

## **POLICY STATEMENT**

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## WHISTLEBLOWING POLICY

TMS Cardiff Gas Ltd. 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.

TMS Cardiff Gas Ltd. is confident in the comprehensiveness and effectiveness of its SQEMS and its role in ensuring the safety of people and the environment, as well as in the effectiveness of its existing reporting channels.

TMS Cardiff Gas Ltd. 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);
- Financial or non-financial malpractice or impropriety or fraud; and
- A safety and/or security risk or hazardous condition that may impact the life or health of individuals on board the vessel.

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 or other Company's representative 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 endeavoring to address individuals' concerns internally, a concern can also be raised through the following channels:

E-mail: dpa@tms-cardiffgas.com

Tel.: +30 6956290265

Reports can be made without fear 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.

ORGE KOURELIS

COO