

Table of Contents

Page

Chapter 11 – Documents Control & Retention.....	2
1. Introduction	2
1.1 ... <i>Regulatory Backdrop:</i>	2
1.2 ... <i>Our Objective:</i>	2
1.3 ... <i>Definitions:</i>	2
2. Policies	3
2.1 ... <i>Documents to be Controlled:</i>	3
2.2 ... <i>Uncontrolled if Printed:</i>	3
2.3 ... <i>SMM Lifecycle Management:</i>	3
2.4 ... <i>SMM Revision Process:</i>	3
3. Responsibilities.....	4
3.1 ... <i>Master:</i>	4
3.2 ... <i>Chief Engineer:</i>	4
3.3 ... <i>Port Captain:</i>	4
3.4 ... <i>DPA:</i>	4
3.5 ... <i>Port Engineer:</i>	4
3.6 ... <i>Systems Manager:</i>	4
3.7 ... <i>Operations Director:</i>	4
3.8 ... <i>Senior Management:</i>	5
4. Documents Repository	5
4.1 ... <i>SMM Documents:</i>	5
4.2 ... <i>Ship Certificates:</i>	5
4.3 ... <i>Logs & Memos:</i>	5

Title of Document:	Safety Management Manual	Document Number:	SMM Chap 11
Authority:	Operations Director	Revision:	6
Custodian/Owner:	Designated Person Ashore	Issue Date:	11 Sep 2026
NOT-CONTROLLED IF PRINTED			Page 1 of 5

Chapter 11 – Documents Control & Retention

References: [ISM Code] *International Safety Management Code* (2018)

1. Introduction

1.1 Regulatory Backdrop:

The ISM Code intends that our SMS include procedures to **control** all its relevant documents and data. So doing, we are to ensure that:

- a valid and current set of these controlled documents is available at all relevant locations,
- crew on each vessel have on-board access to all such documents relevant to that vessel,
- changes to these are reviewed and approved by authorized personnel prior to issuance,
- obsolete controlled documents are promptly removed from access.

1.2 Our Objective:

Our objective is to maintain control of, but also continually improve our controlled documents. This requires procedures to ensure that only the most recent SMM revision is accessible and used afloat and ashore. Success here is essential for helping achieve our overarching goal, which is to:

- provide for safe practices in ship operation and a safe working environment,
- assess all identified risks to our ships, personnel, and the environment, and establish safeguards, and
- continually improve the safety skills of our personnel, including their preparedness for emergencies.

1.3 Definitions:

Controlled Documents: a set of formally managed policies, procedures, and records that are held in a secure repository and closely tracked for revision changes dictated by compliance, safety, security, or quality requirements.

NOC: Notice of Change - notice issued to update all relevant parties and vessels with prompt updates, or by regulatory authorities to maintain compliance with maritime laws and standards.

SMM: Safety Management Manual – The controlled set of documents that describe and define the implementation of our SMS.

SMS: Safety Management System - a structured and documented framework that enables our personnel to effectively implement our maritime safety and environmental protection policies.

VMS: Vessel Management System - integrated system used for our marine operations, document repository, preventative maintenance system, regulatory compliance and safety documentation, marine personnel management, vessel logs, and performance reports. Our VMS is named *Helm Connect*.

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Authority:	Operations Director	Revision:	6
Custodian/Owner:	Designated Person Ashore	Issue Date:	11 Sep 2026
NOT-CONTROLLED IF PRINTED			Page 2 of 5

2. Policies

2.1 Documents to be Controlled:

Our SMS shall include procedures to control all its relevant documents and data. Relevant documents shall be defined as the 14 chapters of our SMM and their associated SOPs. We shall implement and maintain an effective system for control of these documents while maintaining a mechanism to continually improve them.

2.2 Uncontrolled if Printed:

Printed copies of controlled documents are uncontrolled and shall be clearly marked as “UNCONTROLLED IF PRINTED” or equivalent on each page. Any printed extract used for operational convenience shall be verified against the current VMS version before use and discarded or clearly marked as obsolete when superseded.

2.3 SMM Lifecycle Management:

Our SMM shall undergo strict lifecycle management including formal reviews, change approvals, and dated versions to ensure that all personnel use only the current revision and that no unauthorized changes are made.

Each chapter of the SMM shall be subject to periodic review at intervals not exceeding twelve (12) months or prior to the next DOC audit, or more frequently if triggered by audit findings or changes in regulations. Periodic reviews shall be recorded and any resulting actions tracked.

2.4 SMM Revision Process:

Revisions to our SMM shall be managed through a system of documented submittals, investigations, drafts, reviews, approvals, issuance, and retention involving the DPA and the shore-side Marine management team.

- **Submittal**: Any recommendations by crew for changes to an element of our SMM shall be submitted to the DPA in writing. Masters shall also have opportunity to submit recommendations to the DPA via their annual Master’s Reviews. Shore-side managers and Senior Management shall submit any recommendations for consideration at regular Marine management meetings.
- **Investigation**: The Port Captain shall be responsible for investigating change submittals by Masters and crew and shall involve all those with responsibility for evaluation as listed in this chapter.
- **Draft**: If the change is deemed desirable, the Port Captain shall submit to the Marine management team a working draft of the relevant SMM chapter or SOP with the proposed change highlighted.
- **Review**: The Marine management team shall review the change in context, then fine-tune and gain consensus for the proposed change. This process may be iterative before a final draft is developed.
- **Approval**: Only after reaching consensus on content and wording shall the Marine management team formally approve the change for inclusion in the next SMM revision. The Operations Director holds final authority for the formal approval and issuance of SMM revisions.
- **Issuance**: Approved changes shall be documented, issued, and annotated within our control system procedures and communicated to the fleet through NOCs.
- **Acknowledgment**: Vessels and shore departments shall confirm receipt and implementation of each new NOC or revision through the VMS, physical sign-off at meeting, or equivalent recorded means. The DPA shall track outstanding acknowledgments.
- **Retention**: Annotations of changes manifested on approved change drafts shall be documented and retained for 3 years.

Title of Document:	Safety Management Manual	Document Number:	SMM Chap 11
Authority:	Operations Director	Revision:	6
Custodian/Owner:	Designated Person Ashore	Issue Date:	11 Sep 2026
NOT-CONTROLLED IF PRINTED			Page 3 of 5

3. Responsibilities

3.1 Master:

Each vessel's Master is to be conversant with the current revision of our SMM. The Master ensure that all onboard personnel are familiar with and able to access it. The Master is also responsible for acknowledging issued NOCs and promptly removing access to any obsolete vessel documents or postings.

3.2 Chief Engineer:

Each vessel's Chief Engineer is to be familiar with the current revision of our SMM, particularly those elements relating to machinery, maintenance, critical equipment, and pollution prevention. The Chief Engineer ensures that engine room personnel have ready access to current controlled documents relevant to their duties and shall promptly remove or quarantine any obsolete engineering documents, drawings, or postings under their control.

3.3 Port Captain:

The Port Captain is to be conversant with the current revision of our SMM. He is responsible for ensuring that updates are promptly distributed to the vessels and office, and that any NOCs are distributed and acknowledged.

3.4 DPA:

The DPA is to be conversant with the current revision of our SMM. He is responsible for notifying the fleet and affected personnel of any changes and revisions to controlled documents. The DPA provides overall oversight of the document control system, tracks acknowledgment of NOCs and new revisions, and escalates any systemic weaknesses in document control to Senior Management and the Operations Director.

3.5 Port Engineer:

The Port Engineer is to be conversant with the current revision of our SMM, with particular focus on technical, maintenance, and critical equipment. He supports the currency of manufacturer manuals and technical documents relevant to the fleet and supports the Port Captain and Systems Manager in ensuring that engineering-related controlled documents and records within the VMS remain accurate.

3.6 Systems Manager:

The Systems Manager is to be conversant with the current revision of our SMM. He is responsible for the technical administration of the VMS. This includes configuration of access rights, ensuring that version control functions correctly so that only authorized current versions are presented to users, maintenance of system backups and recovery capability, audit-trail functionality for document changes, and support for offline or contingency access when connectivity is limited. He is responsible for the systematic workflow of processing the SMM revisions and NOCs within the VMS.

3.7 Operations Director:

The Operations Director is to be conversant with the current revision of our SMM. He is responsible for ensuring that any changes are reviewed by appropriate company experts for accuracy. He is responsible for ensuring that adequate resources are available for the effective functioning of the document control system.

Title of Document:	Safety Management Manual	Document Number:	SMM Chap 11
Authority:	Operations Director	Revision:	6
Custodian/Owner:	Designated Person Ashore	Issue Date:	11 Sep 2026
NOT-CONTROLLED IF PRINTED			Page 4 of 5

3.8 Senior Management:

Senior Management is to be conversant with the current revision of our SMM. Senior Management provides leadership commitment to the document control system, ensures that the DPA and Operations Director have the authority and resources necessary to maintain an effective system, and reviews the overall performance of document control (including audit findings related to documentation) as part of Management Review.

4. Documents Repository

4.1 SMM Documents:

Our VMS is to be used to centralize and control our SMM policies, directives, SOPs, and related documents, and to ensure that the vessel crews always have access to only the current versions. It is intended to:

- enable users to digitize, schedule, and report on audits, safety meetings, document control, and crew certifications, ensuring compliance with regulations such as STCW.
- provide tools to build, manage, and schedule internal and external audits, track non-conformities, and manage corrective actions.
- allow users to create, distribute, and track digital forms (such as daily checklists, safety drills, or incident reports) to replace paper-based processes on vessels.
- centralize and control our SMM, procedures, and documents to allow the crew access to only authorized and current versions.
- manage crew qualifications documents, training records, and certifications with automated alerts for expiration dates.
- track asset certifications to keep vessels and equipment compliant with regulatory bodies.
- support controlled access rights so that editing and approval privileges are restricted to authorized personnel while read access is available to all who require it; and
- provide backup and recovery capability for shore-side and on-board contingency arrangements such as offline access or controlled printed extracts for periods of limited connectivity.

4.2 Ship Certificates:

Original certificates are to be issued to and maintained on the vessel in a “*Ship’s Certificates File*” and scanned copies of these are to be provided to the office and maintained in the VMS. Logs and other evidentiary documents are kept in original hard copy on the vessel. Scanned copies of some may be retained in the VMS. The Master is responsible for the currency and completeness of the onboard file; the Port Captain and DPA are to monitor overall certificate status through the VMS.

4.3 Logs & Memos:

The following are records and not controlled documents for revision purposes. Such records are to be retained as follows:

- logs (5 years),
- memos (3 years),
- SMM change records/NOCs (3 years),
- audit & non-conformity records (3 years minimum),
- Master’s & Management Review records (3 years),
- training/certification records (duration of employment + 3 years or per STCW/flag),
- incident investigation records (5 years or longer if litigation possible).

Note 1: *flag-State requirements take precedence.*

Note 2: *archived records kept for legal/historical reasons must be clearly identified as obsolete for operational use.*

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Custodian/Owner:	Designated Person Ashore	Issue Date:	11 Sep 2026
NOT-CONTROLLED IF PRINTED			Page 5 of 5