

C624 SILVERSEA ONBOARD COMPLAINTS PROCEDURE

At Silversea, we adhere to the Royal Caribbean Group code of business conduct and ethics as well as the Silversea standards of conduct.

In line with this, we work to:

- Put people first
- Achieve excellence together
- Grow with purpose
- Lead with integrity
- Be a force for the greater good

Our aim is to create a healthy, safe, respectful and happy living and working environment onboard, therefore we take any alleged breach of these standards very seriously.

A seafarer right to raise a complaint and the subsequent handling of the complaint by the company are regulated by MLC2006 and by Flag State Administration. For such, seafarers have the right to:

- Be accompanied or represented at any investigation or conciliation by another seafarer of their choice on board the ship.
- Be safeguarded by the company against victimization - disciplinary action may be taken towards any person acting against a seafarer for raising a complaint, by the mean of threats or adverse action.
- Complain directly to the master and/or ship owner and/or competent authorities
- Complain to external authorities

Before embarkation, all crewmembers are provided with the Seafarer's Employment Agreement and the present policy to be downloaded on our welcome page. This procedure and the contact information of the relevant entities it contains are also posted on crew boards and other crew prominent locations and kept up-to-date. This procedure is laid down accordingly to MCL2006 and Flag Administration requirements and is applicable to all Silversea vessels.

Reporting a Concern

If our crew have any concerns with their life or work onboard, the first step is to report this onboard. We always aim to resolve concerns at the lowest level possible:

- Raise any concerns in a timely manner
- If suitable; communicate with the person causing the concern; let them know how their actions make you feel and politely ask them to stop
- If it is not suitable to approach the person causing the concern, or perhaps it is not an individual causing the concern, report to a suitable person. Depending on the nature of the concern, a suitable person to report to onboard may be:

- A Supervisor, Manager or Department Head
- HR Manager
- Staff Captain
- Security Guard or Security Officer
- Medical Centre
- Captain

Raising a Formal Complaint

Any crewmember (onboard or ashore) willing to raise a formal complaint or grievance can do so via one of the following means:

- By filling the Form C625 “Record of Onboard Complaint” and handing it to your onboard HR Manager.
- By contacting the AWARE Compliance and Ethics Hotline¹:
 - Call toll-free below number if you are onboard

NOVA	**88
DAWN	*88
MUSE	*88
SPIRIT	88
MOON	*88
SHADOW	**88
WHISPER	**88
CLOUD	**88
WIND	**88
ENDEAVOUR	No phone – email report only (see below)

- Call toll-free 888-81-AWARE (888-812-9273) if you are ashore
- Online via rclaware.ethicspoint.com
- By contacting via email one of the following : MLC mediator, HRBP, DPA or Deputy DPA

Complaints should be made within 30 days of occurrence. For crewmembers not onboard or who have been terminated, their complaint should be filed within ninety (90) days of sign off or thirty

¹ The Aware Compliance and Ethics Hotline gives you the option to report your complaint anonymously and is available 24/7. An investigation conducted according to Company Policy and MLC2006 / Flag State requirements follows all complaints received.

(30) days from the date the employee knew or should have known of the concern or incident, whichever is longer.

Please ensure that the facts contained in your complaint are truthful and correct to the best of your knowledge. If a complaint is subsequently found to be manifestly vexatious or malicious then, with the agreement of the MLC Mediator, disciplinary action may be brought against the seafarer making the complaint.

The HRM will update you on the status of your complaint if you submitted it via Form C625. If you submitted your complain to the Aware Compliance and Ethics Hotline directly, you will receive a report key and password, which can be used to see your complain report and follow up on your submission.

After receiving and reviewing the complaint, RCG Compliance and Ethics Team assigns an appropriate investigator. As we aim to resolve complaints at the lowest level possible, investigators are usually part of the onboard management, or if required the MLC mediator or HR shore based team. In any case, individuals reported in the complaint cannot be put in charge of the investigation and eventual conciliation, nor have access to the complaint. We aim to resolve complaints within 30 days of reception.

The HR Manager or designee shall keep a log of all Record of Onboard Complaint forms received in Navex Ethic Point. The log should be made available to Flag State inspectors, as well as, authorized internal and external auditors, upon request.

Complaints containing allegations of violation of seafarers' rights (as stated in their employment agreement, by MLC, by Flag State, or by the relevant CBA) must be resolved within 30 days. But, if conciliation acceptable to both parties cannot be reached after 20 days, both parties have a further 20 days to bring the complaint to the attention of the Flag Administration (or an agent appointed by Flag Administration) for them to act as mediator and endeavor to find a solution satisfactory to both parties. Moreover, the person conducting the investigation and conciliation shall make a written report detailing each complaint, the actions taken and the conciliation decisions agreed via Form C625 "Record of Onboard Complaint" . The Master is to countersign each report and sent it to the MLC Mediator. A copy of the report shall be given to the seafarer making the complaint and the final report is to be uploaded in Navex Ethic Point.

Internal Authorities Contact

The onboard HR Manager, or other assigned officer, can provide confidential and impartial advice regarding your complaint and if requested, help you to follow this complaint procedure (including attendance at meetings or hearings). In addition, you can also contact the below:

- The MLC Mediator: silverseamlc@silversea.com
- The Company's Designated Person Ashore and the Deputy DPA: dpa@rccl.com

External Authorities Contact

Crewmembers also have the right to report to an external authority if they wish to. External authorities include but are not limited to:

- The Flag Administration: The Director of Labor, c/o The Bahamas Maritime Authority, Shirlaw Street, P.O Box N-4679, Nassau, Bahamas, email: stcw@bahamasmaritime.com.
- Port State Control Officer
- Representative of a local seafarer labor organization
- ISWAN (International Seafarers Welfare Assistance Network): <http://seafarerswelfare.org/>
- The Seafarers' Administration in their country of employment – please refer to below table².

² Whilst every effort is made to ensure the information below is correct it cannot be guaranteed as details may periodically change. The most recent information and such for non-listed countries is available on the national administration websites via the [ILO MLC database](#))

Country	Administration	Telephone	Email
Bangladesh	Department of Shipping	+880 9555128-9 / +880 2 9513305	info@dos.gov.bd , dosgdgdbd@btcl.net.bd
Bulgaria	General Labour Inspectorate Executive Agency	+359 29885172	secr-glsecretar@gli.government.bg
Bermuda	Department of Maritime Administration	+1441 295 7251	enquiries.bermudashipping@gov.bm
China	Maritime Safety Administration, Shanghai, China	+86 21 6607 2773 (Crew Management Section)	cyc@shmsa.gov.cn
Croatia	Republic of Croatia - Ministry of Maritime Affairs	+385 16169104	igor.butorac@pomorstvo.hr
Estonia	Estonian Maritime Administration - Eesti Veetedeamet	+372 6205665 / +372 6205500	eva@vta.ee / navinfo@vta.ee / eino.ots@vta.ee
France	Service des Affaires Maritimes		
Georgia	Lepi "Maritime Transport Agency"	+995 422 274925 / +995 422 274917 / +995 422 274916	info@mta.gov.ge
Germany	BG Verkehr/Dienststelle Schiffssicherheit	+49 40 361 37213 / +49 40 361 37600	mlc@bg-verkehr.de
Greece	Hellenic Republic Ministry of Shipping, Maritime Affairs and the Aegean Hellenic Coast Guard - Seamen's Labour Directorate	+30 210 419 1442 / +30 210 406 4217 / +30 210 419 1295	dner@yen.gr
India	Shipping Master Mumbai	+91 22 2269 7971 / +91 22 2269 7972	smmumbai@dgshipping.com
Indonesia	Department of Sea Communication	+21 3811308 / +21 3447017	helpdesk@ditlala.org
Ireland	The Marine Survey Office (MSO) of the Irish Maritime Administration (IMA)	+353 1 6620922 / +353 1 6620923 / +353 1 6783440	NMOCireland@dttas.ie chrisreynolds@dttas.ie davemcmlyer@dttas.ie
Italy	Ministry of Transport - Directorate General for the supervision of port authorities, port facilities and maritime transport and inland waterways	+39 6 59084205	dm.genova@pec.mit.gov.it cpgenova@mit.gov.it
Latvia	Maritime Administration of Latvia Primary contact: Arturs Oss Secondary contact: Sigita Lazdane	+371 67062166 / +371 67062101	artirs.oss@lja.lv / lja@lja.lv
Lithuania	Lithuanian Maritime Safety Administration	+370 46 469602	msa@msa.lt
Myanmar	Myanmar Marine Department	+95 1 558904	myanmarine@mptmail.net.mm desdma@mptmail.net.mm
Norway	Norwegian Maritime Authority	+47 5274 5000	post@sdir.no
Pakistan	Government Shipping Office	+92 2199263021 / +92 2199263011	contact@shippingoffice.gov.pk

Philippines	POEA (Phil Overseas Employment Administration)	+63 2 833 6992 / +63 2 5516641 / +63 2 5511560	onboardconci@poea.gov
Poland	Ministry of Maritime Economy and Inland Navigation	+48 22 583 8670	sekretariat_gt@transport.gov.pl
Portugal	Directorate-General of Maritime Authority	+(351)210 984 050 / +(351)210 984 038	Costa.campos@marinha.pt Dgam.scpmh@marinha.pt
Romania	Romanian Naval Authority	+40 241 616 124 / +40 241 616 104	rna@rna.ro
Russia	Ministry of Transport of the Russia Federation(MINTRAS)	+7 495 6261010	info@mintrans.ru
Sri Lanka	Ministry of Ports & Highways	+94 112435127	dmsmos@slt.net.lk
Sweden	Swedish Transport Agency	+46 771 52 00 52	
Switzerland	Trade Union "Nautilus International	+41 61 262 24 24	infoch@nautilus.org
Turkey	Republic of Turkey Ministry of Transport, Maritime	+90 312 203 11 16 / +90 312 203 11 11 (24 hrs)	okm@ubak.gov.tr
UK	UK Maritime and Coastguard Agency	+44 (0) 203 8172543	mlc@mcga.gov.uk
Ukraine	Ministry of Infrastructure of Ukraine	+38 044 351 50 09	portal@mtu.gov.ua

Record of Onboard Complaint

Reference ILO Maritime Labour Convention 2006 Regulation 5.1.5;

[Crew](#) > [1.0 Crewing - Onboard procedures](#) > 1.4 Crew Policies

Name of Complainant:	Rank:
Department:	Supervisor/HOD:
Complaint Made to:	Date of Initial Complaint:
Ship	Master

NOTE: A seafarer making a complaint should refer to the onboard HR and/or to the respective crew representatives and has the right to be accompanied or represented at any investigation or conciliation by another seafarer of their choice on board the ship

Details of Complaint:

Actions Taken	Date Resolved:
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If not resolved –further actions taken

HOD Signature	Seafarers Signature
Master Signature	MLC Mediator Signature

A copy of this report must be given to the seafarer making the complaint.