

## **THE COMPANY'S POLICY IN SEAFARER'S RECRUITING PROCESS:**

- 1.1. Maintaining, with due regard to the right to privacy and the need to protect confidentiality, full and complete records of the seafarers covered by their recruitment and placement system as follows:
  - 1.1.1. the seafarer's qualifications;
  - 1.1.2. record of employment;
  - 1.1.3. personal data relevant to employment;
  - 1.1.4. medical data relevant to employment;
- 1.2. According to license conditions regulating The Company's activity on intermediation in employment of citizens abroad, the Company is obliged to conclude «the Contract on granting of intermediary services in employment of the seafarer», in which responsibility of the Company for protection of the confidential information connected with employment of the seafarer is stipulated.
- 1.3. In order to ensure the right to privacy and to protect confidentiality of seafarers the Company follows requirements of Law of Russian Federation No 152-F3 from 27/07/2006 "About personal data".
- 1.4. Maintaining up-to-date lists of the ships for which the SRPC provide seafarers and ensuring that there is a means by which the services can be contacted in an emergency in all hours:
  - 1.4.1. The Company has, conducts and daily updates the data of the list of vessels which it serves, the crew list on these vessels with the data of the beginning and termination of working hours under the contract, date of arrival and departure from a board of a vessel and date of departure and returning in base port.
  - 1.4.2. The Company has at its own disposal the possibility to contact all vessels, which it serves, in case of emergency at all hours via an email address, through Inmarsat Globe Wireless and Inmarsat Telephone Numbers. The vessel's contact list is keeping updated and accessible for everybody who needs to contact a vessel.
- 1.5. Ensure that seafarers are not subject to exploitation by the Company or their personnel with regard to the offer of engagement on particular ships or by particular companies:
  - 1.5.1. The only diversification lies with the salary, which is dependent on the type of ship; the bulk carrier, the tanker or the reefer carrier.
  - 1.5.2. The choice of the type of ship which each seafarer is going to serve is carried out according to his desire, qualification and types of vessels on his previous sea service.
- 1.6. Prevent the opportunities for exploitation of seafarers arising from the issue of joining advances or any other financial transaction between the ship-owner and the seafarers which are handled by the Company:
  - 1.6.1. The recruitment and placement service for all seafarers are absolutely free from any costs and advances, since all expenses are paid by shipowner as per our contract of crew manning.
  - 1.6.2. No fees or other charges for seafarer recruitment or placement or for providing employment to seafarers are borne directly or indirectly, in whole or in part, by the seafarer.
  - 1.6.3. The seafarers have to bear the cost of obtaining the national seafarer's book and a passport or other similar personal travel documents not including the cost of visas which shall be borne by ship owner.
- 1.7. Clearly publicizing costs, if any, which the seafarer will expected to bear in the recruitment process:
  - 1.7.1. Seafarers do not bear any costs in the recruitment process.
- 1.8. Ensuring that seafarers are advised of any particular conditions applicable to the job for which they are to be engaged and of the particular Shipmanager's policies relating to their Employment.

- 1.9. Dealing with cases of incompetence or indiscipline consistent with national laws and practice are in accordance with the principles of natural justice.
- 1.10. Procedures to ensure, as far as practicable, that all mandatory certificates and documents submitted for employment are up to date and have not been fraudulently obtained and that employment references are verified:
  - 1.10.1. All mandatory certificates and documents are subject to verifying their authenticity in State Register of Seafarer's Documents.
  - 1.10.2. All references declared by seafarers are subject to verifying with Shipping Company or Manning Agency where seafarers had sea services.
- 1.11. Ensure that requests for information or advice by families of seafarers while the seafarers are at sea dealt with promptly and sympathetically and at no cost:
  - 1.11.1. There is good practice in the Company with respect to answering promptly, sympathetically and at no cost to omit for all reasonable queries of Seafarer's next-of-kin at any working time. For this reason, Shipmanagers supply Manning Office with regular updated Position List of Company's concerning vessels.
- 1.12. Ensure that anti-pandemic measures, recommended by the Russian authorities, World Health Organization, IMO and any appropriate authorities are applied during transportation of seafarers on board a vessel and backward.