 NNC	Integrated Management System Manual	IM 01	
	Policies and Objectives	Revision 0	Page 1 of 4
	Company Policies, Objectives and Values	Section 01	Date 01/11/2010

1.1 Introduction to the Company

National Navigation Company was founded in 1981 as an Egyptian free zone company, mainly for bulk cargoes activities, and is today owning and managing a diversified fleet of worldwide vessels.

The owned fleet of National Navigation Company includes Bulk Carrier, Container, General Cargo and Passengers Vessels. The owned and managed fleet is serviced by the company's Head Office, at Cairo, and the Branch Office, at Alexandria, Egypt.

The Company also charters-in third party vessels to service contracts of affreightment commitments.

Being Egypt's largest bulk carries owner and operator, National Navigation Company has taken the pioneering steps towards development and modernizing the Egyptian fleet.

The basic functions that the Company's management performs, in order to fulfil its contractual commitments, are:

- Bulk and General Cargo Booking.
- Chartering in and out.
- Containers feeder services.
- Controlling passengers booking (passenger booking outsourced).
- Ships manning.
- Supplies, including bunkering (except for chartered out ships).
- Ships technical support.
- Maintenance and repairs (major repairs and dry docking outsourced).
- Controlling ship insurance (outsourced).
- Ship operations.

National Navigation Company has full-time functions within its organization that monitors every aspect of the operations on a daily basis, both within offices and onboard vessels, to ensure that every activity is handled in accordance with the corporate commitment to company's policies and objectives. Continuous monitoring of the applied standards is achieved by monitoring the adherence to the working practices on board and ashore.

1.2 Company Vision, Policies and Objectives

The National Navigation Company aims to be recognised as the first choice supplier of the highest quality services to the shipping industry with absolute regard for the safety and the marine environment.

The long term goals and aspirations of the National Navigation Company are to prevent human injury, ill health or loss of life, to avoid damage to the environment in particular to the marine environment and to the property by pursuing a policy of zero accidents and zero spills at sea.

In order to achieve the objectives, the Company has established its Health, Safety, Environmental & Quality Policy, which is implemented throughout the Integrated Management System (IMS); the policy is shown on the next page.


The Company has adopted a slogan that reflect these principles, which simply states:

**"QUALITY SERVICE WITH NO ACCIDENT, NO HARM TO PEOPLE
AND NO DAMAGE TO THE ENVIRONMENT"**

Other policies and objectives, including for more details, exists in the IMS manuals and procedures.

Each department's manager is required to display at least one copy of the IMS policy, signed by the Managing Director, for all shore staff to see. Each vessel will receive two copies of the IMS policy, signed by the Managing Director, one copy is to be posted in a prominent position for all to see and the other is to be displayed in the bridge.

The policies will, from time to time, be reviewed and changed if required in order to accommodate changes in objectives, the pursuit of health & safety and environmental excellence, legislation and for the sake of continual improvement.

 NNC	Integrated Management System Manual	IM 01	
	Policies and Objectives	Revision 0	Page 2 of 4
	Company Policies, Objectives and Values	Section 01	Date 01/11/2010

NNC Health, Safety, Environmental & Quality Policy

At National Navigation Company, Health, Safety, Environmental and Quality responsibilities are integral to the way we conduct our business

NNC has developed and implemented Health, Safety, Environmental & Quality management system, the Integrated Management System (IMS), which has the objectives of:

- Promoting and ensuring safety, ashore & at sea, and prevention of human injury, ill health or loss of life;
- Avoiding damage to the environment and property, in particular to the marine environment;
- Enhancing customer satisfaction by determining and meeting their requirements.

NNC objectives and targets are directed for preventing spill and aim to reduce air emissions as part of our effort to minimize the impact of our business on the environment, and recognize the importance of monitoring appropriate technology and management practices to enhance our environmental performance, as practicable.

NNC in order to pursuit the above, is committed to:

- Operate, manage and maintain the ships as per statutory, regulatory and customer requirements.
- Comply with the relevant national and international rules and regulations governing the maritime industry and comply with the applicable legal and other requirements related to company's environmental aspects and occupational health and safety hazards.
- Assess all identified risks to ships, personnel health & safety and the environment and establish appropriate safeguards.
- Prevent pollution and protect the environment by reducing waste and minimizing resources consumption.
- Provide safe and healthy work environment and ensure the welfare of the staff.
- Provide for safe practices in ship operation and establish safeguards against all identified risks by adequate contingency planning related to safety and environmental protection.
- Ensure all employees have the appropriate training, the required skills and experience necessary to perform their jobs in safe and environmentally friendly manner.
- Continuously improve occupational health & safety, environmental and quality performance and management skills of personnel ashore and at sea, through identifying & providing adequate resources, trainings and take decisions that are based on the analyzed data and feedbacks.
- Provide and ensure the availability of the essential resources and support, including funding, necessary to establish, maintain, and improve the Integrated Management System.
- Ensure compliance with our standards through regular and independent internal audits.
- Support a "No Blame" Health, Safety and Environmental culture and provide all employees a risk free method of communicating wrong actions ashore or at sea.
- Use, as far as practicable, suppliers and contractors whose environmental standards conform to company's standard.
- Share information with external interested parties on environmental performance.
- Develop operating standards by adopting best practices through a comprehensive integrated management system.


Managerial responsibility and accountability for the performance of Health, Safety and Environmental related activities, lies with the departments' managers and ships' masters and with every employee having the personal authority to stop work when exposure to a hazard presents too high risk.

NNC policy is the framework for setting and reviewing the occupational health & safety, quality and environmental objectives and targets and shall be reviewed annually to ensure that it remains relevant.

NNC policy is communicated to all staff, contractors and suppliers and made available for the public.

Chairman & Managing Director

M. Shawky Younis

 NNC	Integrated Management System Manual	IM 01	
	Policies and Objectives	Revision 0	Page 3 of 4
	Company Policies, Objectives and Values	Section 01	Date 01/11/2010

1.3 Customer Focus

National Navigation Company's management recognises the fact that the aim of achieving and enhancing customer satisfaction depends on the understanding of customers' needs (expectations and perceptions) as well as their requirements.

National Navigation Company's management recognises the simple principle that the company exists to serve its customers long into the future. Business leaders who act on this, and persuade all their people to believe in it, can transform ordinary companies into world beaters.

National Navigation Company's management consider the establishment of customer satisfaction level, hoping that the resulted data will be useful when:

- Setting corporate objectives and targets
- Planning for Marketing
- Holding onboard and at shore committees' meetings
- Reviewing service processes
- Analysing training needs
- Developing systems, processes and procedures

1.4 Values

National Navigation Company's values come from the commitment towards the Integrated Management System that stands for the following major standards:

- ISM Code International Safety Management Code
- ISO 9001:2008 Quality management systems - Requirements
- ISO 14001: 2004 Environmental management systems - Requirements
- BS 18001: 2007 Occupational health and safety management systems - Requirements


The above standards focus on how the service is to be delivered, at what condition and quality, targeting the satisfaction of all stakeholders from employees, suppliers, subcontractors to clients.

1.5 Code of Ethics

National Navigation Company requires its employees to observe high standard of business and personal ethics in the conduct of their duties and responsibilities.

National Navigation Company and its employees shall practice honesty, integrity and transparency in every respect of dealing with clients, the business community, the public, suppliers and government authorities.

The Company's code of ethics is shown in the next page.

 NNC	Integrated Management System Manual	IM 01	
	Policies and Objectives	Revision 0	Page 4 of 4
	Company Policies, Objectives and Values	Section 01	Date 01/11/2010

National Navigation Company

Code of Ethics

Responsibility to Clients

- Each employee shall diligently and honestly pursue our client's legitimate objectives. No employee shall place his or her own needs and desires above those of the client in the performance of work for that client.

Responsibility to Employees

- NNC avoids discrimination on account of race, colour, age, sex or religion. All persons are to be treated with dignity and respect and they shall not be unreasonably interfered within the conduct of their duties and responsibilities.

Sensitive transactions

- NNC and its employees will not enter into any activity considered to be illegal, unethical, immoral or of such nature that it can reflect adversely on the integrity of the Company.

Commercial bribery

- NNC prohibits commercial bribes, kickbacks or similar payoffs or benefits to be paid to any supplier or client.
- Employees and agents of the Company are prohibited from receiving, directly or indirectly, anything of a significant value in connection with any transaction entered into by the Company, other than salary, wages or other ordinary compensation.

Confidentiality

- NNC prohibits employees from disclosing confidential or proprietary information outside the Company, either during or after employment, without the Company's authorisation to do so.

Conflict of interest

Prior to accepting any engagement for services, NNC shall disclose to any potential client any known conflicting interest it may have between:

- that client and any other client;
- that client and its employees;
- that client and its suppliers.
- If any such conflicting interest arises after commencement of services, that interest shall also be disclosed to the client.

Fair play

- NNC endeavours to deal fairly with its clients, competitors, suppliers and employees.
- NNC shall not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practice.