

**The Marine
Technology
Specialists**

seatronics

Understanding the controls & Implementing the solution

Seatronics Pte Ltd ICP

Background of our company

Over the years Seatronics has moved with the times and proved that we are not just a rental company. We now offer a number of complex industry solutions which are based on tried and tested 'best in class' equipment.

- ▶ Seatronics founded in 1978 and part of Acteon Group since 2007
- ▶ The largest and youngest subsea electronic rental fleet available
- ▶ Exclusive agency agreements with best in class
- ▶ Cables and Connectors - the only manufacturer approved cable molding facility
- ▶ Exclusive products
- ▶ Global coverage
- ▶ Calibration facilities
- ▶ Offshore personnel
- ▶ Onshore support 24/7



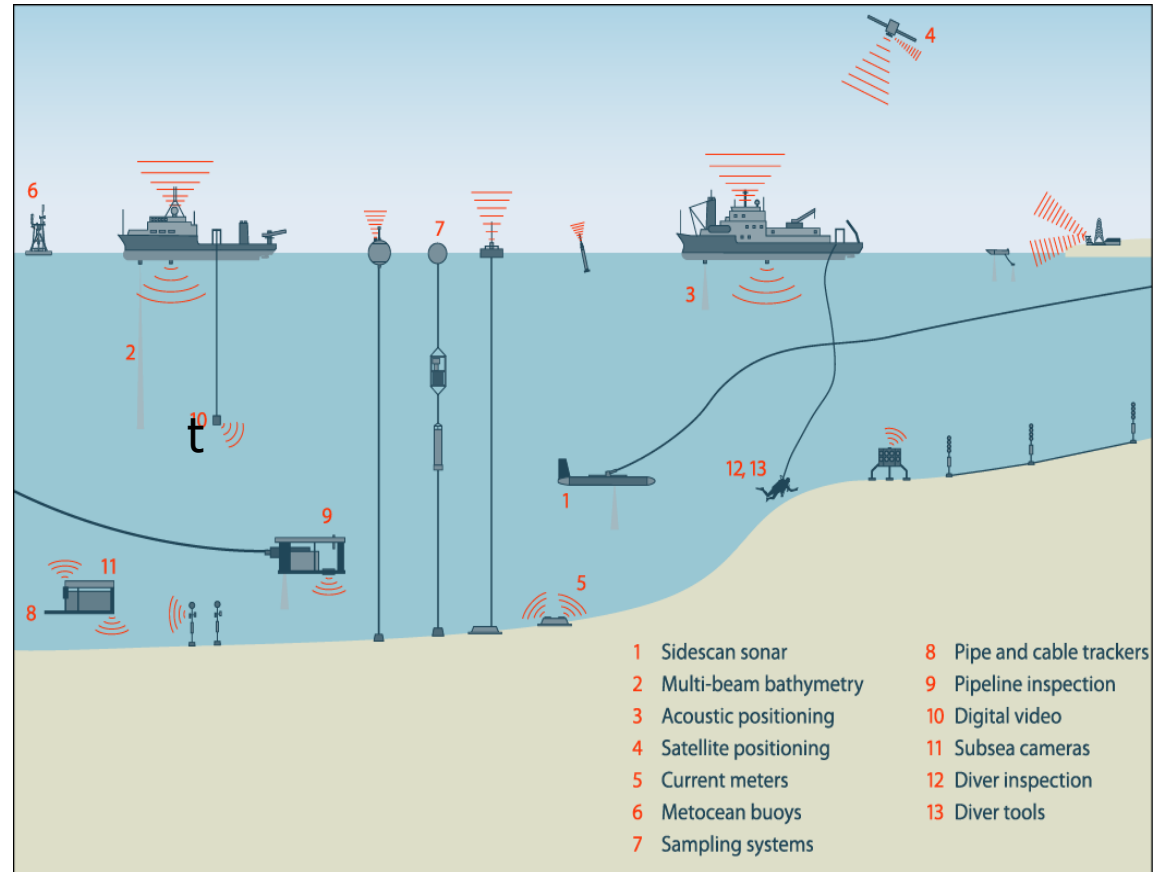
Offices Around The Globe

- ▶ Aberdeen, United Kingdom
- ▶ Macaé, Brazil
- ▶ Åkrehamn, Norway
- ▶ Houston, United States
- ▶ Louisiana, United States
- ▶ Abu Dhabi, United Arab Emirates
- ▶ Singapore, Asia
- ▶ Perth, Australia
- ▶ Hamburg, Germany



Our Market Sectors

- ▶ Offshore Construction
- ▶ Coastal Engineering
- ▶ Environmental Monitoring
- ▶ Oceanography
- ▶ Dredging and Decommissioning
- ▶ Subsea Inspection
- ▶ Non-Destructive Testing
- ▶ ROV & Diving Industries
- ▶ Renewable Energy
- ▶ Scientific Research



Equipment From World Leading Suppliers



Capabilities



Cable
Moulding



Calibration



Computer
Rental



Diving



Fishing



Geophysical
Survey



Hydrographics



Metocean



Personnel



Product
Development



Positioning



ROV Survey



ROV Tooling



Video
Inspection

The Challenge.....

- ▶ Approximately 75% of our asset pool is considered controlled equipment
 - ▶ Seatronics owns approximately 6,000 assets
- ▶ Presents our company with a global challenge
 - ▶ For our clients perspective
 - ▶ Internally for Seatronics Group
- ▶ Seatronics Ltd - UK OGEL for ~11 years
 - ▶ Freedom to export to all of Seatronics overseas locations on a temporary basis
 - ▶ Understood and well maintained
 - ▶ Relatively easy to add new equipment to this list

Seatronics Pte Ltd.

- ▶ Seatronics Pte Ltd established in Singapore some 16 years ago
- ▶ I took over as the Vice President for Asia Pacific 2007 / 08

- ▶ Strategic Goods Control Act – Introduced in 2003
- ▶ Business critical for Seatronics to hold a Tier 3 Export Licence
 - ▶ This therefore needed to be fast tracked
 - ▶ Tier 1 permit applications do not suit our business model

- ▶ No group compliance resource within Acteon
 - ▶ Forced to understand local requirements and implement the solution

Understanding the Controls

- ▶ First task was to become intimate with the requirements
 - ▶ Identify the STGC Checklist
 - ▶ Base ICP on the key points contained
 - ▶ Implement ICP
 - ▶ Ensure Procedures were robust and sustainable for our business
 - ▶ Ensure they were compliant
 - ▶ Demonstrate that we could maintain an auditable document trail

- ▶ After this we could proceed to apply for Tier 3 Licence

Seatronics ICP

Singapore Customs, Strategic Goods Control Branch
55 Newton Road, #06-02, Revenue House
Singapore 307987
Contact No.: 6337 5996
Fax No.: 6337 5212
Email: customs_stgc@customs.gov.sg



ANNEX A - INTERNAL COMPLIANCE PROGRAMME (ICP) QUESTIONNAIRE

This form is to be completed when you apply for an STS Tier 2 and/or Tier 3 permit.

This form may take you about 30 minutes to complete.

Important Notes:

1. Please fill in all fields. (Write NA if not applicable.)
2. Tick (✓) where applicable.
3. Please complete the questionnaire and submit it with the relevant application form and supporting documents (via email, fax or post) to Singapore Customs.

Section A: Element 1 – Company's Commitment

1. ICP manual

a. Is there an ICP manual?

☐ Yes

☐ No [Proceed to 2.]

b. How is it made available to all staff?

☐ Employee Handbook

Seatronics ICP

- ▶ Based on the 7 Key Points – ICP Checklist
 - ▶ Company Commitment
 - ▶ Nomination of responsible personnel
 - ▶ Product Classification / Order Screening
 - ▶ End User Screening
 - ▶ Record Keeping
 - ▶ Training
 - ▶ Audits

Companies Commitment

- ▶ Very straight forward
 - ▶ Business critical
 - ▶ Group MD embraced and attended the STGC awareness training on his first visit to Singapore
 - ▶ Was fully appraised of the implementation process
 - ▶ Vocal and 100% supportive
 - ▶ Signed undertakings distributed throughout the organisation

Nomination of Responsible Parties

- ▶ VP Assumed STGC Officer
- ▶ Senior Sales Engineer assumed role of STGC Administrator
- ▶ Distributed throughout organisation and displayed locally



20th May 2008

Strategic Goods Control – It's your responsibility!

Seatronics Pte Ltd hereby agree to be bound by the regulations laid down by the Singapore customs department in relation to *The Strategic Goods Control Act, Cap 300 (SGCA)* and the *Strategic Goods Control Regulations (SGCR)* and confirm that we will not support or be actively involved with the production of Weapons of Mass Destruction (WMD)

Seatronics understand our responsibilities and liabilities as an exporter of controlled, and potential "dual-use" items, we take responsibility to ensure that the correct export control procedures are adhered to as per our Internal Control Procedure document PI 316.

Seatronics will actively ensure full compliance with the requirements of the Singapore Customs department and will notify them immediately of any discrepancies. We welcome them to visit to conduct an audit of our procedures without warning.

Failure to comply with the control procedures will result in the immediate termination of employment and possible prosecution by the Singapore authorities.

Contravention of these rules may result in any or all of the following:

- A) One a first conviction, a fine not exceeding S\$100,000 or 3 times the value of the goods or technology in respect of which the offence was committed, whichever is higher, or imprisonment for a term not exceeding 2 years or both, or
- B) On a second or subsequent conviction, to a fine not exceeding S\$200,000 or 4 times the value of the goods or technology in respect of which the offence was committed, whichever is higher, or imprisonment for a term not exceeding 3 years or to both.

For further details please visit: www.customs.gov.sg

Strategic Goods Control Officer

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Strategic Goods Control Administrator

Allan Donaldson

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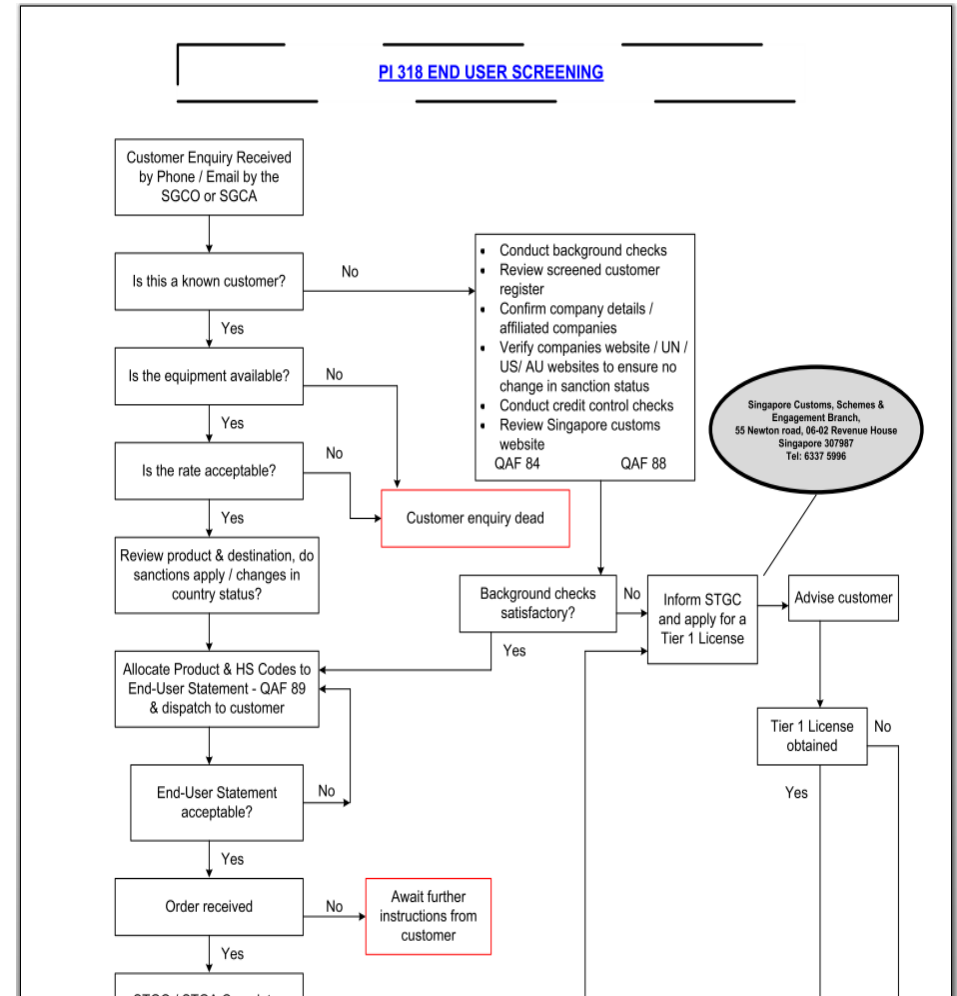
Allan.Donaldson@Seatronics-group.com

Product Classification / Order Screening

A	B	C	D	E	F
ITEM	MANUFACTURER	SCREENED PRODUCT REGISTER TECHNOLOGY DESCRIPTION	HS CODE	PRODUCT CODE	COUNTRY OF ORIGIN
1	Applanix Inc	POS MV 320 Positioning & Orientation System	90148090	DL7A103A	USA
2	Applied Acoustics Eng. Ltd	PAM 2520 Release/Rangemeter/Test Deck Set	90148090	DL7A103A	UK
3	Benthos Inc	ATM 875, 885 & 887 Subsea Acoustic Telemetry Modems	90158090	DL5A001B1	USA
		SIS-1000 Seafloor Imaging System (1000m)	90158090	DL6A001A2B	USA
		SIS-1500 Chirp Sidescan Sonar System	90158090	DL6A001A2B	USA
		SIS-3000 DeepTow Seafloor Imaging System	90158090	DL6A001A2B	USA
4	CDL Ltd	Mini RLG2 Underwater Inertial Measurement Unit	90148090	DL7A103A	UK
		Mini Spool Underwater Metrology Package	90148090	DL7A103A	UK
		Mini Pos2 Underwater Inertial Measurement Unit	90148090	DL7A103A	UK
5	Codaoctopus Ltd	F180+ GPS Precision Attitude and Positioning System	90148090	DL7A103A	UK
		F185 GPS Precision Attitude and Positioning System	90148090	DL7A103A	UK
		F190 GPS Precision Attitude and Positioning System	90148090	DL7A103A	UK
		Echoscope Mk II 3D Acoustic Imaging Sonar	90158090	DL6A001A1A	UK
6	Edgetech Inc	Full Spectrum Deep Towed/ROV & AUV Seabed Mapper System	90158090	DL6A001A2B	USA
7	GeoAcoustics Ltd	GeoSwath Swath Multibeam System	90158090	DL6A001A1A	UK
8	Geometrics Inc	G880 DeepTow Cesium Magnetometer System	90158090	DL6A006B	USA
9	Imagenix Technology Corp	Delta T Model 837A Multibeam Profiling Sonar System	90158090	DL6A001A1A	CANADA
10	Imenco Technology AS	SD3020 Subsea High Quality Digital Stills Camera System	90063000	DL8A002F	NORWAY
		SD3030 Subsea High Quality Digital Stills Camera System	90063000	DL8A002F	NORWAY
		SD3040 Subsea High Quality Digital Stills Camera System	90063000	DL8A002F	NORWAY
11	Innovatum International Ltd	Smarttrak Cable and Pipetracking System	90158090	DL6A006A4	UK
12	iXSEA SA	Octans 1000/3000 Subsea Gyrocompass and Motion Sensor	90142000	DL7A103A	FRANCE
		PHINS Subsea Inertial Navigation system	90142000	DL7A103A	FRANCE
		Magis High Resolution High Speed Magnetometer System	90158090	DL6A006B	FRANCE
		GAPS USBL Positioning System	90148090	DL7A103A	FRANCE
		MT 832 Mini Transponder	90158090	DL6A001A1D	FRANCE
		Acoustics Spare parts	90149090	DL6A001A1D	FRANCE
		Oceano HD 15, 55, 100, 200, 300 Heavy Duty Acoustic Releases	90158090	DL6A001A1D	FRANCE
		Oceano 1250, 2500 Acoustic Releases	90158090	DL6A001A1D	FRANCE
		Oceano Telecommand Unit TT801	90158090	DL6A001A1D	FRANCE
13	Kongsberg	Seatex MRU 5 & MRU 6 Marine Motion Sensor Units	90148090	DL7A103A	NORWAY
		MRU-H Versatile Heave Compensator	90148090	DL7A103A	NORWAY
		Seatex Seapath 200 Precise Heading, Attitude and Positioning Sensor	90148090	DL7A103A	NORWAY
		OE 14-108 Underwater Digital Stills Camera	90063000	DL8A002F	NORWAY
		OE 14-208 Underwater Digital Stills Camera	90063000	DL8A002F	NORWAY
		OE 14-308 Underwater Diver Digital Stills Camera	90063000	DL8A002F	NORWAY

End user Screening

- ▶ Clear set of procedures developed to ensure clients were effectively screened
- ▶ Flow charts produced to guide staff through each step of the process
- ▶ Very clear emphasis on the fact that Any employee could stop Any process at Any time if they were in Any doubt



Record Keeping

- ▶ Seatronics operate a global asset tracking system
- ▶ Records of all transactions accessible globally
- ▶ Standard documentation for all shipments
 - ▶ Yellow order forms
 - ▶ Pink STGC checklist (3 Stage Check)
 - ▶ Blue picking list
 - ▶ All present to allow a dispatch



Record Keeping

Seatronics Group operate a software package called 'Result' which monitors all company assets globally. In addition to the 'Result' system a hard copy contract file is produced for all external hire contracts and stored locally, these files are archived for a minimum period of 5 years.

The contract file will contain the following documentation when active:

- Customer Quotation & Correspondence
- Customer Order form (QAF04/Rev1-Yellow)
- Customer Purchase Order
- Blue equipment pick list (QAF04/Rev1-Blue)
- Order Confirmation (QAF04/OC/Rev1)
- Pro forma Invoice *
- End User Statement ** - (QAF 89)
- End User Screening Form - (QAF 84)
- Strategic Goods Control Permit **
- Export license *
- Airway Bill *
- Goods Out
- Strategic Goods Checklist (QAF 90)

* Denotes where applicable, items not exported from Singapore will not require these documents

** Non Strategically Controlled goods will not be subject to these conditions

Additional Strategic Goods Control documentation will include the following documents but not limited to:

- QA Internal Audit Reports - (QAF 28)
- Training records - (QAF 29)
- Non compliance incident reports, if applicable

All records are to be made freely available for inspection / audit upon request by Singapore Customs officials.

Training

- ▶ Seatronics were already committed to training
- ▶ All staff attended / attend STGC awareness training regardless of discipline
- ▶ Weekly STGC discussion during Ops Meeting
- ▶ Regular updates from Group Compliance



Training

Seatronics will review and conduct regular training courses to ensure that all members of staff are fully aware of the rules and regulations relating to the control of 'Strategic Goods Control' and their export requirements.

Seatronics have registered for all Singapore Customs electronic mail updates. These will be reviewed and if necessary transmitted to the staff to ensure that current export requirements are adhered too.

- Regular training courses to ensure procedures have not changed
- New staff to be inducted and updated on all processes related to STGC
- Conduct regular staff briefings to ensure continued compliance with SGCR regulations
- (QAF 29) Training records will be held by the company HR representative and updated to include content, participation and general understanding of the requirements
- Educate our customers on STG / Offer advice where we can
- Open 'Tool Box' discussions between staff and senior management to be conducted to ensure that the best working practices are implemented
- Seatronics operate an open door policy, open discussions are encouraged!

All records are to be made freely available for inspection / audit upon request by Singapore Customs officials.

Audit

- ▶ Seatronics Group & Individually Pte ISO 9001-2008 accredited
- ▶ Comprehensive Quality Management System which drives our business
- ▶ ICP forms an annex to this system
- ▶ Maintain comprehensive documentation
- ▶ Held a Tier 3 Open General Export Licence for 7 years (3 at an enhanced banding level)



Audits

Seatronics will undertake an internal audit compliance process every 3 months initially to ensure the system procedures are being fully adhered too. – (QAF 25) Internal Audit Plan

In addition to this Seatronics will ensure an external audit is performed by their International Freight Forwarder on an annual basis to ensure continued full compliance with SGCA regulations.

Full audit reports (QAF 28) will be compiled detailing any relevant discrepancies within the operating procedures, a copy will be submitted to Senior Management for review and acceptance. Any corrective or preventative action (QAF 34) deemed necessary will be acknowledged and procedural amendments implemented or additional training requirements scheduled.

The audit review process will include the following key points:

- Management Policy Statement – Adequate and current
- STGC Manual is formalised and updated where necessary – Change notes highlighted
- Comprehensive step by step procedural review to ensure continued compliance
- Review of all documentation registers including Screened Product Register / End-User Screening / Product Screening / Screened Customer Register / Training Records / Export Register
- Identification of Strategically Controlled Goods, Storage Facilities / Security of Infrastructure

Documentation List

QAF 25 Internal Audit Plan
 QAF 26 Internal Audit Check List
 QAF 28 Internal Audit Summary Report
 QAF 29 Training Review
 QAF 34 Corrective & Preventative Action Request
 QAF 64 Export License Register
 QAF 84 End-User Screening Form
 QAF 85 Product Screening Form
 QAF 86 Screened Customer Register
 QAF 87 Screened Product Register
 QAF 88 Product Screening Register
 QAF 89 End-User Statement
 QAF 90 Strategic Goods Checklist

These records will be retained for a minimum period of 5 years.

All records are to be made freely available for inspection / audit upon request by Singapore Customs officials

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Questions?