



NIBC Sustainability Policy
SHIPPING & INTERMODAL
Sector Policy

May 2016

SHIPPING & INTERMODAL

The shipping and intermodal sector is an integral part of the economy, a key industry for society and our stakeholders.

Around 90% of world trade is carried by the international shipping industry. Seaborne trade brings significant benefits for consumers and businesses around the world through competitive freight costs.



Responsible Ship Recycling Standards

NIBC is one of three founding members of the Responsible Ship Recycling Standards (RSRS).

The initiative aims to promote responsible practices in the shipping sector by embedding RSRS into internal E&S policies procedures and standard for the financing of shipping assets.

Although the members are not directly involved in financing the recycling of ships, they recognize that ship recycling is part of the shipping industry supply chain. Furthermore they share concerns that unsustainable shipbreaking can imply adverse environmental and social impacts.

Responsible recycling of ships can help to prevent contamination of water resources, ensure worker safety and health, and protect basic human and labour rights.

Shipping & Intermodal at NIBC

NIBC provides a range of financial services to the shipping & intermodal sector. We are committed to continuing to be a long-term financial services provider to our clients in this sector, whilst at the same time ensuring that such services are provided in a responsible manner. We recognise that the potentially material Environmental and Social (E&S) impacts of shipping make this a particularly sensitive sector if these impacts are not managed appropriately.

Our concerns

Although shipping is recognised as a less environmentally damaging form of commercial transport (compared with land and air transport), the large scale of the industry and the significance of potential E&S impacts lead to increased concerns regarding the shipping sector. Key E&S issues for this sector include:

- Accidents, oil spills, fires, explosions associated with petroleum and hazardous materials;
- Wastewater and other effluents such ballast water, domestic wastewater and sewage, bilge water and cargo tanks wash waters;
- CO², sulphur oxide, nitrogen oxide, or other emissions; from engine exhaust, shipboard incineration or ozone depleting substances;
- Solid waste generation from domestic waste or hazardous wastes such as solvents and batteries, ship breaking waste potentially containing asbestos, PCBs or CFCs;
- Operational Health and Safety risks including physical hazards such as slips and falls, manual handling accidents and machine operation accidents, confined working spaces, chemical hazards (exposures by inhalation or skin contact), risk of fires and explosion;
- Community health and safety exposure to spills, accidents, pipeline rupturing;
- Environmental, safety and occupational health risks resulting from the decommissioning of vessels in countries with limited E&S regulations;
- Security issues resulting from piracy and armed robbery of vessels.

Our view is that, if managed responsibly, the shipping sector can contribute to furthering the sustainable policy, economic and political development of emerging and industrialised markets and States.

OUR POLICY

NIBC recognises that the shipping industry has developed responsible approaches to address the E&S impacts resulting from its activities.

The safety of shipping is regulated by the International Maritime Organization (IMO) which has developed a comprehensive framework of global maritime safety regulations.

We finance vessels that are 12 years old or younger. Exceptions to this age restriction may be made for clients that demonstrate performance which meet or exceed industry sustainability standards.

Decommissioning

NIBC supports sustainable decommissioning of vessels. NIBC will not be directly involved in the financing of unsustainable ship recycling facilities or the purchasers of shipping assets intended for unsustainable ship recycling (these intermediaries are sometimes referred to as 'cash buyers').

We support the decommissioning of vessels in line with the letter and spirit of the Hong Kong International Convention and EU Ship Recycling Regulation. In case NIBC has a relation with the vessel at the time of decommissioning, we expect decommissioning in line with these standards.

Green Passport

An Inventory of Hazardous Materials (Inventory) can serve to minimise the dangers associated with (recycling of) hazardous materials on board ships. When financing new ships, we expect these to carry an Inventory. When financing existing ships, we expect owners to establish an Inventory at the next dry-docking latest.

We will not knowingly provide financial services to vessels that are:

- Not compliant at all times with a reputable classification society ;
- Not insured by a reputable Protection and Indemnity Club;
- Single-hull unless used exclusively in a stationary position as a storage facility;
- Operating under any of the unacceptable flags defined by the EU, Asia Pacific or USCG port state control black list;

We believe that human rights apply at sea, as equally as they do on land. Therefore we are guided by international and maritime labour standards.

NIBC encourages companies to include clauses on compliance with social economic and environmental criteria in their contracts with subcontractors and

suppliers. These should be evidenced by the companies concerned where practicable via certifications, site visits, and/or audits to help ensure responsible practice throughout their supply chains.



Conventions and Standards

NIBC will be guided by the following industry standards when assessing a client's approach to managing the E&S impacts resulting from its activities.

- International Convention for the Prevention of Pollution from Ships (MARPOL);
- International Maritime Organisation (IMO);
- International Association of Classification Societies (IACS);
- International Chamber of Shipping (ICS) and the International Shipping Federation (ISF);
- International Labor Organization (ILO);
- Maritime Labor Convention;
- Basel Convention on the Control of the Transboundary Movements of Hazardous Wastes and their Disposal;
- EU Ship Recycling Regulation; and
- Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships.

This policy applies to our clients and all new services provided to them by NIBC.

We acknowledge that legacy issues may arise from continuing engagements entered before the implementation of this policy. Although the policy is not intended to be applied to financing agreements and investments retrospectively, NIBC endeavours to address potentially material legacy issues relevant to a particular engagement whenever a specific issue arises. In addition, clients are assessed against these policies as part of the periodic review process or as they become due for renewal.

NIBC will exercise discretion in deciding whether to apply this policy to the provision of financial services to a company that has only marginal involvement in the shipping sector. NIBC will make such decisions on a case-by-case basis after assessing the materiality of the risk that NIBC is supporting unsustainable activities.



Updates

NIBC reviews and updates its policies on a regular basis. Our sustainability policies are reviewed at least annually. Reviews do not always result in policy changes. Therefore policy documents will be updated if and when changes are made and have been approved according to NIBC's agreed procedures.



Feedback Welcome

NIBC welcomes feedback on its policies and practices from its stakeholders. We believe that dialogue on issues and dilemmas is an opportunity for NIBC to not only improve its practices and strengthen its policies, but importantly to create value for our clients, investors and other stakeholders.

Even with the best policies and practices in place, NIBC may cause or contribute to an adverse impact that was not foreseen or prevented. If it is identified that NIBC is responsible for such an impact, we will endeavour to remedy or co-operate in the remediation of the situation through legitimate processes. Any person or party who believes that the NIBC has not acted in accordance with this policy, has suggestions on how we can strengthen our policies or has other feedback relating to our sustainability policies is invited to contact us.

Feedback: compliance-office@nibc.com

Grievances: <https://www.nibc.com/contact/complaints-form.html>

Alternatively, you may also write a letter to NIBC at the following address:

NIBC Bank N.V.
For the attention of: The Complaints Commission
PO Box 380
2501 BH The Hague

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