

**2.11 Harrasment and Bullying Policy****HARASSMENT & BULLYING POLICY**

The Company is committed to provide and ensure a working environment in which there is respect for the dignity, personality and well-being of seafarers, free from offensive, hostile and/or intimidating influences that may affect job performance, safety and/or mental and physical well-being, encouraging the elimination of harassment and bullying.

The Harassment & Bullying Policy addresses concerns related to vindictive and/ or humiliating and degrading behavior, including, but not limited to, the following:

**Harassment:**

- Displaying or circulating offensive material
- Offensive language, mockery or sexist/racist/homophobic jokes or remarks, and rude gestures.
- Comments about a person's physical appearance or character which cause embarrassment or distress.
- Spreading malicious rumours, or insulting someone or intrusive/persistent questioning (particularly regarding age, race, ethnic origin, marital status, sex, disability, sexual orientation, culture, religion or belief, personal life)
- Making or sending unwanted, sexually suggestive, hostile or personally intrusive comments, telephone calls, text messages, emails, comments on social networks, faxes or letters

**Bullying:**

- Verbal or physical threats or abuse, such as shouting or swearing, in public or in private, including derogatory or stereotyped statements or remarks
- Personal insults
- Making threats or inappropriate comments about career prospects, job security or performance appraisal reports.
- Cyber bullying including inappropriate: suggestive and unwanted remarks, graphics or threat-centered abusive emails, postings on social networks and text messages.

The Company actively encourages its seafarers to bring incidents, including those that affect others, to its attention without delay, adopting reporting procedures. Complaints can be made without fear of retaliation, provided that they are not vexatious or malicious, whilst the seafarer has the right to be represented. The Company will treat all complaints of harassment and bullying seriously and in strict confidence.

Senior Officers on board and/or DPA ashore may be contacted as the first point of reference for each seafarer that wishes to make a complaint or report an incident that has suffered.

The Company provides to the victim of harassment or bullying the opportunity, at his discretion, to resolve the complaint informally, by explaining the effects of the alleged perpetrator's actions in the presence of another Company person, familiar with complaints resolution, and to the alleged perpetrator the opportunity to apologize for his actions and undertake not to repeat them.

SIGNED .....  
GENERAL MANAGER

  
**CENGİZ EKER**

DATE: 25.01.2024