InterManager

General Principles of Conduct & Action
Expected Behaviours / KPIs

Self-Assessment / Gap Analysis

SELF-ASSESSMENT INSTRUCTIONS
a) *Fill in the following fields (   ) by selecting one of the following status levels according to the extend the Company's SMS meets the relevant Expected Behaviour / KPI requirements:*
✓ *Achieved*
✓ *Partially Achieved: To be achieved in the short-term*
✓ *Non-Achieved: To be achieved in the long-term*
b) *Provide supporting evidence for the declared status: related SMS references / attachments (e.g. sections, paragraphs, policies, forms, KPIs, etc.).*

General Principles of Conduct & Action
Expected Behaviours / KPIs
Self-Assessment / Gap Analysis

I. CARE AND RESPECT FOR PEOPLE
SHIPOWNER/SHIP OPERATOR COMMITMENT
DIVERSITY, INCLUSION AND EQUAL OPPORTUNITIES

Unity in diversity towards excellence

All InterManager members are committed to Diversity, Inclusion and Equal Opportunities and ensure fair treatment and equal opportunities for all.

We aim to eradicate prejudice and discrimination in Shipping on the basis of individual or group's protected characteristics such as:

- Race
- Gender
- Age
- Religion/belief
- Sexual orientation
- Pregnancy
- Disability

We acknowledge that unity in Diversity outperforms unity in similarities and thus recognise, respect each other's differences and embrace a diverse environment with a wide range of backgrounds and mindsets.

By promoting inclusion, we create an environment where everyone feels welcomed and valued.

Through continuous training we raise our awareness of our unconscious biases and learn how to manage them.

Equal opportunities mean fairness at its core: we ensure that individuals, or groups, are not treated less favourably because of their protected characteristics.

We protect the disadvantaged and provide the tools they need to access the same, fair opportunities as the rest of their peers.

We are vigilant and DO NOT tolerate any form of discrimination on our watch

Expected Behaviours/KPIs

General Principles of Conduct & Action
Expected Behaviours / KPIs
Self-Assessment / Gap Analysis

1.	Code of Conduct including Diversity, Inclusion and Equal Opportunities valuing Shore and Seagoing personnel by respecting their human rights, complying with the MLC and all applicable legislation.
	Supporting evidence / documentation:
2.	Management system, supported by appropriate staffing and procedures, to promote Diversity, Inclusion and Equal Opportunities and manage compliance with MLC.
	Supporting evidence / documentation:
3.	Code of Conduct including Diversity, Inclusion and Equal Opportunities, relevant guidelines (Dos and Don'ts) and practical resources are provided as part of the onboarding process to newcomers.
	Supporting evidence / documentation:
4.	Mandatory cultural awareness, diversity and inclusion, emotional intelligence, social dynamics training and mentoring plan is available for Shore and Seagoing personnel aiming to facilitate cultural competencies.
	Supporting evidence / documentation:
5.	An environment where personnel is informed, involved and able to exercise their rights through regular communication of their rights and obligations in relation to Diversity, Inclusion and Equal Opportunities is cultivated.
	Supporting evidence / documentation:
6.	Declaration of employees/seafarers' rights" included to employment contracts which must be signed as "read and acknowledged" by the newcomer.
	Supporting evidence / documentation:
7.	Anti-discrimination enforcement: Zero tolerance to discrimination verified by internal audits, surveys, visits, whistleblowing, disciplinary actions and ensured confidentiality.
	Supporting evidence / documentation:

General Principles of Conduct & Action
Expected Behaviours / KPIs
Self-Assessment / Gap Analysis

8. Recruitment, promotion and career development are based on merit (qualifications, skills, talent, motivation, potential, fit for duty, etc.) regardless of any protected characteristic or relationship.	
Supporting evidence / documentation:	
9. Shore and Seagoing personnel's career and promotion support is provided through identification of individual training for the development of the necessary technical and behavioural competencies.	
Supporting evidence / documentation:	
10. Procedures, plans and practices that promote visible leadership, teamwork, respect and fair treatment and aim to continuously improve trust from Top Management to all levels/ranks of personnel.	
Supporting evidence / documentation:	
11. Recruitment and promotion of female seafarers is actively encouraged through policies and recruitment plans. Guidelines to ensure gender equality and protection are in place. Female seafarers' empowerment is achieved through special forums, communications, mentoring, training and relevant industry information sharing regarding.	
Supporting evidence / documentation:	
12. Grievance and whistleblowing procedure (as per ISO 37002) as well as Open Reporting System facilitate communication of discrimination occurrences, incidents, complains and relevant improvement suggestions. Confidentiality and non–retaliation is ensured.	
Supporting evidence / documentation:	
13. Forced labour is strictly prohibited: It is verified that Shore and Seagoing personnel (as applicable) are not subject to fraud, debt bondage, illegal recruitment fees, other placement fees, contract substitution, passport retention, repatriation costs, etc. It is ensured that all personnel receive their salaries in full, on time and at the official published rate, including any overtime and/or agreed bonuses.	
Supporting evidence / documentation:	

General Principles of Conduct & Action
Expected Behaviours / KPIs
Self-Assessment / Gap Analysis

14. Equal pay for equal work value is guaranteed (same position/rank/responsibilities, same pay) through crewing, human resources and accounting record verification.	
	Supporting evidence / documentation:

General Principles of Conduct & Action
Expected Behaviours / KPIs
Self-Assessment / Gap Analysis

I. CARE AND RESPECT FOR PEOPLE
SHIPOWNER/SHIP OPERATOR COMMITMENT
BULLYING AND HARASSMENT

Our tolerance is ZERO

All InterManager members are committed to providing a working environment free from bullying and harassment of any kind.

We aim to ensure that all staff are treated, and treat others, with dignity and respect onboard, at work and out of the workplace, work-related events or social functions.

This applies to all staff at all levels and ranks and independent contractors which bear personal responsibility not to bully or harass any other staff or contractor.

We have zero tolerance regarding any unwanted conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

Offensive, intimidating, malicious or insulting physical or verbal behaviour, abuse or misuse of power through means that undermine, humiliate, denigrate or injure the recipient are not tolerated.

We welcome and facilitate only legitimate and reasonable criticism of a staff member's performance or behaviour, or reasonable management instructions within the boundaries of our principles and ethics.

We reinforce positive behaviours through encouraging speaking up and grievance, access to support, promoting non-retaliation, training, raising awareness and through leading by example.

We are vigilant and DO NOT tolerate any form of harassment and bullying on our watch

Expected Behaviours/KPIs
1. Code of Conduct sets the expectations to refrain from any kind of bullying, harassment, violence and non-retaliation onboard, at work and out of the workplace, work-related events or social functions complying with all applicable legislation.
Supporting evidence / documentation:
2. Management System, supported by appropriate staffing and procedures, with zero tolerance and immediate resolution for bullying, harassment, violence and non-retaliation occurrences including disciplinary actions of various degrees applicable to all staff at all levels and ranks and independent contractors.

General Principles of Conduct & Action
Expected Behaviours / KPIs
Self-Assessment / Gap Analysis

	Supporting evidence / documentation:
3.	Code of Conduct including bullying, harassment, violence and non-retaliation relevant guidelines (Dos and Don'ts) and practical resources are provided as part of the onboarding process to newcomers.
	Supporting evidence / documentation:
4.	Mandatory anti-bullying and harassment training available for Shore and Seagoing personnel aiming to raise awareness and promote vigilance.
	Supporting evidence / documentation:
5.	An environment where personnel is informed, involved and able to exercise their rights through regular communication of their rights and obligations in relation to bullying, harassment, violence and non-retaliation is cultivated.
	Supporting evidence / documentation:
6.	Grievance procedures and whistleblowing procedure (as per ISO 37002) as well as Open Reporting System facilitate communication of bullying, harassment, violence occurrences, incidents, complains and relevant improvement suggestions. Confidentiality and non–retaliation is ensured.
	Supporting evidence / documentation:
7.	Anti-bullying and harassment enforcement: Zero tolerance to bullying, harassment, violence and retaliation verified by internal audits, surveys, visits, whistleblowing, grievance, disciplinary actions and ensured confidentiality.
	Supporting evidence / documentation:
8.	Company specific minorities and vulnerable groups who have one or more protected characteristics are defined in Management system. Provisions for special attention to risky situations and having open communication (e.g. surveys and interviews) are provided.
	Supporting evidence / documentation:

General Principles of Conduct & Action
Expected Behaviours / KPIs
Self-Assessment / Gap Analysis

9.	Strict guidelines and regulations to ensure maximum protection against bullying and harassment specially towards women on board.
	Supporting evidence / documentation:
10.	Access to 24/7 helpline providing support and guidance to bullying, harassment, violence and retaliation victims.
11.	Recognise the Risk & Take Action Plan. Develop a clear understanding of what bullying, harassment, violence and non-retaliation is, the relevant consequences, find out what preventive measures must be taken and establish a prevention program.

General Principles of Conduct & Action
Expected Behaviours / KPIs
Self-Assessment / Gap Analysis

I. CARE AND RESPECT FOR PEOPLE
SHIPOWNER/SHIP OPERATOR COMMITMENT
STAKEHOLDERS' HEALTH AND WELLBEING
We protect and care for our people
All Intermanager members are mindful employers recognise that our Company is its people and are dedicated to increasing physical and mental health and wellbeing awareness and provide the necessary resources, support and information.
We commit to value and respect our staff, safeguard their physical and mental health and wellbeing and protect their human rights in accordance with Maritime Labour Convention.
Setting a proactive culture focused on the prevention and promotion of physical and mental health and wellbeing is a priority.
We are dedicated to promote understanding of the positive link between physical and mental health and wellbeing and organizational resilience.
Understanding the factors that influence our stakeholders' health and wellbeing is of paramount importance in our philosophy.
We consolidate a healthy workplace through setting realistic and measurable targets, involving all in the process, to continuously improve it.
Our leadership is dedicated to reduce stigma and make it healthier to talk about any physical and mental health issues in the workplace.
We protect our people during and after emergencies and crises and mitigate the impact in their physical and mental health and wellbeing.
Caring for ourselves and each other is our duty
Expected Behaviours/KPIs

1.	Code of Conduct including commitment to promoting Physical and Mental Health and Wellbeing of all staff complying with the MLC and all applicable legislation.	
	Supporting evidence / documentation:	
2.	Management system, supported by appropriate staffing and procedures, includes a Fatigue Risk Management System to ensure fatigue is considered in crewing arrangement.	
	Supporting evidence / documentation:	

General Principles of Conduct & Action
Expected Behaviours / KPIs
Self-Assessment / Gap Analysis

3.	Physical and Mental Wellbeing Plan with goals and objectives supported by a committee of designated and appropriately trained wellbeing personnel and a relevant budget as an integral part of measures to address occupational health, morale, motivation, security and safety for all staff.
	Supporting evidence / documentation:
4.	Wellbeing Plan addressing five criteria: Physical, Emotional, Intellectual, Spiritual, and Social Aspects.
	Supporting evidence / documentation:
5.	Assesses tasks, duties and responsibilities to meet peak workload situations, conditions and requirements, and ensure the welfare and health of seafarers by avoiding extreme fatigue.
	Supporting evidence / documentation:
6.	Fresh, healthy, good quality food and water, of sufficient quantity, nutritional value, and variety, considering religious and medical requirements and cultural practices is provided.
	Supporting evidence / documentation:
7.	Focuses on mental health, by providing mental health support (e.g. 24/7 helpline access, mental health champions) and access to free and confidential counselling for all staff.
	Supporting evidence / documentation:
8.	Staff health and wellbeing aspects are monitored periodically (e.g. through surveys, interviews, or consultations) including listening to and actioning suggestions from staff for improvement of the relevant areas.
	Supporting evidence / documentation:
9.	Training for all staff on physical wellbeing, reducing stigma, stress management, psychological first aid and mental health is available to increase knowledge and awareness.
	Supporting evidence / documentation:

General Principles of Conduct & Action
Expected Behaviours / KPIs
Self-Assessment / Gap Analysis

10. Guidelines to empower and encourage staff to speak up when operational demands from superiors risk their own safety and wellbeing.	
	Supporting evidence / documentation:
11. Grievance procedures and whistleblowing procedure (as per ISO 37002) as well as Open Reporting System facilitate communication of health and wellbeing complains and relevant improvement suggestions. Confidentiality and non–retaliation is ensured.	
	Supporting evidence / documentation:
12. High-quality recreation facilities in each vessel on its fleet are available. Recreational and wellbeing activities are planned for the crew to encourage social interaction. Access to low cost/high quality internet is available. Bonding and wellbeing activities for shore staff are promoted.	
	Supporting evidence / documentation:
13. Preventive health care program that promotes and encourages staffs' health and wellbeing.	
	Supporting evidence / documentation:
14. Emergency, crisis and/or threat management plan is in place to mitigate harm and protect Physical and Mental Health and Wellbeing of staff and their families.	
	Supporting evidence / documentation:

General Principles of Conduct & Action
Expected Behaviours / KPIs
Self-Assessment / Gap Analysis

I. CARE AND RESPECT FOR PEOPLE
SHIPOWNER/SHIP OPERATOR COMMITMENT
SOCIAL RESPONSIBILITY

The power of giving back

All InterManager members are accountable to operate, develop and grow in a manner that benefits the society and environment and prepare and protect future generations.

We understand the impact: We acknowledge that the positive effect of Social Responsibility is hard to quantify, but the negative consequences of a disaster are enormous.

Transparent and ethical behaviour govern the entire spectrum of our operations at all times.

We ethically validate our decisions to ensure that no harm to society or the environment ensues from our actions.

Our leadership considers personal gain over the society and environment's welfare as unethical and irresponsible.

We aim at creating and promoting behaviour that generates value to all interest stakeholders (customers, staff, suppliers, environment and community) in the context of a socially responsible culture.

We unite to assist the society in crises.

Through dialogue with all, we establish stable relationships, active listening mechanisms, identify the most relevant subjects to improve our sustainability and constantly evolve.

We ensure that the Social Responsibility strategies and practices are followed, reached, evaluated and constantly improve.

Our goal: Sustainable growth

Our duty: Welfare of the society and the environment

Expected Behaviours/KPIs
1. Code of Conduct including commitment to creating and promoting behaviours that generate value to all interest groups (customers, employees, suppliers, environment and shareholders) in the context of a socially responsible culture that is reflected in the development of a sustainable Company.
Supporting evidence / documentation:
2. Website that serves as telematic support to consult the Company's Social Responsibility and any revisions or updates.

General Principles of Conduct & Action
Expected Behaviours / KPIs
Self-Assessment / Gap Analysis

	Supporting evidence / documentation:
3.	Ethics Committee that guarantees the principles and norms of conduct including at least the Top Management, HR/Crew and HSQE. Heads ensure that the Company's Social Responsibility strategies and practices are followed, reached and evaluated.
	Supporting evidence / documentation:
4.	Social Responsibility action plan with KPIs, actions and relevant timetable.
	Supporting evidence / documentation:
5.	Benchmarking as a guide on how to measure the Company's Social Responsibility performance against top performers and develop an optimal roadmap of initiatives.
	Supporting evidence / documentation:
6.	Ensuring a transparent and sustainable business by supplying knowledge of all necessary operational aspects.
	Supporting evidence / documentation:
7.	Personnel Engagement (satisfaction, health, respect, volunteerism, diversity & inclusion, motivation, turnover rate, data protection & privacy, etc.) is measured. Improvement actions and relevant timetables are available.
	Supporting evidence / documentation:
8.	Total Company Social Responsibility Impact KPI (number of social activities, number of community members organization reached, time spent in volunteering, no of social policies, etc). Improvement actions and relevant timetables are available.
	Supporting evidence / documentation:
9.	Social Return of Investment (SROI) calculation.
	Supporting evidence / documentation:

10. Company Social Responsibility Recognition: The Company actively seeks and obtains recognition through pursuing relevant nominations and awards.	
	Supporting evidence / documentation:
11. Strategic Partners KPI (significant collaborations with corporate partners, non-profit organizations and NGOs) aiming to improve Shipping and the Community in general.	
	Supporting evidence / documentation:

General Principles of Conduct & Action
Expected Behaviours / KPIs
Self-Assessment / Gap Analysis

I. CARE AND RESPECT FOR PEOPLE
SHIPOWNER/SHIP OPERATOR COMMITMENT
PARTNERSHIP
It is our network that makes us unique
All InterManager members acknowledge that Partnership is fundamental in the way we work towards achieving our mission.   Partnership enables us to utilise our considerable experience, knowledge and motives. It allows us to deliver sustainable services, optimize our operations and to thereby strengthen the overall system.   We move from rivalry to cooperation to advance our mutual interests and we know that a lasting Partnership begins with trust, open communication and accessibility.   We share ownership and responsibility regarding all members' ethical obligations and celebrate each other's successes as one.   Partnership allows us to combine our resources and expertise with each other and our partners, so that we can work more effectively, and achieve more, than we would if working individually.   We facilitate capacity building and sustainability by supporting partner organisations to develop their skills and capacities through shared projects.   We form mutually beneficial and interactive relationships with intergovernmental organisations (IGOs), non-government organisations (NGOs) and a wide range of partners including industry associations, business, consultants & academia.   This enables us to include a wide range of perspectives in both our policy and operations which is why our views are widely respected within the industry and far beyond.
We share aspirations towards common goals of sustainable and positive impact
Expected Behaviours/KPIs

1.	Partnership Policy which outlines the principles and approaches that are fundamental to Company's project level, one-to-one, alliances, coalitions, consortia and strategic level partnerships.	
	Supporting evidence / documentation:	
2.	Company's goals should align with InterManager's and provide a clearly defined added value to achieving its mission. Company's vision, mission, values and ways of working should be compatible with InterManager's.	
	Supporting evidence / documentation:	

General Principles of Conduct & Action
Expected Behaviours / KPIs
Self-Assessment / Gap Analysis

3.	Commitment in providing agreed inputs in common projects and necessary support for the delivery of intended outcomes, towards achieving agreed goals with the rest of the members.
	Supporting evidence / documentation:
4.	Commitment to foster an open and participatory dialogue between members/partners with an emphasis on consultation and sharing of information from the earliest stages of the relationship.
	Supporting evidence / documentation:
5.	Commitment to learning from each other's actions, successes and mistakes and to provide the necessary time, space and environment to facilitate formal and informal learning to ensure that all members/partners can act upon lessons learnt successfully.
	Supporting evidence / documentation:
6.	Participation in joint learning activities to facilitate learning processes between partners in order to strengthen learning practices and to support a structured approach to learning that provides opportunities for reflection and joint improvement.
	Supporting evidence / documentation:
7.	Safeguard all InterManager members' right to be at the table and exhibit mutual respect for all other members, irrespective of their size, power or status. Engaged to ensure that the association is not be dominated by any one organisation and all members should expect to be treated fairly.
	Supporting evidence / documentation:
8.	Respect each other's mandates, obligations, principles and independence. Recognise other members for all of their contributions, not simply those that are measurable in terms of cash value or public profile.
	Supporting evidence / documentation:
9.	Ethical obligation to the other members/partners to accomplish tasks with integrity and in a responsible and appropriate manner.

General Principles of Conduct & Action
Expected Behaviours / KPIs
Self-Assessment / Gap Analysis

	Supporting evidence / documentation:
10. Commitment to work with other members/partners and not through them: Collaborate to achieve shared goals, contribute beyond the immediate scope towards building networks, value and respect members/partners' approaches, opinions and creativity and support capacity development and working towards excellence.	
	Supporting evidence / documentation:
11. Accountable for choosing the right partnerships to work with and understand every partner organisation's strength and weakness.	
	Supporting evidence / documentation:
12. Due Diligence basic minimum standards outline for assessing potential partners.	
	Supporting evidence / documentation:
13. Due Diligence exercise with potential partners, to assess its structure and governance, key capacities, reputation and ethics. Provide assistance for improvement if acceptable weaknesses are identified.	
	Supporting evidence / documentation:
14. Memoranda of Understanding (MoU) for important mutually beneficial long-term partnerships. The MoU to agree an overall goal, ethics and vision for the partnership and how it might develop over a defined period of time. A strategy for working together and examples of the type of collaboration or projects that might be embarked upon is outlined.	
	Supporting evidence / documentation:

General Principles of Conduct & Action
Expected Behaviours / KPIs
Self-Assessment / Gap Analysis

II. CONTINUOUS DEVELOPMENT & OPTIMIZATION
SHIPOWNER/SHIP OPERATOR COMMITMENT

HSQE Excellence
Do it right consistently, do it better continuously

All InterManager members continuously pursue operational excellence through strong commitment to maritime HSQE aspects.

Health, safety, quality and environmental protection are core principles of our business. They are the foundation to everything we do. Our decision making, actions and behaviours will adhere to these principles 100% of the time.

We have our own strict quality standards which comply with all applicable requirements determined by regulatory authorities, InterManager General Principles of Conduct & Action and our clients' standards.

Our primary goal is to avoid causing any harm to people or the environment. We continuously strive to improve the quality and safety of our services.

We actively seek to minimize the environmental impact of our own operations and minimize or even eliminate hazardous emissions.

We recognize the importance of an effective security program to protect our personnel, assets, information, integrity and reputation from threats.

We mitigate risks by engaging in activities that focus on the core competencies of crisis management, prevention, preparedness, response and recovery.

Through our optimized integrated management systems, we embed HSQE into our daily operations.

We don't just comply, we take HSQE concerns to heart

Expected Behaviours/KPIs
1. An Integrated Management System (IMS) is in place covering all HSQE relevant aspects/policies and industry's requirements. IMS is optimized/simplified to maximize implementation, consistency and compliance.
Supporting evidence / documentation:
2. Management commitment in HSQE excellence and IMS implementation is defined in vision/mission statements, policies and procedures.
Supporting evidence / documentation:

General Principles of Conduct & Action
Expected Behaviours / KPIs
Self-Assessment / Gap Analysis

3. HSQE and IMS improvement: Periodic Management Review committee meetings with KPIs and related improvement action plans.	
Supporting evidence / documentation:	
4. HSQE performance is verified through benchmarking, internal and external audits.	
Supporting evidence / documentation:	
5. IMS and HSQE training plan including CBTs and internal/external trainings is in place.	
Supporting evidence / documentation:	
6. Governance: Internal/External Communications, accountabilities and responsibilities, organizational chart are available.	
Supporting evidence / documentation:	
7. Fleet (navigation, cargo, engineering, mooring/anchoring, etc.) safety, management and maintenance related procedures are in place.	
Supporting evidence / documentation:	
8. Procedures for the identification of potential hazards and shore-based management of operational risks (Risk Assessment, Permit to Work, Daily Work Plan, Mitigation Measures, Safety Inspections, etc.) are available.	
Supporting evidence / documentation:	
9. An Environmental Protection Policy and management plan is in place. The environmental management plan includes energy efficiency, benchmarking, regulation compliance, fuel management, minimization of atmospheric emissions, evaluation of Company's environmental impact, etc.).	
Supporting evidence / documentation:	
10. A long-term "zero-emissions" environmental plan is maintained. The company explores new ideas and engages in technology partnerships related to environmental performance.	

	Supporting evidence / documentation:	
	11. Emergency Preparedness, Business Continuity, Contingency Planning, Drills, Crisis Management and relevant facilities are available.	
	Supporting evidence / documentation:	
	12. A structured process for conducting vessel inspections/audits to monitor, analyze and improve the standards/condition of vessels in the fleet is in place. Analysis of inspection results is compared with data from third party inspections.	
	Supporting evidence / documentation:	
	13. Policies, procedures and training in order to respond and mitigate identified security threats covering all Company activities including cyber security are in place.	
	Supporting evidence / documentation:	
	14. Data Protection procedure including general privacy principles for the processing and transfer of personal data. Data Protection Officer (DPO) is assigned.	
	Supporting evidence / documentation:	

General Principles of Conduct & Action
Expected Behaviours / KPIs
Self-Assessment / Gap Analysis

II. CONTINUOUS DEVELOPMENT & OPTIMIZATION
SHIPOWNER/SHIP OPERATOR COMMITMENT
ETHICAL BUSINESS AND SUSTAINABILITY

Ethical and sustainable way of operating makes good business sense

All InterManager members responsibly manage our resources to positively benefit the society and our communities.

We take seriously our role as a responsible and ethical employers and economic contributors to our communities, providing well-paying jobs, contributing our share of local and state taxes, providing essential services for diverse customers and operating transparently.

Through systematic monitoring of the breadth and impact of our Ethics & Compliance plans we minimize the risk of noncompliance and increase ethical conduct within our Companies.

As integral parts of InterManager, we act sustainably to meet the needs of our customers in accordance with our collective responsibility for people, progress and the environment.

Our business decisions and actions demonstrate our commitment to the three pillars (financial, social and environmental) of long-term sustainability.

All InterManager members are committed to adopting clean technologies and gradually replace harmful substances with eco-friendly alternatives.

We adhere to InterManager's General Principles of Conduct & Action and conduct ethical and sustainable operations through professionalism, respect for staff and stakeholders and a permanent concern for health, safety, quality and the protection of the environment.

Through honesty, responsibility, fairness, integrity, respect and care we succeed.

Through honesty, responsibility, fairness, integrity, respect and care we succeed

Expected Behaviours/KPIs
1. Ethics & Compliance are central to the Company's Strategy. Code of Ethics and Conduct incorporates InterManager's General Principles of Conduct & Action. Bribery and Anticorruption and Sustainability policies and procedures are in place. Code of Conduct is not simply rule-based, it is a cultural point of reference.
Supporting evidence / documentation:

General Principles of Conduct & Action
Expected Behaviours / KPIs
Self-Assessment / Gap Analysis

2. Vision, Mission, Purpose statements and core values give clear guidance relevant to what is considered right and what wrong in terms of the Company's ethical culture. Ethical culture is led from the Top. Staff feels confident and are trained to raise concerns. Clients, third parties and all stakeholders are treated fairly and with transparency.	
	Supporting evidence / documentation:
3. Disciplinary procedures describing levels of misconduct and related disciplinary actions.	
	Supporting evidence / documentation:
4. Ethics and Compliance Plan build around 5 principles (E&C in Business Strategy, E&C Risk Management, Culture of Integrity, Speaking Up and Accountability).	
	Supporting evidence / documentation:
5. Interdepartmental Human Factors & Organizational Culture Group (HFOG) monitors, evaluates and proposes actions for improving the Company's Ethical & Compliance Maturity.	
	Supporting evidence / documentation:
6. The Company communicates its Ethics and Compliance principles and learning internally though posters, circulars, forums, leadership communications, etc.	
	Supporting evidence / documentation:
7. The Company shares its learning externally to positively influence other InterManager members and other Companies and toward ethical operation, responsible practices and a commitment to integrity.	
	Supporting evidence / documentation:
8. A procedure is in place for internal and external response in case of serious misconduct harmful to the organization's reputation. Appropriate disclosures are made to regulatory or other government authorities.	
	Supporting evidence / documentation:

General Principles of Conduct & Action
Expected Behaviours / KPIs
Self-Assessment / Gap Analysis

9. Misconduct/ethical history is considered for employee advancement, incentives, and awards.	
	Supporting evidence / documentation:
10. The Company cooperates only with parties that it trusts. Third parties and suppliers are evaluated in terms of Ethics, Compliance to applicable laws/regulation, sustainability and social responsibility as applicable. Rejected third parties are communicated to InterManager.	
	Supporting evidence / documentation:
11. Sustainability Report with environmental, social and governance (ESG) key metrics.	
	Supporting evidence / documentation:

General Principles of Conduct & Action
Expected Behaviours / KPIs
Self-Assessment / Gap Analysis

II. CONTINUOUS DEVELOPMENT & OPTIMIZATION
SHIPOWNER/SHIP OPERATOR COMMITMENT
INNOVATION AND CHANGE

Change is an opportunity, stagnation a threat

All InterManager members consider innovation and change as essential requirements for organizational success and growth and aim to go beyond a "Be more innovative" as an action towards change.

We acknowledge the need to balance day-to-day operational needs, comply with complex regulations, manage risks while also drive change and innovation in order to constantly adapt, evolve and create more safe and efficient operations.

Our leaderships promote the idea of change and innovation and commit to lead by example.

In our Companies an empowered culture of initiative, creativity and innovation is fostered: Our leaders encourage innovation, provide resources and reward relevant behaviours. Breakthroughs are celebrated.

We actively seek people that can innovate and develop a workplace friendly to change and novelty through strategies that evaluate and balance between short- and long-term benefits / effects.

Our long-term planning philosophy incorporates quick wins, consolidation of best practices and adaptability at its core.

We facilitate an Innovative Mindset through training our people to tolerate ambiguity, have curiosity, affirmative judgement and remain persistent.

Persistence and Determination drives us.

Ambiguity and Complexity are motivators, not obstacles. We do not kill ideas, we encourage our people to find other ways to pitch them until we can see their value.

We embrace change and detest stagnation - We turn ideas into actions

Expected Behaviours/KPIs
1. A Change and Innovation policy that defines innovation and change and disseminates the Company's development and adaptation strategy towards sustainable growth, transformation and competitiveness is available.
Supporting evidence / documentation:
2. Management system, supported by appropriate staffing and procedures, to promote innovation and change especially towards energy efficiency, environmental protection and human factors development.

General Principles of Conduct & Action
Expected Behaviours / KPIs
Self-Assessment / Gap Analysis

	Supporting evidence / documentation:
3.	Procedures that facilitate the selection, appraisal and promotion of individuals with an Innovative Mindset are in place. Cross departmental familiarization is part of the main familiarization process.
	Supporting evidence / documentation:
4.	Growth Mindset, Innovative Mindset and Leading Change trainings are available for Shore and Seagoing personnel.
	Supporting evidence / documentation:
5.	Open Reporting System with suggestions for improvement where relevant feedback are welcomed ensuring confidentiality. No retaliation for ideas that bring change is ensured.
	Supporting evidence / documentation:
6.	KPIs for the periodic adoption of suggestions for improvement and best practises are monitored.
	Supporting evidence / documentation:
7.	Annual budget dedicated to innovation and change actions.
	Supporting evidence / documentation:
8.	Innovative idea generation is formally rewarded and recognized throughout the Company and fleet.
	Supporting evidence / documentation:
9.	New approved ideas and best practices are implemented within a predefined time-frame.
	Supporting evidence / documentation:
10.	Annual self-assessment and verification to adherence with InterManager's General Principles of Conduct and Action.

		Supporting evidence / documentation:
	11. Periodic assessment and verification to adherence with InterManager's General Principles of Conduct and Action by a third-party assessor.	
		Supporting evidence / documentation:
	12. Identification of issues of non-compliance regarding InterManager's General Principles of Conduct and Action set goals to address gaps and improve performance through an action plan with internal processes and a set of deadlines within a year of self-assessment.	
		Supporting evidence / documentation:
	13. Roadblocks to novelty, idea generation, change and best practice adoption are identified through periodic surveys, interviews, internal and external audits, etc.	
		Supporting evidence / documentation:
	14. Senior Officers are encouraged to participate and contribute in Office projects during leave.	
		Supporting evidence / documentation:

General Principles of Conduct & Action
Expected Behaviours / KPIs
Self-Assessment / Gap Analysis

II. CONTINUOUS DEVELOPMENT & OPTIMIZATION
SHIPOWNER/SHIP OPERATOR COMMITMENT

EFFECTIVE HUMAN RESOURCES

Hire character, Train skill

All InterManager members understand that **Human Resources management is one of the most important and most dynamic assets** in our organizations.

We consider as priorities **the motivation of our workforce, competitive remuneration, adequate training and management development programmes**. Provision of optimal working conditions are paramount for us because **we care for our people**.

We emphasize on **selecting our people based on character, cultural fit and skill** and seek to operate over and above the required labour and employment legislation.

Professional competency consists of both **Technical and Behavioural competency** and we constantly seek to hire, appraise, develop, promote and reward people on both facets.

Errors are perceived as genuine human mistakes, our leaders are the first to accept their shortcomings, we don't seek to punish. We constantly seek to identify, appreciate and reward our staff.

We promote **a healthy and effective workplace** through realistic and measurable targets, safety standards, work-life balance, emotional and physical security, talent management and opportunities for growth.

A bidirectional communication is encouraged and continuously facilitated. **Frontline employees actively contribute and participate in improving our culture**.

We are **transparent in our public communication, discrete in private** and constantly seek to align the work with our Company's goals.

When people are emotionally invested, they want to contribute

Expected Behaviours/KPIs
1. Human resources guidelines (Dos and Don'ts) regarding the approach the Company utilizes to manage its people.
Supporting evidence / documentation:
2. Crew and Human Resources procedures consisting of hiring, familiarization, appraisal, promotion, training requirements, personnel development, etc.

		Supporting evidence / documentation:
3.	Hiring procedure with systematic evaluation of Technical and Behavioural Competencies consisting of relevant predefined competency criteria frameworks.	
		Supporting evidence / documentation:
4.	Ethical Guidelines / Policy Acceptance signed by all.	
		Supporting evidence / documentation:
5.	Work-life balance is promoted and protected through procedures, policies and leading by example.	
		Supporting evidence / documentation:
6.	Employee relations procedures include among others, talent management, teleworking, motivation, employee support, misconduct, extra-curricular initiatives, higher education as applicable for shore and seagoing personnel.	
		Supporting evidence / documentation:
7.	Human Factors Committee which periodically evaluates Company's culture, ethics, personnel satisfaction, wellbeing, performance issues, related policies and decides on improvement actions and plans.	
		Supporting evidence / documentation:
8.	Actions to establish a well-defined culture onboard and ashore are evident (surveys, campaigns, visits/meetings' agenda, lead by example, etc).	
		Supporting evidence / documentation:
9.	Volunteering, engagement with the community and social activities are actively promoted.	
		Supporting evidence / documentation:
10.	The appraisal process is essential and consists of departmental, contract and personalized targets/KPIs. Appraisers are evaluated for the quality of their evaluations.	

General Principles of Conduct & Action
Expected Behaviours / KPIs
Self-Assessment / Gap Analysis

	Supporting evidence / documentation:
11. Human Resources KPIs beyond the monitoring of retention rates and may include metrics such as Job Satisfaction, Trust towards Management, Average Appraisal Scores, etc.	
	Supporting evidence / documentation:
12. Systematic attraction, identification, development, engagement, retention, and deployment of those individuals who are of particular value to the Company is achieved through efficient talent management.	
	Supporting evidence / documentation:
13. A formal reward scheme comprising of the monetary, non-monetary and psychological incentives provided to personnel exists. The scheme is linked to specific performance indicators.	
	Supporting evidence / documentation:
14. Benchmarking is utilized to compare the Company's Human Resources management performance against top performers within InterManager/Industry and develop an optimal roadmap of initiatives.	
	Supporting evidence / documentation:

General Principles of Conduct & Action
Expected Behaviours / KPIs

Self-Assessment / Gap Analysis

II. CONTINUOUS DEVELOPMENT & OPTIMIZATION
SHIPOWNER/SHIP OPERATOR COMMITMENT
TRAINING ASHORE AND ONBOARD

It's not the Ship, it's the Competence

All InterManager members acknowledge that proper quantity, quality and variety of training ashore and onboard are the cornerstones of safe and efficient vessel operation.

Our aim is to promote an inclusive working culture through training and mentoring to support open communications and improve morale and working relationships ashore and onboard.

Continual professional development of personnel is actively encouraged and supported within our Companies.

We understand that proper training gives everyone a great understanding of their responsibilities and the knowledge and skills they need to perform their duties. This enhances their confidence which improves overall safety awareness and overall performance.

Furthermore, we are aware that personnel in Shipping work in highly risk environments, where Human Factors and personnel Technical & Behavioural competencies play a key role in performance at both individual and organizational level.

Thus, Human Factors, Human Error and Technical and Behavioural Competencies are integral parts of our training planning.

Our training and mentoring programmes for job competencies, maximize learning through peer-to-peer knowledge exchange.

We focus on building strong theoretical foundations

We consolidate competence through hands-on practical implementation

Expected Behaviours/KPIs
1. Code of Conduct including commitment to promote an inclusive working culture through training and mentoring to support open communications and improve morale, working relationships and peer-to-peer knowledge sharing onboard and ashore.
Supporting evidence / documentation:
2. A dedicated budget for Shore and Seagoing personnel for promoting higher education and advanced training is available on an annual basis.
Supporting evidence / documentation:

3. A training Program (in line with Industry standards i.e., ISM Code, SOLAS, MARPOL, STCW, MLC 2006 etc.) which includes minimum training required for key positions ashore and onboard, including job specific HSSE training, is available.	
	Supporting evidence / documentation:
4. Computer-based training (CBTs) onboard are available.	
	Supporting evidence / documentation:
5. A Competence Management System, including Technical (Navigation, Mooring & Anchoring, Cargo, Engine) and BCAV training is in place.	
	Supporting evidence / documentation:
6. An established process for measuring the value and effectiveness of the training provided is available.	
	Supporting evidence / documentation:
7. HSQE training is consistent globally and verified during Internal Audit process. Relevant KPIs are monitored.	
	Supporting evidence / documentation:
8. Training in the maritime industry, job skills, languages, business technology, leadership/management, finance, and similar topics at various levels is offered in partnership with academic/training institutions or own programs.	
	Supporting evidence / documentation:
9. A formal cadet training program to ensure that future manning needs can be met is in place.	
	Supporting evidence / documentation:
10. A process for deck Officers to receive ship-handling training prior to promotion to Master exists.	

	Supporting evidence / documentation:	
	11. Cooperation with (or a dedicated) training centre with practical training including simulator is available.	
	Supporting evidence / documentation:	
	12. Continual professional development of personnel is encouraged and supported.	
	Supporting evidence / documentation:	

General Principles of Conduct & Action
Expected Behaviours / KPIs
Self-Assessment / Gap Analysis

III. EFFECTIVE SAFETY CULTURE
SHIPOWNER/SHIP OPERATOR COMMITMENT
VISIBLE SAFETY LEADERSHIP

Our dedication to Safety is unconditional

All InterManager members understand that leadership commitment to safety is the core component of an effective safety management system.

Safety is our core value, an undisputed first priority. We frequently communicate key aspects of our safety policy, principles and vision.

Our commitment to safety does not change with commercial pressure and is integrated into all significant and relevant business decisions.

Our leaderships visibly demonstrate their commitment to continuous improvement in safety culture and safety performance.

We continuously strive to develop an environment of trust through consistent communications and consultation with all staff.

We actively conduct regular safety conversations, lead safety meetings, enforce standards and are willing to allocate any necessary resources for safety initiatives.

Two-way communication with the frontline employees is prioritized. We learn from those who do the job.

Our leaderships are personally involved in incident investigations to gain insights while ensuring impartiality, no-blame and freedom to report and enhance due diligence.

Our long-term planning philosophy aims at promoting continuous improvement in the safety journey.

We recognise that the journey to safety excellence either starts at the top or doesn't start at all

Expected Behaviours/KPIs
1. Safety Leadership statement from the Top Management that highlights the belief that all injuries are preventable and demonstrates genuine care for all personnel.
Supporting evidence / documentation:
2. Leaders act to promote Safety: They shape Safety Culture through actions, commitment, leading by example, ensuring appropriate resources and compliance to processes.
Supporting evidence / documentation:

General Principles of Conduct & Action
Expected Behaviours / KPIs
Self-Assessment / Gap Analysis

3. Leaders demonstrate due diligence regarding Safety: They are personally involved to gather information, understand and gain knowledge to share first-hand regarding Safety.	
	Supporting evidence / documentation:
4. Annual message from the Top Management that goes beyond basic compliance and connects personal and professional purpose to the top objectives of the Company including Safety.	
	Supporting evidence / documentation:
5. An annual plan is presented from the Top Management to address the following question: *What strategies will you implement to ensure your actions as a Leader are helping, not hindering, your safety efforts?*	
	Supporting evidence / documentation:
6. Periodic physical and virtual Management vessel visits with agenda.	
	Supporting evidence / documentation:
7. Periodic physical and virtual Top Management vessel visits with agenda.	
	Supporting evidence / documentation:
8. Mentors onshore and onboard are identified based on their capacity to promote Safety Culture.	
	Supporting evidence / documentation:
9. Safety Leadership capacity is an integral part of the selection, appraisal and promotion processes.	
	Supporting evidence / documentation:
10. Reward plan is in place for Safety Leadership exemplary performance.	
	Supporting evidence / documentation:

General Principles of Conduct & Action
Expected Behaviours / KPIs
Self-Assessment / Gap Analysis

11. Safety leadership training/workshops for onshore and onboard leaders.	
	Supporting evidence / documentation:
12. Annual forum where leaders from all levels have the opportunity to be visible and closely interact with each other and frontline personnel.	
	Supporting evidence / documentation:
13. A process for bottom-up, consultative approach that ensures open dialogue between personnel and leadership and reduces the relational distance between different levels of the organisation and contributes to a positive safety culture by promoting trust is in place.	
	Supporting evidence / documentation:
14. Periodic surveys to all personnel monitor levels of trust and commitment to onshore and onboard leadership.	
	Supporting evidence / documentation:

General Principles of Conduct & Action
Expected Behaviours / KPIs
Self-Assessment / Gap Analysis

III. EFFECTIVE SAFETY CULTURE
SHIPOWNER/SHIP OPERATOR COMMITMENT
CORPORATE COMMITMENT TO SAFETY

When it comes to safety, we walk the walk

All InterManager members acknowledge that trend chasing is not enough, only long-term strategies succeed.

We know that creating a strong culture of safety in the workplace can be complicated and difficult. It requires a comprehensive approach that involves continuous improvement.

However, we are strongly committed and personally devoted to empower our workforce to become self-accountable for injury prevention and actively care for the safety and health of others.

We are willing to listen to both good and bad news and thus facilitate the capacity of our people to report.

Our leaders are enthusiastic and passionate, and show care, respect and appreciation for all staff. We are constantly searching for ways to reward and support desirable acts through emotion, empathy and empowerment.

We are not failure-focused, we focus also on positive accomplishments, like safety hazards removed, near-misses reports submitted and reviewed or safety audits completed.

Personnel participation in our safety processes is the key to preventing injuries. Everyone in our organizations is involved in monitoring and improving Safety and we actively seek people that can make a difference.

Safety is a condition of employment and all personnel are responsible for Safety and for preventing injuries.

Safety practices need to be meaningful, not mechanical

Expected Behaviours/KPIs
1. Safety is a core value and an integral part of the Company's Vision, Mission, Purpose statements and policies.
Supporting evidence / documentation:
2. Management system, supported by appropriate staffing and procedures, to promote Safety Culture, practices, Leadership's commitment and involvement/compliance of all personnel in Safety.
Supporting evidence / documentation:
3. Rather than looking to blame, leaders commit to learn about Safety through feedback on systems, conditions and tasks.

General Principles of Conduct & Action
Expected Behaviours / KPIs
Self-Assessment / Gap Analysis

	Supporting evidence / documentation:
4.	Job descriptions with minimum requirements, objectives and accountabilities relevant to Safety are evident.
	Supporting evidence / documentation:
5.	A process to report barriers for reporting is in place: Conditions that trigger reporting are identified and clarified. Reporting is formalized and facilitates learning and improvement in regard to Safety.
	Supporting evidence / documentation:
6.	Safety critical tasks are defined. Appropriate training and mitigation measures are in place to control risk and hazards.
	Supporting evidence / documentation:
7.	Safety Committee identifies and addresses safety concerns suggestions.
	Supporting evidence / documentation:
8.	Company's leaders participate in industry's forums to share and gain knowledge regarding the latest Safety related trends.
	Supporting evidence / documentation:
9.	Training for onshore and onboard personnel to build the situational awareness that allows them to focus on specific actions and move toward value-based consequences.
	Supporting evidence / documentation:
10.	Periodic communication/campaigns aiming to educate personnel regarding latest advancement in Safety are evident.
	Supporting evidence / documentation:
11.	Promotion of Ethics training to help onshore and onboard personnel recognize circumstances in which their own actions could harm others, the environment and tarnish the Company's reputation.

General Principles of Conduct & Action
Expected Behaviours / KPIs
Self-Assessment / Gap Analysis

		Supporting evidence / documentation:
	12. Leadership actively engages with the workforce at all levels, sharing values, expectations, information, listening and acting on feedback and concerns regarding Safety.	
	13. Zero accidents goal	
		Supporting evidence / documentation:

General Principles of Conduct & Action
Expected Behaviours / KPIs
Self-Assessment / Gap Analysis

III. EFFECTIVE SAFETY CULTURE **SHIPOWNER/SHIP OPERATOR COMMITMENT**
HUMAN FACTORS MANAGEMENT

Our people are the solution, not the problem

All InterManager members know that **Human Factors are an integral part of our strategy and a key enabler to further reduce safety**, **environment, security and health negative impacts within our organizations**.

We unconditionally accept that:

1. Error is normal. Even the best people make mistakes.

2. Blame fixes nothing.

3. Learning and improving is vital. Learning is deliberate.

4. Context influences behavior. Systems drive outcomes.

5. How we act and respond to failure matters.

We comprehend that **Human Error is impossible to eliminate** and thus we focus to minimize it via seeking to applying best practices and promoting an **Error Minimization Culture**.

Reliable human performance is facilitated within our Companies by **offering optimal working** conditions to minimize error and decrease the risk for human failure.

We constantly strive **to understand why our people do what they do and what drives their actions.** This drives our risk management and focus our efforts and resources on the most significant lessons learnt and risks we identify.

To **materially reduce risk to our personnel, third parties, environment and assets we**:

1. Lead and shape our cultures.

2. Promote well executed tasks and procedures.

3. Provide well designed equipment and controls.

4. Build capacity and skills of our personnel to respond to emerging situations.

5. We learn before and after things go wrong.

We daily assess and determine the safer and most effective way to operate

Expected Behaviours/KPIs

General Principles of Conduct & Action
Expected Behaviours / KPIs
Self-Assessment / Gap Analysis

1. Company policy on Human Factors along with a commitment that the company plans to implement this policy.	
	Supporting evidence / documentation:
2. Company's Core Values/Vision/Mission are enhanced to include Human Factors and human performance related elements.	
	Supporting evidence / documentation:
3. Human Factors, Safety Culture and Organizational Culture Concepts are defined within the Safety Management System.	
	Supporting evidence / documentation:
4. Human Factors representatives onboard.	
	Supporting evidence / documentation:
5. Methods, tools and training (Human Factors, Error Typology, etc.) to assess the underlying conditions that shape human performance in safety-critical tasks.	
	Supporting evidence / documentation:
6. Behavioural Based Safety procedure and training.	
	Supporting evidence / documentation:
7. Error Risk Management, Job Hazard Analysis, Error Risk Minimization, Task Risk Assessment (TRA) procedures are in place.	
	Supporting evidence / documentation:
8. Human Factors Development role to be responsible for understanding and implementing Human Factors is established. Relevant accountabilities, objectives and minimum requirements are in place.	
	Supporting evidence / documentation:

9. Interdepartmental Human Factors & Organizational Culture Group (HFOG) to support the Human Factors Development role is established. Evidence of periodic meeting minutes, action plans and follow up are available.	
	Supporting evidence / documentation:
10. Performance Influencing Factors (PIFs) are defined and monitored.	
	Supporting evidence / documentation:
11. Periodic Independent Human Factors Audits.	
	Supporting evidence / documentation:
12. Incident investigators' competence in Human Factors is build. The independence of investigators' recommendations from Company management is evident.	
	Supporting evidence / documentation:
13. Benchmarking is utilized to compare the Company's Human Factors management performance against top performers within InterManager/Industry and develop an optimal roadmap of initiatives.	
	Supporting evidence / documentation:

General Principles of Conduct & Action
Expected Behaviours / KPIs
Self-Assessment / Gap Analysis

III. EFFECTIVE SAFETY CULTURE
SHIPOWNER/SHIP OPERATOR COMMITMENT
SAFETY PERFORMANCE IMPROVEMENT
We focus on commitment, not compliance

All InterManager members understand that Safety cannot be consistently improved without specific, data-based feedback.

We acknowledge that data must be carefully selected to identify, not just accidents and other negative events, but also accomplishments.

We are skeptical of opinions and recommendations, even if they make sense, we always back them up with data that can be used to target specific Safety Aspects and facilitate continuous improvement.

We align our Safety improvement approach with our vision and are careful to integrate Safety improvement approaches into one integrated system that allows employees to speak one language.

We develop well-trained incident investigation teams that understand that real and accurate findings which will eventually help our organizations solve the real problem.

We refrain from being overly strict and create fear on our people for unsafe acts. We focus on recognizing and rewarding them for their contribution to Safety.

We acknowledge that complacency is the most dangerous form of hazard. We promote new techniques on how to be safe at work and remind our people of their role in safety with refresher training.

Our goal is to constantly improve and not just maintain the status quo.

We make sure our people know what happens when they do the right thing and ensure that they know what happens when they don't

Expected Behaviours/KPIs

1. Safety Culture KPIs are defined and reviewed periodically. Relevant improvement actions plan tackle subpar performance and facilitate improvement.

    Supporting evidence / documentation:

2. Safety related best practices are identified, rewarded and promoted within the Company as well as, to the other InterManager members and the industry.

	Supporting evidence / documentation:
3.	Benchmarking is utilized to compare the Company's Safety Culture improvement against top performers within InterManager/Industry and develop an optimal roadmap of initiatives.
	Supporting evidence / documentation:
4.	Company's leaders are willing to act as "Mentors" to other InterManager members to promote Safety within the association. They are equally willing to receive mentoring form others.
	Supporting evidence / documentation:
5.	Training plan for onshore and onboard personnel to build capacity to respond effectively in challenging situations.
	Supporting evidence / documentation:
6.	Recognition and reward plan for employees' contribution to Safety.
	Supporting evidence / documentation:
7.	The Company uses scenario-based exercises to assesses the effectiveness of training for safety-critical activities.
	Supporting evidence / documentation:

General Principles of Conduct & Action
Expected Behaviours / KPIs
Self-Assessment / Gap Analysis

III. EFFECTIVE SAFETY CULTURE
SHIPOWNER/SHIP OPERATOR COMMITMENT
SHARING OF LESSONS LEARNT / PROACTIVITY

Knowledge doesn't matter unless it is shared

All InterManager members acknowledge that knowledge management is one of the most crucial aspects of business progress.

Without access to knowledge employees and organizations suffer and thus facilitation of knowledge sharing within and between our Companies is a priority.

We are committed to facilitate a knowledge sharing culture aiming to increase effectiveness, expertise, proactivity, social interaction and trust among us. To enhance our Corporate Memory, we enrich our knowledge bank so everyone is able to access it.

We intend to be systematic and methodical in developing knowledge sharing systems where, through leading by example, knowledge is passed from senior and more experienced employees to juniors and newcomers.

Unity is strength and all members commit to participate in our annual forums, regular virtual conferences, periodic campaigns to communicate best practices and lessons learnt, promote safety and discuss ideas. More experienced members commit to pass knowledge to junior, newcomer and candidate members.

Together we are progressing collectively from blame to learning culture, we become learning organizations and we consider error as an opportunity to develop, succeed and act proactively.

InterManager, is dedicated to provide continuous mentoring to all members regardless of their status in order to ensure that they steadily progress and succeed.

We gain power by sharing knowledge, not by hoarding it

Expected Behaviours/KPIs
1. Code of Conduct defines knowledge management and corporate memory as a set of proactive activities with the aim of supporting the organization and in developing, integrating, disseminating and implementing its knowledge.
Supporting evidence / documentation:
2. Integrated Management system, with a continuous process to understand the organization's need for knowledge, the location of knowledge, as well as the process for improving knowledge. The goal is to increase the organization's ability to perform its key processes effectively through a knowledge management system.
Supporting evidence / documentation:

3. A no-blame culture and facilitation of knowledge policy is in place. Error is defined as an opportunity, a step towards process and part of being successful.	
	Supporting evidence / documentation:
4. A mentoring scheme is available for newcomers and for personnel near promotion.	
	Supporting evidence / documentation:
5. Actions that facilitate corporate memory are in place. Lessons learnt from incidents, accidents and near misses are part of the familiarization process, CBTs, campaigns, trainings, meetings and annuals forums.	
	Supporting evidence / documentation:
6. The Company participates in InterManager's annual forums. Lessons learnt from incidents, accidents and near misses as well as best practices and ideas are shared with the other members and discussed periodically.	
	Supporting evidence / documentation:
7. The Company is willing to act as a "mentor" to candidate members, members in probationary status and members in need of further development in order to help them improve.	
	Supporting evidence / documentation:
8. The Company is willing to seek and accept support from InterManager and other members in order to facilitate its practical implementation of the Code of Conduct, develop and improve.	
	Supporting evidence / documentation:
9. A "Risk Management System" is in place that monitors various leading indicators and leads to proactive action plans.	
	Supporting evidence / documentation:
10. Periodic campaigns aiming to educate personnel regarding latest advancement in shipping are evident.	

		Supporting evidence / documentation:
	11.	Progress regarding adherence to InterManager's Code of Conduct is shared with the rest of the members. Roadblocks, best practices, achievements and failures are openly discussed.
		Supporting evidence / documentation: