

RAMAN *SHIPMANAGEMENT*

INTRODUCTION TO RAMANSHIP MANAGEMENT Ind Pvt Ltd. RPSL-MUM-162278

(Rev 17, October 2024)



INTRODUCTION TO ‘RAMAN SHIP MANAGEMENT’

INDEX

1. Preface	3
2. 2 Section 1: Safety Management System	4-7
3. 3 Section 2: New Legislations which will impact our SMS	7-9
4. 4 Section 3: RSMI SMS	9-11
5. 5. Section 4: Company Certificates	11-12
6. Quality Product Statement	13
7. HSE Policy	14
8. Recruitment Policy	15
9. Drug & Alcohol Policy	16
10. Energy Conservation Policy	17
11. RSMI Security Policy	18
 Appendix	
12. Onboard Complaint Procedure	19

Disclaimer:

This document serves as an introduction only and must not be considered a substitute for any part of the ‘Raman Ship Management’.

In the event of any contradictions or anomalies arising as a result of translation into any language, the English language version shall prevail at all times

INTRODUCTION TO ‘RAMAN SHIP MANAGEMENT’

Preface

This document has been prepared in a simple FAQ format to enable seafarers and non-technical shore staff to understand:

- ◆ The concept of Safety Management System (SMS),
- ◆ Various relevant Standards (ISO 9001, ISO 14001, and ISM) and legislations,
- ◆ Why we have SMS and who does it apply to.
- ◆ What our company's SMS, called the Raman Ship Management, is all about and its scope,
- ◆ The requirements for maintaining the necessary certifications, and
- ◆ The new legislation(s) coming into force within a period of next 12 months and what is expected of them to ensure compliance.

Section 01-Safety Management System

What is a Safety Management System (SMS)?

A safety management system is a structured and documented system which enables company personnel, both ashore and on board to effectively implement company's various policies such as Safety, Health, Security, Environmental protection, Quality, Energy Conservation, Recruitment etc.

It comprises of written procedures & manuals for each activity in the organization. These procedures/manuals provide control on the key activities thus ensuring the company consistently delivers service to the satisfaction of the ship owner, charterer and other interested parties.

It also states how the company will:

- Measure performance of each procedure.
- Identify non-conformance.
- Correct it.

And in doing so, improve the system. This improvement must be 'continual improvement'.

Why do we have a Management System?

Top Management at RSMI has documented Policy statements such as Quality, Health, Safety and Environment, Drug & Alcohol, etc (Complete set of policy statements provided in Section 4 of this booklet). These statements send key messages to all ashore and on board ships. The purpose is to:

- Give a direction, and
- Set priorities

Using the policy statements, the Managers at RSMI set up procedures. These procedures form part of the Management System, which is used for control of key steps. By controlling the key steps the company strives to achieve the goal(s) stated in the policy.

It also provides people in the organization with the following:

- Organizational structure
- Roles and responsibilities
- Processes
- Resources

To whom does this apply?

The Raman Ship Management applies to all working on board and in the office. Your (seafarer's) contribution is vital for the success and to achieve it, your understanding and involvement is absolutely necessary.

Remember:

- ◆ It works for you, not against you.
- ◆ It makes you an important part of the company
- ◆ Reduces number of accidents
- ◆ Encourages team work
- ◆ Gives you better quality of life in the work place
- ◆ It helps to keep you safe and secure
- ◆ Reduces risk of pollution
- ◆ In the end it guarantees Customer Satisfaction.

INTRODUCTION TO 'RAMAN SHIP MANAGEMENT'

What is the ISM Code?

ISM stands for 'International Safety Management'. In late 1980s there was growing concern about poor management standards in the shipping industry. In fact many accident investigations revealed root cause as major errors on the part of ship managers. In 1987 IMO decided to set up a Maritime Safety Committee responsible for developing guidelines for ship board and shore based management. This led to the evolution of the ISM Code. The current version of the ISM Code came into force on 1 July 2010. The Code's focus is on:

- ◆ Providing Safe practices in ship operation and a safe working environment .
- ◆ Establishing safeguards against all identified risks
- ◆ Continuously improve safety management skills of personnel ashore and aboard ships, including preparing for emergencies related to safety and environmental protection

What is ISO?

ISO stands for "International Organization for Standardization". It is a network of the national standards institutes of 157 countries, on the basis of one member per country, with a Central Secretariat in Geneva, Switzerland, that coordinates the system. These institutes are non-governmental organizations.

Which are the most widely known ISO Standards?

The ISO 9000 and ISO 14000 are among ISO's most widely known standards ever. ISO 9000 has become an international reference for quality requirements in business-to-business dealings, and ISO 14000 looks set to achieve at least as much, if not more, in helping organizations to meet their environmental requirements.

What is ISO 9001:2008 and why was it developed?

ISO 9001:2008 is the current edition of the Quality Standards, which replaces all previous ones. This was introduced in November 2008.

It deals with "quality management", and offers guidelines for an organization on what it should do to enhance customer satisfaction by meeting customer and applicable regulatory requirements and continually to improve its performance in this regard.

What is ISO 14001:2004?

ISO14001: 2004 is second edition, which replaced the first edition (ISO 14001:1996). It is primarily concerned with "environmental management", and offers guidelines for an organization on how it should conduct its business in a most environmentally friendly manner. It helps the organization by providing guidance on how it can determine the harmful effects of its activities on the environment, and continually to improve its environmental performance.<http://www.iso.org/iso/en/aboutiso/introduction/index.html> - top#top

INTRODUCTION TO 'RAMAN SHIP MANAGEMENT'

What is Raman Ship Management? (MMS)

MMS is RSMI's Safety Management System. Instead of calling it SMS (Safety Management System) we decided to call it MMS. Reason being the fact that our management system certification is what is known as a Seamless Certification, which provides an "Integrated Management System" covering.

- ◆ ISM Code (International Safety Management Code).
- ◆ ISO 9001:2008
- ◆ ISO 14001:2004

In this document the term Management System is used in the context of **QHSE**:

- ◆ Quality
- ◆ Health
- ◆ Safety, and
- ◆ Environment

What are the benefits of a Seamless Certification/Integrated Management system?

- ◆ It provides framework for legislative and regulatory compliance
- ◆ Focuses on customer requirements
- ◆ Management Commitment
- ◆ Safer working environment Reduced Risks of contamination of marine environment.
- ◆ Enhance Image with Regulators/Public/Investors
- ◆ Increases Efficiency/Cost saving
- ◆ Employee Awareness
- ◆ Provides clear job responsibilities

How was the Raman Ship Management developed?

The company's original management system was based on ISM and it addressed the 16 elements of ISM. Later the company made a decision to go in for a Seamless Certification and to do this we needed to integrate ISM, ISO 9001:2008 and the ISO 14001:2004 into the existing management system. The fact that the ISM and the two ISO standards have a great deal of common elements, made it relatively easy to integrate all three and come up with the "Raman Ship Management".

What are the Elements of the Raman Ship Management?

The Raman Ship Management was developed using the ISO 9001:2008 as a platform. With each of the ISO 9001:2008 element, we introduced common elements from ISM and 14001:2004.

ISO 9001:2008 requirements are arranged in five elements, and these form the basis of the MMS:

- ◆ Element 4/Quality Management System
- ◆ Element 5/ Management responsibility
- ◆ Element 6/Resource Management
- ◆ Element 7/Product Realization
- ◆ Element 8/Measurement, Analysis and Improvement

INTRODUCTION TO ‘RAMAN SHIP MANAGEMENT’

Where can you find more details about the Raman Ship Management?

Company manual Raman Ship Management provides all necessary information. Read more about it in the Section 02 of this booklet.

What is ISPS Code?

The International Ship and Port Facility Security Code (ISPS Code) is a comprehensive set of measures to enhance the security of ships and port facilities, developed in response to the perceived threats to ships and port facilities in the wake of the 9/11 attacks in the United States.

What is the certificate issued to a ship that complies with the ISPS Code?

A ship that is compliant is issued an International Ship Security Certificate (ISSC).

Section 02 - New Legislations which will impact our SMS

In this section we will provide an over view on some new legislations expected to come into force soon with focus on how it will affect you – the sea farer.

What are the new legislations coming into force soon?

1. Revised MARPOL Annex V comes into effect on 1 January 2013
2. ILO Maritime Labour Convention 2006 was ratified and adopted on 20th Aug 2012 and shall come into force on 20th Aug 2013. It is also known as MLC 2006

What are the changes in MARPOL Annex V?

Basically five fundamental changes made to the existing annex:

- ◆ Discharge of all garbage into the sea is prohibited, except as expressly provided otherwise.
- ◆ The number of categories of garbage has been increased including a definition for cargo residues.
- ◆ Some cargo residues and cleaning agents can be discharged as long as they are not harmful to the marine environment.
- ◆ It is incumbent on the owner/ Master to prove that discharge material is not harmful to the environment.
- ◆ The requirements covering placards, garbage record books and garbage management plans have changed.

What has RSMI done to prepare the vessels for MARPOL Annex V Implementation?

- ◆ New Garbage Log Book has been printed and sent out to all vessels.
- ◆ New garbage management placards have been printed and sent to all vessels for display.
- ◆ To assist all seafarers in understanding the new requirements we have a presentation available in 'MIPS/QHSE/Others/Training and Familiarisation Presentations'.

INTRODUCTION TO 'RAMAN SHIP MANAGEMENT'

What is the ILO MLC 2006 all about?

It is a 'Bill of Rights' for all seafarers put together by the UN body called International Labour Organisation and is the FOURTH PILLAR of Maritime Legislations:

- ◆ STCW
- ◆ SOLAS
- ◆ MARPOL, and
- ◆ ILO MLC 2006

What is the objective of MLC 2006?

Provide a commitment from Governments and shipowners to guarantee all seafarers decent living and working conditions, equality, health protection, medical care, social protection, non-discrimination and protection unjust actions.

How is the MLC 2006 structured?

MLC 2006 is divided into five (5) Titles:

- ◆ Title 1 The minimum requirements for seafarers to work on ships;
- ◆ Title 2-Conditions of employment for seafarers;
- ◆ Title 3-Accommodation, recreational facilities, food and catering;
- ◆ Title 4-Health protection, medical care, welfare and social security protection; and
- ◆ Title 5-Compliance and enforcement

Where can you find details on MLC 2006?

A copy of the ILO MLC 2006 publication is available in the ship's library.

How is RSMI preparing for compliance with MLC 2006?

RSMI has contracted LRS for this certification process - classification societies have been authorized by flags to do this on their behalf.

MLC 2006 certification stages are as follows:

- ◆ Declaration of Maritime Labour Compliance (DMLC) Part I. This is a set of flag legislations which cover all the IMO MLC 2006 requirements. We now have these in hand for the Bahamas and Panama flag vessels. Saudi has not issued this as they have not ratified the MLC 2006 Convention.
- ◆ Declaration of Maritime Labour Compliance (DMLC) Part II. Based on the flag legislations listed in DMLC Part I we now have to demonstrate which sections in our SMS addresses each of the flag legislation. The document with all necessary SMS cross references will be known as DMLC Part II
- ◆ Soon as DMLC Part II is ready we shall invite Class, LRS in our case, to come and verify our declaration list.
- ◆ Once Class is satisfied that we have met all the flag requirements, they shall begin vessel inspection to verify records and practice on board. Crew shall be interviewed to determine if they are **aware of their rights**.
- ◆ On satisfactory inspection of vessel class will issue a MLC certificate to the vessel

INTRODUCTION TO 'RAMAN SHIP MANAGEMENT'

Are there any important MLC 2006 issues a sea farer must be aware of?

Vessels will be subjected to Port State Inspections and they will be interviewing crew to determine if every crew member is aware of rights granted to them under the IMO MLC 2006. For details you may refer to presentation available in MIPS/QHSE/Others/Training and Familiarisation Presentations.

Listed below are few issues for which you must have a clear understanding.

- ◆ Every seafarer must carefully read and understand the Seafarers' Employment Agreement before signing it. Should he have any doubts, he should seek clarification before putting his signature on the document.
- ◆ Two originals for the Agreement shall be prepared - one should be in the seafarer's possession and the other in the shore office.
- ◆ Hours of work and hours of rest. RSMI's Work & Rest hour module in MIPS is based on the ILO MLC 2006 requirement.
- ◆ Every seafarer must be fully aware of the 'Onboard Complaint procedure' (over view provided as Annex 1 to this document)

Section 03- RSMI's SMS

What Policy statements has RSMI issued?

RSMI has issued six policy statements and they are:

1. Quality
2. Health Safety and Environment
3. Recruitment
4. Drug and Alcohol
5. Energy Conservation
6. Security

Where can you find the company's policy statements?

These policy statements are available in this booklet in the last few pages. Copies are also displayed on board the ships.

What are the RSMI Procedures?

ISM Code requires ship management companies to develop a Safety Management System (SMS), which should include instructions and procedures to ensure safe operation of ships and protection of the environment.

To meet these requirements in the code and those laid out in the ISO standards; RSMI has eleven (11) Manuals for the ships and twenty five (25) procedures for the shore office. In addition to this there are two (2) manuals, which are common to both ships and the shore office.

- ✓ The 11 manuals for the ships are:
 - 1 SMS - Safety Management System
 - 2 FGI - Fleet General Instructions
 - 3 NAV - Navigation
 - 4 TNK -OIL - Tanker Oil

INTRODUCTION TO 'RAMAN SHIP MANAGEMENT'

- 5 TNK - CHEM - Tanker Chemical
- 6 TEC - Technical
- 7 SAF - Safety
- 8 DRY - Dry cargo
- 9 CRW-Crewing
- 10 FMS-Forms
- 11 CL's-Circular Letters

✓ The 24 Procedures in the shore office are:

1. Quality Management System
2. Contingency Planning
3. Crew Supply
4. Marine Operations
5. Communications
6. Agency
7. Purchasing
8. Accounts
9. Safety
10. Technical
11. Training
12. Crewing
13. Quality System Administration
14. Insurance
15. Information Technology
16. Major Repairs and Dry-docking
17. Measurement & Calibration
18. Subcontractors & Vendors
19. Environment Protection
20. Fixture of Charter Parties
21. Job Descriptions
22. New Business, Inspection & Delivery of Vessels
23. Management of Change
24. Human Resource Management
25. Fleet Personnel Administration

Out of the 25 procedures, seven (nos. 1, 3, 6, 11, 12, 17 & 20) have been withdrawn. RSMI 025 'Fleet Personnel Administration' has been added replacing No's 3 & 12 which have now been taken out.

✓ The two Manuals common to the shore office and the ships are:

1. **QHSE Management Programme:** This is RSMI's documented procedure adopted for identifying aspects and impacts of ship operation on the environment. It further provides guideline on how we determine significance of the aspects & impacts. The Manual also presents the company's KPIs (Key Performance Indicator) for the shore office and the ships.

INTRODUCTION TO 'RAMAN SHIP MANAGEMENT'

2. **Raman Ship Management (MMS).** This Manual is a core document which serves to provide the reader an insight into how RSMI has integrated the ISM Code, ISO 9001:2008 and ISO 14001:2004. It includes a tabulated cross reference to demonstrate how the various sections of the ISM and ISO standards. are interlinked. In doing so, it provides a useful tool for an auditor, especially an external auditor, to determine if the company's SMS meets all the requirements /clauses of the ISM Code, ISO 9001:2008 and ISO 14001:2004.

Where can you find the ship manuals on board your vessel?

RSMI has switched over to fully electronic SMS. Soft copies of all manuals are now available. in MIPS. However, to comply with industry requirement one set of hard copy of the Navigation manual is available on board. It is the Master's responsibility to update this hard copy of RSMI/NAV every time a new revision is released.

How has RSMI ensured that the manuals are available to all and even in the event of a server crash?

- ◆ To achieve RELIABILITY we have:
 - ✓External Hard Disk Drive (HDD) connected to network. The SMS is automatically stored in this external HDD
 - ✓ Off-line copy gets stored in Master's and CE's PC,
 - ✓Master does a daily back up of the server on a back-up tape,
- ◆ For ACCESSIBILITY the SMS is now available on all PCs on board which have MIPS access and these are:
 - ✓Master's PC.
 - ✓Chief Engineer's PC, Chief Officer's PC/CCR
 - ✓PC dedicated for Crew's Work & rest Hour record.

Where can you get details of the arrangement on board for Electronic SMS?

A presentation 'Electronic SMS' is available in MIPS/QHSE/Others/Training and Familiarisation Presentations. Here you will find how replication takes place and the controlled documents are updated.

Section 04-Company Certificates

What are the related Certificates?

- ◆ Document of Compliance or DOC
- ◆ Safety Management certificate or SMC
- ◆ Management System Certificate for ISO 9001:2008
- ◆ Management System Certificate for ISO 14001:2004

What is a Document of compliance or DOC?

This is a certificate issued by a Classification Society on behalf of the flag state. It certifies that the Manager complies with requirements of the ISM Code for certain type of ships.

Ships in our management are registered under the following flags: Saudi, Panama, and Bahamas. This makes it necessary for us to have DOC from each of the three flag states. The issuing authority for the RSMI DOC is DNV .

A DOC is valid for 5 years and the issuing authority audits the shore office every year to ensure continued compliance. Following a satisfactory audit the certificate is endorsed.

INTRODUCTION TO ‘RAMAN SHIP MANAGEMENT’

What is a Safety Management certificate or SMC?

This is a certificate issued by a Classification Society on behalf of the flag state under which the ship is registered. It certifies that the vessel complies with requirements of the ISM Code. A SMC is valid for 5 years and the issuing authority audits the vessel once in between 2 & 3 year. This is called the Intermediate audit. Following a satisfactory intermediate audit the certificate is endorsed.

What is a Management System Certificate for ISO 9001:2008 ISO 14001:2004?

The Management System Certificate is issued by an ISO authorized organization. RSMI has chosen DNV for this certification.

The Management System Certificate has two separate certificates, one each for ISO 9001:2008 and ISO 14001:2004. In October 2011 RSMI switched the ISO certification to a Norwegian Accreditation body as they offer certificate validity period of 5 years thus enabling us to harmonize it with DOC.

The ISO certificate is issued to the Management Company and it has a list of all the ships under management. To maintain the ISO certification, the management shore office and an agreed number of ships from the fleet are audited every year to verify compliance to the ISO Standards. The number of ships to be audited depends on the fleet size with a goal to complete all vessels during the 5 year period. Following the audit there is NO ENDORSEMENT on the certificate; instead an audit report is issued.

What are internal audits and why do we do it?

ISM Code (12,1) requires us to carry out internal audits on board vessels and ashore at intervals not exceeding 12 months. In exceptional circumstances flag may grant a 3 month extension. To meet this requirement we at RSMI work on a (-) 3 month window and try do the audit at the first convenient opportunity once it is 9 months since the last internal audit. Purpose is to verify that the SMS is being followed. Any breach found during an audit is reported as non-conformity.

Disclaimer:

This document serves as an introduction only and must not be considered a substitute for any part of the RSMI's SMS (Safety Management System).

In the event of any contradictions or anomalies arising as a result of translation into any language, the English language version shall prevail at all times.

QUALITY POLICY STATEMENT

Vision:

RSMI is to be globally recognized as a high quality ship manager

Mission:

RSMI as environmentally and safety-driven ship managers, and providers of supplementary marine services, are committed to:

- ◆ Provide focused services to the affiliated ship owners.
- ◆ Satisfying customer requirements by providing good ship performance through continuous technological improvement.
- ◆ Continually improving our management system and processes by setting quality objectives and targets. Abiding by statutory and regulatory requirements related to our service activities.
- ◆ Operate efficiently and cost effectively to make the company profitable.



Raman K Ravi
Managing Director
Raman Ship Management Limited
October 2024

INTRODUCTION TO 'RAMAN SHIP MANAGEMENT'

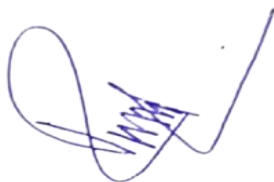
HEALTH, SAFETY & ENVIRONMENTAL POLICY

It is the policy of RSMI Ship Management Limited JLT (RSMI) that in all its activities, account will be taken of the need to protect the health and safety of its employees and other involved persons, and to conserve the environment.

RSMI aims to eliminate work-related injuries and illnesses, and to achieve high standards of environmental protection. RSMI complies with the letter and the spirit of relevant legislation and conventions, whose purpose it is to protect the health, safety and environment of all, and avoid damage to property. In following this policy RSMI:

In following this policy RSMI:

- ◆ Complies with mandatory rules and regulations, and takes account of codes, guidelines and standards from maritime organisations, in the execution of the management of vessels.
- ◆ Believes that work-related accidents and environmental pollution are preventable. It actively promotes high standards of safety & environmental consciousness, discipline and individual accountability. It promotes employee involvement in defining and monitoring measures taken to safeguard and improve health, safety and environment at work. This involves continuous improvement in safety and environmental protection skills at all levels in the company, and preparation and training for emergency situations.
- ◆ Management demonstrates their undivided commitment and demands the commitment of all employees to high standards in respect of health, safety and environmental protection, and ensures that they have the skills and support to achieve the long term goal of "zero incidents and zero spill operation" and in doing so provide safe practices in ship operations together with a safe working environment.
- ◆ Requires that contractors working under its direct control, and affiliated companies, apply health, safety and environmental standards consistent with prevalent industry standards, and keeps them appropriately informed of known or potential hazards. It uses its best endeavours to influence trading associates and suppliers to do likewise.
- ◆ Uses its best endeavours to identify risks associated with Health and Safety and environmental impacts and establish safeguards for the prevention of accidents, and for the prevention of pollution and to mitigate and remedy the consequences of accidents, which have occurred.
- ◆ Participates in discussion with regulatory, academic and government bodies, with a view to being aware of current topics, and to develop measures to safeguard health, safety at work, and the environment. It supports and facilitates the dissemination of knowledge developed in these fields.
- ◆ Strive for continual improvement of the HSE policy by periodically reviewing the environmental performance, objectives and targets, and by revising the HSE MS to meet and or exceed the legislative requirements and the demands of our clients.



Raman K Ravi
Managing Director
Raman Ship Management Limited
October 2024

RECRUITMENT POLICY

SELECTION & APPOINTMENT OF SEA STAFF

RSMI Ship Management Limited JLT (RSMI) recognises and endorses the requirement of the Standards of Training, Certification and Watchkeeping (STCW) Convention, and considers that these requirements are the minimum for all seafarers appointed to managed vessels.

RSMI also recognises the need to apply the following criteria to the recruitment, selection and appointment of all senior sea staff appointed to managed vessels:

- ◆ Acceptance by RSMI representatives at Technical/Operational interview.
- ◆ References from past employers.
- ◆ Previous experience.
- ◆ Qualifications.
- ◆ Appraisal Reports.
- ◆ Medical Reports.
- ◆ Training.
- ◆ Appointment Briefing.

The Fleet Personnel Manager in conjunction with the Fleet Manager is responsible for any appointment on the basis of the above criteria. Should no suitable candidate be available, then the Fleet Personnel Manager will consult the President.



Raman K Ravi
Managing Director
Raman Ship Management Limited
October 2024

DRUG & ALCOHOL POLICY

BLANKET DECLARATION

RSMI warrants and represents that it has a policy on Drug and Alcohol Abuse ("Policy") applicable to all vessels which the company operates and which, after the date of this certificate, the undersigned may operate.

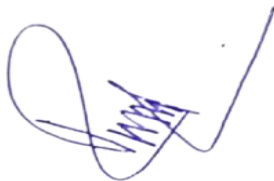
The Policy meets the standards laid out in the Oil Companies' International Marine Forum Guidelines for the Control of Drugs and Alcohol Onboard Ship'. Under the Policy, alcohol impairment shall be defined as a blood alcohol content of 40mg/100ml or greater.

The carriage and consumption of alcohol and use or possession of unprescribed drugs is totally prohibited on board any RSMI managed tonnage. Possession of prescribed drugs for personal use is permitted provided it has been declared to the Master.

To enforce the zero tolerance policy, RSMI is committed to using the industry practices for monitoring proper implementation of this policy and offenders shall be dealt with severely.

The company further warrants that the Policy will remain in effect unless you are otherwise specifically notified and that the company shall exercise due diligence to ensure compliance with the Policy

It is understood that an actual impairment or any test finding of impairment shall not in and of itself mean the company has failed to exercise due diligence.



Raman K Ravi
Managing Director
Raman Ship Management Limited
October 2024

ENERGY CONSERVATION POLICY

It is the policy of RSMI Ship Management Limited JLT that in all its activities account will be taken to conserve all energy sources deployed on vessels managed by the company and its shore- based establishments.

RSMI Ship Management Limited JLT is committed to eliminating all wasteful use of energy resources it deploys in its normal course of business.

In following this policy, RSMI Ship Management Limited JLT:

- ◆ Acknowledges the safety of personnel, ship, cargo and the environment as paramount.
- ◆ Complies with mandatory rules and regulations, and takes account of codes, guidelines and standards laid down by competent maritime bodies while conducting its business.
- ◆ Creates awareness among its employees on the consequences of wastage of energy resources on the environment.
- ◆ Promotes a work culture that discourages the waste of energy resources.
- ◆ Demands that all its employees examine their work processes to identify any waste of energy resources and eliminate such waste.
- ◆ Participates in discussions with regulatory academic and government bodies with a view to being aware of current techniques and to develop measures to conserve energy resources and promulgate such knowledge in the company.



Raman K Ravi
Managing Director
Raman Ship Management Limited
October 2024

INTRODUCTION TO 'RAMAN SHIP MANAGEMENT'

RSMI SECURITY POLICY

It is the Policy of RSMI Ship Management Limited JLT to provide a secure working environment, by establishing and maintaining the required security measures to prevent unlawful acts against ships, which endanger the safety and security of persons and property on board Company managed ships.

RSMI Ship Management Ltd. JLT (the "Company") objectives are to:

- provide security procedures and practices for ship operations to protect the security of ports and the wider community
- establish safeguards to reduce the risk to crew and port personnel on board Company ships
- improve security skills and awareness of Company personnel ashore and onboard ship
- prepare contingency measures for emergencies relating to possible security incidents

These objectives will be achieved by:

- a ship security assessment and a ship security plan specific to each individual ship
- comprehensive training for Company personnel
- actively promoting security awareness amongst Company
- personnel regular documented reviews and internal audits of security procedures and plans, in order to allow for constant update and improvement of the plan

All employees are expected to comply with the required procedures within the ship security plan and should be familiar with the relevant security duties required of them and the measures required to protect the ship from any unlawful act.

Achievement of the above objectives will ensure that the Company Security Officer, the Master and Ship Security Officer will receive the necessary support to fulfill their duties and responsibilities in accordance with XI-2 of the 1974 SOLAS Convention.



Raman K Ravi
Managing Director
Raman Ship Management Limited
October 2024

INTRODUCTION TO 'RAMAN SHIP MANAGEMENT'

APPENDIX 1 **ONBOARD COMPLAINTS PROCEDURE**

Every seafarer has the right to lodge his complaint / grievance without fear of any victimization directly with the Master, or a RSMI representative or an external authority. To guarantee this seafarer's right RSMI has a detailed procedure on how every such seafarer's complaint will be investigated within a period of 20 days to the full satisfaction of the seafarer. It is available in RSMI/CRW Section 61.4 and it is summarized in a flow chart shown below.

Let us see what are some of the specific crew related issues in the flow chart (RSMI Complaint Handling Procedure, Pg. 20);

- ◆ You have a complaint make sure it is 'Genuine and not frivolous';
- ◆ Non-genuine or frivolous complaints could end up in disciplinary action and a possible dismissal;
- ◆ If you are afraid to go to your HOD (Head of Department) with the complaint because you might be victimized, you have the option to report it to the Office representative.
- ◆ If complaint is reported to HOD, he may investigate and resolve it at his level,
- ◆ If the HOD feels he must inform the Master, then the Master shall investigate and resolve it within 20 days;
- ◆ Master shall make appropriate entries in Ship's Log and submit the final complaint report to the Fleet Manager.
- ◆ Complaints which are not closed out within 20 days may be reported to Flag or a Labour Official in seafarer's country of origin

Some additional features of the onboard complaint procedure:

Seafarers with a genuine complaint has the right to be accompanied by another crew member of their choice, at all times, while discussing the complaint with any Senior Officers(s) on board.

- ◆ If the seafarer is afraid to report his grievance to his superiors on board he may lodge the complaint with company representative.
- ◆ If he feels even reporting to a company representative he may be victimized he has the option to report to an 'External Authority' such as Port State Control official, local seafarer labour organization, or other seafarer welfare assistance service.
- ◆ If a complaint relates to the Master or Senior Officers onboard and the Master found withholding it Company treats it as a serious policy breach and the Master will be subject to disciplinary procedure.
- ◆ Each seafarer at time of joining shall be provided with a copy of this complaint procedure which shall include:
 - ✓ Name of person or persons on board the ship who can provide seafarers with impartial advice on their complaint and otherwise assist them in following the company's complaint procedure.
 - ✓ Contact information for concerned official in flag administration and/or that of competent labor authority in the seafarer's country of residence.`