ABUSE & HARASSMENT POLICY

Abuse and Harassment Policy (aligned with MLC 2006 Standards)

TOS will treat all complaints of harassment and bullying seriously and in strict confidence. Your senior officer on board and your contact person ashore have been trained in dealing with complaints of harassment and bullying. You may approach or both to report of any incident you have suffered.

TOS considers any complaint of cyber bullying to be a serious issue.

If you do not feel comfortable raising a complaint yourself, you may submit your complaint anonymous via our website.

Remember, it is the victim's perception of any actions that counts. If you feel you have suffered harassment or bullying, TOS will look into the issue raised.

The Board of Directors

Purpose

This policy ensures compliance with the Maritime Labour Convention, 2006 (MLC 2006) by providing a clear and transparent process to address abuse and harassment onboard vessels. It prioritizes the dignity, safety, and well-being of seafarers, fostering a respectful workplace environment.

1. Scope

This policy applies to all TOS personnel onboard, including seafarers, officers, contractors, and visitors. It covers all forms of abuse and harassment, including but not limited to:

- Physical abuse
- Verbal abuse
- Sexual harassment
- Bullying and intimidation
- Discrimination based on race, gender, religion, nationality, or other protected attributes

2. Definitions

Abuse: Any behavior that causes physical or psychological harm
Harassment: Unwelcome behavior that creates a hostile or intimidating environment
Complainant: The individual reporting abuse or harassment
Respondent: The individual accused of abuse or harassment

3. Policy Statement

- TOS is committed to a zero-tolerance approach to abuse and harassment onboard
- All incidents will be investigated promptly, fairly, and confidentially
- Retaliation against complainants or witnesses is prohibited

4. Reporting policies

1. Immediate reporting:
    - Affected individuals are encouraged to report incidents to a designated officer (e.g., Master, Chief Officer, or Designated Person Ashore - DPA) as soon as possible.
2. Confidentiality:
    - Reports will be handled discreetly to protect the privacy of all parties involved.
3. Documentation:
    - Complaints should be submitted in writing, detailing the incident(s), including date, time, location, and parties involved.
4. Anonymous reporting:
    - Anonymous complaints may be submitted via designated channels (www.tospeople.com), though this may limit the investigation's scope.

5. Investigation process

1. Initial assessment:
    - The Master or DPA will review the complaint to determine its validity and immediate risks.
    - If the complaint involves the Master, the investigation will be conducted directly by the company or DPA.
2. Interim measures:
    - If necessary, the accused individual may be reassigned or suspended to prevent further harm during the investigation.
3. Formal investigation:
    - An impartial investigator will gather evidence, interview involved parties, and review relevant documentation.
4. Outcome determination:
    - The investigator will submit a report to the company or Master, recommending appropriate action based on findings.

6. Resolution and disciplinary actions

- Substantiated claims:
  Disciplinary measures may include:
    - Verbal or written warnings
    - Mandatory counseling or training
    - Reassignment or demotion
    - Termination of employment
    - Legal action, if warranted
- Unsubstantiated claims:
  No action will be taken against the accused unless new evidence emerges.

7. Support for complainants

- Access to counseling services or support groups.
- Assurance against retaliation or victimization.
- Assistance in relocation or reassignment, if needed.

8. Training and awareness

- Regular training sessions on recognizing and addressing harassment and abuse.
- Distribution of anti-harassment policies in accessible formats.
- Induction briefings for all crew on expected behavior and reporting mechanisms.

9. Review and continuous improvement

- The policy and policies will be reviewed annually to ensure alignment with MLC 2006 and evolving best practices.
- Feedback from crew members will be solicited to improve the process.

Contact Information for reporting abuse and harassment:

- Onboard contact: Master or Senior Officer on board
- Designated Person Ashore: Responsible TOS consultant
- Confidential Reporting Channel: via email/phone/website www.tospeople.com