

CODE OF CONDUCT

Premiumfocus Nautilus Ltd will embark personnel to augment the standing Ship's Crew. They are the guests of the Master and his crew and are there to support the vessel's normal operations whilst causing the minimum of disruption to life on-board.

Command and Control

All embarked personnel are to be mindful that whilst representing **Premiumfocus Nautilus Ltd**, they are subject to the Command of the Master at all times and are to respectfully follow and uphold all legal orders issued by him. If there is any course for disagreement with the Master's instructions then the Team Leader is to attempt to resolve the situation, if this is not possible then further advice should be sought from **Premiumfocus Nautilus Ltd**.

The Team Leader is to be the link between the Master, **Premiumfocus Nautilus Ltd** and Team Members to coordinate security measures, logistics and administration and is to act as the link between Team Members.

The Team Leader is to be fully responsible for the conduct of his team at all times and Team Members are to be mindful of this whilst conducting themselves on-board. In the event of a pirate action, the responsibility for the use of firearms lays with the Master of the vessel. It is the Master alone who may authorize the use of firearms, however once this has been ordered it is the responsibility of the individual to act within the **Premiumfocus Nautilus Ltd** Use of Force Policy and must satisfy themselves that the action they are taking is legal, justified and commensurate with the threat.

Teamwork and Professionalism

All **Premiumfocus Nautilus Ltd** embarked personnel are expected to be able to work as part of a team at all times. If there are differences in opinion or objections to other Team Members then this is to be kept private. Team Members are to support each other at all times. The Team Leader is to ensure that the whole team has been fully briefed to maintain continuity so that if queried by the vessel's officers, the team's responses are consistent. All embarked staff are to ensure that their drills, procedures and conduct is beyond reproach at all times.

Premiumfocus Nautilus Ltd aims to have the highest reputation within the maritime security industry. As ambassadors of the company it is beholden upon all Team Members to ensure nothing is done to tarnish that reputation. This is to be considered at all times when interacting with our customers, their representatives and agents.

Discipline and Etiquette

Discipline is an integral part of professionalism. When conducting their daily operations all Team Members are to ensure that their conduct is beyond reproach. The Team Leaders instructions are to be followed without hesitation and any disagreements or concerns are to be discussed in private at a later time. Equally, the Master's orders are to be followed at all times as are those of his appointed representative (i.e. the Officer Of the Watch and Chief Officer). When addressing the Ship's Officers their title, rank or "Sir" is to be used until instructed otherwise. As a minimum, Team Members are to use the same forms of address as the crew and under no circumstances are to use a greater level of familiarity than that afforded to permanent crew members. The only exception to this is the Master who is to be addressed at all times as either Master/Captain or Sir.

Punctuality

The importance of punctuality cannot be stressed enough. All Team Members should present themselves for their watch 15 minutes before it is due to commence i.e. for the 1200 – 1600 watch the oncoming watch keeper should arrive at the bridge at 1145 so as to ensure a full and comprehensive hand over. This may be modified to suit the vessel's internal routines. For all other serials, the '5 Minute Rule' should be observed.

Integration and Interaction with the Crew

For a successful working relationship to build it is essential that embarked staff integrate with the routine of the crew as much as possible. In the unfortunate event of a pirate action it will be the relationships that have been built and the mutual trust and confidence that will lead to a successful outcome. Team Members are to be encouraged to engage with all Officers and Crew relating to their daily business but are to avoid discussing any of **Premiumfocus Nautilus Ltd** or the customer's business practices that may be deemed to be 'Commercial in Confidence'.

Dress and Deportment

All **Premiumfocus Nautilus Ltd** personnel are to wear their issued uniforms at all times. The basic uniform will consist of clean safety boots, trousers and T-shirt. This may be augmented by sunglasses and hats if required. Any hats that are worn are to be in fitting with the **Premiumfocus Nautilus Ltd** uniform and not bear any logos that may be deemed offensive. Sunglasses are not to be ostentatious in nature. **Premiumfocus Nautilus Ltd** recognizes the individual choice regarding facial and scalp hair, it is to be kept neat and not appear scruffy. Whilst in the public eye (i.e. that of the crew) body language is to be as professional as possible – avoid slouching and adopting a slovenly air. Team Members are to be mindful that the vessel's crew will be looking at them for confidence and their first impression will be your appearance and deportment.

Weapon Competence, Safety and Maintenance

The Team Leader is to ensure that all are fully conversant with the weapons carried on their vessel and are to refresh themselves as soon as possible after embarking in the following:

- Normal safety precautions.
- Basic function tests.
- Loading.
- Immediate action drills.
- Stoppages.
- Making safe.
- Stripping and cleaning.
- Magazine rotation.

All weapons are to be located on the bridge at all times. Weapons are to be stowed in their individual cases which are to remain locked. The key is to be held by the on-watch Team Member. Weapons are only to be removed from their cases when ordered by the Master. The only exception to this is if to delay would affect the individual's right to self-defence (see Use of Force Policy).

All weapons are to be stripped and cleaned on a weekly basis. The routine and timings for this is to be determined by discussion between the Master and Team Leader to ensure minimal reduction in ship's defence capability. Ideally this should be done overnight when the threat is reduced however this may be changed as the situation dictates. On completion of weapon cleaning, magazines are to be discharged and ammunition loaded into new magazines so that all magazines are rotated and damage/strain on springs is minimized. All weapon containers are to be cleaned at least once per mission, so as to avoid any debris collecting that may affect the weapons reliability.

Equipment and Ammunition Accounting

All kits are supplied with a muster list for all weapons, cases, magazines and additional equipment and their associated serial numbers. All equipment is to be mustered upon embarkation and reported to **Premiumfocus Nautilus Ltd** operations. Ammunition is to be kept on the bridge at all times. The Team Leader is responsible for ensuring that all ammunition expenditure is reported following the firing of any weapons.

Alcohol and Other Intoxicating Substances

Under no circumstance is alcohol or other substances to be used or purchased (including duty free) whilst on-board a customer's vessel. Additionally alcohol or other intoxicating substances are not to be used in the 12 hours proceeding embarkation and only sparingly in the 12 – 24 hours prior to embarkation. This policy is not negotiable and abuse of this rule will result in disciplinary action being taken. **Premiumfocus Nautilus Ltd** reserves the right to conduct routine drug and alcohol tests on all deployable personnel, failure to comply will have a knock on effect on the individual's employment.

Behaviour Ashore

Whilst ashore either en-route to/from a vessel or in-between transits all Team Members are to avoid acting in any manner that will cause embarrassment to **Premiumfocus Nautilus Ltd**, it's customers or associated parties. People within port towns are generally closely knitted and whilst it may seem that no one is aware of whom individuals represent, word will soon get around if your conduct is not of the expected level which has the potential to cause serious harm to **Premiumfocus Nautilus Ltd's** reputation. Any serious breaches of social conduct ashore will be investigated and may result in disciplinary measures being taken.

Tolerance and Understanding

In the modern world ship's crews are often made up of people of multiple races, cultures, sex and orientation. Their customs may be different than their own practices; however all team members are to be mindful of cultural differences whilst engaging with crew members and are to avoid any possible embarrassment or conflict from either party. If in doubt, seek guidance from the Team Leader or the vessel's Officers.

Gifts and Generosity

Whilst there may be times that individual Masters and Officers wish to offer their personal thanks for a 'job well done', it is against **Premiumfocus Nautilus Ltd** policy to accept gifts and acts of generosity in recognition for anything that a staff member has done that could be deemed a normal requirement of their employment. Whilst the offer may be totally innocent in origin, it is possible that it may be deemed as inappropriate by a third party and so therefore, in order to avoid potential embarrassment at a later date, any such offer should be refused politely.

Equally if a **Premiumfocus Nautilus Ltd** employee is approached to conduct any activity outside of his remit or normal terms of employment in return for a gift of generosity, this may be construed as an attempt to bribe and should not be taken, but refused and reported to **Premiumfocus Nautilus Ltd** operations at the earliest opportunity. Gifts of friendship and of a routine nature (i.e. t-shirts, caps etc.) may be accepted at the Team Leader's discretion. Further guidance is available from **Premiumfocus Nautilus Ltd** Operations as required.

Conflicts of Interest

A conflict of interest exists when a person's private interest interferes, or even appears to interfere in anyway, with the interests of **Premiumfocus Nautilus Ltd**. A conflict situation can arise when an employee takes actions or has interests that may make it difficult for them to perform company work objectively and effectively.

It is acknowledged that deployed Team Members will also be employed by other Private Maritime Security companies. Personnel are not to divulge any information relating to **Premiumfocus Nautilus Ltd** to these companies under no/any circumstances. In the event of a conflict of interest arising, **Premiumfocus Nautilus Ltd** will review and investigate the situation before deciding what, if any, action is required. Severe conflicts of interest may result of termination of employment.

Political Affiliation

Premiumfocus Nautilus Ltd recognizes and supports the democratic right to peaceful self-expression. However, given the nature of the industry in which the company operates and the ethnically diverse environment of international shipping there will be times that differences of opinion will arise. So as to avoid potential embarrassment and souring of relations, all employees are to avoid expressing any opinion regarding political parties, regimes or interest groups that may be deemed to be extreme or may cause offence.

Illegal Acts/Practices

If at any time it becomes evident to any team member that the vessel may be conducting an act that may be judged to be illegal under International Law or the law of the Flag State then **Premiumfocus Nautilus Ltd** is to be informed at the earliest possible opportunity and further guidance will be advised. Examples include, but are not limited to smuggling, trafficking and environmentally unsound practices. Often these acts are conducted by the crew without the knowledge of the ship managers or owners. If there is any doubt, then **Premiumfocus Nautilus Ltd** are to be contacted at the earliest opportunity.

Compliance with the Law

Premiumfocus Nautilus Ltd personnel are to act in accordance with the International law at all times regardless of their geographic location. Failure to do so may lead to disciplinary actions being taken. Embarked staff is also to fully comply with the law of the Flag State so far as practicable. Whilst ashore, personnel are to subject to the law of that State. Whilst naivety is mitigation, it is not a defence. **Premiumfocus Nautilus Ltd** will endeavour to brief team members on any specifics prior to deploying from the Base. The responsibility however, rest with the individual.

Health & Safety

Premiumfocus Nautilus Ltd strives to provide all employees with a safe and healthy work environment. All Team Members have the responsibility for maintaining a safe and healthy workplace for all employees by following environmental, safety, and health rules and practices and by reporting accidents, injuries and unsafe equipment, practices or conditions. **Premiumfocus Nautilus Ltd** does not have the ability to control environments on-board individual vessels. If the Team Leader is concerned for the health and safety of his team, he is to contact **Premiumfocus Nautilus Ltd** Operations for further guidance.