



Harassment and Bullying Policy

We are an equal opportunities employer. This means that we will make good faith efforts to comply with the spirit and letter of the equality laws and other laws.

We will promote a good and harmonious working environment in which our employees are treated with dignity and respect. We do not bully them, nor will we discriminate unlawfully against them or harass them on the "equality grounds"; which are related to the gender, sexual orientation, marital or civil partnership status, religious or similar philosophical belief, political opinion, racial or ethnic group, nationality and age.

What is Harassment?

Harassment is unwanted conduct related to the equality grounds which damages, or which is done with the aim of damaging, a person's dignity or of creating an intimidating, hostile, degrading, humiliating or offensive environment for that person.

What is Bullying?

Bullying is similar to harassment in the sense that it is offensive, hostile or oppressive behaviour. The main difference is that bullying doesn't need to be related to the equality grounds, but may be done for other reasons, such as jealousy or personal dislike or revenge or insecurity.

Implications of Harassment & Bullying

Harassment and bullying can damage the health, confidence, morale and performance of employees who are affected by it. Harassment is unlawful under the equality laws. Harassment and bullying may also be civil or criminal offences and may contravene health and safety law.

Quite apart from the legal implications, both harassment and bullying are contrary to the standards of behaviour that we expect of our employees. Both types of behaviour are unacceptable in our workplace and are not permitted or condoned. We will treat such behaviour as misconduct, which may warrant dismissal from employment.

Employees' Rights

Our employees have a right to work in a good and harmonious environment that is free from harassment and bullying and to complain about such behaviour should it occur.

Employees who make complaints, and others who give evidence or information in connection with such complaints will not be victimised (i.e. they will not be discriminated against, harassed or bullied in retaliation for their actions).

Victimisation is also discrimination contrary to the equality laws and this policy. We will treat it as misconduct, which may warrant dismissal from employment.

Employees' Responsibilities

All our employees must comply with this policy. They must treat each other with dignity and respect. They must not themselves commit any acts of harassment or bullying against any person, such as other crewmembers, shore personnel or our customer representatives. Such behaviour will not be permitted or condoned. We will treat it as misconduct, which may warrant dismissal from employment.

All our employees should discourage harassment and bullying by making it clear that they find such behaviour unacceptable and by supporting co-workers who suffer such treatment. Any employee who is aware of any incidence of harassment or bullying should alert the Master or department head to enable us to deal with it.

Employer's Responsibilities

We continuously make good faith efforts to implement this policy. The main responsibility for this is with the MLC person of trust (POT) **Mr. Schepers, Conrad** (direct line: +49-175-5905652, e-mail: c.schepers@mcc-germany.de).

However, onboard the fleet, Masters also have a special responsibility for enforcing this policy on a day-to-day basis, especially in setting a good example for other employees to follow and for intervening where necessary to protect and reassure employees.

To implement this policy, we will:

- Provide all employees crew with a copy of this policy and explain it to them;
- Ensure that all complaints of harassment and bullying are dealt with promptly, seriously and confidentially as well as in accordance with our internal complaint procedure;
- Set a good example by treating employees with fairness, dignity and respect;
- Be alert to unacceptable behaviour and take appropriate action to stop it;
- Monitor all incidents of harassment and bullying and review the effectiveness of this policy periodically.

Haren (Ems), Germany, 11th of December 2018


Mr. Alexander Bölle
(Managing Director)