



Sinbad Navigation

COMMUNICATION ON PROGRESS

Prepared for the United Nations Global Compact

12 November 2021 – 12 November 2022

Communication on Progress

8 November 2022

To our Stakeholders,

I am pleased to confirm that The Sinbad Navigation Company (SN) continues to affirm its support to the Ten Principles of the United Nations Global Compact (UNGC) in the areas of Human Rights, Labour, Environment and Anti-Corruption for 2021/22, and have integrated the 17 Sustainable Development Goals (SDGs) into the company's business model, thus adding value to our business, the environment, and society.

In this, our first annual 'Communication on Progress', we describe our existing policies and our actions to continue to improve the integration of the UNGC, its principles, and the SDGs into our business strategy, culture and daily operations, which includes seeking adherence from our business partners, suppliers and even clients.

We are an expanding company in the SME bracket (small and medium-sized enterprises) and keen to 'do our bit' to help the UNGC work towards the vision of a sustainable and inclusive global economy and help companies meet their commitment to corporate sustainability.

We commit to share this information with our stakeholders through our website and the Global Compact. We are ISO 9001 and ISO 28000 certified and are committed to analysis and continuous improvement of our performance and look forward to any feedback on this report.

Yours sincerely,



Marianne Rose Faderanga

General Manager

Human Rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses.

Our support of the Universal Declaration of Human Rights (UDHR) and our observer membership of the International Code of Conduct for Private Security Providers' Association (ICoCA) demonstrates our commitment to Human Rights and these first 2 principles. The latter endorses the principles of the Montreux Document (*Montreux Document on Pertinent International Legal Obligations and Good Practices for States Related to Operations of Private Military and Security Companies During Armed Conflict*) and the "Respect, Protect, Remedy" framework it adopts.

Policy & Assessment

Our Code of Conduct explains how we will conform to the rule of law and acknowledges our corporate responsibility to protect and respect human rights, as well as seeking to ensure our business partners and suppliers do the same. Part of this process is achieved by assessing Human Rights related risks and their impact in our business sector and countries of operation prior to beginning any work there.

We require our personnel to treat all people humanely and with respect for their dignity and privacy and will report any breach of compliance. We will not engage in torture or other cruel, inhuman or degrading treatment or punishment. Contractual obligations, superior orders or exceptional circumstances such as an armed conflict or an imminent armed conflict, a threat to national or international security, internal political instability, or any other public emergency, can never be a justification for engaging in torture or other cruel, inhuman or degrading treatment or punishment.

We require our personnel to report any acts of torture or other cruel, inhuman or degrading treatment or punishment known to them, or of which they have reasonable suspicion. Such reports will be made to our senior management who will coordinate with the client, and/or the competent authorities in the country or jurisdiction where the act took place, the country of nationality of the victim, and the country of nationality of the perpetrator. We have made the means of any such reporting easy by designing a 'Don't Walk By' initiative, where all cases of Human Rights abuse can be freely reported by anyone.

In addition to inhumane treatment of individuals, we pay particular attention to acts which are considered particularly heinous and at no point will they ever be sanctioned by us, including but not limited to:

- Sexual exploitation and abuse or gender-based violence. SN will not benefit from, nor allow their personnel to engage in or benefit from, sexual exploitation (including, for these purposes, prostitution) and abuse or gender-based violence or crimes, either within the Group or externally, including rape, sexual harassment, or any other form of sexual abuse or violence. SN requires its personnel to remain vigilant for all instances of sexual or gender-based violence and, where discovered, report such instances to senior management and competent authorities.
- Human trafficking. SN will not engage in trafficking in persons and requires its personnel to remain vigilant for all instances of trafficking in persons or illegal trafficking of human organs and, where discovered, report such instances to senior management and competent authorities. This includes, but is not limited to:
 - A commercial sex act induced by force, fraud, or coercion.

- Labour or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, debt bondage, or slavery.
- Illegal trafficking of human organs.

As before, all such suspicions and/or actual cases can also be reported by of our personnel using our 'Don't Walk By' initiative.

To every reasonable extent, we also monitor the use of equipment provided by the Company and will investigate situations in which such equipment is used in an inappropriate manner. Every effort will be made to ensure that information used as the basis for allegations of human rights abuses is credible and based on reliable evidence. The security and safety of sources will be protected. Additional or more accurate information that may alter previous allegations will be made available as appropriate to concerned parties.

The Top Management (Executive Director and General Manager) have overall responsibility for the protection of Human Rights within SN, advised by the Human Resources and HSSEQ Departments, but all personnel have a responsibility to report any abuse or violation up to senior management.

Achievements

- Helping to ensure the safety and security of seafarers by providing the critical services required by our Private Maritime Security Company (PMSC) clients in the fight against modern-day piracy in the Indian Ocean.
- With our ISO 28000 approved security procedures, we help to prevent the potential diversion of controlled goods, including firearms and ammunition, to internationally sanctioned states such as the present war-torn Yemen.
- We are an approved UN Supplier and our vessel Antarctic Dream was contracted by the UN to support the UNMHA (UN Mission to Support the Hodeidah Agreement) to help humanitarian aid to reach people suffering in Yemen (March 2019 to April 2020).
- Awareness raising of Human Rights continues to be conducted for all personnel upon joining, as laid down in our HSSEQ Induction and Code of Conduct.
- Due Diligence conducted on our PMSC clients to ensure they align with the UN Global Compact principles and our own Code of Conduct.
- We have designed and implemented a 'Don't Walk By' initiative, where all cases of Human Rights abuse can be freely reported by any of our staff.
- We have initiated a 'Community Investment Policy' whereby worthy community projects will be identified and established in order to bring the local community together and help eradicate human rights and forced labour issues. Over the past reporting period we have continued our support to hurricane victims in the Philippines by collecting and donating clothing and other resources.

Goals for 2023

- Continue to provide the critical services required by our PMSC clients to ensure the safety and security of seafarers, and the prevention of potential diversion of controlled goods, including firearms and ammunition, to internationally sanctioned states.

- Continue to participate in programmes that support Human Rights across the world.
- Continue to raise awareness of Human Rights issues by keeping people informed, consulted and interested, as written in our Code of Conduct.
- Continue to conduct Due Diligence on our PMSC clients to ensure they align with the UN Global Compact principles and our own Code of Conduct.
- Continue working on our Community Investment Programme to help improve Human Rights in areas of greatest need.

Measurement of outcomes

We intend to continue monitoring and evaluating our performance by:

- Recording specific progress made in the area of Human Rights in the past reporting period.
- Recording any Human Rights violations and explaining how we dealt with them (nil to date).
- Recording any Human Rights related investigations, legal cases, rulings, fines and other relevant events (nil to date).
- Conducting periodic reviews of results by senior management.

Labour

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in respect of employment and occupation.

Policy & Assessment

Our Human Resources, Compliance and Health & Safety integrated management systems are based on National and International Labour Organisation (ILO) Core Conventions, and daily consultation with our employees is an important part of our business. We are certified to ISO 9001 and ISO 28000 and encourage our employees to feedback their thoughts (good and bad) and engage in dialogue with their supervisors and managers in order to continuously improve the company's performance. This includes collective bargaining or open negotiation between management and employees to reach agreements on topics such as working conditions, wage scales, working hours, training, health and safety, overtime, grievance mechanisms, and rights to participate in workplace or company affairs.

At part of our processes we include assessments of labour-related risks in our business areas.

It is our policy that neither us nor our partners, suppliers or clients will use slavery, forced or compulsory labour, or be complicit in any other entity's use of such labour. We respect the rights of children to be protected from the worst forms of child labour, including:

- All forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labour, including forced or compulsory recruitment of children for use in provision of armed services.
- The use, procuring or offering of a child for prostitution, for the production of pornography or for pornographic performances.
- The use, procuring or offering of a child for illicit activities, in particular for the production and trafficking of drugs.
- Work, which by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children.

We undertake all necessary steps to provide a safe and secure workplace for all personnel. All Group workplaces operate without any threat of violence, harassment or discrimination and operate in a respectful, safe, healthy and responsible way, in line with our policies and procedures.

Discrimination, or behaviour or comments that may be understood to be based in discrimination, will not be tolerated from or to personnel of the Group. All personnel are treated equally irrespective of race, ethnicity, religion, colour, national origin, gender, sex, sexual orientation, gender identity, age, veteran status, marital status, ancestry, genetic information or disability, or any status protected by national or international law.

Harassment will not be tolerated from or to personnel of the Group. Harassment includes, but is not limited to, racist, sexist, ethnic, or other inappropriate comments, jokes, gestures, or any action or statement that demeans individuals or creates a hostile, intimidating, or offensive work environment.

The Top Management have overall responsibility for the protection of Labour Rights within SN, advised by the Human Resources and HSSEQ Departments, but all personnel have a responsibility to report any abuse or violation up to senior management, which can be done easily using our 'Don't Walk By' initiative.

Achievements

- We continue to be equal opportunity employers to multi-national staff in our office and on all our vessels.
- Designed and implemented a 'Don't Walk By' initiative, where any Labour related issues can be freely reported by anyone.
- Awareness raising of the Labour Principles is conducted for all personnel upon joining, as laid down in our HSSEQ Induction and Code of Conduct.
- Due Diligence conducted on our PMSC clients to ensure they align with the UN Global Compact principles and our own Code of Conduct, including the hiring of suitably experienced and qualified Maritime Security Operatives (MSOs).

Goals for 2023

- Continue to be equal opportunity employers to multi-national staff in our office and on all our vessels.

- Continue to raise awareness of the Labour Principles for all personnel upon joining, as laid down in our Code of Conduct.
- Continue to conduct Due Diligence on our PMSC clients to ensure they align with the UN Global Compact principles and our own Code of Conduct, including the hiring of suitably experienced and qualified Maritime Security Operatives (MSOs).

Measurement of outcomes

We intend to continue monitoring and evaluating our performance by:

- Recording specific progress made in the area of Labour in the past reporting period.
- Recording any Labour related violations and explaining how we dealt with them (nil to date).
- Recording any Labour related investigations, legal cases, rulings, fines and other relevant events (nil to date).
- Conducting periodic reviews of results by senior management.
- Study of the demographics of management and employees by diversity factors (e.g. gender, ethnicity, age, etc.) to ensure we remain an equal-opportunities employer.

Environmental

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

Policy & Assessment

All our decision-making processes consider the potential impact on the environment. We do this by following our strict Environmental Policy, analysing our performance by completing Environmental Checklists, and conducting Environment Risk Assessments prior to beginning any project.

Vessels

As the owner of a fleet of ocean-going vessels, one of the most environmentally friendly forms of transport, the implementation of our new Ship Energy Efficiency Management Plan (SEEMP) is an operational measure that establishes a mechanism to improve the energy efficiency of our vessels in a cost-effective manner in accordance with IMO regulations. This works hand-in-hand with our Shipboard Oil Pollution Emergency Plan (SOPEP) and our comprehensive vessel Garbage Management Plans to maintain high levels of environmental protection awareness throughout our fleet and ensure tight and effective emergency procedures.

The introduction of our Environmental Policy Checklist has further helped to reduce our footprint upon the environment by raising awareness throughout our offices and on board our vessels, with such things as:

- The banning of all single-use plastics in all offices and vessels
- Turning lights, heating/cooling and electric items off when leaving a room
- Installing thermostats and motion-sensitive lighting
- Use of energy efficient electrical items and light bulbs
- 'Think before you print' initiative, printing on both sides and reusing scrap paper
- Using mugs and reusable cups instead of disposable cups
- Recycling garbage where possible, and purchasing recycled products
- Ordering environmentally friendly chemicals/cleaning solutions where possible
- Tightening up stock control systems

The Top Management have overall responsibility for the protection of the environment within SN, advised by the HSSEQ Department, but all personnel have a responsibility to report any abuse or violation up to senior management, which again can be done freely with our 'Don't Walk By' initiative.

Achievements

- Our quest to reduce the amount of paper and ink we use has continued with our 'think before you print' initiative and completing electronic versions of forms wherever possible.
- Some of our vessels have shaft generators which dramatically reduces the amount of fuel used.
- Reduction of plastic waste in our offices and on our vessels by banning all single-use plastics such as cups and spoons, and educating personnel on the importance of keeping our environment and oceans free of plastic (see more listed on SDG Goal 14 below).
- Creation of our 'Don't Walk By' initiative, creating a quick and easy way any worker can feed back environmental non-conformities, and ideas for reducing our environmental footprint.
- Awareness raising of our Environmental Policy and the 17 SDGs for all personnel upon joining, as laid down in our HSSEQ Induction and Code of Conduct.

Goals for 2023

- Continue to educate and consult with interested parties to ensure our Environmental Policy is followed, including business partners, suppliers and clients.
- Invest in our Community Investment Programmes.
- Continued commitment at reducing our environmental footprint.
- Continue contributing to the 17 SDGs.

Measurement of outcomes

We intend to continue monitoring and evaluating our performance by:

- Recording specific progress made in the area of environmental progress in the past reporting period.

- Recording any environmental policy/legal violations and explaining how we dealt with them (nil to date).
- Recording any environmental related investigations, legal cases, rulings, fines and other relevant events (nil to date).
- Conducting periodic reviews of results by senior management.

Anti-Corruption

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

Policy & Assessment

SN has a zero-tolerance policy for corruption, bribery and extortion.

The Group expects all personnel to not engage in any activity which conflicts or competes with the interests of the Group or in any way damages the Group's reputation or integrity. Personnel must not exploit their position or influence, or misuse any Group asset including confidential information, for their own personal gain or benefit or that of an unauthorised third party. This also precludes any unfair bias or favouritism during the recruitment of personnel or any other business activity. Any potential conflict of interest must be reported to senior management.

All Group, business partner and supplier activities shall be exercised in strict compliance with the laws and regulations against corruption in force in the United Arab Emirates, as well as other international legislation including the UN Convention Against Corruption, US Foreign Corrupt Practices Act 1977, the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions of 1997, the Convention of the European Union of 1997, as well as their transcription in national law. Personnel must not promise, offer or give to any person or public official, directly or indirectly, anything of value for the public official or another person or entity, in order for that person to act or refrain from acting in the exercise of their official duties if such inducement is illegal. This includes the prohibition of facilitation or "grease" payments.

Our processes include an assessment of corruption-related risks in our business area. We also allow all personnel to report any suspicions or non-conformities via our 'Don't Walk By' initiative.

The Top Management has overall responsibility for anti-corruption within SN, advised by the Legal and HSSEQ Departments, but all personnel have a responsibility to report any abuse or violation up to senior management.

Achievements

- 'Don't Walk By' initiative, creating a quick and easy way any worker can feed back suspicions or non-conformities.
- Awareness raising of corruption and corrupt practices continues for all personnel upon joining, as laid down in our HSSEQ Induction and Code of Conduct.
- Consultation with interested parties to ensure harmonious principles are followed, including business partners, suppliers and clients.

Goals for 2023

- Continue to raise awareness of corruption for all personnel upon joining, as laid down in our Code of Conduct.
- Continue to consult with interested parties to ensure harmonious principles are followed, including business partners, suppliers and clients.

Measurement of outcomes

We intend to continue monitoring and evaluating our performance by:

- Recording specific progress made in the area of anti-corruption in the past reporting period.
- Recording any corruption related violations and explaining how we dealt with them (nil to date).
- Recording any corruption related investigations, legal cases, rulings, fines and other relevant events (nil to date).
- Conducting periodic reviews of results by senior management.

The 17 Sustainable Development Goals

In 2015, UN signatory countries adopted the [2030 Agenda for Sustainable Development](#) and its [17 Sustainable Development Goals](#) (SDGs) to transform our World. We support this agenda, and this is our progress to date on all applicable Goals:

Goal 1: End poverty in all its forms everywhere

- We have 10 owned vessels operating across the Indian Ocean and employ multinational staff, contractors and crew, supporting families and communities across the world, and helping them escape and remain free from poverty.

Goal 2: End hunger, achieve food security and improved nutrition and promote sustainable agriculture

- We aim to support people in areas of malnutrition through our Community Investment Programmes, including disaster relief packages to hurricane victims in the Philippines.

Goal 3: Ensure healthy lives and promote well-being for all at all ages

- For all our workers, crew and passengers, we emphasise the importance of family life, healthy diets and exercise. All our vessels provide 3 healthy meals a day, facilities for rest & relaxation, and fitness equipment.
- Our published 'Safety and Security Guidance' for every country we operate in ensures our staff and visitors remain safe and healthy throughout their work.
- We publish Health Alerts and information bulletins for health threats such as COVID-19, Malaria and Chikungunya.

Goal 4: Ensure inclusive and quality education for all and promote lifelong learning

- In our other offices, we provide free First Aid, Fire Safety and Health & Safety training for all our staff, as well as giving them the opportunity to promote their professional and personal education with a variety of courses for lifelong learning.

Goal 5: Achieve gender equality and empower all women and girls

- Gender equality is not only a fundamental human right, but a necessary foundation for a peaceful, prosperous and sustainable world. At SN, this is written into our Code of Conduct and governs all our business activity. In our Office, 60% of the permanent staff are female.

Goal 7: Ensure access to affordable, reliable, sustainable and modern energy for all

- Some of our vessels are powered by shaft generators which save huge amounts of fuel and help promote the use of more environmentally friendly means of transportation to our clients and other interested parties.

Goal 8: Promote inclusive and sustainable economic growth, employment and decent work for all

- It is our aim to provide as many job opportunities as we can by sustainable economic growth, creating the conditions that allow people to have quality jobs that stimulate the economy while not harming the environment.

Goal 9: Build resilient infrastructure, promote sustainable industrialization and foster innovation

- It has long been recognized that growth in productivity and income, and improvements in health and education outcomes require investment in infrastructure. A part of our business involves helping the international community protect their shipping trade from the scourge of piracy.
- Having vessels stationed in the Red Sea and around the coast of Yemen, we will continue to monitor the situation carefully in order to be ready to provide any possible reconstruction and other services in Yemen once peace has returned.

Goal 11: Make cities inclusive, safe, resilient and sustainable

- We are committed to doing 'our bit' to make cities opportunities for all, including improved access to basic services, energy, housing, transportation and more. While limited in our ability to do this directly, we can help by doing so within our business, which will then leach out into the surrounding cityscape. To some extent, our Maritime Support Programmes, reducing piracy in the Indian Ocean, helps stabilise the blue economy, and in turn helps to improve the sustainability and safety of the city scape.

Goal 12: Ensure sustainable consumption and production patterns

- In our office and onboard all our vessels, we have been proactive in reducing waste by adopting better recycling processes (where possible), reducing our consumption of plastic (e.g. banning single-use plastics) and using biodegradable substances where possible, including non-ablative paints on our ship hulls. This can be seen from our Environmental Policy (and associated Environmental Checklists), and on board Garbage Management Plans.
- Our quest to reduce the amount of paper and ink we use has continued with our 'think before you print' initiative and completing electronic versions of forms wherever possible.

Goal 13: Take urgent action to combat climate change and its impacts

- Climate change is affecting every country on every continent. It is disrupting national economies and affecting lives, costing people, communities and countries dearly today and even more

tomorrow. Wherever possible, our Environmental Policy allows us to help combat climate change by using non-polluting and energy efficient technologies, such as:

- We promote the use of travel alternatives such as video/phone conferencing;
- We favour 'green' transport methods (shipping is one of the most environmentally friendly), such as vessels with shaft generators, and maintain our own vehicles to keep them as efficient as possible;
- We endeavour to book more direct flight options and favour fuel efficient aircraft where possible;
- We monitor our vessel CO₂, SOX and NOX emissions and reduce them as much as possible in line with our Ship Energy Efficiency Management Plan (SEEMP);
- Our office and each vessel undertake Environmental Checklists to ensure they are operating as environmentally sustainably as possible.

Goal 14: Conserve and sustainably use the oceans, seas and marine resources

- The world's oceans – their temperature, chemistry, currents and life – drive global systems that make the Earth habitable for humankind. Among the negative effects of mankind, the use of plastics is slowly killing life in the Ocean. We are committed to looking after the Oceans by:
 - Following international MARPOL guidelines;
 - Following a Bunkering Procedure Checklist according to our company Safety Management Manual in accordance with the ISM Code;
 - Bilge water and sludge discharge only to shore facilities;
 - MSDS (Maritime Safety Data Sheets) available and followed for all harmful chemicals;
 - Garbage Management Policy enforced (e.g. garbage correctly lashed down and not disposed of overboard);
 - Educating staff, crew and passengers on the importance of our oceans, helping to prevent them from littering the sea with plastic bags and bottles etc.;
 - Developing a good environmental protection culture in our offices and on board our vessels so everyone understands the damage garbage and plastics can have on life & the environment;
 - Strict ballast water management according to local and international regulations;
 - Reduced plastic consumption (e.g. we have banned all single-use plastics);
 - Using biodegradable substances where possible, including non-ablative paints on our ship hulls;
 - Reduced garbage creation (e.g. we have installed electric hand dryers on board our vessels so no more paper towel waste);
 - Reducing paper use by storing all files online (soft copy) and only printing/using paper when essential;
 - Environmental checklist completed on all our vessels.

Goal 16: Promote just, peaceful and inclusive societies

- By helping rid the Indian Ocean of Piracy, we can help States progress along the road of good governance and stability in terms of national and regional security.

Goal 17: Revitalize the global partnership for sustainable development

- A successful sustainable development agenda requires partnerships between governments, the private sector and civil society. As 'Active Participants' in the UN Global Compact, we are actively involved in developing these partnerships and working towards a sustainable future for generations to come.