



**SNS**

## **QUALITY POLICY**

SNS Ltd has established this “Quality Policy” in accordance with relevant provisions of applicable Quality Management System (QMS) International Standard ISO 9001. Person responsible for drafting and reviewing this policy is the Quality and Security Manager. Person responsible for approval of this quality policy is the Managing Director.

It is of the utmost importance to meet the needs and expectations of customers and to provide high quality services. SNS Ltd acknowledges that in order to meet established objectives to the best of its’ capacity and to be able to respond to market demands, a suitable and effective QMS needs to be developed and implemented in compliance with applicable requirements. SNS Ltd Management is therefore committed to maintain an effective Quality Management System via :

- Conforming to all applicable legal, statutory and regulatory requirements, as well as meeting interested parties expectations
- Establishing and monitoring the performance of suitable Key Performance Indicators that reflect established objectives, thus providing necessary evidence of continuous improvement
- Using suitable equipment to ensure provision of services
- Satisfying customer, as well as stakeholder, needs and expectations, without prejudice
- Monitoring market developments in order to address needs as they arise
- Monitoring and reacting as soon as possible to customer requests and questions
- Fulfilling contractual requirements
- Evaluating and monitoring suppliers and subcontractors performance and ongoing competence
- Taking all necessary documented measures to address identified non conformities and deficiencies, by initiating appropriate corrective and/or preventive actions after a thorough root cause analysis of the detected problem
- Providing all recourses necessary to implement and maintain a conforming QMS
- Providing adequate and ongoing appropriate personnel training, thus ensuring required competence



- Promoting necessary awareness among all levels of organizational structure, with regard to the importance of complying to applicable requirements
- Communicating this policy to all personnel through training and exhibition at prominent places within company premises.

Every staff member, regardless of position within company structure, needs to be involved in the implementation of the established QSMS and should maintain familiarity with related provisions, including changes / revisions / amendments thereof.

## **2. Company's Procedures**

In order to operate in compliance to this policy and according objectives, SNS Ltd has developed and implements a documented QSMS that conforms to relevant requirements provided for, in the International Standard ISO 9001 as demonstrated in the "ISO 9001 Compliance Matrix" of this procedure. Furthermore, compliance of this QSMS to ISO 28000:2007 and ISO 28007-1:2015 requirements for a Security Management System in the Supply Chain is also demonstrated within the "ISO 28007-1:2015 Due Diligence Compliance Matrix" of this Appendix 3.

## **3. Exclusions from ISO 9001 Standard**

Due to the nature of services provided, it is hereby noted that SNS Ltd does not use any monitoring or measuring devices and related equipment requiring evidence of measurement traceability to national or international standards of measurement. Therefore, provisions of ISO 9001 Clause 7.6 "Control of measuring and monitoring devices" are excluded. If such a need arises in the future a suitable calibration procedure shall be issued.



The Company ensures effective implementation of the Quality & Security Management System by:

- Maintaining a documented process approached system in compliance with ISO 9001 and ISO 28007-1:2015 standards
- Allocating a management representative - Quality and Security Manager - who regardless of other duties, bears responsibility for the effective and conforming implementation of the QSMS
- Maintaining a suitable secure record keeping system that allows for all activities to be traceable
- Providing adequate resources for effective implementation
- Ensuring that all necessary inspections / audits are executed in a timely and independent manner
- Monitoring customer requirements and collecting evidence of the level of satisfaction achieved
- Taking appropriate corrective and / or preventive actions for every deficiency identified
- Establishing quality objectives to facilitate the overall QSMS effectiveness monitoring and improvement achievement

#### 4. Definitions

##### **Standard:**

For purposes of this document the ISO 9001& ISO 28000:2007 will be referred to as standards. ISO 28007-1:2015 is a Publicly Available Specification and is to be implemented and understood in conjunction with ISO 28000:2007.

##### **Deficiency:**

An observed situation where objective evidence indicates the non-fulfillment of a specified requirement.

##### **Objective evidence:**

Information, records or statements concerning the existence and implementation of a

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QSMS item, which is based on observation, measurement or testing and which can be verified.

**Corrective action:**

Action which must be taken to identify, correct and eliminate a non-conformity / nonconforming service, as well as the action taken to identify and eliminate their cause.

**Preventive action:**

Action which must be taken to reduce / eliminate potential factor which could lead to a non- conformity / nonconforming service.

**Audit:**

A systematic and independent examination to determine whether activities and related results comply with planned arrangements and whether these arrangements are implemented effectively and are suitable to achieve specified objectives

**Internal Auditor:**

A person who is authorized to plan and execute an internal audit.

**Controlled document:**

Any document issued which has been uniquely identified as a “Controlled Document” and is traceable for recall. Only “Controlled Documents” shall be used for work affecting quality of services provided. Any document which has not been uniquely identified as a “Controlled Document” is an uncontrolled document. Copies of Controlled Documents designated as Non Controlled Documents may be issued and distributed to external organizations for promotional reasons, but such users shall not be notified of any future revisions.

**Uncontrolled document:**

A copy of a document (e.g. a procedure) which is not maintained as up to date. Generally used for information only, or where previous versions of a document (obsolete documents) need to be retained. The fact that the document is uncontrolled should be indicated on it.

**Definition of the term “shall”:**

The term “shall” is being used throughout this QSMS documentation to emphasize the required enforcement of according provisions.



## ISO 9001 Compliance Checklist Matrix

Clause	ISO 9001:2008	COMPLIANCE
1	Scope	
2	Normative references	
3	Terms and definitions	
4	Quality management system	title only
4.1	General requirements	
4.2	Documentation requirements	QSP-01, QSP-08
5	Management responsibility	title only
5.1	Management commitment	QSP-01
5.2	Customer focus	QSP-01 & QSP-12
5.3	Quality policy	QSP-01
5.4	Planning	QSP-08
5.5	Responsibility, authority and communication	QSP-02
5.6	Management review	QSP-11
6	Resource management	title only
6.1	Provision of resources	QSP-03,04
6.2	Human resources	QSP-03,04
6.3	Infrastructure	QSP-03,04
6.4	Work environment	QSP-03,04
7	Product realization	title only
7.1	Planning of product realization	QSP-03,04
7.2	Customer-related processes	QSP-12
7.3	Design and development	QSP-03,04
7.4	Purchasing	QSP-05
7.5	Production and service provision	QSP-05,06
7.6	Control of measuring and monitoring devices	<b>Not Applicable</b>
8	Measurement, analysis and improvement	title only
8.1	General	QSP-09
8.2	Measurement and monitoring	QSP-09
8.3	Control of nonconforming product	QSP-09
8.4	Analysis of data	QSP-07,09
8.5	Improvement	QSP-07,09
4.2.2	Control of documents	QSP-08
4.2.4	Control of records	QSP-08
8.2.2	Internal Audit	QSP-09
8.3	Control of deficiency product	QSP-10
8.5.2	Corrective action	QSP-10
8.5.3	Preventive Action	QSP-10



## ISO 28000:2007 and ISO/PAS 28007:2012 Compliance Checklist Matrix

No	Requirements	Ref ISO/PAS 28007:2012	Remarks
<b>A.</b>	<b>Security Management System Elements for PMSCS</b>		
1	Documented relevant international and national legal and regulatory environment including licensing and export/import requirements, the political, the natural and physical environment, the role, perceptions and risk tolerance of the client.	4.1.1	Para. 1d,2b,11 CoC policy QSP-01 para. 2,3 QSP-02
2	PMSC evaluates and documents the elements that might impact on its management of risk including its own organization and lines of authority for operations, its capabilities in delivering objectives and policies, and the contribution of partners and subcontractors.	4.1.1	Para. 4 & company's policies 1-7 QSP-01 Para. 5 QSP-05
3	PMSC' s understanding of the interaction of elements in the risk analysis of the ship-owner which has prompted consideration of the use of PCASP, the legal requirements of the flag state and the need for prior approval to deploy PCASP.	4.1.1	Para. 1 QSP-02
4	Register of the interested parties that are relevant to the PMSC operations and the related legal and regulatory requirements (perceptions, values, needs, interests and risk tolerance of the interested parties).	4.1.2	QSP-01 QSMS Records and Data Base
5	The PMSC considers risk criteria that may impact on interested parties: a. The overall risk policy of the organization, and of the client, and their risk tolerance. b. The inherent uncertainty of operating at sea in an area with high risk of piracy c. The nature of the likely threats and consequences of an incident on its operations, reputation and business d. The impact of an incident e. The impact of the combination of a number of risks	4.1.2 4.1.2 a 4.1.2 b 4.1.2 c 4.1.2 d 4.1.2 e	Para. 2 CoC policy QSP-01 QSP-18



6	PMSC's scope of the security management system, including coverage of any subordinate bodies, regional bodies or subcontracted entities	4.1.3	Para. 5 CoC QSP-01 QSP-03 para 6
7	Implementation, maintenance and improvement of a risk based security management system.	4.1.4	QSP-11 QSP-18
8	Security policy and security objectives are established and are compatible with the strategic direction of the PMSC	4.1.5 a	Policy 04 CoC QSP-01
9	Integration of the security management system requirements into the PMSC's business processes	4.1.5 b	QSMS Manual
10	Sufficient resources to deliver, implement, review and continually improve the security management System	4.1.5 c	Para 2 QSP-11
11	The importance of effective security management and of conforming to the security management system requirements have been communicated.	4.1.5 d	QSP-03 (SCL-02/05/06) QSP-14 (INSTRUCTIONS)
12	Compliance with legal and regulatory requirements and other requirements to which the organization subscribes	4.1.5 e	QSP-02
13	The security management system achieves its intended outcome(s)	4.1.5 f	Para 2 QSP-11 Para 1 QSP-01
14	Directing and supporting persons to contribute to the effectiveness of the security management system	4.1.5 g	Para. 3.2 b QSP-01
15	Promoting continual improvement of the security management system	4.1.5 h	Para 1 QSP-01 Para 1.1 QSP-11
16	Supporting other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility	4.1.5 i	QSP-01_0
17	Documents of the skills, experience, and professional capability of the PCASP's Team Leaders.	4.1.6	Para. 2 QSP-03
18	Competence on the basis of qualifications, training and relevant and appropriate experience of PCASP	4.1.6 a	QSP-03