

## Chapter 12 Company Verification, Review and Evaluation

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### 1.0 Introduction

TDI-Brooks carries out a program of comprehensive internal safety audits and vessel inspections, both ashore and on the vessels, to verify that safety and pollution prevention activities comply with the SMM and its expectations.

This chapter discusses the procedures used to verify, review, and evaluate the company SMS for all vessels and the home office.

### 2.0 Responsibility

The Designated Person Ashore (DPA) is responsible for ensuring that the SMS is adequately documented to permit the effective review of procedures through the internal audit and management review processes.

The Port Captain will establish the audit schedule, review audits, and receive recommendations from various company managers and ship's officers.

### 3.0 Procedures

The effectiveness of the company SMS will be verified through external and internal audits. External audits are third-party audits conducted by a qualified auditor chosen by the client ordering the audit. External audits are also conducted by class societies. The management reviews will include both a shore-side review and the Captain's annual review of the SMS.

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### 3.1 External Audits

Our vessels routinely undergo third-party audits ordered by our clients. Client ordered audits are conducted by qualified auditors of their choice. The scope of the audits may range from a causal walk thru to a detailed marine audit. The client will also specify which non-conformity and observations they require to be closed out prior to commencing the job. These audits should be included in any management review as a valuable tool in determining the effectiveness of the company SMS.

External audits will also be conducted by qualified auditors of a recognized Organization of the Administration per requirements of the ISM code and to meet the requirements of a vessel of its class under Flag State regulations.

### 3.2 Internal Audits

A qualified person will conduct internal audits of each vessel and the company DOC at least annually. A qualified person is one who has been trained in the audit process.

### 3.3 Corrective Actions and Observations

All corrective action reports (CAR's) and non-conformities resulting from TDI-Brooks management or regulatory agency audits will be handled according to the Non-Conformities processes outline in Chapter 9.

### 3.4 Management Review

The Management Review shall be conducted annually and will include the analysis of major incidents, re-occurring issues, manning/ training of vessel crew, updates to the SMS, the annual Captains Reviews of the SMS and any other relevant issues.

All reports generated by management and captain's reviews will be tracked by the Port Captain for review and possible improvements to the SMS.

### 3.5 Documentation/ Reports

The auditor will provide a report of the audit, including all non-conformities and observations to the Company, and office personnel enter all non-conformities and any observations the company determines merits further review into the Quality and Compliance tracking system. The Port Captain, HSE Manager or their designee will generate corrective action reports.

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