



SNS GUARDS' RULES

CODE OF CONDUCT

Company operates within the context of ICoC, voluntary principles on security and human rights, as well as by incorporating the basic principles on the use of force and firearms by law enforcement officials.

The established Quality and Security Management System and this mandatory Code of Conduct have been developed using the full guidelines of ISO 28007-1:2015 as a Private Maritime Security Company providing Privately Contracted Armed Security Personnel on board vessels, for protection against unlawful acts of piracy in High Risk Area.

In particular, with regard to ICoC:

- SNS operates in accordance with applicable laws and regulations and in accordance with relevant corporate standards of business conduct and ethics.
- SNS operates by recognizing and supporting the rule of law, with respect to human rights, cultural and religious differences, while protecting client interests. Personnel operate with professionalism, without exercising any discriminatory, unethical and/or other personal misbehavior, with the upmost respect towards human life.

In particular, with regard to ISO 28000:2007 and ISO 28007-1:2015 requirements:

SNS top management has established and authorized an overall security management policy. This policy:

- Is consistent with other established company policies e.g. regarding health and safety, protection of the environment, human rights etc.
- Is considered a framework which, enables the specific security management objectives, targets and programmes established, to be implemented in an effective manner
- Is consistent with the overall security threat and risk management framework developed
- Is appropriate to the threats to the organization and the nature and scale of the operations undertaken
- Clearly states the overall/broad security management objectives which are to protect client's ship and crew at high risk area from loss or damage due to unlawful acts of piracy



- Clearly expresses our commitment to continually improve the established security management processes and the overall effectiveness of the Quality and Security Management System implemented, through established security objectives which are reflected in relevant quantified key performance target indicators, subject to periodic monitoring and evaluation
- Clearly states our commitment to always comply with current applicable legislation, regulatory and statutory requirements, as well as with other requirements as requested for, by our clients and recognized interested parties.
- Is fully endorsed by SNS top management, who hereby are committed to provide all necessary resources as required to achieve effective implementation
- Is documented, implemented and maintained through established Quality and Security Management System documentation and related records
- Is considered mandatory for all SNS personnel and is communicated to all employees via systematic in house training and relevant document distribution, regardless of job position and level within the company chain of command
- Is communicated to all interested third parties, including contractors and visitors, via access to our website and with the intent that these persons are made aware of their individual security management-related obligations.
- Is communicated to stakeholders where appropriate and when requested.
- Is systematically reviewed for suitability and effectiveness, especially in case of the acquisition of, or merger of the company with other organizations, or in case of any other major changes to the business scope which may affect the continuity or relevance of the security management system.

1. COMMITMENTS

SNS Ltd ensures that its personnel will comply with the principles included in the ICoC. This is implemented, by establishing the right selection, screening and vetting criteria, by proper and ongoing training, by raising awareness and by signing appropriate text within a contractual agreement.

SNS Ltd will accept a due diligence check or audit, whenever a shipping company requires so, or when the company or any other competent authority assumes it necessary, as was the case in the past.



Services rendered shall not be used in violation of human rights law or international humanitarian law. This is ensured by appropriate end user licenses of all arms, as well as by monitoring the arms movement via traceable serial numbers from port to port, maintaining an updated appropriate database and providing authorities with all necessary information.

SNS Ltd is committed to act in a manner consistent with the laws of the countries within which the company is active, to be mindful of the highest applicable international standards and to promote compliance with applicable international law enforcement principles, therefore possessing all necessary permissions for arms transfer/storage to as many coastal states as considered practical.

SNS Ltd top management is hereby committed to:

- ensuring that the security policy and security objectives are established and are compatible with the strategic direction of the company
- ensuring the effective integration of the quality and security management system requirements into the established business processes
- providing all necessary resources to deliver, implement, review and continually improve the established quality and security management system
- communicating the importance of an effective quality and security management system and of conforming to relevant requirements to all employees
- to comply with all applicable and current legal and regulatory requirements, as well as any other requirements to which the company chooses to subscribe
- ensuring that the quality and security management system achieves intended outcome(s)
- directing and supporting personnel to contribute to the effectiveness of the quality and security management system by taking into account relevant suggestions for improvement
- promoting overall personnel awareness and pursuing continual improvement
- supporting other relevant company management roles to demonstrate their leadership as it applies to their areas of responsibility



2. RISK ASSESSMENT

During operation, SNS Ltd considers the following risk criteria that may impact on interested parties:

- The overall risk policy of the company, as well as that the client and related acceptable risk tolerance.
- The inherent uncertainty of operating at sea in an area with a high risk of piracy
- The nature of the likely threats and consequences of an incident on its operations, reputation and business
- The impact of an incident
- The impact of the combination of a number of risks are taken into consideration for each distinct transit undertaken :
 - ✓ The residual risk of being pirated
 - ✓ The lifesaving capabilities of the ship and the ship's safety certificate
 - ✓ Facilities for the safe storage of firearms onboard the ship
 - ✓ The potential for, and measures to mitigate, the misuse of firearms resulting in bodily injury or death
 - ✓ The potential for, and measures to mitigate, unforeseen accidents
 - ✓ The potential for, and measures to mitigate, armed guards escalating a piracy incident
 - ✓ Liability issues
 - ✓ Measures to ensure compliance with international and national laws.

In addition, SNS Ltd (Commercial Manager and Operations Manager responsibility) is focused in:

- Obtaining extensive background information from various sources –monitoring and adapting to changing, complex political, economic, and law enforcement, military and social situation (Somalia). Sources for information are the following: open sources, such as NATO shipping center, Oceanus live or EUNAVFOR site (use of password) - intel received from the spot (warships in the area) or from the EU OHQ (Northwood) – maritime opintel report (on a daily basis) as well as “fresh”/updated intel from our vessels transiting the area and monitoring the situation either through the alert messages via Ch. 16 or other incoming information.
- While delivering equipment (including lethal and non-lethal equipment) to the security personnel, risk of such a transfer should be taken into consideration, as well



as the relevant export licensing requirements. Company ensures the safe transfer through: appropriate legal licenses which involve also port authorities or police (for instance in Mauritius), or Navy (for instance in Sri Lanka) - locked weapons in safe containers-weapons also remain locked in safe box on board the vessel's bridge, apart from: training period of PCASP on board and after the detection of suspicious boat where the box is being unlocked.

3. DEPLOYMENT AND CONDUCT

SNS Ltd Management ensures that PCASP will behave humanely and with respect to dignity and privacy rights, regarding the treatment of any human being. Strict orders have been communicated to our personnel, in particular to Team Leaders.

Use of force:

The general rule is the avoidance of the use of force. In case use of force is inevitable, then, use of force should be proportionate to the threat and appropriate to the situation. Extensive experience regarding use of force indicates that potential pirates interrupt attack and retreat, upon receiving warning shots. Therefore direct use of force without previous use of all the other means (flares –verbal warnings-warning shots-raising up /showing the arms – firing against the outboard engine) will probably result in further engagement, in revenge fire or later likely retaliation and in any case in further unwanted escalation of an incident. SNS Ltd doctrine is to allow the pirates to leave “proud-without losing face”- that is, use all the other means for the job, without offending the attackers. If this fails and as a last resort one may exercise the self- defense right. The use of force will be in the context of self-defense right, or defense of others against the imminent threat of death or serious injury. SNS Ltd PCASP are exclusively ex-navy or army Special Forces distinguished members and have received professional training for years on the application of rules of engagement in tense situations.

- No use of weapons that cause unwarranted injury or present an unwarranted risk.
- Arms shall be used only in the appropriate circumstances and in a manner likely to decrease the risk of unnecessary harm.
- When force is used, medical treatment shall be provided to injured persons, including to offenders (company provides all PCASP with



- STCW/medical first aid while at least one member, primarily the Team Leader, has also received medical trauma qualification).
- Equipment exports and imports comply with all applicable law and regulations, of the country concerned.
 - Company monitors the use of equipment and investigates situations where such equipment is used in an inappropriate manner.
 - Prior to use of force, the deployment of non-lethal incapacitating weapons (e.g. rocket flares) should be used, situation permitting, while general policy is to exercise restraint from applying means capable of causing death or injury to persons.
 - Assistance and medical aid be offered to any injured person.
 - Clear intent of using weapons shall be demonstrated in advance (for instance: showing/raising up the weapons-verbal warnings/we are armed onboard).

4. DETENTION OF PIRATES

Detention of pirates can only occur in case someone is arrested during an attack, while taking into account that Master retains the ultimate control and responsibility for the safety and security of the ship. Decisions made by the Master shall be abided by immediately, by the PCASP. The decision for the provision of assistance rests at the Master of the vessel.

Taking all the above into consideration, they should be treated humanely, without any torture or other cruel or degrading treatment or punishment. In particular, if someone is to be detained on board after an unsuccessful attack or possible injuries then:

Vessel/PCASP contacts UKMTO or any warship in the area (channel 16,8,72) or the coastal state authorities if the incident takes place within its territorial waters, to inform of the evolving situation. In case there is a warship in the area and it is known that it has a medical role 2 capability (surgery on board), if there are injured pirates on board, then they will be transferred there either by helicopter or boat transfer (depending on the situation). If not, the injured person should be treated accordingly, until ship arrives in port. During the detention of either injured or non-injured pirates, all shall be treated in a humane manner. It is noted that any pirate at sea, after overturn of the skiff (it is likely to happen as a result of aggressive maneuvers), shall be salvaged.



5. SELECTION AND VETTING OF SUBCONTRACTORS

Company's policy is not to use subcontractors. SNS Ltd maintains a "pool" of security guards that participate in the assigned missions and are trained / evaluated through company procedures.

6. PERSONNEL CONTRACTS

Any PCASP contract shall clearly state the following:

"during my deployment for provision of either armed or unarmed services, I will be in line with the principles of ICoC (International Code of Conduct), voluntary principles on security and human rights as well as with basic principles on the use of force and firearms by law enforcement officials".

Company maintains employment and service records for past and present personnel for at least five (5) years. Human Recourses holds passports or other identification documents for the shortest time reasonable for administrative purposes.

Contracts of employment include a requirement for the individual to notify the PMSC of any circumstances that might lead to a review of their screening status and possible suspension of employment in accordance with applicable law. In addition, company retains records (application forms) details of personnel's next of kin and written consent for contact within the framework of established protocols, as to how and by which suitably trained persons.

7. MANAGEMENT OF WEAPONS

Weapons which used by the company, are fully authorized and with all necessary user licenses. Company uses semi-automatic, for an accurate-and layered/graduated level of defense at a distance. The mentioned weapons are used only for protection against piracy.

All transactions of weapons take place after necessary possession of arms transfer and storage licenses with the interesting regional countries

All weapons are controlled/monitored by serial numbers from embarkation place to disembarkation place

Records regarding to whom and when the weapons used are kept



8. WEAPONS TRAINING

Personnel, who carry weapons, are authorized to use such a type (same caliber), are trained in the weapons they carry and in the use of force, while also been trained in the issues referred to in para 56-57-58-59 of ICoC and in the UN principles as well as in the use of force and firearms by law enforcement (1990) and national laws or regulations, in effect, the area “duties will be performed”.

9. INCIDENT REPORT

Every incident which involves the use of weapons (except for training purposes) or any attempt to attack the vessel with the use of force, shall be reported and kept in record, including the following details:

- time and location of incident
- weather conditions
- details of the persons involved (both guards and crew’s members) in the incident
- injuries or damage caused (in case of attack stage)
- circumstances leading up to this incident
- actions by PCASP (actions against the pirates, notification of the relevant authorities etc.)
- reaction by the notified authorities (UKMTO, warships, etc.)
- cause of incident – lessons learnt
- submitting a specific incident form.

Upon such an incident, SNS Ltd is committed to assist any investigation initiated by competent authority, by providing all necessary details, while protecting the scene and safeguarding any evidence from tampering. Reports of incidents and any investigation conclusions shall be retained for at least ten (10) years.

10. SAFE AND HEALTHY ENVIROMENT

Company, will ensure a safe and healthy working environment by taking the appropriate precautionary measures:

- hostile environment training



- appropriate protective equipment (helmets, gloves, bullet proof jackets, special glasses, lifejacket)
- suitable weapons
- excluding personnel with medical, psychological problems, misconduct, alcohol, drug abuse or other improper behavior, as such issues are identified and reported by Master or Team Leader.

11. VOLUNTARY PRINCIPLES

SNS Ltd is committed to act in a manner consistent with the laws of the countries within which PCASP is present, to be mindful of the highest applicable standards and to promote the observance of applicable international law enforcement.

Company obtains extensive background information regarding piracy, from various and different sources, monitoring and adapting to changing, complex political, economic and law enforcement, military and social situations. In order to achieve this, we receive:

- piracy information from open sources (e.g. NATO shipping center)
- piracy information from established sources (e.g. MSCHOA/maritime security center Horn of Africa-based in EU OHQ, Northwood, U.K)
- from Oceanus live (password)
- intel from warships in the area (due to previous command of one of the founders)
- updated info about the situation, through a number of international conferences (e.g. Navigator 2011)
- updated intel from other vessels underway with boarded SNS PCASP Teams
- maritime opintel report on a daily basis
- regarding “equipment transfer”, SNS Ltd ensures the prevention of misappropriation or diversion of the arms which may lead to human rights abuses, via holding appropriate licenses for each port and following transfer procedures with regard to proper storage of the arms in the designated appropriate and safe places (Navy depot, Police Armory etc.).

Company complies with all the applicable laws and regulations regarding the equipment imports and exports, by possessing the appropriate end user certificates for weapons held.

Company ensures that where force is used, medical treatment should be provided to injured persons, including the offenders, as also stated in relevant principle of ICoC. For that purpose, a person with trauma treatment qualification is assigned to the PCASP Team.



Company ensures that force is used only when it is strictly necessary and to an extent proportional to the threat, as clearly explained in Company's RUF (rules for use of force).

12. BASIC PRINCIPLES ON THE USE OF FORCE AND FIREARMS.

Company uses (as also stated in company's RUF) non-lethal incapacitating weapons (flares Comet or Pain Wessex), exercising a strict restraining policy on applying means capable of causing death.

Company ensures the assistance and medical aid to any injured or affected pirate at the earliest possible moment.

A clear warning of intent to use firearms is demonstrated given sufficient time for warning to be observed.

13. PCASP TEAM CONDUCT RULES.

- a. Be courteous to everyone and don't provoke anyone, even if he is wrong. Report everything to SNS TL who is the entitled person to discuss-requests issues with the Chief Officer and Master.
- b. Be decisive, quickly enough.
- c. Have a plan. Have a back-up plan, because the first one probably won't work.
- d. Move away from your attacker. Distance is your friend (*Lateral and diagonal preferred*).
- e. Use cover or concealment as much as possible.
- f. Locate individuals that consist primary targets because they pose highest threat.
- g. Request permission via radio from "SNS TL" for targeting fire.
- h. Flank the pirates when possible. Protect yours.
- i. Make sure you always have extra ammo.
- j. Be alert and always aware of the overall tactical situation, reacting quickly and decisively.
- k. Always try to deter the opponent with the right, cost-effective and proportionate means of force
- l. Act professionally and remain calm, maintain self-control and demonstrate control of the evolving situation.
- m. Never use Captain's seat at bridge/mess/rest area or any other designated area.

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- n. Never ENTER or USE Captain's or other crew member's compartment without permission.
- o. Your presence on the bridge must be discretionary but don't hesitate to ask everything related to your duty.
- p. Follow on crew's schedule.
- q. Convince by knowledge and reasoning.
- r. The use of crew's belongings is forbidden.
- s. Keep a professional image and attitude.
- t. Take care of your appearance. Always wear your uniform.
- u. Take care of your personal hygiene daily (bath, shaving).
- v. Adhere to the hierarchical chain of command of the team and the ship's crew.
- w. Avoid conversations with people not in charge unless you can learn something useful.
- x. Don't argue in front of the crew.
- y. Stay on crew's schedule.
- z. Don't use items that are owned by crew.
- aa. You must NOT give to any others (competitors or any other individuals):
 - Details of SNS Ltd documentation-procedures.
 - Photos -videos related to SNS Ltd business.
 - SNS Ltd partners.
 - SNS Ltd clients' details.

Collect and don't pass any information related to SNS' business. Information will reach SNS' competitors.