer appraises engine crew**.
 - Appraisals must be **fair, unbiased, and documented**.
 - Reports are **sent to the office** and added to the seafarer's **personnel file**.
- **Master/Chief Engineer Appraisals:**
 - Evaluations based on **superintendent reports, PSC inspections, and vetting feedback**.
 - **Final appraisal approved by the M.D.**

6.7 Training & Certification

- **Mandatory Training:**
 - Compliance with **STCW'95** certification requirements.
 - Certification for all ranks must be **verified before joining**.
- **Onboard Training:**
 - Conducted through **practical training, videos, and company superintendents**.
 - **Junior officers trained by senior officers** for promotion readiness.

6.8 Fatigue Management

- **Rest Hours Policy:**
 - **Minimum 10 hours of rest in 24 hours**.
 - Rest can be split into **two periods**, with one being at least **6 hours**.
 - In exceptional cases, rest can be **reduced to 6 consecutive hours for 2 days**, provided **70 hours of rest** is taken per week.
- **Workload Planning:**
 - **Masters must plan crew workload in advance** to prevent fatigue.
 - **Emergency drills must be scheduled** without disrupting mandatory rest periods.

6.9 Drug & Alcohol Policy

- **Pre-Joining Test:** All seafarers must undergo **drug & alcohol tests** at an **approved laboratory** before joining.
- **Onboard Random Testing:**
 - **Monthly breathalyzer tests** for all crew, including the Master. **Refer for D-045**



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- **Post-incident alcohol tests** must be conducted.
- **Unannounced shore-based testing** at least **once per year**.

Details of Implementation of as per SMM Ch 9.7

COMPLIANCE CHECKLIST – HUMAN RESOURCE MANAGEMENT

✓ Crew Selection & Recruitment

- Verify that **crewing agents are certified** and have a **valid license**.
- Ensure **seafarer qualifications match company standards** before hiring.
- Conduct **background checks on crewing agents** where feasible.

✓ Crew Joining & Handover

- Ensure that new crew members hold valid certificates before release of outgoing crew.
- Conduct Initial Safety Familiarization (Form D-051A) for all joining crew.
- Perform safety tours using Checklist D-051B.

✓ Promotion & Appraisal

- Verify that **promotions follow the defined experience and performance criteria**.
- Ensure **probationary officers undergo a 10-day overlap** before assuming full command.
- Complete **crew performance appraisals (Form D-050A)** before sign-off.

✓ Training & Fatigue Management

- Ensure all crew possess **valid STCW'95 certifications**.
- Schedule **work/rest hours in compliance with IMO regulations**.
- Verify **crew training records and competency assessments**.

✓ Drug & Alcohol Compliance

- Conduct **pre-joining drug & alcohol tests**.
- Perform **monthly onboard breathalyzer tests**.
- Ensure **post-incident alcohol testing** is completed and recorded.



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CHAPTER 07 – SHIPBOARD OPERATIONS

7.1 Shipboard Operations Overview

All shipboard operations are conducted per the established procedures outlined in the following **manuals**:

1. **Shipboard Main Manual**

- This manual serves as a comprehensive guide for vessel operations, covering essential procedures, responsibilities, and safety protocols. It provides structured guidelines on navigation, engineering, communications, health procedures, and compliance with industry regulations. The objective is to ensure operational efficiency, safety, and regulatory adherence across all maritime activities.

2. **Shipboard Safety Manual**

- Provides detailed safety requirements and procedures for emergency preparedness, drills, and safety compliance.

7.2 Master's Responsibilities in Shipboard Operations

- **Deviations & Unforeseen Situations:**



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- If the Master encounters a situation **not covered** in routine operations, they must **immediately consult the Operations Manager**.
- If the issue involves **safety or pollution**, the Master must **urgently contact the Designated Person Ashore (DPA) and Company Security Officer (CSO)**.
- The Master's decisions must align with **safety, environmental, and operational policies** of the company.
- **Emergency Communication Protocol:**
 - In the event of an emergency, the Master must follow **company contingency procedures**.
 - The **Operations Manager (DPA/CSO) must be informed immediately** for further instructions.
 - The **Deck Log Book and relevant reports** must document all actions taken.

COMPLIANCE CHECKLIST – SHIPBOARD OPERATIONS

✓ General Operational Compliance

- Ensure all shipboard operations are conducted per **Shipboard Main Manual** and **Shipboard Safety Manual**.
- Verify that all officers and crew **understand and follow operational procedures**.

✓ Emergency Procedures & Decision Making

- In case of **uncertainty**, consult the **Operations Manager** for guidance.
- **Report all safety and pollution-related incidents** to the **DPA/CSO** without delay.
- Maintain **proper documentation** in the **Deck Log Book** for all shipboard operations.

✓ Safety & Environmental Considerations

- Follow **ISM Code guidelines** for **safe ship operations**.
- Ensure all crew comply with **safety and pollution prevention protocols**.

CHAPTER 08 – EMERGENCY PREPAREDNESS

8.1 Emergency Preparedness Overview

Emergency preparedness is critical to ensuring the safety of the crew, vessel, and environment. The company follows a structured approach through the following key manuals:

1. Shipboard Safety Manual

- **Chapter 4:** Procedures for Emergencies
- **Chapter 5:** Fire Onboard

2. Contingency Planning Manual

- Outlines the company's response strategy for emergencies, including procedures for fire, grounding, collision, flooding, and security threats.

3. SOPEP (Shipboard Oil Pollution Emergency Plan)

- **Flag State Approved**
- Contains procedures to follow in case of an oil spill or an environmental emergency.
- **Annex 2 (National Contact List) must be updated quarterly** (March, June, September, December).



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- The Master is responsible for ensuring that the **latest contact list is onboard**.

8.2 Emergency Response Actions

The Master must ensure that:

- **All crew are aware of their emergency duties and responsibilities.**
- **Drills and training are conducted regularly** as per the Safety Drill Schedule.
- **Emergency plans and contingency procedures are available on board** and accessible at all times.

8.3 Emergency Drills and Exercises

To maintain preparedness, the following drills must be conducted as per the company's schedule:

Mandatory Drills:

1. **Fire Drill** – Monthly (as per SOLAS requirements)
2. **Abandon Ship Drill** – Monthly
3. **Oil Spill Response Drill** – Every 3 months
4. **Man Overboard Drill** – Every 3 months
5. **Enclosed Space Entry Drill** – Every 2 months
6. **Emergency Steering Drill** – Every 3 months
7. **Security Drill** – As per ISPS requirements

All drills must be **documented** in the **Deck Log Book** and **Drill Report Forms (D-016A & D-016B)**.

8.4 Responsibilities of Key Personnel in Emergencies

- **Master:**
 - Takes command in an emergency.
 - Activates the emergency response plan.
 - Communicates with shore-based management, authorities, and rescue services.
 - Ensures drills are conducted and recorded.
- **Chief Officer:**
 - Leads emergency teams.
 - Ensures all emergency equipment is operational.
 - Conducts crew training sessions on emergency procedures.
- **Chief Engineer:**
 - Manages machinery during emergencies.
 - Ensures emergency generators, fire pumps, and bilge pumps are ready for use.
 - Reports equipment failures to the Master immediately.
- **All Crew:**
 - Must be familiar with emergency roles assigned in the **Muster List**.
 - Must attend all emergency drills and training sessions.

8.5 Emergency Equipment Readiness

The Master must ensure that:



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- **All fire extinguishers, fire pumps, and emergency generators are inspected as per schedule.**
- **Lifeboats and liferafts are serviced and ready for immediate deployment.**
- **Emergency escape breathing devices (EEBDs) and lifejackets are in their designated locations and in good condition.**
- **GMDSS emergency communication equipment is functional and tested regularly.**

8.6 Pollution Prevention Readiness

- **The SOPEP Plan must be accessible and up to date.**
- **The SOPEP equipment inventory must be complete and functional.**
- **All crew must be trained in the use of oil spill containment equipment.**
- **The National Contact List (Annex 2 of SOPEP) must be reviewed every quarter.**
- **Any oil pollution incident must be reported immediately as per SOPEP procedures.**

COMPLIANCE CHECKLIST – EMERGENCY PREPAREDNESS



Emergency Manuals & Plans

- ☐ Ensure that the **Shipboard Safety Manual, Contingency Planning Manual, and SOPEP Plan** are onboard and accessible.
- ☐ Confirm that the **SOPEP National Contact List** is updated quarterly.



Drills & Training

- ☐ Conduct **all required emergency drills** as per the company schedule.
- ☐ Record all drills in the **Deck Log Book and Drill Reports (D-016A & D-016B)**.
- ☐ Ensure all crew members **understand their emergency roles as per the Muster List**.



Emergency Equipment Readiness

- ☐ Conduct **regular inspections of firefighting and lifesaving equipment**.
- ☐ Verify that **emergency generators and fire pumps are operational**.
- ☐ Ensure that **lifeboats and liferafts are fully operational and inspected**.



Pollution Prevention

- ☐ Ensure that the **SOPEP Plan and oil spill response procedures are understood by key personnel**.
- ☐ Verify that **SOPEP equipment is available, functional, and ready for use**.
- ☐ Report any oil spills immediately as per SOPEP guidelines.



Communication & Response

- ☐ Ensure the **Master contacts shore-based management (DPA/CSO) immediately in emergencies**.
- ☐ Confirm that all **emergency contact numbers are up to date**.
- ☐ Test the **GMDSS emergency communication equipment regularly**.



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CHAPTER 09 – ANALYSIS OF NON-CONFORMITIES, ACCIDENTS & HAZARDOUS OCCURRENCES

9.1 Reporting & Analysis of Non-Conformities, Accidents & Hazardous Occurrences

All **non-conformities, accidents, and hazardous occurrences** must be:

1. **Reported** to the company.
2. **Investigated** to determine root causes.
3. **Analyzed** to prevent recurrence.
4. **Corrective actions implemented** across the fleet.

Sources of Non-Conformities & Incidents:

- **Internal Reports:**
 - Employee proposals
 - Safety audits
 - Safety committee meetings
 - Docking reports
- **External Reports:**
 - Cargo surveyors
 - Classification societies
 - National and international authorities

9.2 Reporting Procedures

9.2.1 Responsibility for Reporting

- **Master & Officers:**
 - Responsible for **reporting all incidents and non-conformities**.
 - Reports must be submitted using:
 - **Form D-005** (Failure, Accident, Incident, Near Miss Report).
 - **Form D-007B** (Non-Conformity Report).
- **Crew Members:**
 - Must report all near misses or unsafe conditions.
 - May submit reports anonymously via the **Near Miss Reporting Box** on board.
- **Company S&Q Manager:**
 - Receives all reports.
 - Reviews and categorizes incidents.
 - Ensures corrective action is implemented.

9.3 Investigation & Analysis Procedures

All incidents and non-conformities must be **analyzed for root causes** using the following structured approach:

Step 1: Initial Investigation

- **Master & Safety Committee** conduct a **preliminary analysis** onboard.
- **Collect all evidence**, including:
 - Crew statements
 - Logbook entries



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- Work permits
- Equipment records
- CCTV footage (if available)

- **Determine Immediate Cause:** Identify the direct reason the incident occurred.

Step 2: Root Cause Analysis

If the incident is significant, the company's **S&Q Department** or a **Superintendent Team** will conduct a detailed investigation, including:

- **Interviews** with involved crew.
- **Review of procedural failures** (if any).
- **Comparison with past incidents** to identify trends.
- **Use of Formal Root Cause Analysis Methods**, such as:
 - **5-Whys Analysis**
 - **Fault Tree Analysis (FTA)**
 - **Bowtie Risk Assessment**

Step 3: Implementation of Corrective Action

- Corrective action must be documented in **Form D-006A** (Preventive Action Report).
- Any changes to operational procedures must be **communicated to the fleet**.
- If the incident is **serious**, an immediate **fleet-wide training session** is to be conducted.

9.4 Follow-Up & Verification

- **All corrective actions must be verified** during the next **internal audit**.
- The **effectiveness of corrective actions must be assessed** during shipboard inspections.
- The **S&Q Manager and Superintendent** will confirm whether:
 - Crew training has been conducted.
 - Changes in procedures are implemented.
 - Similar incidents are prevented.

9.5 No-Blame Culture & Encouraging Reporting

To ensure full compliance and encourage proactive reporting:

- **The company follows a NO BLAME POLICY.**
- Reports should focus on **learning and improvement, NOT punishment**.
- Near Miss Reports can be **submitted anonymously**.
- Masters must conduct regular **Safety Meetings** to encourage reporting.

COMPLIANCE CHECKLIST – INCIDENT REPORTING & ANALYSIS

✓ Incident & Non-Conformity Reporting

- Ensure **all non-conformities and incidents** are reported using **Form D-005 (Incident Report)** or **D-007B (Non-Conformity Report)**.
- Encourage crew members to report **near misses** using the **Near Miss Reporting Box**.
- Ensure **all reports are sent to the S&Q Manager** without delay.



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✓ Investigation & Analysis

- ☐ Conduct an **immediate preliminary investigation** onboard and collect evidence.
- ☐ Determine **immediate cause** using **crew statements, logbook entries, and equipment records**.
- ☐ Conduct a **root cause analysis using structured methods** (5-Whys, FTA, Bowtie Risk).
- ☐ Submit investigation findings using **Form D-006A (Preventive Action Report)**.

✓ Corrective Action Implementation

- ☐ Implement **corrective actions** as per investigation findings.
- ☐ Ensure **affected procedures are updated and communicated to all vessels**.
- ☐ Conduct **fleet-wide training if required**.

✓ Follow-Up & Verification

- ☐ Conduct a **review during the next internal audit** to verify corrective action effectiveness.
- ☐ Ensure **Safety & Quality Manager reviews past incidents for trends**.
- ☐ Confirm all **safety meetings include a review of past incidents**.

✓ Encouraging a No-Blame Culture

- ☐ Ensure Masters **encourage near-miss reporting** during Safety Meetings.
- ☐ Allow crew to submit reports **anonymously without fear of retribution**.
- ☐ Promote **learning from incidents instead of assigning blame**.

CHAPTER 10 – MAINTENANCE OF SHIP & EQUIPMENT

10.1 Ship Maintenance Policy

The company maintains a **structured Planned Maintenance System (PMS)** to ensure the vessel's compliance with:

1. **Regulatory requirements** (SOLAS, MARPOL, Flag State, and Class Rules).
2. **Manufacturer's recommendations**.
3. **Company-specific policies**.

The **Chief Engineer** is responsible for:

- Maintaining the **PMS software** and ensuring it is **up to date**.
- Assigning **engineers/officers** specific machinery/equipment for maintenance.
- Ensuring that **spare parts are available** and requesting replacements in advance.
- Submitting a **monthly maintenance status report** to the office.

10.2 Inspection & Reporting

The company mandates **periodic inspections** to ensure the vessel is maintained in a safe and operational condition.

10.2.1 Technical Inspections

- **Internal Inspections:**
 - The vessel must undergo a **quarterly inspection by the Technical Superintendent**.
 - Any **deficiencies requiring external repairs** must be recorded in **Form O-01**.



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- Copies of the inspection reports must be **sent to the office** and retained on board.
- **Ballast & Cargo Tank Inspections:**
 - The **Master or Chief Officer** must **inspect at least one ballast tank per month**.
 - Each ballast tank must be inspected **at least once per tenure**.
 - The inspection must cover **structural conditions, joints, frames, ladders, valves, and mud/sludge accumulation**.
 - **All findings must be recorded in Form D-017B** and summarized in **Form D-017A**.

10.3 Critical Equipment & Machinery

The company maintains a **list of critical equipment**, defined as:

- Machinery whose **failure may cause harm to the vessel, crew, or environment**.
- Equipment **required for emergency operations**.

10.3.1 Risk Assessment for Critical Equipment

Before **shutting down** any critical equipment, the **Master and Chief Engineer** must:

- **Assess the risks** using the company's **Risk Assessment Checklist**.
- **Confirm standby equipment** is operational.
- **Notify the Technical Superintendent** if shore assistance is needed.
- **Ensure proper documentation** in PMS & logbooks.

10.3.2 Regular Testing of Standby Equipment

- **Emergency generators, fire pumps, steering gear, and backup navigation equipment** must be tested as per the **maintenance schedule**.
- **Any failure must be reported immediately**.

10.4 Drydock Maintenance

All **Masters and Chief Engineers** must maintain a **"Dry Dock Items" file (TECH 05)**, detailing:

- All **defects and maintenance work** required during the next drydock.
- **Drawings, sketches, and work scope descriptions**.
- Drydock list updates **every three months** (March 31, June 30, September 30, December 31).

Each defect report must follow the numbering system:

- **Deck Issues: D/DQ/01/Date**
- **Engine Issues: M/DQ/01/Date**
- **Electrical Issues: E/DQ/01/Date**
- **Other Issues: O/DQ/01/Date**

10.5 Spare Parts & Inventory Management

- The **Chief Engineer** must **maintain an updated inventory** of spare parts.
- The **minimum spare stock level** must **comply with the manufacturer's recommendations**.
- Requisitions for spare parts must be **submitted in advance** to prevent shortages.
- The **inventory must be reviewed every six months**.



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COMPLIANCE CHECKLIST – SHIP & EQUIPMENT MAINTENANCE

✓ Planned Maintenance System (PMS)

- ☐ Ensure **PMS software is updated and all maintenance records are logged.**
- ☐ Assign **engineers/officers specific machinery/equipment for maintenance.**
- ☐ Submit a **monthly maintenance report** to the office.

✓ Inspections & Reporting

- ☐ Conduct **quarterly inspections** and submit **Form O-01** to the office.
- ☐ Ensure **ballast tank inspections** are conducted monthly and recorded in **Form D-017B.**
- ☐ Maintain a **summary of tank inspections** using **Form D-017A.**

✓ Critical Equipment & Machinery

- ☐ Maintain an **updated list of critical equipment** and ensure its readiness.
- ☐ Conduct **risk assessment before shutting down critical equipment.**
- ☐ Regularly **test emergency generators, fire pumps, and steering gear.**

✓ Drydock Maintenance

- ☐ Maintain and update the **Drydock Items file (TECH 05)** every three months.
- ☐ Ensure **all defect reports follow the prescribed numbering system.**

✓ Spare Parts & Inventory

- ☐ Keep an **updated inventory of spare parts** and ensure stock levels meet requirements.
- ☐ Submit **requisitions for critical spare parts well in advance.**

CHAPTER 11 – DOCUMENTATION

11.1 Controlled Documents on Board

Each vessel must maintain **one copy** of the following **controlled manuals** in a **designated ship's library**:

1. **Company Main Manual**
2. **Shipboard Main Manual**
3. **Shipboard Safety Manual**
4. **Contingency Planning Manual**
5. **Company's Forms and Checklists Manual**
6. **SOPEP (Shipboard Oil Pollution Emergency Plan)**
7. **Safety Training Manual**

The **Master is responsible** for ensuring these documents are **easily accessible to the crew.**

11.2 Document Control & Updates

- **Updates to manuals** will be issued from the **office by the Safety & Quality (S&Q) Manager.**
- Changes must be documented in the **Document Serial Correction Sheet** at the beginning of each manual.
- **Changes must be clearly identifiable**, marked with an **asterisk (*)** at the revised section.

Master's Responsibilities



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- **On receipt of updates**, the Master must:
 - Insert the new page into the respective manual.
 - Remove and **destroy obsolete pages**.
 - Ensure updates are **communicated to relevant crew**.
- **The Master must NOT modify or alter any controlled document** without approval from the office.

11.3 Distribution & Accessibility

11.3.1 Document Holders

Controlled ISM manuals are distributed as follows:

Holder Copy Type

Office (HQ) **Master Copy**

All vessels **Original Copy**

11.3.2 Accessibility

- **Controlled documents must be stored in a designated, secured cupboard.**
- The Master must **encourage all crew members to use these documents** for reference.
- The **Attending Superintendent must verify the availability** of these documents during ship visits.

COMPLIANCE CHECKLIST – DOCUMENTATION

- ✓ **Document Availability**
 - Ensure **all controlled manuals** (Company Manual, Safety Manual, SOPEP, etc.) are present onboard.
 - Verify **documents are stored in a designated ship's library**.
- ✓ **Document Updates**
 - Confirm all **manual updates are incorporated immediately upon receipt**.
 - Destroy **obsolete pages and update the Document Serial Correction Sheet**.
 - Mark updated sections with an **asterisk (*)**.
- ✓ **Distribution & Verification**
 - Ensure the **Master's copy is available on all vessels**.
 - Check that the **Master does not alter any document without office approval**.
 - Verify controlled documents **during shipboard visits**.

CHAPTER 12 – COMPANY VERIFICATION, REVIEW & EVALUATION

12.1 Internal Audits & Company Verification

The company must **conduct internal audits** to verify whether **quality, health & safety, and pollution-prevention activities** comply with the **Safety Management System (SMS) and Integrated System**.

- **QHSE Manager (DPA) or designated personnel** must conduct internal audits **at least once every 12 months**.



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- In **exceptional cases**, this interval **may be extended by a maximum of 3 months** due to operational commitments.
- **Audit reports must be completed within 3 days** of the audit.
- **Ship Performance Index (SPI) 001-008** must be evaluated **every 6 months**, with quarterly reviews during managerial meetings.
- **Department heads must conduct internal audits of their own departments annually.**
- **All vessels must undergo an inspection every 3 months** by the Superintendent using **Form O-001**.

12.1.1 Onboard Inspections

- A **formal safety meeting must be conducted** with officers and crew during every visit.
- **Superintendents must sail with the vessel at least once a year.**
- The **Marine Superintendent must conduct a Navigation Audit annually** during a sailing visit.
- The **Technical Superintendent must inspect machinery, maintenance records, and operational readiness annually.**
- **External auditors may be invited for navigational audits.**

12.2 Management Review

The **management conducts an annual review** of the Integrated System each **December**, assessing:

- **Adequacy and effectiveness** of the system.
- **Potential improvements.**
- **Compliance with safety and quality objectives.**

12.3 Evaluation Criteria for SMS & Integrated System

The **QHSE Manager evaluates**:

- **Policies & Objectives**: Compliance with company goals.
- **Audit Non-Conformities**: Findings from internal/external audits.
- **Incident Analysis**: Accidents, near-misses, and hazardous occurrences.
- **Procedural Effectiveness**: Reviewing checklists, instructions, and compliance.
- **Regulatory Updates**: Adjustments for new laws, fleet changes, or operational shifts.
- **Risk Assessment**: Evaluating hazards and preventive measures.

Findings and recommendations must be documented, and **action plans must be submitted for approval.**

12.4 Corrective Actions & Non-Conformity Management

- **Any non-conformity (NCR) raised during an internal audit must be followed up and closed** using **Form D-007A**.
- **Audit personnel must be independent** of the audited department.
- The **QHSE Manager must communicate audit findings to ship and shore personnel.**
- All **pending NCRs must be tracked** and closed within an approved timeframe.
- **Vessel Superintendents must issue an inspection report during every visit, and a copy must be provided to the Master and Chief Engineer.**



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12.5 Audit & Inspection Frequency

- **Quarterly Technical Inspections** (Form O-001).
- **Annual QHSE Department Audit** (Form O-000).
- **Annual Security Audit by QHSE Manager** (Form O-002).

12.6 Risk Assessment Policy

The company follows ISM objectives to:

- Ensure **safe ship operations and a safe working environment**.
- Establish **safeguards against identified risks**.
- **Prepare for emergencies**.
- **Comply with all legal requirements**.

Risk management includes:

1. **Identifying hazards**.
2. **Assessing risks** to people, the environment, and operations.
3. **Evaluating and implementing preventive measures**.

Mandatory Risk Assessments:

- **Hot Work Permits**.
- **Enclosed Space Entry**.
- **Machinery Overhauls & Major Maintenance**.
- **Bunkering & Cargo Operations**.
- **Emergency Preparedness**.

All risk assessments must be reviewed and approved by the office before execution.

12.7 Classification of Risks

Risk categories:

1. **People** – Workplace safety, potential injuries, health hazards.
2. **Environment** – Pollution, spills, waste management.
3. **Property & Process** – Equipment failure, machinery breakdowns.
4. **Business Risks** – Reputational risks, regulatory compliance.

12.7.1 Determining Risk Severity

Risk severity is assessed using a matrix:

- **Very Likely** (Frequent occurrence).
- **Likely** (Occurs every few years).
- **Possible** (Rare but plausible).
- **Unlikely** (Highly unlikely but possible).
- **Rare** (Extremely unlikely).

12.8 Risk Control & Preventive Measures

- **Implement controls:**
 - **Eliminate hazards** if possible.



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- **Reduce risk exposure** through engineering and procedural controls.
- **Ensure personnel competency and training.**
- **Enforce proper use of PPE and emergency protocols.**
- **Review risk assessments periodically:**
 - **Whenever there is a change in operations, equipment, or personnel.**
 - **Before high-risk tasks** (e.g., enclosed space entry, bunkering, heavy lifting).
 - **After an incident or near-miss.**

12.9 Internal Audit Checklists

The **SQMS-O-002 Checklist** is used to verify:

- **Audit follow-ups and corrective actions.**
- **Non-conformity closures.**
- **Risk assessment adequacy.**
- **Operational compliance.**

12.10 Measurement, Analysis & Improvement

The company must:

- **Monitor internal processes for efficiency.**
- **Use statistical techniques to analyze data trends.**
- **Assess customer feedback, complaints, and satisfaction surveys.**
- **Track repeat business and market performance.**

12.11 Continual Improvement Policy

- **All managers must drive continual improvement in their departments.**
- **Improvement goals must be reviewed during management meetings.**
- **Customer complaints and feedback must be analyzed for service improvements.**

12.12 Internal Audit Procedures

- **Every area must be audited at least once per year.**
- **Audits must be conducted by independent personnel.**
- **Audit findings must be documented** and discussed at management review meetings.
- **Corrective actions must be followed up and verified.**

COMPLIANCE CHECKLIST – COMPANY VERIFICATION & REVIEW

☒ **Internal Audits & Verification**

- ☐ Conduct **annual internal audits** and close NCRs within the set timeline.
- ☐ Ensure **Superintendents conduct ship inspections every 3 months.**
- ☐ Verify **audit follow-ups and corrective actions using Form D-007A.**

☒ **Management Review & Evaluation**

- ☐ Conduct **annual management reviews** and document findings.



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- ☐ Evaluate **policies, objectives, and regulatory compliance.**
- ☐ Assess **incident reports, audit results, and procedural effectiveness.**

☒ **Risk Management & Preventive Measures**

- ☐ Conduct **mandatory risk assessments** before critical operations.
- ☐ Implement **preventive measures to minimize hazards.**
- ☐ Review **risk assessments when there are changes in operations.**

☒ **Continual Improvement & Corrective Actions**

- ☐ Identify **areas for process and system improvement.**
- ☐ Use **customer feedback and complaints for quality enhancement.**
- ☐ Ensure **all corrective actions are effectively implemented and verified.**

☒ **Audit & Inspection Compliance**

- ☐ Conduct **quarterly technical inspections (Form O-001).**
- ☐ Perform **annual QHSE and security audits.**
- ☐ Track **NCR closures and pending corrective actions.**

CHAPTER 13 – SAFETY & SECURITY REPORTING AND INVESTIGATIONS

13.1 General Policy

The company mandates **immediate and transparent reporting** of all **safety, security, and operational incidents**. The objective is to:

- Ensure **timely response and corrective actions.**
- Prevent recurrence through **root cause analysis.**
- Maintain **regulatory compliance** with the ISM Code, ISPS Code, and SOLAS.

All incidents, whether **minor, major, or near-misses**, must be reported **without delay** to the **Designated Person Ashore (DPA)** and **Company Security Officer (CSO)**.

13.2 Reporting Responsibilities

13.2.1 Master's Duties

The **Master is responsible** for:

- Ensuring **all crew members report incidents** as per company policy.
- **Initiating emergency response** when required.
- Submitting reports to the **office within 24 hours** of an incident.

13.2.2 Crew Responsibilities

- Any **crew member witnessing an incident** must **immediately report** it to the Duty Officer.
- If the **Duty Officer is unavailable**, the report must be made **directly to the Master.**
- Anonymous reporting is permitted for **security threats or concerns.**

13.3 Incident Classification

All incidents are categorized as follows:



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1. Personal Injury

- Fatality
- Lost Time Injury (LTI)
- Restricted Work Case (RWC)
- Medical Treatment Case (MTC)
- First Aid Case (FAC)

2. Environmental Incidents

- Oil spills
- Garbage/wastewater discharge violations
- Chemical leaks

3. Security Incidents

- Unauthorized access
- Piracy threats
- Suspicious activity onboard

4. Navigational Incidents

- Grounding
- Collision/allision
- Near-miss navigational hazards

5. Machinery & Equipment Failure

- Critical system failure (e.g., steering gear, main engine)
- Power loss incidents
- Fire suppression system failure

6. Fire & Explosion

- Electrical fire
- Fuel or chemical explosion
- Galley fire

7. Near Misses

- Unsafe conditions or actions that **could have resulted in an incident.**

13.4 Reporting Procedures

13.4.1 Initial Incident Reporting

- **All incidents must be reported within 24 hours** using **Form D-005 (Incident Report).**
- The **Master must notify the company immediately** for **major incidents.**

13.4.2 Near Miss & Hazardous Condition Reporting

- Near misses must be recorded using **Form D-007B (Near Miss Report).**
- The Master must **discuss near misses during safety meetings.**

13.4.3 Security Incident Reporting

- The **Ship Security Officer (SSO) must report** all security incidents to the **CSO.**
- If necessary, the **Master must notify port authorities and coastal states.**



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13.4.4 External Authorities Notification

For incidents involving:

- **Oil spills** – Notify **local authorities, port control, and MARPOL contact points**.
- **Serious injuries/fatalities** – Notify **Flag State and Port Authorities**.
- **Security threats** – Report as per **ISPS Code regulations**.

13.5 Investigation Procedures

13.5.1 Root Cause Analysis Process

The company follows a **structured approach** to incident investigations:

1. **Step 1 – Initial Response**
 - Secure the area and provide medical aid if required.
 - Preserve evidence (e.g., CCTV footage, logs, equipment records).
2. **Step 2 – Data Collection**
 - Interview witnesses.
 - Review logbooks, work permits, and operational records.
3. **Step 3 – Root Cause Analysis**
 - Apply **5-Why Analysis** or **Bowtie Methodology**.
 - Identify **systemic failures** contributing to the incident.
4. **Step 4 – Corrective & Preventive Actions**
 - Implement **immediate corrective actions**.
 - Assign **long-term preventive measures** to avoid recurrence.
5. **Step 5 – Verification & Audit**
 - The **QHSE Manager** verifies corrective action completion.
 - Findings are discussed during **management review meetings**.

13.6 Confidentiality & No-Blame Culture

- The company follows a **No-Blame Policy** to encourage open reporting.
- **Anonymous reporting channels are available** for security and safety concerns.
- Investigation results must focus on **learning and prevention**, not punishment.

COMPLIANCE CHECKLIST – SAFETY & SECURITY REPORTING

- ✓ **Incident & Near Miss Reporting**
 - Ensure **all crew members report incidents** as per procedure.
 - Submit **Form D-005 (Incident Report)** within **24 hours**.
 - Record **near misses using Form D-007B** and discuss them in safety meetings.
- ✓ **Investigation & Root Cause Analysis**
 - Conduct a **structured Root Cause Analysis** for all major incidents.
 - Preserve **evidence (CCTV, logs, work permits)** during investigations.
 - Implement **corrective actions** based on investigation findings.
- ✓ **Security Incident Compliance**



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- ☐ Report **security threats to the CSO and local authorities** as required.
- ☐ Follow **ISPS Code procedures** for unauthorized access incidents.
- ☒ **Environmental & Navigational Incident Compliance**
 - ☐ Report **oil spills and environmental violations** immediately.
 - ☐ Conduct **navigational incident investigations** using voyage data recorders (VDR).
- ☒ **Training & Continuous Improvement**
 - ☐ Ensure all officers are **trained in incident reporting procedures**.
 - ☐ Conduct **regular drills on emergency reporting**.
 - ☐ Review **incident trends in quarterly management meetings**.

CHAPTER 14 – EMERGENCY PREPAREDNESS AND RESPONSE

14.1 General Policy

The company is committed to ensuring the **safety of crew, vessel, and environment** by establishing a structured **Emergency Preparedness and Response Plan (EPRP)**. This plan aligns with the ISM Code, SOLAS, and other international conventions, ensuring a **prompt, effective, and coordinated response** to emergencies.

14.2 Types of Emergencies Covered

The EPRP addresses the following types of emergencies:

1. **Fire and Explosion**
2. **Man Overboard**
3. **Collision and Grounding**
4. **Oil Spills and Environmental Incidents**
5. **Piracy and Armed Robbery**
6. **Medical Emergencies**
7. **Abandon Ship**
8. **Machinery Failure**
9. **Flooding**
10. **Security Threats**

14.3 Emergency Response Organization

- **Master:** Overall in charge; initiates emergency response and coordinates with shore-based management.
- **Chief Officer:** Leads emergency teams on deck.
- **Chief Engineer:** Manages engine room emergencies.
- **Ship Security Officer (SSO):** Handles security incidents and piracy threats.
- **Safety Officer:** Ensures crew compliance with emergency procedures.



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14.4 Emergency Procedures

14.4.1 Fire and Explosion

- **Immediate Actions:**
 - Sound the general alarm.
 - Muster crew as per the Emergency Station Bill.
 - Isolate the source of fire (fuel, electricity).
 - Activate fixed firefighting systems (e.g., CO2, foam).
- **Follow-up Actions:**
 - Contact shore-based management.
 - Record details in the Deck Log Book.

14.4.2 Man Overboard

- **Immediate Actions:**
 - Sound the Man Overboard alarm.
 - Mark the position on GPS.
 - Deploy life ring and visual aids (smoke, flares).
 - Initiate recovery maneuver (Williamson Turn or Anderson Turn).
- **Follow-up Actions:**
 - Inform authorities if the person is not recovered.
 - Conduct debrief and log the incident.

14.4.3 Collision and Grounding

- **Immediate Actions:**
 - Sound the collision alarm.
 - Secure watertight compartments.
 - Assess damage and risk of pollution.
- **Follow-up Actions:**
 - Notify coastal authorities and company DPA.
 - Prepare for possible evacuation.

14.4.4 Oil Spills

- **Immediate Actions:**
 - Sound the environmental alarm.
 - Initiate the SOPEP Plan.
 - Deploy oil containment booms.
- **Follow-up Actions:**
 - Inform port authorities and local response units.
 - Document the spill and response actions.

14.4.5 Piracy and Armed Robbery

- **Immediate Actions:**
 - Sound the security alarm.
 - Muster crew in a safe area.
 - Activate Ship Security Alert System (SSAS).



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- **Follow-up Actions:**

- Maintain communication with authorities.
- Follow the Ship Security Plan.

14.5 Drills and Training

- **Monthly Drills:** Fire, Abandon Ship, Man Overboard.
- **Quarterly Drills:** Oil Spill Response, Security Threat.
- **Annual Drills:** Collision Response, Medical Emergency.

All drills must be documented in the **Drill Log Book (Form D-016A)**.

14.6 Communication During Emergencies

- Use **VHF Channel 16** for distress communication.
- Follow the standard **MAYDAY** protocol.
- Maintain communication with the company DPA and relevant authorities.

14.7 Emergency Equipment Readiness

- **Fire Extinguishers:** Checked monthly.
- **Lifeboats and Liferafts:** Serviced annually.
- **Emergency Generators:** Tested weekly.
- **GMDSS Equipment:** Verified as per SOLAS requirements.

14.8 Post-Emergency Procedures

- Conduct a **Post-Emergency Debrief**.
- Complete **Incident Report (Form D-005)**.
- Submit a **Root Cause Analysis Report** within 72 hours.

COMPLIANCE CHECKLIST – EMERGENCY PREPAREDNESS

✓ Emergency Procedures

- ☐ Ensure **all crew are familiar with emergency roles**.
- ☐ Conduct **regular emergency drills** and document in the Drill Log.
- ☐ Verify **emergency equipment is operational**.

✓ Fire and Explosion Response

- ☐ Sound the general alarm and muster crew.
- ☐ Isolate the source of fire and activate fixed systems.
- ☐ Contact shore-based management and log the incident.

✓ Man Overboard Response

- ☐ Sound the Man Overboard alarm and mark the position.
- ☐ Deploy visual aids and initiate recovery maneuvers.
- ☐ Inform authorities if the person is not recovered.

✓ Oil Spill Response



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- ☐ Initiate the **SOPEP Plan**.
- ☐ Deploy containment booms and notify authorities.
- ☐ Document response actions.

☒ **Piracy and Security Incidents**

- ☐ Muster crew in a safe area and activate the SSAS.
- ☐ Follow the Ship Security Plan and communicate with authorities.

☒ **Post-Emergency Actions**

- ☐ Conduct a debrief and complete the **Incident Report (Form D-005)**.
- ☐ Submit a **Root Cause Analysis Report** within 72 hours.

CHAPTER 15 – MAINTENANCE OF SHIP AND EQUIPMENT

15.1 General Policy

The company ensures that all vessels operate in a **safe, efficient, and environmentally compliant** condition by maintaining a **structured Planned Maintenance System (PMS)**.

Objectives:

- Maintain **safe and seaworthy conditions**.
- Comply with **IMO, Flag State, Class, and manufacturer guidelines**.
- Ensure **preventive and corrective maintenance is performed on schedule**.

15.2 Planned Maintenance System (PMS)

The **Chief Engineer** is responsible for:

- Ensuring the **PMS is fully implemented** onboard.
- Assigning maintenance tasks to relevant officers.
- Ensuring **spare parts are stocked adequately**.
- **Logging all maintenance actions** in the PMS software.

The **Master** is responsible for:

- Verifying that **deck equipment maintenance** is performed as scheduled.
- Ensuring **inspection records are maintained**.

15.3 Maintenance Inspections & Reporting

Technical Inspections:

- The vessel must undergo a **quarterly inspection by the Technical Superintendent**.
- Any **deficiencies requiring external repairs** must be documented in **Form O-001**.
- Inspection reports must be **submitted to the office** and retained onboard.

Ballast & Cargo Tank Inspections:

- The **Chief Officer** must **inspect at least one ballast tank per month**.
- Each ballast tank must be inspected **at least once per tenure**.
- The **inspection report must include**:
 - **Structural conditions** (frames, ladders, weld joints).



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- **Valves, coatings, and accumulation of residues.**
- Findings must be recorded in **Form D-017A & D-017B.**

15.4 Maintenance of Critical Equipment

Critical equipment includes:

1. **Steering Gear**
2. **Main Engine & Auxiliary Engines**
3. **Firefighting Equipment**
4. **Lifesaving Equipment**
5. **Emergency Generators**
6. **Navigation & Communication Systems**

15.4.1 Testing & Risk Assessment

Before **shutting down any critical equipment**, the Chief Engineer must:

- **Assess the risks** using the **Risk Assessment Checklist**.
- **Confirm that standby equipment** is operational.
- **Notify the Technical Superintendent** if shore assistance is required.
- **Log the downtime in the PMS & Engine Room Log Book.**

15.4.2 Emergency Equipment Testing

- **Fire Extinguishers** – Monthly visual check.
- **Lifeboats & Liferafts** – Weekly inspections and servicing as per manufacturer guidelines.
- **Emergency Generators** – Weekly function tests.
- **GMDSS Equipment** – Monthly communication checks.

Any failure must be reported immediately and a corrective action plan initiated.

15.5 Drydock & Major Overhauls

- Each vessel must maintain a **Drydock Items File (TECH-05)** containing:
 - **Planned drydock maintenance scope.**
 - **Structural repairs & modifications.**
 - **Machinery overhauls.**
 - **Inspection of hull, tanks, and coating conditions.**
- The **Drydock List** must be updated every **3 months**.

Defect reporting numbering system:

- **Deck Issues: D/DQ/01/Date**
- **Engine Issues: M/DQ/01/Date**
- **Electrical Issues: E/DQ/01/Date**
- **Other Issues: O/DQ/01/Date**

15.6 Spare Parts & Inventory Management

- The **Chief Engineer** must maintain an **up-to-date inventory** of spare parts.



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- The **minimum spare stock level must align with manufacturer recommendations.**
- **Requisitions for critical spares must be submitted in advance.**
- The **inventory must be reviewed every 6 months.**

15.7 Defect Reporting & Corrective Actions

All **defects and breakdowns** must be reported using:

- **Form D-005** (Failure, Incident, Near Miss Report).
- **Form D-007A** (Non-Conformity Report) for **technical failures.**
- **Form D-006A** (Preventive Action Report) for **corrective actions.**

The **Superintendent must review and approve** corrective actions.

15.8 Non-Conformance & Preventive Maintenance

- **If an equipment failure occurs**, the following must be ensured:
 - The **cause is identified using root cause analysis.**
 - A **preventive measure is implemented** to avoid recurrence.
 - The issue is **logged in the PMS and reported to the office.**
- The **Master must verify corrective actions** have been **completed before closing the defect report.**

COMPLIANCE CHECKLIST – MAINTENANCE OF SHIP & EQUIPMENT

- ✓ **Planned Maintenance System (PMS)**
 - Ensure **PMS software is updated and all maintenance records are logged.**
 - Assign **officers and engineers specific machinery/equipment for maintenance.**
 - Submit a **monthly maintenance report** to the office.
- ✓ **Inspections & Reporting**
 - Conduct **quarterly inspections** and submit **Form O-001** to the office.
 - Ensure **ballast tank inspections** are conducted monthly and recorded in **Form D-017B.**
 - Maintain a **summary of tank inspections** using **Form D-017A.**
- ✓ **Critical Equipment Maintenance**
 - Maintain an **updated list of critical equipment** and ensure its readiness.
 - Conduct **risk assessments before shutting down critical equipment.**
 - Regularly **test emergency generators, fire pumps, and steering gear.**
- ✓ **Drydock & Major Overhauls**
 - Maintain and update the **Drydock Items File (TECH-05)** every three months.
 - Ensure **all defect reports follow the prescribed numbering system.**
- ✓ **Spare Parts & Inventory**
 - Keep an **updated inventory of spare parts** and ensure stock levels meet requirements.
 - Submit **requisitions for critical spare parts well in advance.**
- ✓ **Defect Reporting & Corrective Actions**
 - Use **Form D-005 (Failure/Incident Report)** for **all technical failures.**
 - Implement **corrective actions and preventive measures** based on root cause analysis.



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- ☐ Verify that **corrective actions have been completed before closing reports.**

CHAPTER 16 – MANAGEMENT REVIEW AND EVALUATION

16.1 General Policy

The company conducts periodic **management reviews** to assess the **effectiveness, adequacy, and suitability** of the **Integrated Safety and Environmental Management System**. This ensures **continuous improvement and regulatory compliance** with **ISM, MARPOL, ISO 14001:2015**, and other applicable standards.

16.2 Objectives of Management Review

The management review aims to:

1. Evaluate **audit results** and compliance with legal requirements.
2. Identify **areas for process and system improvements**.
3. Assess **corrective actions from past incidents**.
4. Review **organizational and environmental performance**.
5. Implement **necessary operational and procedural changes**.

16.3 Frequency of Reviews

- **Annual Management Review Meeting:** Conducted in **December** each year.
- **Quarterly Performance Review:** Management reviews **incident trends and corrective actions** every 3 months.
- **Monthly Managerial Meetings:** Assess department-specific performance and **action implementation**.

16.4 Management Review Input Parameters

The following are **mandatory agenda items** for the management review:

16.4.1 Safety & Compliance Performance

- Results from **internal audits and external inspections**.
- Compliance with **national and international regulations**.
- Incident and accident statistics, including **Root Cause Analysis (RCA)**.

16.4.2 Environmental Performance Evaluation

- Monitoring of **SOPEP, SEEMP, IAPP, IOPP** compliance.
- Review of **oil spills, waste disposal records, and emissions**.
- Effectiveness of **pollution control measures**.

16.4.3 Risk Management & Improvement Initiatives

- Updates on **new regulatory changes and industry best practices**.
- Assessment of **identified risks and control measures**.
- Effectiveness of **training programs and emergency drills**.

16.4.4 Review of Corrective Actions & Non-Conformities

- Status of **open NCRs (Non-Conformity Reports) and corrective action plans**.
- Follow-up on **previous audit findings and preventive actions**.



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- Evaluation of **corrective action implementation success**.

16.4.5 Document & Procedural Control

- Verification of **updated manuals and procedures**.
- Ensuring **all controlled documents are current and accessible**.
- Review of **documented changes in procedures**.

16.5 Documentation of Management Reviews

The **Management Review Meeting (MRM) Minutes** must include:

- Summary of **discussions and key decisions**.
- **Assigned actions and deadlines** for improvement measures.
- **Approval of changes to policies and procedures**.
- Records maintained in **Form O-006 (Review of Management Procedure)**.

16.6 Key Performance Indicators (KPIs)

To **quantify the effectiveness** of management reviews, the following **KPIs** are monitored:

1. **Incident Rate Reduction**: Percentage decrease in reportable incidents.
2. **Audit Compliance Score**: Number of **compliant vs. non-compliant findings**.
3. **Environmental Impact Reduction**: Volume of **waste, emissions, and oil spills**.
4. **Training Completion Rate**: Percentage of crew trained in safety & emergency procedures.
5. **NCR Closure Rate**: Percentage of **non-conformities resolved within timeframe**.

16.7 Follow-Up & Continuous Improvement

- The **QHSE Manager** must track and verify implementation of **action items from reviews**.
- Improvement plans must be reviewed at **the next quarterly meeting**.
- If corrective actions are **not effective**, further root cause analysis is required.

COMPLIANCE CHECKLIST – MANAGEMENT REVIEW & EVALUATION

- ✓ **Management Review Process**
 - ☐ Conduct **annual management review meetings (MRM)** in December.
 - ☐ Hold **quarterly performance reviews** to monitor compliance.
 - ☐ Maintain **proper documentation of review findings and corrective actions**.
- ✓ **Safety & Environmental Compliance**
 - ☐ Verify compliance with **ISM, MARPOL, ISO 14001, and SOPEP**.
 - ☐ Monitor **incident reports, environmental performance, and audit results**.
 - ☐ Assess **effectiveness of pollution control measures**.
- ✓ **Corrective Actions & Risk Management**
 - ☐ Ensure **all NCRs (Non-Conformity Reports)** are reviewed and closed.
 - ☐ Implement **risk control measures and preventive actions**.
 - ☐ Conduct follow-up audits to verify **corrective action effectiveness**.
- ✓ **Document Control & Procedural Updates**



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- ☐ Ensure **manuals and policies are up to date.**
- ☐ Verify that **document control procedures are followed.**
- ☐ Keep records of **procedural changes and management approvals.**

☒ **Key Performance Indicators (KPIs)**

- ☐ Monitor **incident reduction rate and training completion rate.**
- ☐ Track **audit compliance and NCR closure timelines.**
- ☐ Evaluate **environmental impact reduction measures.**

CHAPTER 17 – MANAGEMENT OF CHANGE (MOC)

17.1 General Policy

Change is inevitable in ship operations, requiring modifications to **equipment, operational policies, organizational structures, or personnel**. However, **uncontrolled change can lead to accidents, inefficiencies, and regulatory violations.**

The **Management of Change (MoC) program** ensures that **all changes are properly assessed, reviewed, and approved before implementation.** It applies to **temporary and permanent changes** affecting:

- **Ship operations**
- **Technical systems**
- **Personnel and organizational structure**
- **Regulatory compliance**

17.2 Scope of MoC Program

The MoC program governs changes affecting:

1. **Operational policies & procedures** – New work instructions, SOP modifications.
2. **Equipment & Systems** – Machinery modifications, new installations, automation.
3. **Personnel & Organizational Structure** – Key personnel changes, restructuring.
4. **Regulatory Compliance** – New IMO, SOLAS, MARPOL, or Flag State requirements.

17.3 MoC Process Flow

Step 1: Initial Review

- **Initiator** (crew member, officer, superintendent) proposes a change.
- **Change Owner** (officer or department head) conducts a **Preliminary Impact Assessment**:
 - **Is the change needed?**
 - **Is it a replacement-in-kind?**
 - **Does it affect safety, compliance, or operations?**
- If the change **has potential risks, a Senior Review is required.**

Step 2: Senior Review

- **Approver** (Master, Chief Engineer, or Shore-Based Manager) evaluates:
 - **Operational impact** (navigation, engineering, cargo handling).
 - **Risk of non-conformance with regulations.**



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- Training or documentation updates required.

Step 3: Detailed Risk Assessment

- Required for **major changes** with **potential high risks**.
- **Subject Matter Experts (SMEs)** conduct assessments using:
 - **Hazard Identification (HAZID)**
 - **Failure Mode and Effects Analysis (FMEA)**
 - **Risk Matrices**
- Risk controls are proposed.

Step 4: Approval

- If **risk control measures** are **adequate**, the **Approver** formally authorizes the change.
- If the risk is **unacceptable**, the change is:
 - **Rejected**, or
 - **Modified and reassessed**.

Step 5: Implementation

- The **Change Owner** supervises execution.
- **Documentation updates** are **completed** (SOPs, risk assessments, manuals).
- **Training** is conducted for affected personnel.

Step 6: Verification & Closeout

- The **Approver** and **Change Owner** confirm the change was properly implemented.
- The change is **logged in the MoC Register**.
- **Lessons learned** are documented for future reference.

17.4 Special Cases: Temporary & Emergency Changes

17.4.1 Temporary Changes

- **Time-limited modifications** (e.g., using alternative spare parts).
- **Require a formal expiration date**.
- **Reviewed every 3 months** to determine if they:
 - Should be **reversed**.
 - Need to be **converted into a permanent change**.

17.4.2 Emergency Changes

- Implemented **immediately due to urgent operational needs**.
- **Verbal approval may be granted**, but formal MoC documentation must be completed **within 24 hours**.
- **Review and risk assessment must be conducted post-implementation**.

17.5 Roles & Responsibilities

Role	Responsibility
Initiator	Identifies and proposes change
Change Owner	Conducts Preliminary Impact Assessment , supervises implementation
Approver	Authorizes changes and risk control measures



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Role

Responsibility

Onboard MoC Coordinator Maintains MoC records and ensures compliance

Shore-based MoC Coordinator Audits MoC processes, ensures fleet-wide compliance

17.6 Documentation Requirements

- **MoC Form** (Tracks all approvals, risk assessments, and implementation steps).
- **MoC Log** (Records all open, pending, and closed changes).
- **Training Records** (Proof of personnel training for new procedures).
- **Risk Assessment Reports** (Justification for approved changes).

COMPLIANCE CHECKLIST – MANAGEMENT OF CHANGE

✓ General MoC Compliance

- ☐ Ensure **all changes are assessed for risks before implementation.**
- ☐ Use **MoC Forms to document approvals.**
- ☐ Maintain an **MoC Log with current status of changes.**

✓ Risk Assessment & Approval

- ☐ Conduct a **Preliminary Impact Assessment** for each proposed change.
- ☐ Perform a **Detailed Risk Assessment** if required.
- ☐ Obtain **formal approval from the Approver** before executing changes.

✓ Implementation & Documentation

- ☐ Ensure all **relevant procedures, manuals, and documents are updated.**
- ☐ Verify that **affected personnel are trained** on the change.
- ☐ Maintain **records of approvals, assessments, and training.**

✓ Verification & Closeout

- ☐ Conduct a **final review to confirm change implementation.**
- ☐ Log the change in the **MoC Register.**
- ☐ Review **temporary changes every 3 months** to determine if reversal is needed.

✓ Emergency Changes

- ☐ Obtain **verbal approval in urgent situations.**
- ☐ Complete **formal MoC documentation within 24 hours.**
- ☐ Conduct **post-implementation risk assessment.**

CHAPTER 18 – ASBESTOS MANAGEMENT

18.1 Increased Asbestos Risk in Shipping

Ships pose an **increased risk of asbestos exposure** due to:

1. **Historical use of asbestos in shipbuilding.**
2. **Friability** – Ship vibrations, rolling, and mechanical stress make asbestos more likely to emit fibers.



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3. **Widespread application** – Used in insulation, fire protection, gaskets, and various components.

18.2 What is Asbestos?

Asbestos is a **naturally occurring fibrous mineral silicate**, classified into:

1. **Chrysotile (White Asbestos)** – Found in over 95% of asbestos-containing products.
2. **Amosite (Brown Asbestos)** – Used in insulation and cement products.
3. **Crocidolite (Blue Asbestos)** – Previously used in sprayed coatings, highly hazardous.

Definition of Asbestos-Containing Material (ACM):

- **ACM contains 0.5% or more asbestos** as determined by microscopy.
- **Vermiculite insulation with any asbestos content** is considered ACM.

18.3 Health Hazards of Asbestos

Asbestos exposure can cause:

- **Asbestosis** – Lung scarring leading to breathing difficulties.
- **Lung Cancer** – Increased risk, especially for smokers.
- **Mesothelioma** – Aggressive cancer of the lung lining.
- **Pleural Thickening** – Swelling of the lung lining causing shortness of breath.

18.4 Common Asbestos Locations on Ships

Asbestos can be found in:

1. **Structural Components:**
 - Floor tiles, walls, ceiling panels, fire insulation.
 - Boiler cladding, furnace bricks.
2. **Mechanical & Electrical Systems:**
 - Brake linings, gaskets, electrical cables.
 - Packing for piping flanges and valves.
3. **Safety Equipment:**
 - Firemen's outfits, welding shop curtains.
4. **Miscellaneous Applications:**
 - Mooring ropes, adhesives, sealing putties.

A **detailed list by the IMO** highlights potential ACM locations onboard CMM 18-REV (00).

18.5 Asbestos Regulation & Compliance

SOLAS Convention (Chapter II, Regulation 3-5)

- **Pre-2002 Ships:** ACM allowed if properly managed.
- **Post-2002 Ships:** New asbestos installation banned except for:
 - Rotary vane compressors & vacuum pumps.
 - High-temperature gaskets (>350°C).
 - Thermal insulation (>1000°C).
- **Post-2011 Ships:** **Total ban** on ACM installation.



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ISM Code Requirements

- The **Safety Management System (SMS)** must identify asbestos risks.
- The **Ship Manager is responsible** for compliance with asbestos regulations.

ISO Standards

- ISO sets **international guidelines** for asbestos management and exposure control.

18.6 Asbestos Risk Assessment

A **qualified expert must assess the ship** for ACM risks, considering:

1. **Type & Percentage of Asbestos Present.**
2. **Friability** – Potential for fiber release.
3. **Material Condition** – Good vs. damaged state.
4. **Accessibility & Disturbance Risk.**
5. **Air Monitoring for Asbestos Fiber Levels.**

Findings are documented in a **Risk Assessment Report**.

18.7 Asbestos Management & Removal

Onboard Asbestos Inventory

- The company **must maintain a ship-specific ACM inventory**.
- **Annual condition assessment** required for known ACM locations.
- **All asbestos repairs/removals must be documented.**

Controlled ACM Removal Procedures

- **Trained personnel must perform asbestos work.**
- If ACM is exposed or friable, **immediate encapsulation or removal** is required.
- **Sealed disposal bags must be used for ACM waste.**
- Removal should follow **IMO Circular MSC/Circ.1045**.

Temporary ACM Management Measures

- If removal is delayed, ACM must be:
 - **Encapsulated and sealed.**
 - **Clearly labeled with hazard warnings.**
 - **Monitored periodically** for degradation.

18.8 Exposure Control Plan

The **Exposure Control Plan (ECP)** ensures asbestos is handled safely onboard:

1. **Hierarchy of Controls:**
 - **Elimination** – Remove ACM if feasible.
 - **Engineering Controls** – Barriers, negative pressure ventilation.
 - **Administrative Controls** – Asbestos handling SOPs.
 - **PPE Use** – Respirators, gloves, disposable coveralls.
2. **Safe Work Procedures:**
 - **No unauthorized ACM handling by crew.**



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- **Wet methods** used to suppress dust.
- **Air monitoring in high-risk areas.**

3. Crew Training:

- Awareness training on ACM locations and handling.
- Personal Protective Equipment (PPE) usage and fit testing.

18.9 Asbestos Waste Disposal

- **Onboard storage** in sealed, labeled containers.
- **Transfer to certified shore disposal facilities.**
- **Record-keeping** of all disposed ACM in the **Asbestos Disposal Log.**

COMPLIANCE CHECKLIST – ASBESTOS MANAGEMENT

- ✓ **Asbestos Risk Assessment & Inventory**
 - Conduct **annual asbestos risk assessment** onboard.
 - Maintain an **up-to-date ACM inventory** with identified asbestos locations.
 - Verify **periodic condition checks** of existing ACM.
- ✓ **Regulatory Compliance**
 - Ensure compliance with **SOLAS & ISM Code** asbestos regulations.
 - Confirm that **no ACM is installed on post-2011 ships.**
 - Maintain **records of past asbestos removals.**
- ✓ **Asbestos Handling & Removal**
 - Ensure **trained personnel** handle asbestos repairs.
 - Use **proper PPE, wet methods, and negative pressure systems** for ACM work.
 - Securely **store and dispose of ACM waste** per IMO guidelines.
- ✓ **Crew Training & Awareness**
 - Conduct **annual asbestos awareness training** for crew.
 - Train designated personnel in **asbestos handling procedures.**
 - Provide **PPE and fit testing** for personnel working near ACM.
- ✓ **Emergency ACM Response**
 - If ACM is **disturbed or exposed**, take **immediate encapsulation measures.**
 - Conduct **air monitoring to check fibre release levels.**
 - Report all **ACM incidents to Flag State & Port Authorities.**



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Chapter 19: MARITIME LABOUR CONVENTION (MLC) COMPLIANCE

This chapter outlines the company's policies and procedures to ensure full compliance with the **Maritime Labour Convention, 2006 (MLC)**, as amended. It is tailored to the measures in our **Declaration of Maritime Labour Compliance (DMLC) Part II**, demonstrating how the company adheres to each requirement. The company is committed to providing safe, fair, and decent working and living conditions for all seafarers in accordance with MLC standards. All vessels hold a valid **Maritime Labour Certificate** and up-to-date DMLC Parts I & II, which are carried on board and posted for crew reference. Internal and external audits are conducted to verify ongoing compliance.

19.1 Minimum Age and Qualifications

The company enforces strict criteria for minimum age and competency of seafarers to meet MLC Title 1 requirements. No person below the age of 18 is employed or allowed to work on board company vessels. This prevents any form of child or under-age labor at sea. Birth documents and passports are verified during recruitment to ensure compliance. Additionally, all seafarers must hold the necessary training certifications and qualifications for their positions, in line with **STCW** conventions (Standards of Training, Certification and Watchkeeping). This ensures that every crew member is **medically fit, adequately trained, and qualified** to perform their duties safely. Verification of certificates and training is part of the hiring process, and copies of qualifications are kept on board.

Key Compliance Measures:

- **Minimum Age:** Only crew aged 18 or older are hired, with **no exemptions**. Night work and potentially hazardous duties are prohibited for any seafarer under 18 (the company does not anticipate employing under-18 cadets, but if so, their work would be restricted accordingly).
- **Qualifications:** Each seafarer's credentials are checked to confirm they meet **STCW** and flag state requirements (licenses, endorsements, specialized training). Unqualified personnel are not assigned to shipboard roles.
- **Records:** The crew department maintains records of all crew ages and qualifications. Masters shall ensure no one under the required age or without valid certificates is on board at any time.

19.2 Medical Certification

All seafarers employed by the company must hold a valid **medical certificate** from an approved medical practitioner, confirming they are fit for service at sea. This is to ensure that no seafarer has a medical condition that would impair their ability to perform duties or endanger themselves or others. The recruitment process includes verification of the medical fitness certificate (per MLC Regulation 1.2) before a seafarer can join a vessel. Each certificate is issued within the past two years (or one year for seafarers under 18) and covers vision, hearing, and general health as required by the flag state.

Key Compliance Measures:



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- **Pre-Employment Fitness:** A valid medical examination report is required **prior to boarding**. The certificate must state the seafarer is fit for duty in the capacity they will serve, including any limitations if applicable.
- **Renewal Tracking:** The company tracks the expiry dates of all seafarers' medical certificates. Crew change planning ensures that no seafarer's medical certificate expires while on board. If a certificate is due to expire during a voyage, a new medical examination is arranged in advance.
- **Onboard Availability:** Copies of all medical certificates are kept in the ship's medical log or with the Master. This documentation is available for inspection at any time to demonstrate compliance. The Master will not permit any seafarer without a valid medical fitness certificate to sail.
- **Immediate Care Needs:** If a seafarer's medical fitness changes or they become unfit while on board, the company's procedure is to arrange prompt shoreside medical attention and, if necessary, relief and repatriation, in accordance with MLC medical care and repatriation requirements (see §19.12 and §19.7).

19.3 Recruitment and Placement

The company uses only **licensed or certified recruitment and placement services** in accordance with MLC Regulation 1.4. This ensures seafarers are engaged through fair and regulated channels without being charged fees. The company either recruits seafarers directly or through reputable crewing agencies that are **approved by authorities** in countries that have implemented the MLC. If an agency in a country not party to MLC is used, the company ensures that agency still meets the MLC standards.

Key Compliance Measures:

- **No Fees to Seafarers:** Seafarers are not charged any recruitment or placement fees. All costs of recruitment are borne by the company. Charging placement fees to seafarers is strictly prohibited and monitored. If any seafarer reports being charged by an agent, the company will reimburse the seafarer and take action against that agent.
- **Licensed Agencies:** The crewing agencies contracted by the company are **licensed by a competent authority**. The company verifies that each agency holds a valid license or certification under national law and MLC standards. For example, agencies must be authorized by their local marine administration (or equivalent) and, where required, hold an MLC compliance certificate.
- **Agency Oversight:** Agreements with crewing agencies include clauses enforcing MLC compliance, such as no fee charging and ensuring only medically fit and qualified seafarers are provided. The company periodically reviews agency performance (through feedback from vessel officers and incident records) to ensure they meet our standards. Unsatisfactory agencies are delisted.
- **Informing Seafarers of Rights: (2024 Amendment)** The company now provides each seafarer, during recruitment, with information about their rights to compensation if the recruitment agency or the shipowner fails to meet their obligations. In practice, this means seafarers receive a written notice of the **"system of protection"** in place (such as insurance coverage) that would compensate them for monetary loss due to a recruitment agency's default or a breach of their employment agreement by the shipowner.

 ELITE SHIPPING & TRADING FZC	COMPANY MAIN MANUAL	
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This new requirement, introduced by the **2024 MLC amendments**, is integrated into our hiring process. For instance, the crew welcome package now includes details of the insurance that covers against recruitment failures, ensuring seafarers are aware of how to claim compensation if ever needed.

19.4 Seafarers' Employment Agreements (SEA)

Every seafarer employed on the company's ships has a **Seafarer's Employment Agreement (SEA)** signed by both the seafarer and the shipowner/Company (or its representative). This written contract meets all the requirements of MLC Regulation 2.1, clearly stating the terms and conditions of a seafarer's employment. SEAs are issued and signed **before joining the vessel**, and one original is given to the seafarer while a copy is retained on board for inspection. The SEA is written in English (and/or the crew member's language if required), and any applicable Collective Bargaining Agreement (CBA) is attached or referenced.

The SEA covers all mandatory points, including at minimum

- **Identity and Position:** The seafarer's full name, birth date/age, and the capacity in which they are employed (rank or rating).
- **Contract Duration:** The period of employment or voyage particulars. If it's for a definite duration, the start and end dates are stated; if indefinite, the notice period for termination by either party is stated (which is not less for the company than for the seafarer). If for a specific voyage, details of the voyage and the point at which the contract ends are included.
- **Wages:** The amount of wages or wage rate (e.g. monthly basic wage) and any additional wage components or overtime rates (see §19.5 for wage details). The currency of payment and any exchange rate formula (if applicable) are indicated.
- **Leave Entitlement:** The paid annual leave amount (in days per month of service) or the formula for calculating it. The company ensures that leave accrues at **no less than 2.5 days per month** of employment, which meets the MLC minimum standard. This entitlement is stated in the SEA.
- **Repatriation:** The seafarer's right to repatriation is clearly stated, including the **maximum period of continuous service** on board after which the seafarer is entitled to return home at company expense. The company's policy is that no seafarer will serve more than **11 months continuously** on board without repatriation (in line with common industry practice and any flag requirements on maximum service). Typically, contracts are 4–9 months, and in exceptional cases extension beyond 11 months requires crew consent and flag approval.
- **Health and Social Security Benefits:** Any health care and social security benefits provided by the shipowner are listed. For example, the SEA notes that the company provides medical care on board and covers work-related injury or illness costs as per MLC (see also §19.12 and §19.15). If the seafarer is enrolled in a national social security plan or a private insurance by the company, this is indicated.
- **Termination Conditions:** Conditions under which the SEA can be terminated by either party, notice periods, and any compensation if it's ended early. This includes termination for cause, by mutual agreement, or due to unforeseen circumstances (like vessel loss). Notice periods are at least as favorable to the seafarer as those to the company.
- **Collective Agreements:** Reference to any applicable collective bargaining agreement (CBA) or union agreement, with the CBA made available on board if applicable.



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- **Dispute Resolution:** While not explicitly an MLC requirement to be in the SEA, the agreement or accompanying documentation may note the process for grievances (pointing to the on-board complaint procedure, see §19.14) and governing law (usually flag state law).

The Master or officer in charge must **ensure all seafarers have signed SEAs** before departure. A copy of each SEA (and any applicable CBA) is available on the vessel for review by port State control or other inspectors. Seafarers are advised of their rights and obligations under the SEA and given time to review the terms before signing. The SEA, along with the MLC onboard complaint procedure, is provided to seafarers when they join the ship, as required

Amendment Updates: The company has reviewed its SEA template in light of the **December 2024 MLC amendments** to ensure any new provisions are incorporated. In particular, repatriation clauses have been reviewed to align with the latest guidance on facilitating prompt repatriation (see §19.7), and information about connectivity and free food (see §19.10-19.11) are reflected in crew handbooks or guidelines accompanying the SEA.

19.5 Wages and Allotments

The company ensures that all seafarers are paid their wages **in full, on time, and at least monthly**, in accordance with MLC Regulation 2.2. Wages are specified in the SEA and comply with any minimum wage standards (such as ILO minimum wage for ABs, if applicable, or CBA rates). Key aspects of the company's wage payment practice include transparency, regularity, and facilitating the sending of money home.

Wage Payment Policy:

- **Monthly Payment:** Seafarers are paid at **intervals not exceeding one month**. The payroll is typically done monthly on board, with wage accounts closing on the last day of each month. Payments may be made in cash onboard or via electronic bank transfer per the seafarer's request (with documented receipts or wage slips).
- **Wage Slip:** Each seafarer receives a **monthly wage slip** (pay statement) detailing how their wages were calculated, including basic pay, overtime, leave pay, any bonuses, deductions, and the exchange rate used if any conversion was made

This allows the seafarer to verify they were paid correctly for all due earnings. Allotments and exchange rates are shown to ensure transparency

- **Currency and Exchange:** Wages are stated and paid in the agreed currency (usually USD or EUR, as per SEA). If any portion is paid in another currency or converted, the exchange rate is at the prevailing market rate or official rate and not unfavorable to the seafarer

Any fees for currency conversion or transfer are minimized and kept at reasonable levels

The company absorbs bank charges whenever feasible, so that seafarers receive their full net wages.

- **Allotments (Money Sent Home):** The company offers an allotment system allowing seafarers to remit a portion of their wages to their families or dependents ashore, on request. When a seafarer requests an allotment, the company ensures the amount is sent **regularly and in a timely manner** (usually once per month) directly to the nominated person's bank account.

There is no charge by the company for arranging allotments, aside from minimal bank processing fees, and those fees are disclosed. The allotment is documented in wage slips.



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- **No Unauthorized Deductions:** Deductions from wages (such as onboard allotments, advances, or penalties) are made only as permitted by law or CBA – for example, recovery of a loan or an allotment the seafarer asked for. The company does not deduct any costs of equipment or travel or other business expenses from seafarer wages (except if clearly agreed in writing for a specific reason allowed by MLC). Fines as a disciplinary measure are not imposed.
- **Records:** The Master or Purser keeps wage accounts and evidence of wage payments on board. These records are available for inspection to prove that wages are paid as required. Each seafarer signs to acknowledge receipt of wages or that the bank transfer was processed. The company's office also retains payroll records for verification.

In summary, the company's wage system guarantees that seafarers receive their contracted pay on time and can send money home safely. This fosters financial security and meets all MLC wage protection standards.

19.6 Leave and Repatriation

The company recognizes the importance of proper rest and **shore leave** for seafarers' welfare, as well as the fundamental right to be repatriated at the end of their contract or under special circumstances. These practices comply with MLC Regulations 2.4 (Entitlement to Annual Leave) and 2.5 (Repatriation).

- **Annual Leave:** As noted in the SEA, seafarers accumulate **annual leave of at least 2.5 days per month** of service, which is equivalent to 30 days paid leave per year (pro-rated for shorter contracts). The specific leave earned during a contract is usually taken after the seafarer is repatriated (i.e. as vacation between assignments), unless the SEA or CBA stipulates another arrangement. The company does not permit leave to be **forfeited or paid in lieu** except at the end of employment or by proper agreement (ensuring compliance with the Convention's intent that leave should be taken for rest). If a seafarer requests to take some leave during a long assignment (for example, for urgent family reasons), the company will accommodate it if feasible, consistent with operational needs and with mutual agreement.
- **Shore Leave:** While not an explicit MLC "requirement" article, the company strongly supports seafarers taking **shore leave** in ports whenever operationally and security-wise possible. Masters and shore management cooperate to facilitate shore leave to the maximum extent. This means expediting port formalities for crew, providing transport if the port is remote, and not unreasonably denying shore leave for work reasons except when absolutely necessary (safety, cargo operations, etc.). Shore leave is considered critical for seafarers' mental health and welfare, and is granted consistent with the ship's security plan and local regulations.
- **Repatriation:** The company bears the cost and responsibility to repatriate seafarers to their home country (or other agreed destination) in the following cases: end of the contract period, termination of the contract by the company (unless for documented serious misconduct), illness or injury requiring repatriation, shipwreck, ship being sold or laid up, or other reasons as outlined in MLC Standard A2.5.1. In normal circumstances, when a seafarer's contract ends or they have served the maximum allowed continuous period on board, the company arranges and pays for **transportation home**, including any visa or travel documents and a reasonable allowance for food and accommodation during travel if needed. The routes and timing are as direct as possible. A seafarer will not be required to work more



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than 12 months without repatriation (and in practice, we target crew changes at or before 9–11 months). The **entitlement to repatriation at no cost to the seafarer** is clearly stated in the SEA.

Seafarers are also informed of the location of the company's **financial security for repatriation** (see §19.15) – a certificate posted on board evidencing insurance coverage in case the company were unable to fulfill repatriation obligations.

If a seafarer has to be repatriated early due to personal circumstances or compassionate grounds, the company will consider the request and, if approved, will not charge the seafarer (though such early repatriation might be at the seafarer's expense if for personal convenience rather than an emergency or contractual right). In cases of termination for cause (e.g., serious misconduct), repatriation might be at the seafarer's expense as permitted by national law, but this is used sparingly and per flag state rules.

Amendment Note (2024): The MLC 2022 Amendments (entering into force **Dec 2024**) place emphasis on **prompt repatriation** and cooperation among States to achieve it.

In line with this, the company will work proactively with port States, flag States, and labor-supplying States to ensure our crew are repatriated without undue delay in any situation. For instance, during global crises (like pandemic-related travel restrictions) the company coordinates with authorities to get seafarers home or to safe ports as soon as possible. If our vessels are in ports where crew changes are challenging, we liaise with agents and authorities to find solutions rather than extending contracts indefinitely. Additionally, the new amendment clarifies that if our company were to send replacement crew to a ship where the previous crew had been abandoned (in the context of relieving abandoned seafarers), those relief seafarers must also receive their full rights and entitlements. While abandonment scenarios are unlikely for our fleet (given our financial security cover), the company is aware of this provision and would ensure any joining crew in such circumstances are treated properly and repatriated when due, with all their MLC rights intact

In summary, leave is provided to ensure rest, and repatriation is assured at the end of service or under qualifying events, all at the company's cost and arrangement. The policies are designed to prevent fatigue, promote welfare, and guarantee that no seafarer is stranded or forced to stay on board beyond their contract against their will.

19.7 Manning Levels and Work Arrangements

The company operates each vessel with **sufficient manning** to ensure safe and efficient operations, while also allowing crew to receive required rest. Manning levels meet or exceed the vessel's **Minimum Safe Manning Document** (MSMD) issued by the flag State. In compliance with MLC Regulation 2.7, our policy is to crew ships with the necessary number of qualified seafarers to handle all operational and emergency duties without excessive workload

Proper manning is the foundation for preventing fatigue and ensuring that hours of work and rest (see §19.8) remain within legal limits.

Manning Policy Highlights:

- **Safe Manning Document Compliance:** Every vessel's crew count and composition match the requirements of its Safe Manning Certificate. The company reviews manning levels whenever trading patterns or ship conditions change to confirm the MSMD remains appropriate. We do not sail with crew



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numbers below the safe manning requirement. For example, if the MSMD requires minimum 15 crew, we will have at least those 15 on board (and often carry additional personnel for operational flexibility or training).

- **Augmented Manning:** The company will increase manning above the minimum when needed to address specific circumstances – such as intensive port operations, additional security requirements, extended hours cargo operations, or when trainees are on board. This ensures that rest hours can still be respected. We also take into account the size and age of the vessel and equipment; older or larger ships may need extra hands to maintain safe operations and comply with maintenance and watchkeeping demands.
- **Work Organization:** A **work schedule (muster list / work arrangement)** is posted on board in a visible place, usually on the bridge and in the crew mess, describing the shipboard working arrangements. This schedule or table, in the working language of the ship and in English, shows each position's planned working hours, watch rotations, and rest periods. It is updated as needed (for example, when changing from sea voyage to port stay routine) and helps each seafarer understand their duties and rest times. Maintaining this schedule is part of compliance with MLC (Standard A2.3) and STCW rest hour requirements.
- **Avoiding Fatigue:** The company's management monitors reports of overtime and hours of rest (see §19.8) from each vessel. If crew are consistently unable to get required rest, it's a signal that manning may be insufficient or work practices need adjustment. In such cases, the company will investigate and take corrective action, such as sailing with an extra watchkeeper or altering schedules. We also avoid excessive simultaneous operations; the Master has the authority to decline or delay non-essential tasks if they would overburden the crew. Safety always takes priority over commercial pressure.
- **Musters and Drills:** When planning required emergency drills or training, the Master arranges them in a manner that minimizes disturbance to rest periods

Drills are not scheduled during the night or rest hours unless unavoidable. This practice is part of both manning and hours compliance, ensuring crew are well-rested and alert.

Through proper manning and sensible work arrangements, the company ensures that all shipboard tasks can be conducted safely and that every seafarer can obtain their lawful rest. The crewing strategy is reviewed during safety management audits and MLC inspections to verify that it remains adequate for the vessel's operation.

19.8 Hours of Work and Rest

The company strictly adheres to the MLC (and STCW) requirements for **hours of rest** to prevent fatigue and protect seafarers' health (Regulation 2.3). Each seafarer's work and rest schedule is managed so that minimum rest hours are achieved. The standard applied on all vessels is: **a minimum of 10 hours of rest in any 24-hour period, and at least 77 hours of rest in any 7-day period**

These rest hours may be divided into no more than two periods, one of which must be at least 6 hours long, and the interval between consecutive rest periods shall not exceed 14 hours

This essentially mirrors the IMO/STCW work-hour limits and MLC requirements, whichever is more stringent, and is reflected in our shipboard work arrangement charts.

Implementation and Monitoring:



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- **Recording Hours:** Every vessel maintains a daily record of each seafarer's hours of work and rest. The company uses an approved format (often a standardized log or software) that is in English and the ship's working language. Each seafarer records their work and rest times, which are then verified by the Master or an officer authorized by the Master. Both the seafarer and the **Master/authorized officer sign the record each month** to attest it is accurate. Seafarers are provided with a copy of their own records, either as a physical signed sheet or electronically (for example, a PDF printout), as proof of their compliance and for personal reference.
- **Verification of Compliance:** The Master (or Chief Officer) regularly reviews the rest hour logs to ensure no seafarer is exceeding the limits. If a non-conformance is found (e.g., someone fell short of the required rest due to a port operation or an emergency), the Master notes the reason, takes immediate steps to rectify the situation (like giving compensatory rest), and logs the corrective action. Repeated or planned exceptions are not allowed unless under the flexibility permitted by flagged administration (such as in a genuinely unforeseen emergency at sea).
- **Bridge and Engine Watch Schedules:** Watch schedules for officers and ratings are arranged to comply with the rest criteria. Typically, a 3-watch system (4 hours on / 8 off) or 2-watch system (6 on / 6 off, if manning allows and safety management permits) is used such that watchkeepers can get enough rest. For engine room personnel or others not on a watch rotation, work hours are scheduled during daytime and they are off at night except for call-outs, ensuring overnight rest. In port, duty rosters account for those who must work cargo or security watches and rotate duties to allow rest.
- **Drills and Emergencies:** As noted, drills are organized to avoid violating rest requirements. In real emergencies or urgent situations (which are exceptions under the Convention), rest hours might be interrupted; however, any such deviation is documented and the affected seafarers are given adequate rest as soon as possible after the emergency. The company's SMS (Safety Management System) includes guidelines on managing crew fatigue especially after long emergencies (e.g., a fire or heavy weather) – typically the Master will stand down operations afterward until the crew recuperate.
- **Audit and Inspection:** During internal audits, the office reviews a sample of rest hour records for accuracy and consistency. Port State Control and flag State inspectors often inspect these records; the company expects each vessel to be always ready for such scrutiny. The posted work schedule and up-to-date rest log should readily demonstrate compliance. Any identified issues are corrected immediately, and root causes (like understaffing or unrealistic work schedules) are addressed by management as a priority.

By enforcing hours-of-rest rules and maintaining proper documentation, the company ensures a **fatigue-managed work routine** on board. This not only complies with MLC, but also improves safety and efficiency, as a well-rested crew performs better and is less prone to accidents.

19.9 Accommodation and Welfare Facilities

The company is committed to providing **decent, safe, and hygienic accommodation** and recreational facilities on board, in compliance with MLC Regulation 3.1. Seafarers' living quarters, including sleeping rooms, mess rooms, recreational spaces, sanitary facilities, and hospital/sick bay, meet the standards set by the Convention



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and flag State regulations for ship construction and equipment. Each vessel either was built to the MLC 2006 specifications or, if older, has been **upgraded to meet ILO crew accommodation standards** applicable to it. We ensure that accommodations promote the health and well-being of the crew, with sufficient space, ventilation, lighting, and privacy.

Accommodation Standards:

- **Size and Amenities:** Crew cabins meet or exceed the minimum size requirements for floor area and headroom. Berths are of adequate dimensions and come with comfortable mattresses and bedding. There are sufficient lockers and drawers for personal storage. Officers and crew have separate accommodation areas as required, and where applicable, single-berth cabins are provided (especially for officers). Cabins are insulated against noise and vibration as far as practicable to ensure rest. Ventilation and heating systems maintain comfortable conditions in both hot and cold climates, and lighting (natural and artificial) is sufficient for reading and working. These aspects are maintained per flag state rules aligned with MLC **Standard A3.1**
- **Sanitary Facilities:** All ships have ample **toilets and showers** with hot and cold running fresh water for crew use. There are shared washroom facilities in convenient locations (or en-suite facilities for officers, depending on vessel layout and size). The number of facilities meets the MLC minimum based on crew size, and they are kept in good working order and cleanliness. Sewage systems and water supplies are maintained to ensure hygiene.
- **Laundry and Bedding:** Vessels are equipped with laundry facilities (washing machines and dryers or drying rooms) for crew use. The company provides cleaning agents and bedding. Linen is laundered regularly. Each crew member is given sufficient soap and amenities or an allowance to obtain them, supporting personal hygiene needs.
- **Recreational Facilities:** In addition to basic accommodations, the company provides recreation rooms or lounges on board for off-duty seafarers. These may include a crew dayroom with a TV/DVD entertainment system, reading materials (books, magazines), games (cards, board games), and, where space permits, exercise equipment like a small gym or workout area. Outdoors, if feasible, a designated smoking area or a basket ball hoop, ping-pong table, etc., might be available on some vessels. Recreation spaces are **separate from work areas** and allow the crew to relax. The importance of leisure activities is recognized to help reduce stress during long voyages.
- **Social Connectivity: (2024 Amendment)** Recognizing the vital role of communication, the MLC has been amended to explicitly require “**social connectivity**” as part of recreational facilities

In line with this, the company ensures that seafarers have access to **ship-to-shore communication and internet access** on board. All vessels are equipped with means for crew to communicate regularly with their families (through email, internet messaging, or voice calls). The company provides either free or reasonably priced internet connectivity to seafarers for personal use. For example, ships have Wi-Fi hotspots for crew, with daily data allowances covered by the company. This connectivity is provided in a manner that does not compromise the ship’s IT security or navigation systems but meets the personal communication needs of crew. We have adapted onboard IT infrastructure where necessary to comply with this new requirement, effective from December 2024



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- **Shore-Based Welfare:** The company also facilitates access to **shore-based welfare facilities** (MLC Regulation 4.4) when in port. Masters and agents inform the crew of any seafarer centers, missions, or recreational facilities available ashore (such as seamen's clubs, Wi-Fi hotspots, sports facilities, etc.). Where practical, the ship will arrange transport to these facilities. The company encourages crew to use these services for recreation, counseling, or communication, as they are often an important extension of onboard welfare. Information about welfare contacts in various ports is provided in the ship's port info files.
- **Maintenance and Inspection:** The condition of accommodation and recreational facilities is monitored continuously. The Master (or the appointed safety or accommodation officer) conducts **weekly inspections** of crew accommodation areas, galleys, storerooms and recreational spaces to ensure they are clean, habitable, and safe. Inspection results are recorded and any deficiencies (e.g. broken light, ventilation issue, pests, etc.) are reported for prompt correction. The company's shore management will support timely repairs or upgrades when issues are identified. If crew have complaints about accommodation, these can be raised through the safety committee or complaint procedure and will be addressed without delay. By maintaining high standards of accommodation and providing adequate welfare and connectivity facilities, the company promotes a living environment on board that is as comfortable and secure as possible, reducing fatigue and improving crew morale in line with the MLC's objectives.

19.10 Food and Catering

The company ensures that all seafarers are provided with **good quality food and drinking water** in sufficient quantities, prepared and served in hygienic conditions, as required by MLC Regulation 3.2. We recognize that proper nutrition is essential for the health and well-being of crew. Thus, our vessels embark provisions that are abundant, varied, and cater to cultural preferences and any special dietary needs of the crew.

Provisioning and Quality:

- **Nutritious Meals:** Meals are planned to be well-balanced and nutritious, meeting the caloric and dietary needs of seafarers working at sea. Menus include a variety of proteins (meat, fish, eggs), carbohydrates (rice, pasta, bread, potatoes), and fresh or preserved fruits and vegetables. The company budgets adequately for food so that fresh produce can be resupplied at ports of call. We also consider crew demographics – for example, if we have crew from Asia, Europe, etc., the menu will rotate dishes to respect different palates and any religious requirements (such as Halal meat, no beef for certain crews, vegetarian options, etc.)
- **Safe Drinking Water:** All vessels have systems or supplies for **potable water**. Water is regularly tested for potability. On ships with water-makers, the produced water is tested and treated (chlorinated) to keep it safe. We provide bottled water if needed or if crew prefer it. **Drinking water is available at all times**, and in ample quantity, in mess areas or pantries.
- **Free of Charge: (2024 Amendment)** The MLC has clarified that food and drinking water must be provided **free of charge to seafarers during their engagement**



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Our company already complies with this – seafarers are **never charged** for their meals or ordinary food provisions on board. Any such charge would be a violation of MLC and company policy. This free provision is now explicitly affirmed in the Convention amendments, effective Dec 2024, and our practices fully reflect this requirement.

- **Trained Cooks:** Vessels with 10 or more crew have a **qualified ship's cook** on board, who has completed training in food preparation and hygiene (in accordance with flag State requirements). The cook (or chef) manages the galley, prepares meals, and ensures catering hygiene standards. On smaller vessels or in the cook's absence, any person processing food is trained in food handling or at least closely supervised by someone experienced, to maintain cleanliness and food safety.
- **Galley Hygiene:** The galley and pantry areas are maintained in a clean and sanitary condition. Food stores are inspected on delivery and during storage to prevent spoilage and infestation. Refrigerators and freezers are kept at correct temperatures and cleaned regularly. Expiry dates of perishable provisions are monitored. The Master or appointed officer (often the Chief Steward or Chief Cook) conducts weekly inspections of the galley and storerooms, with results recorded, to ensure compliance with health standards and identify needs for re-provisioning or improvements.
- **Catering for All:** Special dietary needs (such as for medical reasons or personal choice) are accommodated as far as possible. If a seafarer needs a particular diet (low salt, diabetes-friendly, etc.), the cook and Master will arrange the menu accordingly. Religious requirements are respected (e.g., providing alternatives during Ramadan fasting hours, or not serving pork to those who don't eat it and offering a substitute).

Catering Welfare: Meal times are scheduled around watch schedules so that all crew can have three regular meals per day (with coffee/tea and snacks available between meals). The menu is posted in advance. The Master periodically checks with crew for feedback on food quality and quantity. Any complaints about food are addressed promptly – if a certain item is unpopular or inadequate, adjustments are made on the next provisioning. The company's office reviews food expenditure and may random-sample crew feedback during inspections to ensure our catering standards are upheld.

By consistently supplying **ample, tasty, and safe food at no cost to the crew**, and by maintaining high standards of galley hygiene, the company fulfills the requirements of MLC 3.2. This contributes greatly to crew health and morale.

19.11 Health and Safety Protection (Occupational Safety and PPE)

Protecting seafarers' health and safety on board is a top priority and a legal obligation under MLC Regulation 4.3. The company has a comprehensive **occupational health and safety policy** as part of its Safety Management System, aligning with both MLC and IMO (ISM Code) requirements. All reasonable precautions are taken to prevent accidents, injuries, and diseases on board, and to provide a safe working environment.

Key Elements of the Health and Safety Program:

- **Safety Management System (SMS):** The company's SMS includes procedures for **safe working practices** in all shipboard operations (enclosed space entry, working aloft, machinery operation, etc.). Risk assessments are conducted for hazardous tasks, and toolbox meetings are held to discuss safety measures. We ensure seafarers are trained in these procedures and understand the risks and controls.



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Compliance with the SMS is monitored by the Master and department heads, and non-conformities (near misses, incidents) are reported and investigated to improve safety continuously.

- **Safety Officer and Committee:** On vessels with five or more seafarers, the Master appoints a **Safety Officer** (typically the Chief Officer or First Engineer) and establishes a **safety committee** that includes representatives of various departments. The safety committee meets regularly (often monthly) to discuss accident reports, safety suggestions, and to review the effectiveness of risk controls. Seafarer representatives are encouraged to actively participate and voice any concerns. This cooperative approach is in line with MLC guidance for onboard safety culture and helps identify issues that management might not see immediately.
- **Personal Protective Equipment (PPE):** The company provides all necessary **personal protective equipment** to seafarers **free of charge**. This includes hard hats, safety shoes, coveralls, gloves, goggles, harnesses, hearing protection, respirators, and any specialized PPE needed for particular jobs (e.g., chemical suits). **(2024 Amendment)** In response to the latest amendments, the company has reviewed its PPE provisions to ensure **“all necessary appropriately-sized personal protective equipment”** is available
This means we not only supply PPE, but also ensure it fits the individual (for example, we stock various sizes of coveralls, gloves, and harnesses so that every crew member can find proper fit). No seafarer is expected to work without adequate protective gear. New joiners are issued PPE on arrival if they do not already have company-approved gear. Damaged PPE is replaced immediately.
- **Health and Safety Training:** All crew receive safety training relevant to their roles. This starts with ship-specific **safety orientation at embarkation** (covering alarm signals, muster stations, hazards on that ship, etc.). Regular drills (fire, abandon ship, man overboard, etc.) are carried out to ensure preparedness. We also conduct periodic training or refreshers on topics like manual handling, working at heights, emergency first aid, and use of fire-fighting equipment. Tool-box talks and safety meetings serve as ongoing education and hazard awareness. The company may provide additional training resources (videos, bulletins) especially after any incident or if new equipment is introduced.
- **Accident Reporting and Investigation:** Despite all prevention efforts, if an accident, injury, or near-miss occurs, it is reported immediately to the ship's command and recorded. The Master ensures a thorough **investigation** is conducted to find root causes and identify corrective actions. The findings and lessons learned are shared with the fleet (anonymized if needed) to prevent recurrence elsewhere. Minor injuries and occupational illnesses are logged in a medical log; more serious cases are also communicated to the office and flag State as required. The company tracks these reports to monitor safety performance and adjust policies.
- **Health Protection Measures:** Beyond accident prevention, the company promotes general health: cleanliness of accommodation (as covered earlier), pest control, safe drinking water, and ample rest (as in §19.8) all contribute to preventing sickness on board. We follow **ergonomic practices** to reduce strain (for example, using mechanical aids for heavy lifts when possible). Noise and vibration in engine rooms are managed through insulation and crew are given hearing protection. There are restrictions on smoking (allowed only in designated areas to reduce fire risk and secondhand smoke). The ship also carries a stock of medicines and first aid equipment for immediate response to any injuries (see §19.12).



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Social Environment: The MLC (through 2016 amendments and guidelines) also expects a working environment free from harassment and bullying. The company strictly prohibits any form of harassment, bullying, or discrimination among crew. This is stated in our code of conduct. Seafarers are encouraged to report any such behavior through the complaint procedure (§19.14) or directly to the Master/company. **Victimization** of anyone who raises safety or compliance concerns is not tolerated. Every crew member has the right to a safe and respectful workplace, which is an integral part of “health and safety protection.”

Through these measures, the company fosters a proactive safety culture. The combination of proper equipment, procedures, training, and a supportive environment helps minimize workplace hazards and safeguard the physical and mental well-being of seafarers in accordance with MLC Reg. 4.3 and related guidelines.

19.12 On-board Medical Care

The company ensures that seafarers have access to prompt and adequate **medical care on board and ashore** when needed, meeting MLC Regulation 4.1 requirements. Every vessel is equipped with the necessary medical supplies and arrangements for medical attention, so that illness and injuries can be treated to the best extent possible at sea, and serious cases can be evacuated or treated in port without delay.

Medical Facilities and Supplies:

- **Medicine Chest:** All ships carry a fully stocked **medical chest** with medicines, medical devices, and first aid equipment as required by the flag State’s carriage requirements (which are typically based on the WHO International Medical Guide for Ships and ILO/IMO guidelines). The inventory includes antibiotics, pain relievers, wound dressings, splints, etc., and is appropriate for the number of crew and voyage duration. Medicines are regularly checked for expiration and replaced. A record is kept of all items dispensed.
- **Medical Guide:** Each vessel has an up-to-date **medical guide** or ship’s medicine handbook, which provides instructions for treating ailments and injuries. Often the standard is the *International Medical Guide for Ships* or a flag-approved equivalent, which helps officers to provide medical care in the absence of a doctor. The ship also maintains the **radio medical advice contact information** for telemedicine services (TMAS).
- **Trained Personnel:** In line with STCW and MLC requirements, at least one seafarer on board (usually the Master or an officer) is trained and certified in **Medical Care** (advanced medical training), and other key personnel have training in **Medical First Aid**
For example, on our vessels the Chief Officer typically holds a Medical Care certificate, enabling him/her to act as the medical officer on board. All officers at minimum have basic first aid training. This ensures there is always someone competent to render first aid or medical treatment to the sick and injured. The company verifies these qualifications and includes medical response roles in the Muster List.
- **Hospital Accommodation:** Each ship has a designated **ship’s hospital or sick bay** (or at least a designated cabin) for isolating and treating an ill or injured crew member. This space is kept clean, quiet, and is readily convertible for patient care. It contains a bed with sanitary arrangements nearby and is stocked with basic medical equipment (like an examination kit). The location is well-marked and available at all times.



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Medical Treatment and Procedures:

- **Free Medical Care:** Any medical care provided on board or by the company ashore is **free of charge to the seafarer**. Seafarers will not be charged for medicines, doctor consultations arranged by the company, or transport for medical treatment. This includes care for injuries or sickness occurring during their service on board.
- **Onboard Treatment:** For minor ailments and injuries, treatment is administered on board by the Master or trained officer. The seafarer is given rest and care in the ship's hospital if needed. All treatments are logged on a medical record form, and the information is kept confidential (only shared with those who need to know, like a doctor ashore, in line with medical privacy).
- **Shore-side Consultation:** If someone's condition is beyond what can be handled on board with available supplies, the ship contacts a **Telemedical Assistance Service (TMAS)** via radio/satellite (medical advice by radio). Qualified doctors on shore guide the crew on treatment steps. The company subscribes to a TMAS service so that expert advice is available 24/7. Many conditions can be managed on board under remote guidance until the seafarer can see a doctor in port.
- **Port Medical Care:** If a seafarer needs a doctor or hospital, the Master will arrange, through the agent or Rescue Coordination Centre, for a **medical evacuation or prompt transport to a shore medical facility at the next port**. The company prioritizes **prompt disembarkation for medical care**, as underscored by the **2024 MLC amendment** which obligates States to facilitate early disembarkation for treatment

We work with port authorities to ensure that if a crew member is seriously ill or injured, they receive immediate permission to come ashore regardless of port schedule, and get to a hospital without delay. This practice was reinforced by lessons learned during the COVID-19 pandemic, and the company is fully aligned with the new requirement emphasizing prompt access to care ashore

- **Repatriation for Medical Reasons:** If a seafarer cannot continue their duty due to health reasons, the company will repatriate them at the earliest opportunity (with a medically-attended escort if necessary). Likewise, in the unfortunate event of a seafarer's death, the company will arrange for the **repatriation of the remains** in accordance with the family's wishes, as now explicitly required by the MLC amendments. This includes handling all logistics and costs for transporting the body and personal effects home, as well as providing any assistance to the seafarer's next of kin.
- **Preventive Care:** The company's health protection includes **preventive measures** such as sanitation, vaccination and education. Seafarers are encouraged to be vaccinated against common diseases; for certain voyages, required vaccinations (e.g. yellow fever) are ensured. The company also provides personal protective measures like mosquito repellent in malaria zones, and emphasizes hygiene and disease prevention practices on board (for example, COVID-19 protocols were implemented during the pandemic). Regular **health drills or campaigns** (like stretching exercises to prevent musculoskeletal issues, or information sessions on STDs, etc.) may be conducted as part of welfare initiatives.



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All these measures ensure that any seafarer suffering from an illness or injury will receive care comparable to that available on shore, as far as possible, and without delay or cost. The company's approach is not only to treat conditions but also to promote the overall health of crew members during their service on board.

19.13 On-board Complaint Procedures

In accordance with MLC Regulation 5.1.5, the company has established a clear and fair **on-board complaint procedure** for seafarers to lodge complaints regarding any aspect of their employment or shipboard conditions that they believe breaches MLC requirements or their rights. Seafarers are encouraged to voice concerns or complaints without fear of reprisal. The procedure is designed to resolve issues **efficiently on board**, but also provides access to external authorities if a complaint cannot be resolved at the ship or company level.

- **Availability of the Procedure:** Every vessel carries a written **On-board Complaint Procedure** that has been adopted by the company and approved as part of our DMLC Part II. Each seafarer is provided a copy of this procedure (in English and in the seafarer's language if necessary) when they sign their SEA or when they join the ship. Additionally, a copy is posted on the notice board or another prominent location on board. The provided documents include contact information for the company's shore office, the flag State's competent authority, and the seafarer's home country authority (if different), which the seafarer can approach if needed. It also identifies one or more persons on board who can offer confidential advice and assistance to seafarers in navigating the complaint process (for example, a dedicated "contact person" or a crew delegate).

Step-by-Step Complaint Process: The general steps of the on-board complaint procedure are:

1. **Department Level Resolution:** A seafarer with a complaint should first (if comfortable) address the issue to their **immediate superior or head of department**. For example, a rating would approach the Bosun or Chief Officer, an oiler might go to the Second Engineer, etc., depending on the nature of the issue. That officer is expected to give the complaint proper attention and attempt a resolution within a set time frame (**the guideline is usually within 5 days**)
2. **Master's Involvement:** If the seafarer feels the issue is not resolved satisfactorily at the department level, or if the complaint directly involves that level of supervision, they can escalate it **directly to the Master**. The seafarer may do this in writing. The Master will then handle the complaint personally, investigating and trying to resolve it. At all stages, the seafarer has the right to be accompanied or represented by a fellow seafarer of their choice during discussions. The Master should ideally resolve the complaint quickly (**within 10 days**).
3. **Shore-Based Resolution:** If a complaint cannot be resolved on board by the Master's action, or if it is of a nature that the seafarer prefers to directly involve the shore office, the seafarer may refer it to the **Company's management** (the shipowner). Our procedure allows seafarers to contact the DPA (Designated Person Ashore) or Crewing Manager directly at any time, even without going through earlier steps if they feel unable to do so. Once the complaint reaches shore management (whether through a report from the Master or directly from the seafarer), the company will address it within a reasonable timeframe (**the guideline is within 8 days upon receipt**). The company may consult with the seafarer or their representative in seeking a solution.



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4. **External Authorities:** If after the internal steps the seafarer still considers the complaint unresolved or if there is a serious breach of rights, they have the right to complain to **external authorities**. This can be done at any stage, and includes contacting the **flag State** inspectors or the **Port State Control** officers where the ship is in port, or a seafarers' union representative, or the competent authority in their home country. The company's procedure document provides up-to-date phone/email contacts for the flag State's complaint handling unit and the ITF or seamen's welfare organizations that can assist. Seafarers are informed that they can make complaints directly to these bodies without retaliation.

Recording and Follow-up: All complaints and their outcomes are documented in a **Complaint Log/Record Book** kept on board. Entries include the date, the nature of the complaint, steps taken, and the resolution or status. If a solution is found, the outcome is noted and the seafarer confirms satisfaction. If referred to shore or beyond, that is recorded too. A copy of the complaint and decision is given to the seafarer. These records are available to flag State inspectors on request, but are kept confidential from other crew to respect the privacy of those involved.

Protection from Reprisal: The company strictly prohibits any form of **harassment, intimidation, or retaliation** against a seafarer for filing a complaint. All officers and management are instructed that seafarers must be able to complain freely. If a seafarer feels they are being penalized or victimized for using the complaint system (for example, unfair evaluation, early termination, bad treatment), they should report this immediately (which itself would be a serious complaint). Such behaviour by any staff is treated as misconduct. The policy is clearly stated in the procedure: **"Any kind of harassment against seafarers filing complaints is banned."**

By implementing this on-board complaint procedure, the company ensures that any grievance can be raised and addressed in an orderly way. This helps to resolve most issues **at the lowest level possible**, promoting harmony on board and continuous improvement of conditions. It also provides seafarers confidence that if an issue cannot be fixed internally, they have recourse to higher authorities without prejudice. The company views complaints as an opportunity to identify problems and strengthen compliance, and commits to treating all complaints seriously and fairly.

19.14 Financial Security and Certification

In compliance with the 2014 and 2016 amendments to the MLC (which introduced financial security requirements effective 2017), the company has obtained and maintains **financial security** guarantees to protect seafarers in specific adverse situations. These certificates of insurance are carried on board and displayed, ensuring that seafarers can easily verify their existence. Additionally, all required MLC documentation and certificates are maintained up-to-date.

- **Repatriation Financial Security (Regulation 2.5 – Abandonment):** The company's obligations for repatriation are backed by an insurance policy (or equivalent guarantee) as required by Standard A2.5.2. This **financial security for repatriation** covers the costs of repatriating crew (travel, subsistence, etc.) as well as essential needs in case the company fails to do so (for example, in a scenario of insolvency or abandonment). The insurance would trigger to pay for repatriation and up to four months of owed



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wages and other entitlements if the seafarer is stranded. The **certificate of insurance** for repatriation (often called the “MLC Certificate of Financial Security for Abandonment”) is posted in a common area on board (usually the notice board or with the ship’s certificates file). It names the provider (usually our P&I Club) and contact details for claiming assistance. Seafarers are informed during induction that this cover exists and where the certificate is posted. This ensures that even in the unlikely event the company cannot arrange their repatriation, they have a guaranteed safety net.

- **Shipowner’s Liability Financial Security (Regulation 4.2 – Death or Long-Term Disability):** Separately, the company carries an insurance to cover **shipowner liability towards seafarers for injury, illness, or death** as required by Standard A4.2.1. This typically refers to compensation payments for long-term disability or death benefits to seafarers or their next of kin, as per employment contracts or collective agreements. The **certificate of insurance for shipowner’s liability** (the “MLC Financial Security for Contractual Crew Claims” certificate) is also kept on board and displayed. It guarantees that any contractual payments for occupational injury or illness (such as disability compensation, loss of life compensation, unpaid wages in these cases, etc.) will be paid out even if the company is unable to meet its obligations. Essentially, it prevents seafarers or their families from being left without due compensation in case of tragic events. The coverage and claim process is explained in the SEA or an annex to it, and the P&I Club’s contact is available if a direct claim is ever needed.

Both above insurances are part of the company’s P&I (Protection and Indemnity) coverage. The crew should never need to directly activate them under normal circumstances, as the company will take care of its responsibilities; however, the MLC requires these **financial security certificates on board at all times** as a condition of the Maritime Labour Certificate.

Document Control and Display: The Master ensures that the following MLC-related documents are posted or readily available on board for verification by the crew or inspectors:

- The Maritime Labour Certificate and the DMLC (Part I and Part II) – these are posted on a notice board or bridge area.
- The On-board Complaint Procedure (as described in §19.13) – posted and given to each seafarer.
- The Financial Security certificates (Repatriation and Shipowner’s liability) – posted in crew areas.
- A copy of the MLC, 2006 (the Convention text) or at least relevant excerpts is available on board (often kept in the Master’s office or library) to reference rights and requirements.
- Contact details of the flag State regarding MLC matters, and any relevant ITF/union contacts, as part of the complaint procedure posting.

2024 Amendment (Administrative): The 2022 amendments to the MLC (effective Dec 2024) introduced a minor administrative update: the financial security certificates must now **include the name of the shipowner or the registered owner, if different**. The company has ensured that all insurance certificates issued after this amendment include the required identifying information, and copies of updated certificates have been placed on board. This transparency helps seafarers and inspectors clearly identify the entity responsible for the insurance.



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Finally, the Master and company office maintain a practice of **annual verification** of all MLC-related certificates and procedures. Prior to the periodic MLC inspections (or renewal audit every five years), the company reviews all 14 areas of compliance (as reflected in this chapter and the DMLC Part II) to ensure everything is in order. This internal review, alongside our day-to-day commitment, helps guarantee that the company remains continuously in compliance with the Maritime Labour Convention and provides a decent working environment for all our seafarers.

COMPLIANCE CHECKLIST – MARITIME LABOUR CONVENTION (MLC) 2006

☒ **Minimum Age & Seafarers' Qualifications**

- ☐ Ensure all crew members are **18 years or older** before employment.
- ☐ Verify that all seafarers hold **valid STCW certificates** and medical fitness certificates.
- ☐ Maintain records of crew qualifications and medical certificates onboard.

☒ **Seafarers' Employment Agreements (SEA)**

- ☐ Ensure every seafarer has a signed **SEA** before joining the vessel.
- ☐ Provide each seafarer with a **copy of their SEA**, including wage details and repatriation rights.
- ☐ Retain signed SEA copies onboard and available for inspection.

☒ **Medical Care & Health Protection**

- ☐ Maintain a **fully stocked** and up-to-date **medical chest** onboard.
- ☐ Ensure **trained medical personnel** (Medical Care/STCW-certified) are available.
- ☐ Arrange **prompt shore medical treatment** and repatriation for serious illnesses.
- ☐ Maintain **valid insurance coverage** for occupational injuries and medical expenses.

☒ **Working & Living Conditions**

- ☐ Ensure accommodation, sanitary, and recreational facilities meet **MLC standards**.
- ☐ Provide **free and adequate food and drinking water** to all seafarers.
- ☐ Maintain proper **ventilation, lighting, and noise insulation** in living quarters.
- ☐ Conduct weekly accommodation **hygiene inspections** and address deficiencies.

☒ **Hours of Work & Rest**

- ☐ Maintain **rest records** ensuring compliance with **minimum 10 hours rest in 24 hours**.
- ☐ Display onboard **work/rest schedules** in English and ship's working language.
- ☐ Prevent excessive overtime and ensure at least **77 hours of rest per week**.

☒ **Repatriation & Financial Security**

- ☐ Ensure seafarers do not exceed **12 months continuous service** without repatriation.
- ☐ Provide **company-paid repatriation** at the end of a contract or in case of medical necessity.
- ☐ Maintain **valid financial security** certificates for repatriation and contractual wage coverage.

☒ **Recruitment & Wage Protection**

- ☐ Use only **licensed** or **MLC-compliant** crewing agencies.
- ☐ Ensure **no recruitment fees** are charged to seafarers.



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- ☐ Pay wages **at least monthly** and provide detailed **pay slips** showing all earnings and deductions.
- ☐ Offer seafarers a **secure allotment system** for sending money home.

☒ **Crew Welfare & Connectivity (2024 Amendment)**

- ☐ Provide **shipboard internet access** for personal communication.
- ☐ Ensure free food and water are supplied onboard **at no cost** to seafarers.
- ☐ Inform seafarers of **welfare facilities available in ports** and facilitate access.

☒ **Occupational Safety & PPE (2024 Amendment)**

- ☐ Conduct **regular risk assessments** and provide training on workplace hazards.
- ☐ Supply **appropriately-sized PPE** free of charge, including fit-tested respirators.
- ☐ Appoint a **Safety Officer** and maintain an active **Safety Committee**.
- ☐ Ensure **emergency drills and safety meetings** are conducted as required.

☒ **Onboard Complaint Procedure & Anti-Retaliation Policy**

- ☐ Post and distribute **onboard complaint procedures** in crew areas.
- ☐ Ensure crew can **report complaints confidentially** without retaliation.
- ☐ Keep a **record of complaints** and resolutions for internal review and inspections.

☒ **Regulatory Compliance & Certification**

- ☐ Maintain a **valid Maritime Labour Certificate** and **DMLC Parts I & II** onboard and displayed.
- ☐ Ensure all **financial security certificates** (abandonment & contractual claims) are displayed.
- ☐ Conduct **internal audits and flag state inspections** to verify ongoing compliance.

This checklist ensures full compliance with **MLC, 2006**, including the **December 2024 amendments**. All vessels must meet these requirements to maintain certification and uphold seafarers' rights.