



ALPHARD MARITIME

SECURITY MANUAL

2.2

COMPANY POLICY

We are committed to developing a security culture to guard against those who would deliberately seek to harm us or our client's interests. Our MST will contribute towards the common security of our people, ships and the cargoes they carry, and of the ports they call at.

We shall evaluate the changing risks posed by developing global situations and devise defences against them. We shall advise our clients for the various ship hardening measures for compliance with most current "Best Management Practice. We shall cooperate with the proper authorities in the fulfilment of good security practice worldwide.

We undertake the responsibility to respect the human rights of, and fulfil humanitarian responsibilities towards, all those affected by our business activities, including Personnel, Clients, suppliers, shareholders, and the population of the area in which services are provided. The company also recognize the importance of respecting the various cultures encountered in our work, as well as the individuals they come into contact with as a result of those activities.

We shall always be alert at all levels of our work - from recruitment, to ship operations, to information management. We shall investigate and act on abnormalities.

We also commit ourselves to the following:-

- a) To operate in accordance with company's manual;
- b) To operate in accordance with applicable NATIONAL and INTERNATIONAL laws and regulations, and in accordance with relevant corporate standards of business conduct; including, but not limited to -:
 - MSC.1-Circ.1443 - INTERIM GUIDANCE TO PRIVATE MARITIME SECURITY COMPANIES
 - ICOC-PSSP (International Code of Conduct for Private Security Service Providers).
 - The Voluntary Principles developed by USA & UK governments.
 - Bribery Act and Prevention of Corruption Act of the relevant national and international laws.
 - UN Basic Principles on the Use of Force & Firearms by Law Enforcement Officials (1990).



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COMPANY POLICY(contd)

- SUA Convention.
- ISO PAS 28007:2012.
- Cyprus Law 77(I) of 2012 (THE PROTECTION OF CYPRUS SHIPS AGAINST ACTS OF PIRACY AND OTHER UNLAWFUL ACTS LAW OF 20121).

- c) To operate in a manner that recognizes and supports the rule of law; respects human rights, protects the interests of their clients and protection of persons.
- d) To take steps to establish and maintain an effective internal governance framework in order to deter, monitor, report, and effectively address adverse impacts on human rights;
- e) To provide a means for responding to and resolving allegations of activity that violates any applicable national or international law and as per our procedure ; and
- f) To cooperate in good faith with national and international authorities exercising proper jurisdiction, in particular with regard to national and international investigations of violations of national and international criminal law, of violations of international humanitarian law, or of human rights abuses.
- g) Compliance with Laws and Regulations including Quality, Health, Safety and Environmental Regulations, Drug and Alcohol Policy that of the owners when the security guards are on board.

Authorised by:

Capt. Alok Kumar.
Chairman
Alphard Maritime

25th Nov 2013



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2.2.1 OCCUPATIONAL HEALTH, QUALITY, SAFETY AND ENVIRONMENT POLICY

OCCUPATIONAL HEALTH, QUALITY, SAFETY AND ENVIRONMENT POLICY

Alphard Maritime shall identify potential hazards of its activities involved and shall provide necessary safeguards (Safe Operating Procedures, Checklists, necessary PPE, etc) and will strive to provide a safe and healthy environment. Company's aim is to achieve zero accident/incident and will ensure that reasonable precautions are taken to protect relevant staff against high-risk or life-threatening operations. These will include:

- a) Assessing risks of injury to Personnel as well as the risks to the local population generated by the activities of providing security to clients and/or Personnel;
- b) Providing adequate training to all of its persons;
- c) Providing adequate protective equipment, appropriate weapons and ammunition, and medical support; and
- d) Adopting policies which support a safe and healthy working environment within the Company, such as policies which address psychological health, deter work-place violence, misconduct, alcohol and drug abuse, sexual harassment and other improper behaviour.

Company shall measure the effectiveness of the policy by the way of setting targets and monitoring Key Performance Indicators and shall keep upgrading its policies/procedures as a part of Continuous Improvement.

Authorised by:

Capt. Alok Kumar.
Chairman
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2.2.2 DRUG AND ALCOHOL POLICY

Drug & Alcohol Policy

While on company's business -:

All MST boarding the vessel had to comply with the vessel Company's D&A policy.

The MST shall not consume alcohol for a period 24 hours before boarding the vessel. The MST shall also not be under the influence of any drug prior boarding the vessel

The use, possession or consumption of drug or alcohol on board by company employees is strictly prohibited.

The Company requires that all the employees, within the scope of their position, are able to respond to an emergency situation at any time during their scheduled duties, and are unimpaired by the effects of drugs and/or alcohol.

The company shall comply with the Drug & Alcohol policies of clients and shall provide full support to ensure compliance of same.

The effectiveness of the policy shall be measured by carrying out random Drug & Alcohol Tests by the Company.

Authorised by:

Capt. Alok Kumar.
Chairman
Alphard Maritime



ALPHARD MARITIME

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2.2.3 COMPANY MISSION AND VISION STATEMENT

COMPANY MISSION AND VISION STATEMENT

COMPANY VISION

Our vision is to remain in the fore front of the Maritime Security Industry.

In doing so, our customers must have the confidence that we have striven to do our utmost to make secure our common interests and that we shall continue to be vigilant in doing so.

COMPANY MISSION

The mission of Alphard Maritime is to provide effective 24x7 maritime security to the client's vessel so that neither person nor property is unpleasantly surprised and thereby harmed under our watch. We do not rest and we are not satisfied until all of our client's people and property are taken to the end port of transit as safely as possible. Alphard Maritime advises on best security practices, physical hardening, enhanced communications, crew training for emergency situations, first aid in paramedic level and unconditioned protection of the client's people and property while under attack.

Authorised by:

Capt. Alok Kumar.
Chairman
Alphard Maritime

25th Nov 2013



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2.2.4 CODE OF BUSINESS ETHICS AND CODE OF CONDUCT

CODE OF BUSINESS ETHICS AND CODE OF CONDUCT

- **CLIENTS' INTEREST WILL ALWAYS COME FIRST**

We always have a clear understanding of our clients' demands, what they wish to accomplish and in what manner they would like to achieve it. As much as we value their interest and as valuable as we consider delivering them the best, even more than their expectations from us, we would never compromise on our code of business and business ethics. In any circumstances, we would not do anything out of the law, out of our company's legal binding policies or anything considered ethically immoral for that matter.

- **ALWAYS PROVIDE INDEPENDENT AND OBJECTIVE ADVICE**

We consider our anatomy as one of our greatest strengths and in any scenario, when realized an off beam situation takes place, we will always be able to disagree on the spot regardless of our esteemed views or any monetary effect by them via fees.

- **PROFESSIONAL QUALITY OF OUR WORK**

"The quality, not the longevity, of one's life is important" – Martin Luther King, Jr. When it comes down to business, what Martin Luther King, Jr. said, we can definitely relate to that. We would rather be the best at what we do than be the biggest with poor quality of service.

- **OUR ASSETS ARE OUR PEOPLE AND REPUTATION**

We take pride in each & every person we appoint for the job as they have to go through a critical selection procedure before they make it into our well-coherent team. Being a part of the service industry, we are well-informed of the fact that without the best & finest, we cannot be the best & finest company ourselves.

- **TRAINING AND CAREER DEVELOPMENT**

We are committed to the current and future development of staff skills, expertise, ability and the job and career related aspirations of individual members of our MSOs and Office staff. We recognise that effective staff development is not only vital to meeting future goals and ambitions but also makes an essential contribution to the development of a responsive, staff supportive and well managed institution. The MSOs are provided in-house trainings, briefings, familiarizations and counseling related to their jobs. We also encourage and promote fast track promotions to deserving employees.

- **ALWAYS TREAT THE CLIENTS WITH UTMOST DISCRETION**

Our clients' confidentiality is always guarded with life at Alphard Security/Maritime and we always make sure that the standards of services we provide are absolutely supreme.

- **INTERGRITY & HONESTY ARE HEART & SOUL OF OUR BUSINESS**

We believe in fair competition so we give every firm a chance to prove themselves without denigrating anyone as we know that with our quality of service and finest selection procedure for the service providers we will always make it on top, even when we compete fairly.



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- **CREATIVITY & IMAGINATION IN EVERYTHING WE CONDUCT**

As they always say, Old is Gold, and it certainly will always be, we believe in constantly upgrading our procedure to provide the utmost service to our clients' problems and to cater to them accordingly. This way, we are always updated and we never lag behind of our clients' needs & expectations.

- **COMPLIANCE WITH ICOC CODE OF CONDUCT AND INTERNATIONAL STANDARDS**

Company is committed to operate in compliance with applicable NATIONAL and INTERNATIONAL laws and regulations, and in accordance with relevant corporate standards of business conduct; including, but not limited to -:

- MSC.1-Circ.1443 - INTERIM GUIDANCE TO PRIVATE MARITIME SECURITY COMPANIES
- ICOC-PSSP (International Code of Conduct for Private Security Service Providers).
- The Voluntary Principles developed by USA & UK governments.
- Bribery Act and Prevention of Corruption Act of the relevant national and international laws.
- UN Basic Principles on the Use of Force & Firearms by Law Enforcement Officials (1990).
- SUA Convention.
- Respect of Human Rights.
- ISO 28007:2015.
- Cyprus Law 77(I) of 2012 (THE PROTECTION OF CYPRUS SHIPS AGAINST ACTS OF PIRACY AND OTHER UNLAWFUL ACTS LAW OF 2012).

Authorised by:

Capt. Alok Kumar.
Chairman
Alphard Maritime

25th Nov 2013



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2.2.5 CLIENT COMPLAINTS, GRIEVANCE AND WHISTLE BLOWING POLICY

CLIENT COMPLAINTS, GRIEVANCE AND WHISTLE BLOWING POLICY

Alphard Maritime has established procedures to document and address complaints or grievances received from internal or external interested parties (including clients and whistle-blowers).

AMPL has established and documented procedures as follows:

- a) For the documented receipt of complaints and grievances.
- b) Establishing steps to address and resolve any such complaints and grievances.
- c) An efficient investigative process of the grievance which includes means of regular communication with the complainant, and procedures to cooperate with any official external investigation.
- d) Expedient address of complaints ideally within three months of initial notification.
- e) Corrective and preventative actions, including disciplinary action where infractions are found, commensurate with the fault which will be documented and retained.
- f) Protection of any whistle-blower for making a report.
- g) Procedures will exist to document and report improper or illegal conduct either internally or by third parties to competent authorities.

Any Complaints, Grievances or Whistle Blowing issues to be addressed to the following email ids

QHSE@alphardmaritime.com & ajit@alphardmaritime.com

Authorised by:

Capt. Alok Kumar.
Chairman
Alphard Maritime

8th June 2016



ALPHARD MARITIME

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2.2.6 HUMAN RIGHTS POLICY

HUMAN RIGHTS POLICY

Alphard Maritime affirms the responsibility to respect the human rights of, and fulfill humanitarian responsibilities towards, all those affected by our business activities, including personnel, clients, suppliers, and the population of the area in which services are provided. We recognize the importance of respecting the various cultures encountered in our work, as well as the individuals we come into contact with as a result of those activities.

Alphard Maritime is committed to creating an environment where human rights are understood and respected and adheres to international law on the protection of human rights even if national law does not specify them.

All personnel shall respect and protect human dignity and maintain and uphold human rights of all persons. Security guards may use force only when strictly necessary and to the extent required for the performance of their duty in accordance with company's SOP, RUF and Code of Conduct.

No security guard may inflict, instigate or tolerate any act of torture or other cruel, inhuman degrading treatment or punishment.

Security guards should apply as much as possible a non-violent means before resorting to the use of force and firearms and should follow the standards set out for the rules and regulations for the use of firearms.

In cases where force is used, such incidents should be reported to the appropriate authorities and to the company, as soon as it is safe to do so. Alphard Maritime also aspires to conform with the legal duty to rescue any persons, including suspected pirates, who no longer pose a threat and may be at risk of drowning or worsening of injuries. Medical aid should be provided to injured persons, including to the offenders.

Alphard Maritime provides effective training for all security personnel in International Code of Conduct of security service providers and Voluntary Principles on Security and Human Rights and declines any persons determined to have been responsible for serious human rights violations. Any employee discovered to have committed such violations after fair hearing will be dismissed.

Authorised by:

Capt. Alok Kumar.
Chairman
Alphard Maritime
21ST Oct 2017



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2.2.7 THIRD PARTY CODE OF CONDUCT

THIRD PARTY CODE OF CONDUCT

Alphard Maritime is committed to work with our partners to promote responsible practices in general and throughout our security management system including supply chain management. Our aspiration is to ensure that all our partners acknowledge our values and share our commitment to conduct business in an ethical, legal and socially responsible manner. We strive to continually improve within the areas of human rights, labour standards and the environment and to work against any form of corruption.

We strongly believe that implementing the "Code of Conduct" towards our partners and in our supply chain will create value for all parties and this is a step to establish a long term sustainable relationship with our partners, our employees and the societies where we operate.

Our code of conduct reflects our commitment to International Code of Conduct of security service providers and our respect for Human Rights.

We recommend that the supplier implements the standards of this code of conduct to its own business partners, including suppliers, contractors and joint venture partners. Where the supplier acts as an agent for Alphard Maritime to supply goods and services, we intend to verify that the supplier meets the standards of this code.

Our Policies and Code of Conduct are available on our website www.alphardmaritime.com

Authorised by:

Capt. Alok Kumar.

Chairman

Alphard Maritime

21ST Oct 2017