

# Grievance & Whistleblowing Policy



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<b>Applicable Entities</b>	Seagull Maritime FCZO, Seagull Maritime Malta, Seagull Maritime Nigeria, Seagull Maritime UK, Seagull Offshore

## INTRODUCTION

Seagull Maritime is committed to the highest standards of openness, probity and accountability. This policy provides the procedure and basis for any person to raise a grievance or “whistle blow” accordingly.

## SCOPE OF POLICY

This policy is designed to enable employees of the Company and/or external 3rd parties or persons to raise concerns internally and at a high level and to disclose information which the individual believes shows malpractice or impropriety.

This policy is intended to cover concerns which are in the public interest and may at least initially be investigated separately but might then lead to the invocation of other procedures e.g. disciplinary. These concerns could include but are not limited to:

- ✓ Financial malpractice or impropriety or fraud.
- ✓ Failure to comply with a legal obligation or statutes.
- ✓ Dangers to health, safety, security or the environment.
- ✓ Criminal activity.
- ✓ Human Rights breaches
- ✓ Improper conduct or unethical behaviour.
- ✓ Attempts to conceal any of these.

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## INTERNAL GRIEVANCES OR CONCERNS (WHISTLEBLOWING)

An important aspect of accountability and transparency is a mechanism to enable staff and other members of the Company to voice concerns or grievances in a responsible and effective manner. It is a fundamental term of every contract of employment that an employee will faithfully serve his or her employer and not disclose confidential information about the employer's affairs.

Nevertheless, where an individual discovers information which they believe shows serious malpractice or wrongdoing within the organization then this information should be disclosed internally without fear of reprisal, and there should be arrangements to enable this to be done independently of line management (although in relatively minor instances the line manager would be the appropriate person to be told).

Legal protection is available to employees against being dismissed or penalized by their employers because of publicly disclosing certain serious concerns.

The Company has endorsed the provisions set out below to ensure that no members of staff should feel at a disadvantage in raising legitimate concerns.

It should be emphasized that this policy is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question financial, or business decisions taken by the Company, nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures. Once the "whistleblowing" procedures are in place, it is reasonable to expect staff to use them rather than air their complaints outside the Company.

If an employee is concerned about anything that is happening in the organisation, they should, in the first instance, report this to the Group Compliance Director. If it would be inappropriate to report the matter to the Group Compliance Director, they should contact any manager with whom they feel comfortable discussing the issue.

An employee must reasonably believe that their disclosure is made in the public interest. This does not cover disclosures which are personal only, as opposed to in the wider public interest, for example, a disclosure about a breach of the employee's particular terms and conditions regarding hours or pay.

If an employee is not satisfied with the response that they receive from the organisation, then they are entitled to contact a relevant external body to share the concern. A relevant external body will be one that has expertise in the area of concern. Your compliance department will be able to assist you with identifying a relevant external body if required or you can contact ICOCA who will also provide support.

The media is not a relevant external body. No employee should contact the media to raise a concern.

No employee should subject a colleague to unfavourable treatment because they have disclosed information to a manager or to an external body - this will be dealt with under the organisation's disciplinary procedure.

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## INTERNAL GRIEVANCE PROCEDURE

Most grievances can be resolved quickly and informally through discussion with your manager. If this does not resolve the problem, you should initiate the formal procedure set out below.

This procedure applies to all employees regardless of length of service.

This procedure does not form part of any employee's contract of employment. It may be amended at any time and we may depart from it depending on the circumstances of any case.

### Step 1: Written Grievance

You should put your grievance in writing and submit it to your manager. If your grievance concerns your direct manager, you may submit it to the Group Compliance Director.

The written grievance should set out the nature of the complaint, including any relevant facts, dates, and names of individuals involved so that we can investigate it.

### Step 2: Meeting

We will arrange a grievance meeting, normally within one week of receiving your written grievance. You should make every effort to attend.

You may bring a companion to the grievance meeting if you make a reasonable request in advance and tell us the name of your chosen companion. The companion may be either a trade union representative or a colleague, who will be allowed reasonable paid time off from duties to act as your companion.

If you or your companion cannot attend at the time specified you should let us know as soon as possible and we will try, within reason, to agree an alternative time.

We may adjourn the meeting if we need to carry out further investigations, after which the meeting will usually be reconvened.

We will write to you, usually within one week of the last grievance meeting, to confirm our decision and notify you of any further action that we intend to take to resolve the grievance. We will also advise you of your right of appeal.

### Step 3: Appeals

If the grievance has not been resolved to your satisfaction you may appeal in writing to the Group Compliance Director, stating your full grounds of appeal, within one week of the date on which the decision was sent or given to you.

We will hold an appeal meeting, normally within two weeks of receiving the appeal. This will be dealt with impartially by a [more senior] manager who has not previously been involved in the case. You will have a right to bring a companion.

We will confirm our final decision in writing, usually within one week of the appeal hearing.

There is no further right of appeal.

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## SAFEGUARDS

### Protection

This policy is designed to offer protection to those employees of the Company who disclose such concerns provided the disclosure is made in good faith and/or in the reasonable belief of the individual making the disclosure that it tends to show malpractice or impropriety and if they make the disclosure to an appropriate person (see below).

It is important to note that no protection from internal disciplinary procedures is offered to those who choose not to use the procedure. In an extreme case, malicious or wild allegations could give rise to legal action on the part of the persons complained about.

## CONFIDENTIALITY

The Company will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

## ANONYMOUS ALLEGATIONS

This policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible, but they may be considered at the discretion of the Company.

In exercising this discretion, the factors to be considered will include:

- ✓ The seriousness of the issues raised.
- ✓ The credibility of the concern
- ✓ The likelihood of confirming the allegation from attributable sources.

## UNTRUE ALLEGATIONS

If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. In making a disclosure the individual should exercise due care to ensure the accuracy of the information. If, however, an individual makes malicious or vexatious allegations, and particularly if he or she persists with making them, disciplinary action may be taken against that individual.

## EXTERNAL GRIEVANCES OR CONCERNS

Any stakeholder, 3rd party or individual who suspects or considers that Seagull Maritime may be involved in malpractice or impropriety, may be in breach of government or industry legislation or any other matter they deem worthy of concern is able to report these concerns directly to Seagull Maritime in line with this policy.

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## REPORTING

Seagull Maritime will safeguard individuals who make disclosures in good faith. All disclosures will be managed appropriately and in confidence.

All Grievances can be sent to [compliance@seagullsecurity.com](mailto:compliance@seagullsecurity.com). Calls and emails can be anonymous, and every reasonable effort will be made to protect the identity of the caller. The compliance email address is directed to one senior staff member with the responsibility for reviewing grievances.

Alternatively, grievances may be sent directly to the ICoCA. For details of this process please go to: <https://icoca.ch/registering-a-complaint>

## OUR COMMITMENT

Seagull Maritime undertakes to:

Acknowledge receipt of and respond to grievances no later than within 5 working days of receipt.

Investigate allegations promptly, impartially and with due consideration to confidentiality.

Keep records about any such allegations, findings or disciplinary measures. Except where prohibited or protected by applicable law, such records will be made available to a Competent Authority on request.

Cooperate with official investigations, and not participate in or tolerate from their Personnel, the impeding of witnesses, testimony or investigation.

Take appropriate disciplinary action, which could include termination of employment in case of a finding of such violations or unlawful behaviour.

Ensure that their Personnel who report wrongdoings in good faith are provided protection against any retaliation for making such reports, such as shielding them from unwarranted or otherwise inappropriate disciplinary measures, and that matters raised are examined and acted upon without undue delay.

## ACKNOWLEDGEMENT

We will acknowledge receipt of your grievance or complaint within 5 working days of receipt.

## RESOLUTION

Dependent on the nature and detail of the complaint, we will seek to resolve your complaint or grievance and provide you with detailed feedback on any actions we have taken or reasoning behind any action not taken within 30 days of receipt of the grievance or complaint.

Should the issue require further investigation and will not be resolved in this timeframe, Seagull Maritime commit to providing timely updates within the above timelines and clear, definitive timelines to you.

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## REPRISAL OR DISCRIMINATION

No reprisal or retaliatory action will be taken against any employee for raising concerns under this policy. The Company is committed to investigating, addressing and responding to the concerns of employees and to taking appropriate corrective action in response to any violation.

A handwritten signature in black ink, appearing to read "Darren Watts".

Darren Watts

**Group Compliance Director**

02/04/2026