



REPUBLIC OF PANAMA PANAMA
MARITIME AUTHORITY Maritime
Labour Convention, 2006

Declaration of Maritime Labour Compliance – Part II

(Note: This Declaration must be attached to the ship's Maritime Labour Certificate)

Measures adopted to ensure ongoing compliance between inspections

The following measures have been drawn up by the shipowner, named in the Maritime Labour Certificate to which this

Declaration is attached, to ensure ongoing compliance between inspections:

(State below the measures drawn up to ensure compliance with each of the items in DMLC-Part I)

With the respect to the provisions of the Maritime Labour Convention, 2006, (MLC, 2006) the following referenced ship:

<i>Name of Ship</i>	<i>IMO Number</i>	<i>Gross Tonnage</i>
AKSON SANDRA	9537264	24050

1. Minimum age (Regulation 1.1)

As per MLC procedures manual section 1.1

Not any person under the age of 18 is employed on board the ship. The Company, considering the nature of the job, in the interest of Health and Safety on board and in order to protect them (persons under the age of 18) has opted that no person below the age of 18 shall be employed or engaged or work on the ship.

It is the responsibility of the Company's Crew Operator to verify that the minimum age standard is maintained without failure during the recruitment and placement process.

In case and despite of the above controls a person employed on board is found to be under 18 years of age, s/he shall be repatriated immediately.

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2. Medical certification (Regulation 1.2)

As per MLC procedures manual section 1.2

Prior to working on the ship, each seafarer must hold a valid medical certificate.

Medical Certification is compulsory for all seafarers working on board the ship.

The responsibility for ensuring the validity of medical certificate and its compliance with MLC, STCW and any applicable Flag State regulations rests with the Company's Crew Operator and/or the Seafarers' Recruitment & Placement Service (SRPS) Agent.

The Master ensures that all seafarers, prior to beginning work, have valid medical certificates and reviews same to check if any seafarer is not suffering from any medical condition that may be aggravated at sea or to render the seafarer unfit for such service or to endanger the health of other persons on board. It is monitored that the medical certificate remains valid throughout the seafarer's tenure on board.

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The medical certificate must be issued by a duly qualified medical practitioner licensed at the place of examination and/or recognized by the competent authority at the place of examination.

The medical fitness certificates shall be in accordance with the requirements of the MLC, 2006 or STCW Code and shall have regard to the ILO/WHO publication entitled 'Guidelines for Conducting Pre-Sea and Periodic Medical Fitness Examination for Seafarers' (ILO/WHO/D.2/1997) (ISBN 92-2-111129-6), including any amendments introduced thereto from time to time, and to any other relative guidelines as may, from time to time, be further specified by the Flag Administration.

The medical certificate shall contain the personal details of the person examined including the name and surname, nationality, age and relevant identity document number such as the sea service, record book or passport number and shall attest that:

- The hearing and sight of the seafarer concerned, including the colour vision; and
- That the seafarer is not suffering from any illness or injury which could be aggravated by sea service.

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Medical certificates shall be valid as indicated on the actual certificate issued but in any case shall not be valid more than a maximum period of two (2) years and a maximum period of six (6) years for colour vision. In the unlikely case where the period of validity of a certificate expires in the course of a voyage, the certificate shall continue in force until the next port of call where the Seafarer can obtain a medical certificate from a qualified medical practitioner, provided that the period shall not exceed three (3) months. In urgent cases, a newly hired seafarer may work without a valid medical certificate until the next port of call where the seafarer can obtain a medical certificate from a qualified medical practitioner, provided that the period of work without a valid certificate does not exceed three (3) months and the seafarer concerned is in possession of a medical certificate that has expired at a recent date [e.g. maximum ninety (90) days or otherwise required by the Flag Administration]. In such cases the Flag administration should be contacted in order to issue a dispensation in this respect. All medical certificates shall be provided as a minimum in English.

3. Qualifications of seafarers (Regulation 1.3)

As per MLC procedures manual section 1.3

All seafarers employed or engaged or work on the ship shall be trained or certified as competent or otherwise qualified to perform their duties on board in accordance with the STCW Convention, National, Flag Administration and Company competency requirements which meet or exceed the national and international requirements.

The identity of seafarers and the authenticity of their certificates and endorsements are to be verified by crewing department prior their employment. Relevant records shall be kept at company .

Seafarers shall not be permitted to work on the ship unless they have successfully completed training for personal safety on board.

The Crew Operator and/or respective Seafarers' Recruitment & Placement Service Agent(s) shall be responsible to ensure compliance with MLC and relevant Flag State requirements.

All seafarers employed or engaged or work on the ship shall hold appropriate certificates with respect to their position and duties.

Expiration dates of seafarers' documents / certificates are monitored by the Company' Crew Operator.

Seafarers are required to be in possession of their original, signed documents / certificates while onboard the ship. Seafarers' documents / certificates when signing on board, will be examined, if practically feasible, to verify that same are not fraudulent.

On board personal safety training is provided to seafarers when joining the ship in accordance with STCW relevant section. A checklist on board provides for this requirement, which is verified by the Master.

It is Company's Policy to train the employed Seafarers, constantly, in order to promote the continuous improvement of the shipboard personnel performance.

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4. Seafarers' employment agreements (Regulation 2.1)

As per MLC procedures manual section 2.1

The Company ensures that the conditions of employment for all Seafarers working on board are in accordance with the relevant MLC standards.

The responsibility for ensuring that the Seafarers' Employment Agreements (SEA) shall in all cases incorporate the relevant Flag Administration laws and regulations, National laws and regulations, any applicable collective bargaining agreements (to the extent compatible with the national law and practice) and Maritime Labour Convention 2006 requirements rests with the Company's Crew Operator and/or Agents.

Seafarers' employment agreement shall be signed by both the seafarer and the shipowner or a duly authorized representative.

In the event that a SEA is signed by crewing agent on owner's behalf same should be done in strict conformity with Company's instructions and guidelines.

The seafarers' employment agreements (SEAs) shall include as a minimum the items listed in the relevant MLC Standard "Seafarers' employment agreements" and any other items as required by the respective Flag Administration.

Upon signing the seafarer's employment agreement, both the shipowner (or through his/her duly authorized representative) and the seafarer shall receive an original copy of the agreement signed by both of them.

Seafarer's employment agreements must always be in writing and the duration period shall not be longer than one (1) year.

A signed original of the Seafarers' employment agreement will be kept by the Seafarer concerned. Another signed original of the Seafarer's employment agreement (SEA) will be forwarded to the ship and kept by the Captain or handed over to the Captain by the Seafarer upon his/her signing on (in order to be accessible for review by any Flag State Inspector, an authorized RO and the Officers of a competent authority).

Where a collective bargaining agreement (CBA) forms all or part of a seafarers' employment agreement, a copy of the CBA shall be forwarded and kept on board, readily available to seafarers in case they want to

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review their conditions of employment. The copy of the CBA shall be also accessible for review by a Flag State Inspector, an authorised RO and the Officers of a competent authority.

Seafarers' employment agreement (SEA) and any applicable collective bargaining agreement shall be written in English.

In cases where a seafarer wishes to extend his service period on board (under company's review / approval) or in case of promotion of a seafarer to a new rank, then a new seafarer's employment agreement must be signed.

Seafarers shall be entitled to adequate compensation in the case of injury, loss or unemployment arising from the ship's loss or foundering and such entitlement shall be incorporated in the relevant SEA in accordance with the relevant Regulation of the MLC "Seafarer compensation for the ship's loss or foundering".

In case of early termination of a Seafarers' employment agreement the minimum notice period to be given by the Seafarers and Company shall be in accordance with the signed seafarer's employment agreement following flag's laws or regulations but shall not be shorter than fifteen (15) days. A notice period shorter than the minimum may be given in circumstances which are recognized under flag's law or regulations or applicable collective bargaining agreements as justifying termination of the employment agreement at shorter notice or without notice.

Leave pays, health and security protection benefits, termination processes and conditions of employment must be included in the Seafarers Employment Agreement (including any applicable CBA).

Entitlement to Repatriation of seafarers and related conditions shall be in conformity with National and Flag Administration laws and shall be reflected in the employment agreements and the CBA where applicable.

Upon termination of a Seafarers' employment agreement, a document containing a record of his/her employment on board the ship shall be given to the Seafarer. This document shall contain sufficient information, with a translation in English, to facilitate the acquisition of further work or to satisfy the sea-service requirements for upgrading or promotion.

Additionally, the document mentioned in the above paragraph shall not contain any statement as to the quality of the Seafarers' work or as to their wages. Such a document shall be the 'evaluation form pl 06a/06b' (or a different work related record as may be differently required by a Flag Administration or National laws).

Every Panamanian-flagged vessel, managed by the Company, must keep on board a document called "Crew List" or an equivalent record, where the hiring of all Crewmembers is established for the record.

The Company and the Seafarers may terminate a work relationship for just causes included in the SEAs (including any applicable CBAs) and in accordance with any additional Flag State requirements (as per ARTICLES 43~47 of Panamanian Executive Decree No. 86).

If the Company, for some reason, wishes to terminate a work relationship with a seafarer, without just cause, before the expiration of the employment, then undertakes the obligation to pay the seafarer concerned a compensation in accordance with signed SEA (including any applicable CBA) and any additional Flag State requirements (as per ARTICLE 50 of Panamanian Executive Decree No. 86).

5. Use of any licensed or certified or regulated private recruitment and placement service (Regulation 1.4)
As per MLC procedures manual section 1.4

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In cases where recruitment services are provided by Recruitment & Placement Service Agents that are based in countries or territories in which the MLC does not apply the company shall require a certificate or other form of documentation from a competent authority or an RO, verifying compliance with the relevant MLC standards.

The Company requires that any Recruitment & Placement Service Agent used has, inter alia, procedures for ensuring that 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, other than the cost of the seafarer obtaining a national statutory medical certificate, the national seafarer's book and a passport or other similar personal travel documents, not including, however, the cost of visas, which shall be borne by the Company.

The Company's Crew Operator shall produce an Appraisal Report on the performance of any Seafarers' Recruitment and Placement Service Agent (if used by the Company) at least once per year and at any other intervals as it might be deemed necessary. The report will comment on their previous performance and on their suitability for future employment based on the evaluation of the parameters.

6. Hours of work or rest (Regulation 2.3)
As per MLC procedures manual section 1.4

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Normal daily working hours for seafarers working on board the ship shall be determined by their employment agreements (including any applicable collective bargaining agreement) and shall not be less favourable than an eight-hour day with one day of rest per week and rest on public holidays in accordance with the relevant Regulation "Hours of work and hours of rest" of the MLC and the specific Flag State requirements.

The Company has developed a procedure clearly indicating minimum hours of rest in compliance with Flag State requirements.



All seafarers (including the Master and Chief Engineer) on board the ship shall be provided with rest period of not less than:

1. 10 hours in any 24 hour period; and
2. 77 hours in any 7-days period.

The hours of rest may be divided into no more than two periods, one of which shall be at least six hours in length and the intervals between consecutive periods of rest shall not exceed 14 hours.

Records of seafarers' daily hours of rest are maintained through a record daily filled, to allow monitoring of compliance with the above.

The Master shall ensure that the records of hours of rest in a standardized format (**form PL 50**), in the English language and in accordance with MLC and relevant Flag State requirements.

The Master of the ship or a person empowered by the Master shall be responsible to hand over to the Seafarers on a monthly basis, a copy of the records of daily hours of rest, pertaining to them, which shall be signed for receipt by the master, or a person authorized by the master and by the seafarers.

Musters, drills and safety & security exercises are conducted in such a manner so as to minimize the disturbance of rest periods and not to induce fatigue.

When a seafarer is on call, such as when a machinery space is unattended, the seafarer shall have an adequate compensatory rest period if the normal period of rest is disturbed by call-outs to work.

The Master has the right to suspend the schedule of hours of rest and require a seafarer to perform any hours of work necessary until the normal situation has been restored. As soon as practicable after the normal situation has been restored, the Master shall ensure that any seafarers who have performed work in a scheduled rest period are provided with an adequate period of rest.

Record of seafarers' daily hours of rest shall be kept for a period of two (2) years and shall be available for inspection and endorsement by any Flag State Inspector.

The Master of the ship, or a person authorized by the Master shall ensure that a table of the "shipboard working arrangements" is posted at prominent and easily accessible places on the ship (ship's mess-rooms, announcement board and control rooms) in the English language which is the working language of the ship. The shipboard working arrangement table shall be in a standardized format (**form PL 50a**) as required by the Flag Administration and shall contain the following information:

- a. The position of the seafarer;
- b. The schedule of service of seafarers at sea and service in port; and
- c. The minimum hours of rest.

7. Manning levels for the ship (Regulation 2.7)

As per MLC procedures manual section 2.7

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The ship must carry a valid certificate of minimum safe manning, a copy of which should be maintained in the Company's office.

The ship shall not be navigated unless she has in her service and on board such complement of officers and crew as is necessary for safe navigation, and with due regards to the safety, security and protection of the marine environment under all conditions, while taking into account Seafarers' fatigue and the particular nature and conditions of the voyages.

The manning of the ship shall be maintained at all times to, at least, the levels specified in the minimum safe manning certificate (MSMC), issued by the relevant Competent Authority and in accordance with the specific Flag State requirements except in urgent cases where the Flag Administration may permit otherwise through a dispensation letter issued upon Company's request.

The Crew Operator is responsible for maintaining Company's manning procedures and ensuring that the ship is manned in compliance with the Minimum Safe Manning Certificate and with Crew of the appropriate high standard.

The Master is responsible for ensuring that his/her assigned ship is manned in accordance with the Safe Manning Certificate requirements and any other requirement that has been established by the Company.

As far as practicable and based on the ship trading pattern, the number of seafarers on board exceeds the requirements of MSMC to avoid excessive workload and fatigue on seafarers.

Competency requirements mentioned hereinabove in paragraph 3 (Qualification of Seafarers – Regulation 1.3) for each seafarer's position are defined in the Company's management system. Positions are filled with seafarers who meet or exceed the defined competency requirements.

Guidance and relevant Flag State documentation should be provided to the Master in cases where a seafarer position suddenly falls vacant due to exigencies and replacement cannot be placed on board in reasonable time, and the ship is required to sail short of the minimum manning requirements.

The minimum safe manning certificate should be kept on board the ship at all times.



8. Accommodation (Regulation 3.1)
As per MLC procedures manual section 3.1

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For ships constructed before the MLC enforcement date, the requirements relating to ship construction and equipment that are set out in the Accommodation of Crews Convention (Revised), 1949 (No. 92).

The Company in an effort to maintain the applicable standards on board the ship has established an inspection program containing weekly, monthly and three monthly, and annual inspections/routines, in order to ensure that:

- Accommodation spaces are clean and in a good state of repair;
- Accommodation are sufficiently heated / ventilated/ air conditioned;
- Accommodation fixtures and fittings include proper bedding, mattress, tables, lamps;
- Laundry facilities are suitably equipped;
- Natural and artificial lighting is sufficient;
- Sanitary facilities are hygienic, accessible and comfortable; and
- Cabins / Public spaces are clean, decently habitable and maintained in a good state.

The ship's hospital shall be kept clean and in perfect sanitary conditions at all times and when not occupied by a patient shall be kept locked and always ready to be used exclusively for medical incidents / purposes.

Inspections of the seafarer's accommodation shall be carried out on board by the Master or under the authority of the Master to ensure that it is clean, decently habitable and maintained in good state of repair at intervals of not more than one (1) week.

The dates and the results of such inspections / routines are recorded in the "**WEEKLY ACCOMMODATION INSPECTION FORM PL 71a, MONTHLY HOSPITAL INSPECTION FORM PL 71C**" and shall be available on board for at least one (1) year.

Additionally, entries with respect to mentioned inspections shall be made in the ship's official log book (where applicable) as may be required by the specific Flag Administration and shall include at minimum the following:

- a. The date and time of the inspection;
- b. The name and rank of the officer(s) making the inspection; and
- c. The particulars regarding the crew and hospital accommodation or any parts found by any of the persons making the inspection that do not comply with these rules.

9. On-board recreational facilities (Regulation 3.1)
As per MLC procedures manual section 3.1

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The Company through its Occupational Health & Safety inspection program shall ensure that the recreational facilities provided on board, including DVD players, assorted movies (a reasonable amount of titles), and a library with both literature and job related titles, are kept in good working condition.

Subject to any national or international laws or regulations, whenever possible and reasonable both Officers and Ratings are expeditiously granted permission to have their partners, other relatives and friends as visitors on board their ships when in a convenient port.

Smoking is permitted in designated smoking areas and consumption of alcohol is not permitted on board at any time.

The use of personal computers should be permitted on board.

Healthy recreation such as hobbies, gymnastics, games or sports should be provided on board as far as practicable.

Appropriate vocational training schemes for Seafarers should include education and information on matters affecting their welfare, including general health and safety hazards.

Regular inspections shall be carried out by the Master or an Officer empowered by him, as part of the inspection program (already mentioned hereinabove / Accommodation - Regulation 3.1), established by the Company, with regard to accommodation.

The dates and the results of such inspections / routines shall be recorded in the "**FORM PL 71A/71C**" and shall be available on board for at least one (1) year.

10. Food and catering (Regulation 3.2)
As per MLC procedures manual section 3.2

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The company provides seafarers with good quality, appropriate quantity & nutritive value food and drinking water under regulated hygienic conditions on board the ship in conformity with the standards set by the MLC Regulation 3.2 "Food and catering" and relevant requirements of Flag Administration, free of charge.



The ship is supplied with food and drinking water, having regard to the number of Seafarers on board, their religious requirements and cultural practices as they pertain to food, and the duration and nature of the voyage. Food and drinking water supplies shall be suitable in respect of quantity, nutritional value, quality and variety. Expiry dates where applicable will be fully met and any expired supplies will be dispensed.

The Catering department is organized in such a way that permits the provision to the seafarers of adequate, varied and nutritious meals prepared and served in hygienic conditions.

The ship's cook(s) are trained, qualified and competent for the position in accordance with requirements set out in the National and Flag Administration laws and regulations. Other catering stuff shall be properly trained or instructed for their positions.

Additionally, Company's minimum age requirements regarding Ship's cooks as referred to in paragraph 1 (Minimum Age - Regulation 1.1).

Inspections shall be carried out on board by the Master or an Officer empowered by him at intervals of not more than one (1) week with respect to:

- Quantity and quality of supplies of food and drinking water;
- All spaces and equipment used for the storage and handling of food and drinking water; and
- Galley and other equipment for the preparation and service of meals.

The dates and the results of such inspections shall be recorded in the Company's **"HEALTH & HYGIENE INSPECTION CHECKLIST, FORM MLC-12"** and shall be available on board for review at least one (1) year.

Procedures ensuring that potable water storage tanks are cleaned and disinfected, at intervals not exceeding one (1) year, are described in Company's **FORM MLC-12**.

11. Health and safety and accident prevention (Regulation 4.3)

As per MLC procedures manual section 4.3

The Company is fully committed to ensure the health, safety and security of all crew members and staff on board the vessels and in its offices, contracted personnel and any other persons who are directly or indirectly linked with its business and operations

Flag state's guidance and regulations are constantly monitored to ensure on-going compliance.

The company by implementing a risk assessment plan (**as described in RISK ASSESSMENT MANUAL**) has identified occupational safety dangers and has adopted relevant procedures to eliminate/minimize risk.

Shipboard personnel, through day-to-day management, should be motivated, trained and committed to implement the Company's policies with respect to safety, health, drugs and alcohol abuse. Upon their embarkation and before the commencement of their duties seafarers are familiarized with the company's policies and occupational health and safety practices.

The Company implements its health and safety program taking into account the guidelines provided by the ILO Code of practice "Accident prevention on board ship at sea and in port, the MCA Code of Safe Working Practices for Merchant Seamen as well as Risk Assessment practices.

The Company has established and maintains a "PERMIT TO WORK" system on board through which all foreseeable hazards which may occur during a specific work are adequately identified and all the appropriate precautions are taken for performing a mentioned work correctly and safely (FORM PL 46/46a/47/48)

The company has undertaken the obligation to analyse extensively incidents and hazardous occurrence reports according to the procedures described in **Chapter 10** of Company's **SMS MANUAL**.

When accidents / incidents are reported, relevant Flag State's requirements / provisions should be taken into consideration.

The Company is fully committed to comply with the requirements of applicable international instruments on the acceptable levels of exposure to workplace hazards on board ships and on the development and implementation of ships' occupational safety and health policies and programs which shall be considered as meeting the requirements of Maritime Labour Convention.

Periodic documented health & safety inspections at intervals of not more than one (1) week should be carried out on board by the Master or an Officer authorized by the Master and findings should be recorded in Company's **form PL70A**. Any discrepancies found shall be corrected immediately.

Adequate safety procedures for the following are established and maintained by the Company to ensure a strong safety culture in an effort to prevent occupational accidents:

- Use of personal protective clothing & equipment (**FORM PL 49**);
- Fire Prevention and Fire Fighting (**Fire Training Manual**);
- Responding to accidents and emergencies (**SMS MANUAL Ch. 8 & 9**);
- Working aloft or over side (**FORM PL 46a**);
- Hot work (**FORM PL 46a**);
- Entry into enclosed or confined spaces (**FORM PL 46**);
- Mooring and Anchoring (**SMS MANUAL CH 12.3, FORM PL 71E**);
- Cargo handling and ballast & safe movement on board (**SMS MANUAL CH 12.4, 12.3**); and

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Safety training drills are carried out in accordance with the company's annual schedule (**FORM PL 28**). Necessary information which allows each key member of the shipboard personnel to know in advance what their duties and responsibilities are, are outlined in a practical way in relevant section of Company's manual. The Company's "drills & training" program is based on standards set by the statutory training requirements for the crew.

The Company has established a procedure with regard to drugs & alcohol abuse (**SMS MANUAL CH 12.8.5, FORMS PL 43/44**).

General health & hygiene procedures as well as personal health measures against dangerous diseases including HIV/AIDS/Malaria, etc.

Seafarers, who are exposed to high levels of noise and vibration, such as those working in machinery spaces, should be instructed accordingly in the dangers to hearing and health of prolonged exposure to hazardous levels of noise and vibration and in the proper use of noise protection devices and equipment provided by the Company (e.g. ear protectors, ear muffs, etc.).

The Master shall chair a Safety Meeting at least once per month. The Master, Chief Engineer, Chief Officer and other officers and crew as decided by the Master, attend the meeting. Minutes of the meetings must be kept in **form PL 02**. The Safety Committee is the forum on board ship in which the Master and the appointed officers meet to discuss matters relating to occupational health, safety, the prevention of accidents, the procedures for the emergency situations, the non-conformities, etc. With the Master as its chairman, the Committee has the means to take effective action in all matters, which it discusses, other than those requiring the authorisation of the employer.

The Safety, Quality & Environmental Management System shall be verified, reviewed and evaluated once a year through Internal Safety Audits (**FORM PL 52a**).

Duties with regard to Occupational Health & Safety are assigned to the Chief Officer who is responsible for facilitating and administering the Company's programs related to the Occupational Health & Safety on board. Master should verify through random checks / inspections that same are implemented successfully.

The Master shall be responsible for implementing the Company's Health, Safety, Quality and Environmental Protection Policy, motivating the Crew in the execution of that Policy.

Duties and responsibilities of the Officers and the Crew with regard to safety on board are clearly defined throughout the Company's **SMS MANUAL**.

12. On-board medical care (Regulation 4.1)

As per MLC procedures manual section 4.1

The Company provides the necessary measures and resources for the protection of the health of Seafarers and ensures that they have access to prompt and adequate medical care whilst working on board.

Such measures provide for health protection and medical care, including essential dental care, for Seafarers whilst working on board the ship. All Seafarers employed by the company are protected from the financial consequences of sickness, injury or death occurring in connection with their employment by the placement of an appropriate P & I insurance policy.

The ship maintains a medical chest, furnished in accordance with the requirements of MLC and the ship's Flag Administration and an inventory showing the kinds and amounts of medicines, medical supplies and equipment and respective expiry dates. The contents of the medicine chest, as well as the medical equipment and medical guide carried on board are inspected at yearly intervals, by authorized personnel and a relevant Medical chest certificate is issued following the yearly inspection.

The medical chest shall be frequently inspected and results shall be recorded in **form PL 78C "Medicine inventory"**.

The Master or a ship officer shall be responsible for the management of the medical stores and shall have received special training updated periodically, at least every five (5) years.

The Company has adopted the medical report **form MLC-09** where all the necessary relevant information is included, for use by the ships' Masters and relevant onshore and on-board medical personnel. The completed forms shall be kept confidential and shall only be used to facilitate the treatment of Seafarers. All medical treatment on-board and on-shore shall be recorded in the **form MLC-14**. Medical records of the seafarers are kept for a period of two (2) years.

One (1) certified seafarer "Medical Care Person in Charge" shall be responsible for medical care and administering medicine as part of his/her regular duties.

One (1) certified seafarer "Medical First Aid Provider" shall be designated to undertake the duties of providing immediate first aid in case of injury or illness aboard ship.

Persons in charge of medical care on board shall have satisfactorily completed training in medical care that meets the requirements of the STCW.

Seafarers designated to provide medical first aid shall have satisfactorily completed training in medical first aid that meets the requirements of STCW.

A single individual may serve in both of the above capacities, provided that s/he holds the two (2) certifications.

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In case required, urgent medical advice can be conducted by radio or satellite, 24 hours a day, as per Admiralty List of Radio Signals (ALRS) - Volume 1, kept on board at all instances.

13. On-board complaint procedures (Regulation 5.1.5)
As per MLC procedures manual section 5.1.5

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All Seafarers shall have access to and be provided, in addition to their seafarers' employment agreement, with a copy of the **"ON BOARD COMPLIANT FORM" (form MLC 05)**, applicable on the ship, that should allow for the fair and effective handling of their complaints alleging violations of the MLC. Complaint procedure should be issued in English. The hand-out should contain contact details of the DPA, Flag Administration, competent authority in the seafarers' country of residence as well as the person or persons on board, appointed by the Company, who will, on a confidential basis, provide seafarers with impartial advice on their complaint and assist them in following the complaint procedure, if required.

Additionally the seafarers should be provided with the **"On board Complaint" form (form MLC 05)** where they will be able to describe their complaint and where all relevant decisions shall be recorded.

Complaints should be sought to be resolved at the lowest level possible and only when the matter cannot be resolved to the satisfaction of both parties, should THEN be elevated to the next level.

Seafarers who file a complaint have the right to be accompanied or represented during the complaint procedure by the seafarer's representative.

The procedures should contain a clear statement that the Seafarer will not be victimized for filing complaints.

All complaints and their decisions must be recorded and documented in the 'On board Complaint' form. A copy of the completed 'On board Complaint' form shall be provided to the related seafarer upon settlement of the complaint.

On Board Complaint Procedures shall be implemented as extensively described in Company's

14. Payment of wages (Regulation 2.2)
As per MLC procedures manual section 2.2

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The total payment of the seafarer is calculated in accordance with the seafarer's employment agreement (SEA), any applicable CBA and the standards set in relevant Regulation of the MLC 2006 "Wages".

All seafarers shall be paid for their work monthly and in accordance with their employment agreements. All wages to which a seafarer may be entitled shall be paid at intervals no greater than one month; and in the event of a seafarer's wages or any part thereof not being so paid or settled, then, unless the delay is due to the act or default of the seafarer or to any reasonable dispute as to liability or to any other cause not being the wrongful act or default of the Shipowner or the Master, the seafarer's wages shall continue to run and be payable until the time of the final settlement thereof.

At the end of the month, a monthly account of the payments due and the amounts paid shall be given to the Seafarers including wages and additional payments and the rate of exchange used where payment has been made in a currency or at a rate different from the one agreed to.

Normal working hours for seafarers are as per seafarer employment agreement and any applicable CBA and shall not be less favourable than an eight-hour work a day with one day of rest per week and rest on public holidays.

Records of all overtime worked are maintained by the Master and endorsed by the Seafarer at monthly intervals. It is the Master or the Department Heads responsibility to ensure that overtime records are consistent with the records of rest hours.

The Company has implemented an "Allotment" payment process where Seafarers at the time of their entering employment or during it, have the right to allot a proportion of their wages for remittance at regular intervals to their families by bank transfers or similar means to the designated bank accounts unless they request otherwise in writing. The Company remits that allotments in due time and directly to the person or persons nominated by the seafarer.

Seafarers employed are paid their leave pay on a monthly basis as per the provisions of the seafarer's employment agreement (SEA) and any applicable CBA.

The Company shall not allow any agreement to forgo the minimum leave pay.

The master of the ship shall, before paying off or discharging any seafarer, deliver on a monthly basis a full and true account of the seafarer's wages and of all deductions to be made there from on any account whatsoever. The said account shall be delivered not less than twenty-four hours before his discharge or payment off. The said account shall indicate the rate of exchange used where payment has been made in a currency or at a rate different from the one agreed to.

On termination of engagement all remuneration due are paid without undue delay, either in cash on board or through a remittance to the Seafarer's designated bank account.



15. Financial security for repatriation (Regulation 2.5)
As per MLC procedures manual section 2.5

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All seafarers working on board the ship are covered, in the event of abandonment, by the P & I insurance system currently maintained by the company in accordance with relevant Flag Administration Rules and Regulations relating to abandonment.

In order to avoid any misunderstanding, a seafarer shall be deemed to have been abandoned where, in violation of the requirements of this Convention or the terms of the seafarers' employment agreement, the ship owner:

- Fails to cover the cost of the seafarer's repatriation; or
- Has left the seafarer without the necessary maintenance and support; or
- Has otherwise unilaterally severed their ties with the seafarer including failure to pay contractual wages for a period of at least two months.

The insurance policy, maintained by the shipowner, must cover the necessary support for seafarers and shall include: adequate food, accommodation, drinking water supplies, essential fuel for survival on board the ship and necessary medical care.

Assistance will be provided by the financial security provider when requested by the seafarer or the seafarers' nominated representative and be supported by the necessary justification of entitlement.

The financial security will not cease before the end of the period of its validity, unless the financial security provider has given prior notification of at least 30 days to the Administration.

The company will have the obligation to notify the seafarers working on board managed ships if the financial security is to be cancelled or terminated.

All ships managed by the company must carry on board documentary evidence of financial security to show compliance with MLC, 2006 Standard A 2.5.2.

The documentary evidence of financial security, mentioned in the above paragraph, is issued directly to the company by the financial security provider (P & I Club) and must contain the information required in MLC, 2006 Appendix A2-I, and more specifically an attestation that the financial security meets the requirements of MLC, 2006 Standard A 2.5.2.

A copy of the certificate/documentary evidence of financial security, in English language, must be posted in a conspicuous place on board the ship, where it will be available to the seafarers.

16. Financial security relating to shipowner's liability (Regulation 4.2)
As per MLC procedures manual section 4.2

X

All seafarers working on board the ship are covered, in the event of death or long-term disability as a result of a work accident, illness or occupational risk, by the P & I insurance system currently maintained by the company in accordance with relevant Flag Administration Rules and Regulations relating to Liability Insurance.

The liability insurance with respect to seafarers' long-term disability and death shall provide for the payment of all contractual claims covered by it which arise during the period of validity of such insurance. It will not cease before the end of the period of validity of the financial security, unless; the financial security provider has given prior notification of at least 30 days to the Administration.

Contractual Claims shall be addressed and settled directly between the financial security provider (P & I Club) and the seafarer in question (including his/her next of kin, or a representative of the seafarer or designated beneficiary) and same, under normal circumstances, must be paid in full and without delay.

Seafarers, shall not, for any reason, be pressured to accept a payment less than the contractual amount.

The company will have the obligation to notify the seafarers working on board managed ships if the financial security is to be cancelled or terminated.

All company ships must carry on board documentary evidence of financial security to show compliance with MLC, 2006 Standard A 4.2.1.

The documentary evidence of financial security, mentioned in the above paragraph, is issued directly to the company by the financial security provider (P & I Club) and must contain the information required in MLC, 2006 Appendix A 4-I, and more specifically an attestation that the financial security meets the requirements of MLC, 2006 Standard A 4.2.1.

A copy of the certificate/documentary evidence of financial security, in English language, must be posted in a conspicuous place on board the ship where it will be available to the seafarers.



The above measures have been reviewed by:

Nippon Kaiji Kyokai


(insert name of competent authority or duly recognized organization)

and, following inspection of the ship, have been determined as meeting the purposes set out under Standards A5.1.3, paragraph 10(b),

regarding measures to ensure initial and ongoing compliance with the requirements set out in *DMLC-Part I* of this Declaration



Seal or stamp of the authority, as appropriate

Name:	D. Kakouris
Title:	MLC Inspector
Address (RO):	Possidonos Av. & 1-3 Pindou Str., 183 44 Moschato, Piraeus, Greece
Signature:	
Place:	Lavrio, Greece
Date:	19th June 2023

