

INTERARMA	INTERARMA LTD	Procedure QSP-01_5
	QUALITY & SECURITY MANAGEMENT SYSTEM MANUAL COMPANY POLICIES	Effective Date September '21

COMPANY POLICIES INDEX

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8. regarding the “equipment transfer”, company ensures the prevention of misappropriation or diversion of the arms which may lead to human rights abuses, by the appropriate licenses for each port and the legal transfer procedures which also concern the storage of the arms in the appropriate and safe places (Navy depot, Police Armory etc).

Company complies with all the applicable laws and regulations regarding the equipment imports and exports, by possessing the appropriate end user certificates for the occupied firearms.

Company ensures that where force is used, medical treatment should be provided to injured persons, including the offenders, as also we state in the relevant principle of ICoCA. For that purpose, always we provide a person with trauma qualification among the PCASP.

Company ensures that force is used only when it is strictly necessary and to an extend proportional to the threat, as clearly explained in Company’s RUF (rules for use of force).

12. BASIC PRINCIPLES ON THE USE OF FORCE AND FIREARMS.

Company uses (as also stated in company’s RUF) non-lethal incapacitating firearms (flares Comet or Pain Wessex), with a view to increasingly restraining the application of means capable of causing death.

Company ensures the assistance and medical aid to any injured or affected pirate at the earliest possible moment.

According to company’s RUF, PCASP gives a clear warning of their intent to use firearms, with sufficient time for warning to be observed.

Date: 3 February 2021	Position: CEO		Signature
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7. political/charitable contributions
8. uncompensated use of company services or facilities or
9. anything else of value.

All forms of bribery and corruption are prohibited. Company will not tolerate any act of bribery or corruption. Any breach of this policy or local law could result in disciplinary action being taken and ultimately could result in dismissal.

A bribe does not actually have to take place - just promising to give a bribe or agreeing to receive one is prohibited.

Bribery is prohibited when dealing with any person whether they are in the public or private sector and the provisions of this policy are of general application.

Date: February 21	Position: CEO		Signature:
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Company upholds all internationally recognized human rights (ie United Nations Guiding Principles on Human Rights) wherever its operations are located and adheres to all relevant international guidelines designed to ensure that firearms or other equipment are not used for the purposes of terrorism or abuse of human rights. In addition, company has “zero tolerance” for any case of human rights’ violence.

Company records all business transactions accurately, prudently and transparently, in compliance with the accounting policies and in accordance with best practice.

Comprehensive assessment and management of risk, together with strong systems of internal control, are essential aspects of company’s structure and serve to ensure that it is managed effectively and that reported results are accurate.

An independent Internal Audit function monitors and reports to the company’s managers on the effectiveness of internal controls and on the ongoing risk management process for identifying, evaluating and managing significant business risk.

The company’s managers have the overall responsibility for the Code implementation. They have the responsibility for monitoring the implementation of the Code and compliance with the Code’s provisions.

Date: February 2021	Position: CEO		Signature
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L. MANAGEMENT OF CHANGE

Company approaches organizational changes systematically with the aim of ensuring:

- Business, Operations and Services continuity
- Optimization of costs
- Minimum negative consequences on its assets, both intangible (like reputation and market position and tangible, primarily the human ones.

For the scope of this Paragraph, changes are considered the major ones, those that potentially affect the majority of the company, its services and its assets. Minor changes as for example an individual change in the legislation context is adequately dealt with in the context of Company’s systems. Major changes might be planned or imposed abruptly externally; for both cases Company should be prepared to absorb the negative impacts of changes and exploit the opportunities that might arise from it. The management of change approach of the Company is followed by the respective written procedure QSP-21.