

	ELBANA DI NAVIGAZIONE S.P.A.	HSSE Department	Page: 1	of: 1
		COMPANY POLICY WHISTLEBLOWING POLICY		Revision: 2
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Elbana di Navigazione is committed to conducting all aspects of her business with honesty and integrity, and to providing a working environment where high standards of ethical, moral and legal business conduct are encouraged and safeguarded. The Company is confident in the comprehensiveness and effectiveness of its Management System and its role in ensuring the safety of people and the environment, as well as in the effectiveness of its existing reporting channels.

Furthermore, the Company is committed to a workplace characterized by open communication regarding its business practices. As such, this Whistleblowing Policy has been developed to provide a means for employees and seafarers to raise concerns that cannot be, or have not been, adequately addressed via usual reporting channels without fear of retaliation or discrimination over such reports made in good faith.

The Whistleblowing Policy addresses concerns related to issues of public interest, including, but not limited to, the following:

- A criminal offence;
- Non-compliance with legislation and/or Company procedures, particularly in relation to health and safety at work or environmental protection;
- Dishonesty, either verbal or written (including intentionally maintaining official log books or records inaccurately);
- Malpractice or unethical conduct;
- Financial or non-financial misadministration or malpractice or impropriety or fraud;
- A safety and/or security risk or hazardous condition that may impact the life or health of individuals on board the vessel;
- Miscarriages of justice; and
- The deliberate concealment of any of the above.

If an employee has a legitimate concern in (and holds reasonable belief that the information he has relates to) one of the above areas and wishes to raise the concern in good faith, it should be raised with the Master, DPA who may be able to agree a way of resolving the concern quickly and effectively.

Although the Company's Top Management maintains an open-door policy endeavouring to address individuals' concerns internally, a concern can also be raised through the following channels:

Employees may report violations in writing via the dedicated link "whistleblowing" available on Elbana di Navigazione website (www.ebanadinavigazione.it). Employees may choose to be anonymous. Employee information will be kept strictly confidential, thus there should be no fear of any form of retaliation.

Upon receipt of a report, same will be assessed by the Company's Top Management and an investigation may commence, if deemed necessary. Any victimization of a member of staff who "whistle-blows", or any attempt to deter him from reporting, will be regarded as a serious disciplinary offense and will result in action under the Disciplinary Procedures.

Managing Director

Fabrizio Freschi

Created by: HSSE Department Date: 01 st January 2024	Checked by: Designated Person Ashore Date: 01 st January 2024	Approved by: Managing Director Date: 01 st January 2024	Reference: IMO Resolution A. 741 (18), as amended. Cross reference: SMS Manual
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