

2.12 Whistleblowing Policy**WHISTLEBLOWING POLICY**

Acechem Tanker is committed to creating a culture where our workforce and other stakeholders, such as customers and suppliers, feel comfortable reporting concerns without fear of retaliation. We take steps to ensure that our businesses are conducted with integrity, professionalism, and fairness and in compliance with applicable laws and regulations.

Employees and external parties such as customers, vendors and other stakeholders are encouraged to report any wrongdoing, unethical or inappropriate action, and/or behavior of any member within the Group or business practices in the Group.

This policy applies to all on board and ashore employees, ship captains, officers, crew, superintendents, managers, directors, costumers, contractors, business partners (including surveyors, terminal workers, pilots suppliers, service providers, agencies, and their employees), of Acechem Tanker office and fleet vessels.

All reports are treated with strict confidentiality and will be directed to and accessed only by the DPA, investigation team and Company management for review, investigation, and follow-up.

Scope of Reporting

Reportable matters include but are not limited to the following:

- Breach of laws, regulations, policies, and procedures
- Health and safety issues, injuries, incidents
- MARPOL and Environmental incidents and violations
- Smuggling, theft, fraud, money laundering or improper use of company property or funds
- Bribery or corruption
- Abuse of power or authority
- Undeclared or mismanaged conflicts of interest
- Insider trading or market abuse
- Breach of sanctions
- Financial irregularities
- Data privacy violations
- Bullying, harassment & discrimination
- Misconduct and malpractice
- Modern slavery and human rights breaches

Reporting Channels and Procedures

Employees and external parties may lodge a report through any of the following channels:

DPA

Ömer DEGIRMENCI

Mob: +90 506 683 00 70

E-mail: omerdegirmenci@acechemtanker.com

or

Directly can send MTR through all crew private account or by mail to support@maritimetrainer.com .In this case no any name and ship name will not be visible. These reports only will evaluate directly by MTR.

Reports should provide the following information, where possible:

Clear definition of the incident/concern,

Identity and particulars of the parties, vessel and witnesses involved

Date, time, and location of incident/concerned subject

Evidence substantiating the incident/concern raised

Investigation:

Upon receiving a report, Company appoints an investigation team in order to investigate incident. Investigation team members shall not have any relation with subject allegation and whistle blower.

The investigation team may examine evidence, such as relevant documents, records or data, to determine whether there is credible information indicating whether or not the incident has occurred.

The investigation team may conduct interviews with relevant people to obtain testimonial evidence relevant to the incident.

Investigation team reports the results directly to company management as confidential.

Confidentiality, Protecting a whistle-blower's identity and Non-Retaliation

Acechem Tanker will ensure the absolute confidentiality of all whistle-blowers and reports received and the anonymity of the person(s) making the report within the legal framework.

Company will not retaliate or tolerate retaliation against any person(s) who report directly or indirectly by the Management or any other person or group.

Company will provide assistance/cooperation with government, regulatory or law enforcement authorities as needed in the investigation of the reported incident.

Whistle-blowers may submit the reports anonymously without disclosing their identity. However, proper handling and/or investigation is more difficult, and sometimes impossible, if company does not know the whistle-blower's identity.

If the whistle blower discloses his or her identity, Company will not disclose the whistle blower's identifying information to any individuals who authorized, implicated in the handling and/or investigation of the incident.

Acechem Tanker may, however, disclose without the whistle-blower's consent, his or her name and contact details - or other information likely to lead to identification - to a regulator, law enforcement or other authority required by law, a legal practitioner (for the purpose of obtaining legal advice or legal representation in relation to applicable laws), or as otherwise required by law.

SIGNED

DATE: 25.01.2024


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