

# **PORT AND TERMINAL MULTISERVICES LIMITED**

## **STANDARD OPERATING PROCEDURE (SOP)**

## **SOP AND PORT ANTI-CORRUPTION POLICY**

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## **AGENCY RELEASING PROCESS**

### **1. CLEARING AGENT (CA)**

- a. The Clearing Agent (CA) approaches the Exit Note Desk (END) and provides the following documents:
  - I. The copy of DTI declaration; and
  - II. PTML Biometric Access Card.

### **2. EXIT NOTE PRINT DESK (ENPD)**

- a) Receive documents (DTI and PTML Card) from CA
- b) Prints the Exit Note for the CA;

### **3. PROTOCOL DESK (PD)**

- a) Receive documents from (CA)
  - I. PTML Biometric Card
  - II. ID/CAC Certificate of Incorporation of receiver
  - III. Original Bill of lading
- b) Print the Protocol (Proforma Invoice).
- c) Return the Protocol to CA

### **4. CASHIER**

- a. Receive Protocol (Proforma invoice) and payment
- b. Issue Cashier Receipt/Delivery Order
- c. Return Receipt/Delivery Order to CA
- d. Forward Receipt/Delivery Order to PD

## **5. TERMINAL DELIVERY PROCESS**

### **a) CLEARING AGENTS**

- i. Upon receipt of the Cashier Receipt/Delivery Order from the Cashier, CA gets the Exit Note (stamped and signed by customs) as a prove of completion of Customs Clearance;
- ii. Present Exit Note (stamped and signed by Customs) and Receipt/Delivery Order to Terminal Delivery Desk

### **b) TERMINAL DELIVERY DESK (TDD)**

- a. Receipt documents from Clearing Agent:
  - i. Cashier Receipt/Delivery Order
  - ii. Exit Note (stamped and signed by Customs)/Customs Disk
  - iii. PTML Biometric Card
- b. Print TDOs & ATLS

- c. Return TDO & ATL to CA
  - i. Handover TDO & ATL to Delivery/Security staff located in the stacking area and at Delivery gate area.

### **C. SECURITY STAFF AT THE DELIVERY GATE**

- a. Truck driver presents ATL to Security staff at entrance gate.
- b. Security staff checks the ATL and the visual conditions of the trucks for NPA minimum standard compliance.
- c. Security staff allows inward movement of truck into terminal upon satisfactory compliance.

### **d. DELIVERY CLERK AT STACKING AREA**

- a. The Delivery Staff receives copy of the TDO and ATL from Terminal Delivery Desk.
- b. Checks and ensure that ATL presented by the truck driver corresponds with copy received from Terminal Delivery Desk.
- c. Directs the truck driver to the stacking/slot area where container is located.
- d. Instructs plant operator to load specific container on truck.
- e. Ensure truck driver move to the designated area of the Terminal for final gate pass checks.
- f. Terminal delivery drivers take the vehicle to buffer area where RoRo units are handed over to CA after security checks for confirmation of chassis number against document.

### **e. GATEPASS OFFICE (GPO)**

GPO verifies that the documents presented are genuine, tally with details on the cargo and confirm final delivery in the electronic releasing system. The truck with container or the RoRo unit is allowed to go out and the delivery process is completed.

## **6. SHIP'S AGENT**

- a. Provide all necessary documents, payments receipts and relevant clearance required for the berthing of the ship.
- b. Arrange the pilot for the inward and outward movement of the ship.

## **7. TERMINAL**

### **I. PRIOR ARRIVAL ACTIVITIES**

- a. Plan all discharge operations
- b. Plan all loading operations
- c. Schedule staff and plant for the ship operations

## **II. IN PORT OPERATIONS**

- a. Receive free pratique from ship Agents
- b. Organise the security onboard for the period of ship's stay
- c. Coordinate all ship operations
- d. Regularly update the ship agent with estimated time to complete operations.

## **III. AFTER DEPARTURE OPERATIONS**

- a. Reconcile the cargo figures with tally and ship agent records;
- b. Issues final ship's report and forward to all relevant parties.

## **8. TERMINAL WORKERS DUTIES**

- i. Proper precaution should be adopted for the dropping of lashing equipment in the terminal.
- ii. Terminal workers should drive at moderate speed limit during delivery and loading operations.
- iii. It is recommended that two or more signallers/helpers should be stationed at the operation to signal when it is safe to back up whenever the operation has an obstructed view to the rear. A whistle is ideal to draw attention to drivers.
- iv. Workers are not to take shelter under the adjacent parked trailer at any time.
- v. Trailer legs should be lowered to the ground before trailers are uncoupled. It is important to ensure that the trailer parking brakes have been properly applied and the front of the trailer left high enough to permit another vehicle to couple to it.

## **9. SUPERVISOR DUTIES IN THE TERMINAL:**

- i. Supervisor should stop immediately any unsafe practice by truck driver. Additionally, driver must ensure that all personnel are clear of the vehicle prior to moving.
- ii. Routine procedures for directing and positioning truck traffic on the terminal must be adhered.
- iii. Traffic should be coordinated ashore and on-board by the use of radio.

## **10. DRIVERS DUTIES IN THE TERMINAL:**

- i. Driver shall not drive vehicle, either forward or backward, while any personnel are in positions where they could be hit.
- ii. Always use great care when coupling a tug master and trailer. A careless job is a risk to safety, as well as the safety of load and of others.
- iii. Truck drivers should be trained in the operation of vehicles used in Ro-Ro operations to prevent unsafe practices. A load vehicle is more likely to roll over than an empty vehicle. Driver should drive slowly around

- bends and make turns gradually. Rollovers can happen when turning too quickly. The speed limit for truck in operations area is 15km/hr.
- iv. Driver should comply with the speed limit in the terminal at all times.
  - v. All tug master/prime mover operators should check their right and left mirrors when they are ready to start operations and pulling out, to be alert of worker working by. Beacon lights must be installed and signal alarm should be distinguishable from the surrounding noise level. Head lamps should be on at all times if beacon lights are not working.
  - vi. Tug masters must be fitted with properly working front and rear lights and has a good braking system. It should not be used if defects make them unsafe to operate.
  - vii. All large vehicles and trailer when being reversed or manoeuvred into stowage positions ashore should do so under the direction of a signaler. Signaler should satisfy them that no person is in a position of danger, particularly in any trapping area behind a reversing vehicle. Drivers should not move their load/vehicles unless a signaler is not within their field of vision.
  - viii. It is not permitted to smoke in the Terminal.
  - ix. Drivers should be aware of safety passage walkways in the Terminal if no other safety access for pedestrians is available. Talking, chatting and the use of mobile phones while driving is prohibited.
  - x. No passengeris allowed on trucks or other mechanical moving equipment.

## **11.DANGEROUS GOODS AREA IN PTML TERMINAL**

Dangerous goods area is designed to eliminate the risk associated with storage and handling of dangerous goods. The following are required in managing dangerous goods area in the Terminal:

- i. The dangerous goods area is specifically marked with signage and is protected against damage from impact with vehicles.
- ii. The dangerous goods are located so that management and or / security personnel may keep them under continuous observation.
- iii. The dangerous goods area should have separate area with all necessary facilities appropriate to the hazards emanating from the cargoes that are stored.
- iv. Dangerous goods area should be so constructed that in case of emergency, adequate access is provided for handling equipment, emergency services etc.
- v. Special areas for damaged dangerous cargoes and waste containment to be provided. These areas should be covered; have a sealed floor or

ground, separate drainage systems with shut off-values, basins and means to discharge.

- vi. All cargo handling equipment for dangerous goods should be of an approved type, properly maintained and tested in accordance with normal requirements.
- vii. Adequate lighting should be provided to all areas and access ways where dangerous goods are stored or handled

## **12.ETHICAL APPROACH**

PTML has the commitment to conduct its business in an ethical business manner that would guarantee fairness, transparency with a view to promote shared corporate culture between the Company and its major stakeholders resulting in the best economic and social value.

## **13.HONESTY AND INTEGRITY WHEN CONDUCTING BUSINESS**

- i. Honesty and integrity are core values of the PTML and the strongest guarantee of our commitment to everyone working in the company as well as to all our suppliers, customers and stakeholders in general.
- ii. All services shall be supplied professionally, independently and impartially, with honesty and in accordance with methods, policies and work practices prescribed by the company.
- iii. PTML ensures that business is conducted with the utmost integrity and transparency. In particular, all operations, negotiations and dealings generally shall be carried out fairly and without discrimination, and all information provided shall be complete, transparent and accurate, in compliance with internal procedures and with the laws in force.

## **14.DEALINGS WITH CUSTOMERS AND QUALITY OF SERVICES SUPPLIED**

PTML considers it essential that its customers are always treated fairly and honestly and therefore demands that its executive officers and employees as well as other stakeholders ensure that all dealings with customers are conducted with honesty, integrity, transparency and professionally.

## **15.ALL PTML EMPLOYEES SHALL:**

- i. Comply with the internal procedures for dealings with customers;
- ii. Provide top quality services that meet or exceed customer's reasonable expectations and needs.
- iii. Efficiently and courteously provide accurate and comprehensive information about the nature, price and conditions of transport services, so that customers can make informed decisions.

- iv. Advertise the company's services and provide any other information accurately and truthfully.

#### **16. NON DISCRIMINATION**

- i. In its dealings with customers, PTML does not discriminate based on age, gender, sexual orientation, health, race or nationality, political opinions or religious beliefs; it does not take account of any influence exerted from within or outside the company and it ensures fairness and equity in accordance with the legal or contractual rules and the principles enshrined in this code.

#### **17. CONFLICT OF INTEREST SITUATIONS**

- i. All business decisions taken on behalf of the PTML must be made in the best interests of the company and in compliance with any applicable laws and regulations. Therefore directors, executive officers, other employees and the PTML 's stakeholders generally must avoid every possible conflict of interest, with particular regard to personal, financial or family considerations which might impair objectivity when deciding what is in the PTML's best interests and what the most appropriate way to pursue those interests is.
- ii. Specifically, all stakeholders must avoid any conflict of interest between them and/or their family members' personal business interests and their duties performed on behalf of the company.

#### **18. BRIBERY AND ILLEGAL PAYMENTS**

- i. PTML, its directors, executive officers, employees and other stakeholders are committed to the highest standard of integrity, honesty and fairness in all their business dealings within and outside the company in compliance with national and international anti-corrupt laws, where applicable.
- ii. In compliance with the foregoing laws and regulation and in accordance with this code, PTML will not tolerate any form of improper payment offered to – or solicited by-Nigerian authorities, its stakeholders, or any other form of corruption (accepting or offering anything of value to secure an improper advantage in an effort to win or retain business) in dealings with private parties or with government officials, representatives of international organizations or anyone acting in an official capacity for a government entity, as well as with any other natural or legal person specified by the applicable laws in force.



## **19.ANTI-MONEY LAUNDERING**

- i. PTML its directors, executive officers and employees will not be engaged or involved in any activity which may imply the laundering of proceeds of criminal activities in any form or manner.
- ii. Before establishing any business relationship with a third party, PTML and its senior management shall verify available information on its proposed business partners and suppliers to ensure that they are reputable and engaged in legitimate business activities. Any violation of anti-money laundering laws may result in criminal, civil or administrative penalties both for the company and for the individual employees involved.

## **20.DEALINGS WITH EXTERNAL STAKEHOLDERS**

- i. PTML and its employees are committed to conducting and enhancing their relationships with all categories of external stakeholders, in good faith and honesty, integrity and transparency so as to uphold the company's core ethical values.

## **21.RELATIONSHIP WITH SUPPLIERS**

- i. Suppliers play a vital role in improving the PTML's overall structural competitiveness. With the aim of achieving the highest level of customer satisfaction at all times, the group selects suppliers through the use of appropriate, objective methods on the basis not only for their quality, innovations, costs and services but also on their social and environmental performance, respect for the values enshrined in this code.
- ii. The company directors, executive officers and employees shall not accept from suppliers any gifts or other items of value unless they are in line with customary business practice, moderately priced and such as not to affect the recipients independent judgment.

## **22.RELATIONS WITH THE PUBLIC SECTOR**

- i. Relations with Nigerian and public institutions will be managed only by departments and employees duly designated for this purpose. All such dealings shall be conducted transparently in accordance with the company's values.
- ii. Stakeholders shall not promise and/or offer any public official or government employee payments or gifts in order to obtain special treatment for the company in the negotiation of contracts or subsidies, in the issuing and management of permits, in officials' inspections and audits, or in legal proceedings.

- iii. Anyone receiving a request for improper payment from government officials shall immediately disclose this to their supervisor and to the supervisory body
- iv. Furthermore, in dealings with government officials, stakeholders shall not:
  - a. Consider or propose employment opportunities for government officials (or their families and relatives) or any other kind of opportunities intended to create a business advantage for them;
  - b. Propose or provide consultancy services.
  - c. Provide entertainment raising questions of propriety insofar as it goes beyond merely promoting the company's image.
  - d. Provide or offer to provide solicit or obtain information or documents that are confidential or, in any event, such as to potentially defame or damage the reputation of one of the interested parties.
  - e. As part of the procurement process, favour suppliers or sub-suppliers recommended by government officials as a condition of pursuing an activity (e.g. granting of loans on easy credit terms, issuing of licenses or passing of inspections, etc).
  - f. Produce forged documents, or false or misleading information, audits and surveys, or withhold or omit documents or required information, in order to seek to improperly influence government officials so as to obtain favourable decisions.
  - g. Act deceitfully so as to lead government employees into errors when making technical or economic assessments of products and services offered/provided, or otherwise improperly influence their decision.

### **23. RULES OF CONDUCT IN RELATIONS WITH REGULATORY AUTHORITY**

- i. Our dealings with regulatory authority (eg. NPA, NIMASA or NSC) are based on maximum cooperation, transparency and fairness.
- ii. PTML prioritizes full compliance with its obligations towards the above mentioned authorities and collaborates actively in inspections, audits and surveys, with particular regards to those carried out on board vessels owned by the company.

### **24. RELATIONSHIP WITH EXTERNAL STAKEHOLDERS**

- i. External stakeholders (including ship agents, clearing agents, consultants, etc) are also required to uphold the principles enshrined in the code.
- ii. In the exercise of their functions, all PTML employees shall.
- iii. Abide by the principle of the code and comply with internal procedures when selecting and dealing with external stakeholders.

- iv. Immediately inform their supervisors and the supervisory body (see 5.3 ) in the event of any violation of the code by external stakeholders.
- v. Include in contracts with external stakeholders a specific provision obligating them to abide with the principles of the code, and specifying that any violation thereof will result in termination of the contract and /or claim for damages against person concerned.
- vi. Agreements with external stakeholders shall be in writing. In any event, the consideration payable shall always be exclusively commensurate with the services contracted. All activities under the contract with the external stakeholders shall be documented and traceable.

## **25.MEDIA RELATIONS**

- i. The communication of information to the media plays an important part in building the image of PTML; therefore all information concerning the company shall be supplied truthfully and consistently, only by the designated media relations officers and strict compliance with the company's policies. In particular, relations with the media shall be based on the principles of transparent, truthful and accurate information, in compliance with the laws and requirements governing the handling of personal data. This activity is carried out in accordance with the mission of the company, at the same time enhancing its image and reputation.
- ii. Since media relations are handled by the company's designated officers referred to above, other stakeholders shall refrain all together from giving media representatives any kind of information (or from undertaking to do so) unless they have been duly authorized by those in charge.

## **26.SYSTEMS OF DISCIPLINARY SANCTIONS**

Any proven violation of the provisions of this Code of Conduct will constitute valid and sufficient grounds for a disciplinary sanction to be inflicted on the wrongdoer.

## **27.OBLIGATION TO REPORT A VIOLATION**

- i. Should a stakeholder become aware of possible violation, he/she shall report it in writing to the relevant supervisory body/local Ethics and Compliance Officer using the channel (s) of communication as instructed (via email, by post, etc) so that the matter can be investigated; reports cannot be made anonymously but the confidentiality of the person making the report will be guaranteed, subject to any legal requirements.
- ii. There shall be no repercussion or any form of retaliation for anyone reporting a concern in good faith even if the report turn out to be unfounded.

- iii. In particular, if a report made by an employee concerns orders, directives, instructions or task received from their supervisor and/or superior that constitutes a breach of the provisions of this code, the supervisory body/local Ethics and Compliance Officer shall examine the report even if it is lodged anonymously.

## **28.DETERMINATION OF SANCTIONS**

- i. Any violation of the principles laid down in the code undermines the relationship of trust between the parties of the company and the wrongdoer, the latter will be subjected to prompt internal disciplinary proceedings and appropriate sanctions, regardless of whether the violation also leads to a criminal investigation and /or results in the laying of charges.
- ii. In particular, compliance with code constitutes an integral part both of the mandates conferred on the Board and the directors-in this respect they are also subject to disciplinary sanctions, the severity of it, depends on the nature of the no-compliance-and or our employees' contractual obligations, in accordance with labour legislation in force.
- iii. It should be pointed out that any violation may have very serious economic repercussion on the company, in terms of the general principles of third party liability, as well as the consequences of a possible sanction imposed on the company under relevant labour laws.
- iv. In light of the above, in addition to internal disciplinary sanctions, the company reserves the right to take any other steps necessary to safeguard its interests, including a claim for damages brought against the person violating the code.

## **29.IMPOSITION OF SANCTIONS**

- i. Any violation of this code committed by an employee will lead to disciplinary proceedings and the imposition of sanctions commensurate with the severity of the violation, and varying depending on whether it is a first offence and on the degree of negligence, as provided for in the applicable employment contracts, National Collective Bargaining Agreement and labour legislation.
- ii. With specific regard to directors, auditors and/or special attorneys, if any violation of this code on their part will also result in disciplinary proceedings and the imposition of sanctions commensurate with the severity of the violation, and varying depending on whether it is a first offence and on the degree of negligence possibly leading to their removal from office for just cause.
- iii. Investigation of a possible violation committed by any of the forgoing executive officers and determination of the resulting sanctions, if any, is

carried out by the Board of Directors, with the exclusion of any members involved in the alleged violation. Should at least half of the directors be involved, a general shareholders' meeting shall be convened.

- iv. Any violation of this code committed by other stakeholders will also result in disciplinary proceedings and the imposition of sanction commensurate with the severity of the violation, and varying depending on whether it is a first offence and/or the degree of negligence, possibly leading to the termination of their contracts with the company.

### **30. RIGHT TO SELF-DEFENCE**

- i. The supervisory body/local Ethics and Compliance Officer shall ensure that anyone accused of a Code violation is advised of this confidentially at least 15 days prior to the date of the disciplinary proceedings; so that they have time to prepare their defence submit statements and request to be heard.

### **31. STATUTE AND BARRED CASES**

Disciplinary proceedings cannot be commenced more than three years after a violation was committed and, in any event, when proceedings are initiated they shall not last more than twelve months from the date on which full knowledge of the alleged infringement was acquired. Disciplinary proceedings shall be concluded with a decision in writing, signed by the body issuing it and indicating the grounds for the decision.

### **32. FINAL AND TRANSITIONAL PROVISION CONCERNING INTERPRETATION OF THE CODE AND REPORTING OF VIOLATIONS**

- i. For queries relating to specific provisions or for clarification on how this code should be applied-until the implementation of the organizational, management and control models and the appointment of the supervisory bodies or the local Ethics and Compliance Officers in the company-employees should contact the Human Resources Department.
- ii. If an employee wishes to report an (alleged) violation of the code, he/she should contact his/her direct superior. If the grievance remains unresolved, or the employee is uncomfortable reporting the matters to his/her direct superior, he/she should make the report to the Human Resources Department or report anonymously or use another established channel of communication.
- iii. If a third party wishes to report an (alleged) violation of the code, the Human Resources/Admin Department should be contacted or use the specific channels of communication as directed by the company.