



# Aethon Marine Services LLC

## WHISTLEBLOWING POLICY

*Aethon Marine Services is committed to conducting all aspects of business with honesty and integrity, and to providing a working environment where high standards of ethical, moral and legal business conduct are encouraged and safeguarded.*

*The Company is confident in the comprehensiveness and effectiveness of its Integrated Management System and its role in ensuring the safety of people and the environment, as well as in the effectiveness of its existing reporting channels.*

*Furthermore, the Company is committed to a workplace characterized by open communication regarding its business practices. As such, this Whistleblowing Policy has been developed to provide a means for visitors, employees, contractors or any third party to raise concerns that cannot be, or have not been, adequately addressed via usual reporting channels.*

*The Whistleblowing Policy addresses concerns related to issues of public interest, including, but not limited to, the following:*

- *A criminal offence;*
- *Non-compliance with legislation and/or Company procedures, particularly in relation to health and safety at work or environmental protection;*
- *Dishonesty, either verbal or written*
- *Malpractice or unethical conduct;*
- *Financial or non-financial misadministration or malpractice or impropriety or fraud;*
- *A safety and/or security risk or hazardous condition that may impact the life or health of any individual*
- *Miscarriages of justice; and*
- *The deliberate concealment of any of the above.*

*If an employee, contractor, visitor or third party has a legitimate concern in (and holds reasonable belief that the information he has relates to) one of the above areas and wishes to raise the concern in good faith, it should be raised with the Managing Director*

*Although the Company's Top Management maintains an open-door policy endeavoring to address individuals' concerns internally, a concern can also be raised through the following channels:*

***E-mail: ...whistleblower@aethon-group.com.***

***Tel.: ....+971 555970850***

*Reports can be made without fear of retaliation and be even anonymous. Upon receipt of a report, same will be assessed by the Company's Top Management and an investigation may commence, if deemed necessary. Any victimization of a member of staff who "whistle-blows", or any attempt to deter him from reporting, will be regarded as a serious disciplinary offense and will result in disciplinary action.*

*Managing Director*

*03 January 2021*

***Approved:*** \_\_\_\_\_ ***Date:*** \_\_\_\_\_