

SAPMER

Group Compliance Policy



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To strengthen its social responsibility with respect to all employees and ensure the smooth running of its operations, the Sapmer Group is committing as follows:

1. Forced labor

- 1.1. The Group prohibits forced labor in all its forms and for all its activities. The Group strictly bans the use of violence or threats in connection with its activities, including for the purpose of retaining staff.
- 1.2. Employees' consent is systematically obtained before they start working for the Group. No employee is made to work against his or her will or work as bonded or forced labor, or subject to corporal punishment or coercion of any type related to work.
- 1.3. The personal documents of the onboard crew members are readily available to the latter during the trip, even when the said documents are kept by another member of the crew.

2. Child labor

- 2.1. The Group prohibits and condemns child labor within its employees for all its activities. The age of each employee is systematically verified before they start working for the Group.
- 2.2. On an exceptional basis, the Group may accept young people as employees, for example for internships or work-study programs, in accordance with applicable national laws. In such case, the Group ensures that the conditions in which they work guarantee their development and that appropriate measures are adopted to meet any specific needs of the young employees.

3. Contractual framework

- 3.1. A contract is drawn up in a language that can be understood by the successful candidate and governs the relationship between the latter and the Group. The contract specifies at least the employee's rights and obligations, the terms applicable to the work assigned, hours of work and the modalities of remuneration.
The selected applicant is given a copy of the contract for consideration prior to its signature.
- 3.2. During the recruitment process, candidates are provided with a clear explanation of the work they will be expected to do for the Group and how this work is expected to be done.
- 3.3. Employees on board of a vessel may request to leave the vessel by giving a minimum of 10 days' notice prior to the scheduled next port visit. next scheduled port visit.
This commitment may be waived in case of health or safety issues and on an exceptional basis, in particular about minimum safe manning.

4. Remuneration

- 4.1. No recruitment fees can be charged to Group employees except legally required fees. The Group undertakes to reimburse any recruitment fees unduly paid by an employee in connection with the work carried out for the Group.
- 4.2. Employees are paid on a monthly basis as contractually agreed and at not less than the minimum legal wage. Each employee is provided with a document, which include particulars such as remuneration and share calculation.
- 4.3. Any deductions shall be carried out only with the employee's expressed consent.

- 4.4. No intermediary may be imposed on employees for the payment of their remuneration by their employer. Employees on board Group ships may choose to send all or part of their remuneration to their family free of charge.

5. Organisation of work

- 5.1. The Group bears the cost of returning employees to their country of origin after any work involving travel abroad.
- 5.2. Employees on board are entitled to a minimum of 10 hours of rest per day and 77 hours per week. This minimum daily rest period may, by way of exception, be reduced to 6 hours in the event of operational necessity. In such case, employees are entitled to additional rest periods to make up for the rest hours lost as soon as possible.

6. Health and safety

- 6.1. The Group's facilities, including its ships, are maintained to ensure the best health and safety conditions. Risk assessments are conducted periodically and updated as necessary. Accidents and incidents are recorded so as to conduct further analysis of their causes and improvement plans are put in place where appropriate.

Exercises are regularly conducted on board to help the crew be proficient with the procedures and tools to be used in the event of an accident or incident.

- 6.2. The Group provides all its employees, particularly those on-board ships, with the necessary safety equipment to ensure their protection, prioritizing collective protection equipment. Operations presenting specific risks are carried out by specifically trained and authorized employees only.
- 6.3. All Group vessels are equipped with the necessary medical supplies in order that first aid may be administered when required. Every crew includes members with the necessary training to use this medical equipment. In addition, all vessels shall have the necessary equipment and procedures to protect crews in case of an epidemic risk.

- 6.4. All onboard crew members have a valid medical certificate.

7. Freedom of association

- 7.1. The Group complies with all applicable regulations on freedom of association and collective bargaining.
- 7.2. No sanction may be taken against any employee based on his or her affiliation or non-affiliation to a staff representative association.

8. Discrimination and harassment

- 8.1. The Group prohibits all forms of violence by its employees, including sexual or psychological harassment, bullying or intimidation. Disciplinary proceedings may be taken against employees who are believed to have used violence at work.
- 8.2. The Group prohibits any form of discrimination between its employees, particularly as regards recruitment, access to training or promotion.

9. Means of implementation

- 9.1. The Group has put in place the necessary procedures for the implementation and monitoring of the the commitments contained in this Policy, including its commitments towards its suppliers. These procedures are regularly audited and reviewed.
- 9.2. A mechanism for collecting and handling grievances is in place, through which all employees of the Group can report any breach of this Policy. In addition to the channel by which employees may report any breach to their line manager, this mechanism comprises a dedicated channel for employees in charge of managing crews and a centralized request processing system guaranteeing confidentiality.

This procedure is communicated to employees in a language they understand as from the very start of their employment relationship with the Group.