



# 深港海事安保有限公司 SINOGUARDS MARINE SECURITY LIMITED

Room 1205, Tai Sang Bank Building, 130 ~132 Des Voeux Road Center, Hong Kong  
Tel: +852 81987300 Fax: +852 30156855 Email: info@sinoguards.com

## Business Code of Conduct

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1. As a Private Maritime Security Company (PMSC) Sinoguards Marine Maritime Security role is becoming increasingly significant and widespread due to the evolving nature of international risk.
2. It is essential that as a legitimate PMSC Sinoguards works within the framework of International Maritime Organisation Guidance, Flag State and Port Laws, as well as Public International Law Principles and set themselves as a result their own high standard of ethics, conduct and procedures.
3. Strict adherence to this code by the Company, its 's employees and contractors will serve as an assurance of the operating standards, professionalism and quality for:
  - Clients
  - Employees
  - Competitors
  - International Organisations
  - Governments and their agencies
4. This document will be responsive to changes in the law, international environment and public opinion. Sinoguards through its representations of various organisations such as SAMI will maintain abreast of Governments, International agencies, and other interested parties, in order to assess the on-going effectiveness, implementation and future development of this Code and to ensure any changes necessary are incorporated herein to ensure compliance with legislative or guidance changes.
5. Sinoguards will only engage in legitimate security work, which adheres to the principles of Public International Law, including International Humanitarian and Human Rights.
6. Sinoguards will conduct all business activities in a transparent manner that fully complies with all relevant International Guidance and Legislation in areas that Sinoguards operates.
7. The nature of Sinoguards work is essentially defensive and protective. As a matter of policy it will never accept any assignment, which will interfere with or possibly destabilise the sovereignty of any nation. It will only work for legitimate governments and commercial organisations.
8. Sinoguards Ensures at all levels that it fully complies with all relevant International Guidance; Port/Flag State Laws and International Legislation. This includes the International Code of Conduct for Private Security Service Providers (ICoC); IMO Guidances MSC.1405, 1406, 1443 and 1444; all Port and Flag State laws on the embarkation, disembarkation of armed security teams and the safe carriage of firearms; BIMCO Guardcon and relevant sections of SOLAS and the ISPS Code.



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8. The Sinoguards ISO certified Quality Management ethos is fundamental to our operations. All personnel are required to conform to the Sinoguards Services Quality Management Programme and are encouraged to comment on it and participate in the process to continually improve Sinoguards perceived and actual performance.

The Quality Management Programme accesses all information and operations performed by Sinoguards in whatever form and ensures that reviews of all work in progress are carried out independently from the original source during operations/production. The qualitative approach incorporates all the core values laid out in this paper in the belief that this leads to increased personnel and client satisfaction which in turn leads to long-term competitive advantage.

9. Sinoguards maintains transparency as far as possible within two key constraints:
  - Client confidentiality
  - Maintaining Information control to avoid security risks.
10. The oversight and management of all Sinoguards Services operations is the responsibility of the Sinoguards Services Board.
11. Sinoguards Services has a clearly defined and responsible chain of command. The chain of command is responsible for the day-to-day implementation of Sinoguards procedures and policies.
12. Sinoguards maintains a strict Grievance Policy to handle both internal and external complaints consistent with Non Conformance Procedure as required in terms of its ISO Quality Management System.

Sinoguards welcomes feedback and will investigate any complaints in a fair unbiased manner and will take disciplinary action in the event of wrongdoing being discovered.

13. All Sinoguards employees are selected in as thorough a way as possible. Personnel are engaged by Sinoguards through a number of different processes:
  - Personal referrals ("word of mouth")
  - Direct application by email
14. In all cases Sinoguards will carry out a thorough check of each individual application to include:
  - Study of CV and cross-referencing
  - Background and criminal record checks
  - Asking for and taking up references
  - Checking of military and other professional records including discharge certificates



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- Interview

- Medical assessment including tests for prohibitive substances including steroids

15. Once accepted, personnel will then undergo induction and pre-deployment training. Continuation training once deployed, together with career development training will follow this.

Periodic specialist training will also take place. The purpose of the training is both to ensure professional competence and efficiency and also to develop skill and maturity to avoid overreaction and other traits that may lead to unnecessary incidents. All training includes instruction in International Guidance and Law, including ICoC PSP.

16. The overall behavioural standard expected of Sinoguards personnel is set down clearly and is monitored in considerable detail.

17. These standards are set with the requirement to always comply with relevant laws and engage in fair business dealings and include:

- Professional and technical competence
- Restraint and maturity
- Honesty and integrity including professional ethics with regard to financial irregularities, inducements, incentives etc.
- Compassion, respect and dignity
- Discretion and confidentiality
- Full understanding of requirements and constraints of their current mission

18. Ensuring these standards are met is the task of the Sinoguards management structure and chain of command at all levels. A formal disciplinary procedure exists to deal with any deviation from the standards laid down and overall responsibility lies with the Sinoguards Services Leadership Team.

19. Sinoguards operates according to a thorough set of Employee Standards, embodied in the Employee Contract for services as well as disciplinary code. These standards are designed to encourage harmonious and effective business relationships amongst staff. Sinoguards operates a zero tolerance policy towards harassment; drugs use; gambling; bribery and corruption. Any complaints of these activities will be investigated fairly and in accordance with the Asset Maritime Security Services Disciplinary Policy.

20. Sinoguards is committed to ensuring the best working conditions that the field of operation will permit.



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21. In line with these procedures Sinoguards follows best practise by ensuring suitable insurance is always in place to cover medical issues, assets and business risk.
22. Although Sinoguards operations are protective, personnel work in an environment where there is a known risk of violence, which necessitate the carriage of firearms. When Sinoguards personnel are armed, they carry arms for personal protection, or the protection of those in their care, or to protect the innocent.
23. All weapons are carried on vessels only when authorised by the vessel owner and vessel Flag State Laws.
24. All weapons and ammunition are procured legally and are transported and stored in a secure manner.
25. When weapons are carried, all Sinoguards personnel will comply with the appropriate Rules for the Use of Force ("RUF"). Sinoguards will use minimum required force at all times.
26. All personnel will be extensively briefed on RUF, and the principles of minimum force instilled in them. Sinoguards personnel are experienced and trained in the use of firearms. Continuous training takes place while deployed with an emphasis on safety, accuracy and restraint.
27. Where Sinoguards personnel resort to the use of firearms, and regardless of whether this results in injury or death; they will make a full report on the incident in accordance with established reporting and review procedures.
28. Where injury or death results from the use of force or firearms, Sinoguards will undertake an internal investigation in accordance with established procedures. Sinoguards will cooperate with any lawful investigation undertaken by the vessel Flag State authorities.
29. All Sinoguards personnel deployed to client's vessels are trained to recognise that the Master retains full control of the vessel at all times.
30. Sinoguards will ensure its personnel:
  - Are diligent, competent and efficient in discharging their professional responsibilities and commitments;
  - Do not participate in activities, which may involve a conflict of interest without appropriate disclosure and approval.

Signed:

Date:

Sinoguards 0110



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