Safety Management System Manual

Section 1		Company Commitment & Policies	
Issue No:	5	Amendment No:	1
Issue Date:	10 – 2015	Amendment Date:	10-2017

SECTION 1 COMPANY COMMITMENT AND POLICIES

1.1. FOREWORD & COMPANY COMMITMENT

This Manual forms part of the Carisbrooke Shipping Safety Management System, and also satisfies the requirements of the International Safety Management Code for the Safe Operation of Ships and for Pollution Prevention as adopted by the IMO assembly Resolution A.741 (18) on 4th November 1993, as amended, and MLC Convention.

Carisbrooke Shipping shall, from here on, be referred to as "the Company" in the context and understanding of the ISM Code and as "the Shipowner" in the context and understanding of MLC 2006 Convention.

The Company Safety Management System (SMS) consists of this manual, forms and checklists, Standing Orders File, Fleet Memoranda File and other subject-specific files and manuals.

The Safety Management System Manual and Files are Controlled Documents, and without formal permission of the person responsible for the issue and revision of this Manual, no other person is allowed to alter the Safety Management Manuals and Files, in any way by amending, adding to, or removing (parts of) its contents. The Chief Executive Officer (CEO) of the Company is the Top Executive Management who approves the Company SMS and subsequent amendments. The CEO has appointed the DPA as the person who is responsible for monitoring and issuance the SMS Manuals and Files.

The Safety Management System will in this document from here on be referred to as the 'SMS', while this Safety Management System Manual will be referred to as the 'SMS Manual'.

Carisbrooke Shipping is an "equal opportunity" employer. Wherever the SMS Manual refers to persons, positions or ranks in the male format, it should be construed to mean both male and female.

The SMS Manuals and Files are the property of the Company and may not be copied or reproduced in any other form without prior written consent from the Company. This prohibition does not apply to current SMS Manual holders within the Company.

COMPANY COMMITMENT

The Company recognises the importance of safe and secure ship operations and endeavours to use its best efforts at all times to ensure that employees at sea and ashore and its ships are safe, secure and the environment is protected.

All Company personnel – at sea and ashore- must therefore:

- Maintain a safe, secure, economical and efficient operation at all times, bearing in mind that the safety
 and Security of personnel, the ship and its cargo and the protection of the environment are of primary
 importance;
- Promote and improve safety and security awareness and safe working practices on board ships and ashore:
- Encourage efficient communication between ship and shore staff to improve efficiency, to avoid waste of materials and resources, and to develop a broad understanding of operational matters.
- Continuously improve their safety-management skills including preparing for emergencies related to safety, security and to environmental protection.

The Company is committed to continual improvement of its Safety Management System through regular reviews of the SMS, both on board its ships and ashore, and to supply the ship and her Master with all required resources in order for them to comply fully with the procedures and systems contained in this Safety Management System.

The Company will use its best endeavours to see that any ship under its management is technically fit and able to perform as required or expected by the Owners/ Charterers/Client.

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1.2. COMPANY POLICIES

COMPANY SAFETY, SECURITY AND ENVIRONMENTAL PROTECTION POLICY

It is the Policy of the Company:

- To provide healthy, safe and secure working and living conditions;
- To prevent human injury and loss of life;
- To avoid damage to the environment, in particular the marine environment;
- To avoid damage to property.

This policy is to be promoted and implemented-by all employees - at Sea and Ashore- by taking all necessary precautions to protect themselves, their colleagues, the ship, the environment and the cargo by complying with all mandatory rules and regulations at all times and by taking into account all applicable codes, conventions, guidelines and standards issued by Maritime Industry Organisations, Administrations, Classification Societies, P & I Clubs and the Company.

The Objectives of the Company are:

- To provide for safe and secure working practices in ship's operations;
- Continually reduce accidents on its ships, both in frequency and severity;
- To continuously improve the safety management skills of personnel both ashore and on board ships, including preparing for emergencies related to both safety and environmental protection;
- Maintain or improve the value of the assets in its care.

To enable the above Objectives the Company will:

- Maintain high standards of safety consciousness, personal discipline and actively promote employees participation in matters of improving safety, security and protection of the environment.
- Comply with and to continually improve this Safety Management System and its efficiency and effectiveness;
- Ensure that the requirements of the Safety Management System are communicated as necessary to all persons at sea and ashore;
- Provide the necessary resources in terms of time, manpower, facilities and funding on board and ashore;
- Ensure that services supplied are of the required standard and in compliance with the ISM Code, the ISPS Code, and the Maritime Labour Convention 2006 and with relevant National and International legislation;
- Assess all identified risks to its ships, personnel and the environment and establish appropriate safeguards;
- Work as a team to achieve continual improvement and cost effective services;
- Ensure that personnel are appropriately qualified, skilled, medically fit and competent to carry
 out their assigned duties and tasks in a satisfactory manner and that, where and when necessary,
 they receive training.

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- Ensure that each ship appropriately manned in order to encompass all aspects of maintaining safe operations on board.
- When and if applicable, the Company will periodically verify whether all those undertaking delegated ISM-related tasks are acting in conformity with the Company's responsibilities under the Code.
- Ensure that the ships' personnel are able to communicate effectively in the execution of their duties related to the SMS by ensuring all seafarers satisfy personnel recruitment criteria.

The Company will ensure that this policy is observed, implemented and maintained at all levels of the organisation, both ships and shore based.

The implementation and maintenance of this policy is the responsibility of all Company personnel, and ultimately rests with the Company CEO <u>and Fleet Technical Director</u>.

Original signed by the CEO and held in the Company's Office.

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COMPANY OCCUPATIONAL, HEALTH AND SAFETY AT WORK POLICY

The Company accepts that it is their duty to safeguard, as far as is reasonably practicable, the health and safety at work of all its employees and other authorised persons, both on board and ashore, with particular attention having been paid to the health and safety of seafarers under the age of 18.

The Company is responsible for the implementation and effectiveness of the Company's overall occupational health and safety policy and for the compliance to any regulations, which may be made pursuant to the Merchant Shipping Acts.

The Company requires that all employees act in a responsible manner at all times to prevent injury to themselves and their fellow workers, or other persons who may be affected by their actions at work.

The Company requires, authorises and fully supports all employees, both ashore and on board ships, to stop any act or work activity that they regard as unsafe.

All levels of management ashore and at sea are hereby instructed that it is their duty to do everything reasonably practicable to achieve the following objectives:

- Provide and maintain so far as reasonably practicable a safe place of work, and a safe means of access to that work;
- Ensure that there is in place a Risk Assessments System and in use a Safe Work Permits System;
- Provide and maintain equipment (such as provision of personal protective equipment) and systems of work that are, so far as is reasonably practicable, safe without risk to health.
- Provide so far as it is reasonably practicable such information, instruction and supervision that will
 enable all employees to identify and avoid hazards thus making a positive contribution to their own
 safety at work.
- Make arrangements to ensure, so far as it is reasonably practicable, that the storage and handling of
 articles and substances which may be encountered on company ships, is carried out in a safe manner,
 with reference to current information and knowledge to preclude risk to both health and safety.
- Minimise the risk of pollution and disturbance to the environment from the Company's operations.

This Policy will, as often as may be appropriate, be revised. This Policy, and any future revisions, will be brought to the attention of shore and sea staff either by means of a Fleet Memo or other appropriate manner. The implementation and maintenance of this policy is the responsibility of all personnel, and ultimately rests with the Company CEO and Fleet Technical Director.

Original signed by the CEO and held in the Company's Office.

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COMPANY DRUGS AND ALCOHOL POLICY

It is Company policy that the use, possession or distribution of unlawful drugs by any person on board ship is not permitted.

The Company reserves the right to carry out random drug and alcohol testing on any employee, ashore or at sea, whether or not the use of drugs and/or alcohol is suspected, or when an accident or hazardous occurrence/near miss has taken place.

It is Company policy that there must be no consumption of alcohol during the four hours prior to going to work/on duty/on watch and no consumption of alcohol whilst at work/on duty/on watch .

This policy applies to All Masters, Chief Engineers, Officers and Engineers, All Crew, and all shore personnel, visitors, or other personnel attending to work on board the Company's ships.

The maximum permitted alcohol limit shall not be greater than 0.05% blood alcohol level or **0.25 mg/l of alcohol in the breath** in compliance with STCW Convention as amended.

No crewmember is permitted to bring alcohol and illegal drugs onto the ship.

Any alcohol intended for consumption on board shall be obtained from the Master and is strictly limited to beer and wine.

Fortified wine, liquors or spirits of any type are NOT permitted to be sold or consumed on board Company ships.

In some countries different alcohol limits apply (i.e. Zero) and random tests may be carried out.

All on board personnel are to comply at all times to the most stringent requirements when in ports and/or national waters.

If a person on board is found positive, the ship may be prevented from sailing and the offender held subject to legal prosecution under the laws of the country the ship is visiting.

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COMPANY SMOKING POLICY

This policy shall apply to All Crew, Shore Personnel, Visitors, Passengers and any other personnel on board the Company's ships.

SMOKING, which includes ELECTRONIC CIGARETTES, IS PROHIBITED AT ANY TIME IN ALL THE FOLLOWING LOCATIONS:

- In the living accommodation, except in specifically allocated smoking areas and cabins;
- On the Navigation Bridge unless specifically approved by the Master in his Standing Orders;
- On the main deck (in front of accommodation block), in Cargo Holds and on the BRIDGE WINGS;
- In the Engine Control Room <u>unless specifically approved by the Chief Engineer in his Standing</u>
 Orders;
- In the Engine Room and all other engine compartments, including air conditioning and refrigeration rooms:
- In the vicinity of bunker stations;
- Near or inside store rooms, including paint store, deck stores and forecastle;
- In areas with equipment containing gas, including gas storage rooms and battery lockers;
- In the vicinity of and within enclosed and confined spaces;
- On manoeuvring stations during manoeuvring;
- On deck during bunker operations;
- By, or in vicinity of the ship's gangway for the crew on duty.

SMOKING IS ONLY PERMITTED in designated internal smoking rooms, individual cabins fitted with an air extracting system and smoke alarm, and in external areas clearly marked for this purpose. Outside areas will be limited to decks aft of the accommodation block and only permitted when operational considerations allow this. Ashtrays shall be provided in such designated areas, and available in the applicable individual cabins.

Matches and lighters must be used with care and should not be carried while working in areas where smoking is prohibited. Cigarette ends and matches should be disposed of in ashtrays or other fire safe containers. Lit cigarettes should not be left unattended in ashtrays and must be fully extinguished after smoking. They should not be thrown overboard due to the danger of being blown back on board.

"NO SMOKING" signs shall be prominently and permanently displayed in areas where smoking is not permitted.

The Master must strictly enforce the Company's Smoking Policy.

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COMPANY MEDIA POLICY

This policy shall apply to Masters, ALL crew, shore staff, visitors, passengers and any other personnel authorised to be on board the Company's ships.

In the event of media interest in the Company, its ships, employees, an incident or other occurrence concerning the Company or employees ashore or at sea, no personnel other than members of the Company's Media Response Team (CEO and Fleet Technical Director) is authorised to respond to enquiries from third parties and / or the press.

Personnel for whom this policy shall apply, such as Masters, All Crew, Shore Based Personnel, are not under any circumstance permitted to release information on social media sites or respond to queries or provide information to parties or sources outside the Company, unless express permission has been given by the Company Top Management.

All enquiries shall immediately be referred to the head of the Media Response Team at the Company's office.

PERSONAL USE OF SOCIAL MEDIA, PUBLIC FORUM AND NETWORKING SITES

The term 'social media' is used to describe dynamic and socially interactive networked information and communication technologies, by which personal information and / or opinions can be presented for public consumption on the internet including, but not limited to, Facebook, Twitter, MySpace, Instagram, Flickr, YouTube, Pinterest, Google+, Vine, Instagram, etc. and personal Blogs.

It is Company policy that the use of personal social media, public forum or networking sites will not be permitted at during hours of work.

It shall be prohibited at any time to publish on such personal sites details of work related matters or material that could adversely affect the Company, a work colleague, a client, the professional relationship with any client or identify individuals who are clients, employees or otherwise associated with the Company. Failure to comply may be considered a disciplinary offence.

It is important to remember that when posting in a personal capacity individuals may still easily be identified as working for the Company even if not stated.

Making personal statements is no insurance against negative publicity and all should be aware that posts can be shared outside personal networks.

If anyone is contacted by the media or press about posts on personal sites which relate to the Company it must discussed with Top Management before a response is made.

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Robert Wester – Chief Executive Officer (CEO)

Carisbrooke Shipping Ltd.

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