

Maritime Labour Convention, 2006

Declaration of Maritime Labour Compliance – Part II

Measures adopted to ensure ongoing compliance between inspections

Name of Ship	IMO Number	Gross tonnage

The following measures have been drawn up by the shipowner, named in the Maritime Labour Certificate to which this Declaration is attached, to ensure ongoing compliance between inspections:

(State below the measures drawn up to ensure compliance with each of the items in Part I)

1. Minimum age (Regulation 1.1) ☒
- No person below the minimum age of 18 shall be employed or engaged or work on a ship.

Seafarer age verification is conducted prior to employment and onboard by the Master, to verify that no one under the age of 18 is employed.

The Manning Agent provides the Company with confirmation regarding the age of all seafarers.

Annual internal audits are conducted to verify conformance with these processes.

References:

MLC Compliance Booklet para 3.1
UMMS/Ch.6.1.3 Resources
Form C 001 Crew List
Form C 002a Seagoing Personnel Application
Form A 002 Company's Internal Audit
Form A 003 Manning Agent Audit
Form A 004 Ship's Internal Audit Checklist

2. Medical certification (Regulation 1.2) ☐
- Medical fitness of seafarers is ascertained by the use of the ILO/WHO Guidelines for Conducting Pre-sea and Periodic Medical Fitness Examinations for Seafarers and with Flag State requirements.

Every seafarer shall, prior to beginning work on a ship, hold a valid medical certificate issued by a duly qualified medical practitioner recognized by the competent authority, attesting that the seafarer is medically fit to perform the duties that he is to carry out at sea.

Upon arrival onboard, the Master or designated Officer checks the validity of the seafarers' medical certificates and, where relevant, colour blindness certificates.

The IMS establishes the criteria for checking the validity of medical certificates, and procedures with respect to certificates that may become out of date during the voyage.

Urgent cases of seafarers joining a vessel without a valid medical certificate are also addressed. A procedure is also available for seafarers that have been refused a certificate or have had a limitation imposed on their ability to work.

References:

MLC Compliance Booklet para 3.2

UMMS/Ch.6.1.2 Responsibilities

UMMS/Ch.6.1.7 Recruitment and Selection of Seafarers

UMMS/Ch.6.1.7.4 Medical Examinations

Form C 001 Crew List

Form C 002a Seagoing Personnel Application

Form A 002 Company's Internal Audit

Form A 004 Ship's Internal Audit Checklist

3. Qualifications of seafarers (Regulation 1.3) ☒

As part of its IMS, the Company has procedures for checking the validity of appropriate certificates and/or dispensations as required by the STCW Convention, as well as the qualifications of seafarers providing medical care onboard and of ship's cooks or catering personnel.

The Crew Department ensures that all contracted seafarers have the appropriate qualifications and are holding valid and authentic certificates, in accordance with STCW and Company's additional requirements.

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The Master is also responsible for ensuring that records of all qualifications for personnel onboard are valid and available at all times.

In accordance with standing orders, personal safety familiarisation and ship specific familiarisation are given to each seafarer upon joining the ship and before commencing their duties.

References:

MLC Compliance Booklet para 3.3

UMMS/Ch.6.1.2 Responsibilities

UMMS/Ch.6.1.7 Recruitment and Selection of Seafarers

UMMS/Ch.6.1.8 Briefing and Pre-joining Familiarization

UMMS/Ch.6.1.10.1 Familiarization Procedures

UMMS/Ch.6.1.12 Training

UMMS/Ch.6.1 APPENDIX II Minimum Experience Requirements

UMMS/Ch.6.1 APPENDIX III Certificates and Other Documentation Requirements

UMMS/Ch.6.1 APPENDIX IV Senior Officers Familiarisation/Briefing Periods

Form C 001 Crew List

Form C 008a Deck Officers Familiarization Checklist

Form C 009a Engine Officers Familiarization Checklist

Form C 010 Ratings Familiarization

Form C 011a Master Familiarization

Form C 012a C/E Familiarization

Form C 004 Briefing of Masters and Senior Officers

Form C 014 Onboard Safety Training Program

Form A 002 Company's Internal Audit

Form A 004 Ship's Internal Audit Checklist

4. Seafarers' employment agreements (Regulation 2.1) ☒

Prior to joining the ship, the Company or its Manning Agencies issue each seafarer with a signed copy of the Seafarers' Employment Agreement (SEA), compliant with national regulations. A signed original is held by the Company and by the seafarer.

The SEA (in the English language) is also available onboard for seafarers to review their conditions of employment.

Each seafarer's job description is defined. The job descriptions are available onboard the ship and are provided to the Manning Agency.

Some seafarers onboard the ship may be covered by Collective Bargaining Agreements (CBAs). A copy of the CBA is available onboard.

The Company has a procedure for ensuring that the provisions of any applicable CBA conform to the relevant SEA, details of which are kept with the IMS.

Sign-off arrangements and repatriation, at the end of a voyage or term of employment, are defined. Financial security to ensure that seafarers are duly repatriated (e.g. the P&I Certificate of Entry) is available onboard.

Annual leave calculations, health and security protection benefits, termination processes, conditions of employment, and repatriation are described in the agreements. Flag State regulations are regularly reviewed to verify that seafarer payments meet or exceed minimum wage requirements.

Each crew member has a record book to provide proof of employment onboard the ship.

The effectiveness of the SEA is assured in case of piracy and/or armed robbery against the ship.

References:

MLC Compliance Booklet para 3.4

UMMS/Ch.6.1.2 Responsibilities

UMMS/Ch.6.1.9 Travel Documents and Records

Form C 005 Policy Acceptance

Seafarer's Employment Agreement

Form A 002 Company's Internal Audit

Form A 004 Ship's Internal Audit Checklist

5. Use of any licensed or certified or regulated private recruitment and placement service (Regulation 1.4) ☒

Flag State regulations regarding recruitment are monitored. Flag State approved training is provided to the seafarers. Medically fit seafarers are employed irrespective of age, sex, religion, or race.

Manning Agencies used by the Company are licensed by the competent authority in the nations concerned. Where relevant, documentary evidence including evidence of

inspections by the Flag State, RO or the Company to confirm that manning agencies in nations not party to the MLC or which have not been licensed by the competent authority are in compliance with the Convention, are kept with the onboard IMS documentation.

Personnel files are maintained for each seafarer. Seafarers' rights to privacy are protected. Manning Agents provide documentation for each seafarer prior to joining.

Internal audits of the Company and Manning Agents are conducted to verify that requirements are being met.

Seafarers, prior to or in the process of engagement, are informed about their rights under the seafarers' recruitment and placement services' system of protection, to compensate seafarers for monetary loss that they may incur as a result of the failure of the recruitment and placement service or the relevant shipowner under the seafarers' employment agreement to meet its obligations to them.

References:

MLC Compliance Booklet para 3.5

UMMS/Ch.6.1.7.2 Recruitment Through Company Approved Manning Agencies

Form A 003 Manning Agent Audit

Form C 005 Policy Acceptance

Form C 007 Instructions to Manning Agent

Form A 002 Company's Internal Audit

Hours of work or rest (Regulation 2.3)

Working arrangements regarding hours of work and rest periods for all seafarers are defined.

The Company has elected to apply the minimum hours of rest which is in line with the STCW and MLC 2006 requirements.

The official schedule or table of work/rest hours at sea and in port is posted in accessible places.

Copies of individual seafarers' rest hour records are given to all seafarers onboard, and checked and signed by each seafarer at least once a month.

Any deviations related to the above requirements shall be reported as a non-conformity in order to be evaluated, assessed and take any corrective / preventive actions as necessary.

Flag State's regulations regarding hours of work and rest are monitored by the DPA.

References:

MLC Compliance Booklet para 3.6

UMMS/Ch.7.11 Fatigue

Form SICD-101 Record of Hours of Rest

Form SICD-100 Table of Shipboard Working Arrangements

Form A 004 Ship's Internal Audit Checklist

7. Manning levels for the ship (Regulation 2.7) ☒
It is Company's Policy for all fleet vessels to be manned with adequate number of seafarers in excess of those requested by the Safe Manning in order for a better performance of vessels' operations to be achieved.

The Safe Manning Certificate approved by the Flag State is kept with the onboard IMS documentation.

Master and Senior Officers assess seafarers' fatigue and provide feedback to the Company, so that appropriate corrective actions can be implemented.

References:

MLC Compliance Booklet para 3.7
UMMS/Ch.6.1 Resources and Personnel (Crew)
Form A 002 Company's Internal Audit
Form A 004 Ship's Internal Audit Checklist

8. Accommodation (Regulation 3.1) ☒
Seafarer accommodation are designed and constructed in accordance with Flag State requirements for size of rooms (i.e., floor space, head room, number of berths, etc.), heating and ventilation, noise and vibration, sanitary facilities, lighting and hospital accommodations.

The hospital accommodation shall always be clean, locked and used only for medical purposes. The sanitary facilities provided for the hospital is used exclusively by the occupants of the hospital. When not in use, the hospital is inspected weekly and secured to ensure this.

High noise areas are distinctively marked and seafarers are made aware of these areas during the familiarisation process.

In case of high levels of noise and/or vibration in the accommodation, catering and recreational facilities, the ships management investigates the reason and initiates appropriate measures to reduce the noise / vibration levels.

The Company's established procedures for planned, scheduled and internal audits and weekly Master's inspections ensures that the accommodation, recreational and catering facilities meet the requirements of MLC on health and safety protection and accident prevention, with respect to preventing the risk of exposure to other ambient factors and chemicals onboard.

Ventilation, heating, and air conditioning systems are regularly maintained and cleaned in accordance with manufacturer's instructions, so as to maintain the atmosphere within the accommodation at a satisfactory temperature compared to the outside temperatures likely to be experienced.

Where the ventilation system requires the windows, doors or port holes to be kept open, ships calling mosquito infested ports are provided with equipment and /or arrangements to minimize the exposure of crew to mosquitoes.

Lighting of the accommodation is also checked during the weekly inspections by the Master or the person designated by the Master, to ensure that it is safe, protected and sufficient in accordance with flag state standards.

Wash Basins are provided with hot and cold potable water, which is checked during weekly inspections.

Laundry facilities consisting of at least one washing machine for clean clothes, one for working clothes, with adequate drying facilities are provided on the ships and are regularly inspected and maintained in safe and hygienic condition.

Mess rooms are furnished taking into account the number of seafarers likely to use them, with due respect to their religious and social practices.

Separate sleeping room facilities for male and female seafarers are provided, if required.

In accordance with standing orders, the accommodation, mess rooms, sanitary facilities and hospital accommodation are weekly inspected by the Master or a designated Officer. The results of the inspections, and any deficiencies and corrective actions taken, are recorded in documents kept with the onboard IMS.

References:

MLC Compliance Booklet para 3.8
UMMS/Ch.2 APPENDIX IV Health & Hygiene Policy
UMMS/Ch.7.10.6 Health and hygiene procedures onboard
UMMS/Ch.7.10.6.4 Galley hygiene and housekeeping
UMMS/Ch. 15 New Acquisitions and Shipbuilding Projects
Form A 004 Ship's Internal Audit Checklist
Form S 001 Health, Safety, and Hygiene Inspection Checklist
MoC for vessel acquisition

9. On-board recreational facilities (Regulation 3.1) ☒
- Appropriate seafarers' recreational facilities, amenities and services, including social connectivity, as adapted to meet the special needs of seafarers who live and work on ships, are provided on board for the benefit of all seafarers. The Company ensures that recreational facilities are provided at no cost to the seafarers. Internet access and reasonable access to ship-to-shore telephone communications, where available, is provided to seafarers with charges, if any, being reasonable in amount.

Recreational facilities are located as far removed from excessive noise and vibration as is practicable. Weekly sanitary inspections of the accommodation also include recreational areas.

All ships are provided with a book-case and facilities for reading, writing and, where practicable, without cost to the seafarers, other recreational facilities, such as a smoking room, television, sports equipment, facilities for swimming, a library, facilities for recreational handicrafts and access to internet access and to ship-to-shore telephone communications, which charges, if any, being reasonable in amount.

The Chief Officer is responsible to monitor and report the condition of all recreations means on the vessel at least once a week.

References:

MLC Compliance Booklet para 3.9
UMMS/Ch.2 APPENDIX IV Health & Hygiene Policy
UMMS/Ch.6.1.22.1 Senior Officers' Spouse Visitation Policy
Form A 004 Ship's Internal Audit Checklist
Form S 001 Health, Safety, and Hygiene Inspection Checklist

10. Food and catering (Regulation 3.2) ☒

Seafarers on board during the period of their employment are provided with a sufficient supply of drinking water, and of food of suitably nutritive quality, balance and variety taking due regard of the number of seafarers on board, their religious requirements, custom and habit (cultural practices), which is properly and hygienically prepared, dispensed and served at no cost to the seafarers.

In accordance with standing orders, food preparation only takes place in the galley, which conforms to national regulations.

Ship's cooks and catering staff are qualified in accordance with national regulations. Documentation concerning qualifications is kept with the onboard IMS.

The galley, food storage areas, quantity, nutritional value, quality and variety and supplies of food and water are inspected by the Master or a designated Officer at weekly intervals, with particular reference to hygiene. The results of the inspections, and any deficiencies and corrective actions taken, are recorded in documents kept with the on board IMS.

The Company has established that potable water tanks should be opened up, emptied, ventilated and inspected annually. Procedures on potable water are fully described on the MLC Compliance Booklet.

References:

MLC Compliance Booklet para 3.10
UMMS/Ch.2 APPENDIX I Safety policy
UMMS/Ch.2 APPENDIX II Quality Policy
UMMS/Ch.2 APPENDIX III Environmental Policy
UMMS/Ch.2 APPENDIX IV Health & Hygiene Policy
UMMS/Ch.3.3.2 Ships' Functions/Job Descriptions
UMMS/Ch. 6.1 – Appendix III
UMMS/Ch.7.10.6.3 Catering Department
UMMS/Ch.7.10.6.4 Galley hygiene and housekeeping
UMMS/Ch.7.10.6.5 Fresh Water
Form A 004 Ship's Internal Audit Checklist
Form S 001 Health, Safety, and Hygiene Inspection Checklist
Form C 010 Ratings Familiarization

11. Health and safety and accident prevention (Regulation 4.3) ☒

Health and safety and accident prevention policies and programmes, including risk evaluation, are covered by the IMS. This is subject to internal and external audits and

certification as required by the IMO ISM Code.

Occupational accidents are recorded within the IMS and the ship's official log, and reported to the DPA.

In accordance with the IMS, a Permit to Work system is in operation.

A structured training programme is implemented to train the crew in safe working practices and increase their awareness of hazards at the work place.

In accordance with standing orders and the IMS, all necessary, appropriately-sized Personal Protective Equipment (PPE) is always provided and must be worn by crew members when required.

A formal corrective/preventive action system is established to identify areas of nonconformity and for recommending changes to the management system affecting safety and environmental protection.

Procedures are established for a Safety Committee to be formed onboard that effectively addresses the health and safety matters. Minutes can be found with the onboard IMS documentation. Issues identified, including any issues that cannot be immediately resolved, are reported to the Master and the DPA.

Personnel records are maintained on each seafarer that includes training and medical history. These records are maintained in a confidential manner shore-side. Various publications and informational literature on health and safety are provided to the ships.

Internal audits are conducted to ensure conformance with requirements.

The Company has in place a 'Harassment and Bullying' policy, and implements onboard programmes for the elimination of harassment and bullying, taking into consideration the latest version of the "Guidance on eliminating shipboard harassment and bullying" (published by the International Chamber of Shipping and the International Transport Workers' Federation). The Company promotes inspecting, reporting, investigating and correcting problems arising from harassment and bullying.

References:

MLC Compliance Booklet para 3.11
UMMS/Ch.2 APPENDIX I Safety Policy
UMMS/Ch.2 APPENDIX XII - Harassment & Bullying Policy
UMMS/Ch.3.3.2 Ships' Functions/Job Descriptions
UMMS/Ch.3.4.3.1 Safety and Environmental Committee
UMMS/Ch.7.9 Procedures for Safe Work Performance
UMMS/Ch.7.9.3 Permit-to-work System
UMMS/Ch.7.9.4 Entry into Enclosed Spaces
UMMS/Ch.7.9.12 Working Overside or Aloft
UMMS/Ch.7.9.25 Personal Protective Clothing and Equipment
UMMS/Ch.8 Emergency Preparedness

UMMS/Ch.9 Reporting, Root Cause Analysis & Investigation of N/Cs, Incidents and Near Misses

UMMS/Ch.14 Risk Assessment (RA) and Risk Management (RM)

Form P 001 Enclosed Space Entry Permit

Form P 002 Hot Work Permit

Form P 003 Cold work entry permit

Form P 005 Electrical Work Permit

Form P 007 Working over-side or aloft

Form NCR 002 N/C Near Miss Report

Form NCR 003 Incident Investigation Report

Form NCR 004 Personal Injury / Occupational Disease Report /MLC

Form A 004 Ship's Internal Audit Checklist

Form S 001 Health, Safety, and Hygiene Inspection Checklist

Form S 002 Medical Report & MLC

Form Z 001 Safety & Environmental Committee Meeting

Form MI-109 Report of Marine Incident or Casualty

12. On-board medical care (Regulation 4.1)



The rights of seafarers to free medical care and health protection are set out in the SEA, copies of which are kept with the onboard IMS documentation.

Seafarers designated to provide medical care are qualified in accordance with STCW standards and undergo refresher training every five (5) years.

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Hospital facilities are on each ship and outfitted in accordance with Flag State requirements regarding medicines and medical supplies. The vessel is provided with a certified Medical Chest in compliance with Flag requirements and inspected annually by a responsible persons designated by the competent authority for proper labelling, expiry dates and conditions of storage.

Records of Flag State inspections of the chest are kept with the onboard IMS documentation.

Medical evacuation and other emergency situations are included in emergency response plans onboard. Medical guide publications are provided to the ships accordingly.

The Medical Report Form, as required by the Flag State, shall be used to facilitate the exchange of medical and related information concerning individual seafarers between ship and shore in cases of illness or injury, with completed report forms being kept by the Master to ensure confidentiality.

The medical log is used for recording all medical treatment provided onboard and ashore.

Procedures are established for obtaining radio medical advice.

All relevant publications required to access contact details of coast stations through which radio medical advice can be obtained are provided onboard and regularly updated.

Medical Assistance onboard for Medical Emergencies

Country / Place GREECE

RED CROSS CONTACT GREEK RED CROSS

Telephone / fax / Numbers

Phone: +30-210-523-0880

Phone: +30-210-523-7515

Phone: +30-210-361-3848

ADDITIONAL SOURCES FOR MEDICAL ASSISTANCE CAN BE FOUND IN THE MEDICAL SECTION OF THE INTERNATIONAL CODE OF SIGNALS.

Where a seafarer has died during the ship's voyage, the body or ashes of the seafarer are repatriated in accordance with the wishes of the seafarer or their next of kin, as appropriate, and as soon as practicable.

References:

MLC Compliance Booklet para 3.12

UMMS/Ch.7.10.16 Medical Attendance of Crewmembers

Form S 002 Medical Report & MLC

Form S 003 Medicine Log

Form Z 001 Safety & Environmental Committee Meeting

Form MI-105MR Injury and Illness Medical Record

Form MI-109-1 Report of personal injury or loss of life

Form MI-105G Ship Master's Report Form

13. On-board complaint procedures (Regulation 5.1.5)

A formal complaint process is established onboard for fair and expeditious handling of the seafarer complaint alleging breaches of the requirements of MLC, including the seafarer's right to be accompanied or represented during the complaint procedure, while ensuring that seafarers are not victimised for lodging complaints.

In accordance with standing orders, all seafarers are provided with a copy of the onboard complaint procedures in the working language of the ship.

The Contact details of Company's representative and Flag Administration for registering a complaint are provided to each seafarer and posted onboard. Blank forms of the Complaint Report are available in special boxes onboard.

Target dates for resolution are established.

The Master has been given clear instructions and guidance to ensure seafarers are not victimized for reporting complaints.

References:

MLC Compliance Booklet para 3.13

Form MLC 001 Complaint Procedure and Contact Points (contact points will be plasticized and posted)

Form MLC 002 Onboard Complaint Report (blank forms will be available onboard)

Form MLC 003 Registry of Complaints and Follow Up

14. Payment of wages (Regulation 2.2)