

INTEGRATED MANAGEMENT SYSTEM MANUAL

Chapter 2 COMPANY'S POLICIES
AND MANAGEMENT
COMMITMENT
APPENDIX XI:
OPEN REPORTING POLICY

Issue No.: 01

Issue Date: 09/01/2023

Rev. No.: 00

Rev. Date: 00/00/0000

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Open Reporting Policy

SEA HAWK MARITIME S.A. commits to conduct all aspects of its business with honesty and integrity and to provide a working environment where high standards of ethical, moral, and legal business conduct are encouraged and safeguarded.

Furthermore, **SEA HAWK MARITIME S.A.** is committed to a workplace characterized by open communication regarding its business practices. This Policy aims to provide a means for employees to raise concerns, not adequately addressed via usual reporting channels, without fear of retaliation or discrimination. This Policy addresses concerns related to issues of public interest, including, but not limited to, the following:

- Criminal offense
- Non-compliance with legislation or Company's procedures
- Dishonesty, either verbal or written, including intentional inaccurate maintenance of official log books or records
- Malpractice or unethical conduct
- Financial or non-financial misadministration or malpractice or impropriety or fraud
- Safety or security risk or hazardous condition that may impact the life or health of individuals
- Miscarriages of justice
- Deliberate concealment of any of the above.

If an employee has a legitimate concern in (and holds a reasonable belief that the information he has relates to) one of the above areas and wishes to raise the concern in good faith, he must raise this concern with the Master, DPA, or a Company's representative who can decide on a way of resolving the concern quickly and effectively.

You can also raise a concern through the following channels:

E-mail: nga@seahawkmaritime.com
Tel.: (+30) 6949 730499 (Open Reporting Hotline)

Reports can be made without fear of retaliation and can even be anonymous. Upon receipt of a report, the Top Management assesses the report, and an investigation immediately begins. Any victimization of a member of staff who openly reports, or any attempt to deter him from reporting, is regarded as a serious disciplinary offense.

Date: 09/01/2023

General Manager