

**APPENDIX P – POLICY AGAINST HUMAN TRAFFICKING**

Diaploous Maritime Services (DMS) strongly supports a work environment that is free from human trafficking and slavery, which includes but is not limited to forced labor, bonded labor and unlawful child labor. DMS being a global organization will not tolerate or condone human trafficking and slavery in any part of our supply chain from internal employees to sub-contractors and agents. This policy is consistent with DMS's Code of Ethics and Business Conduct highlighting our core values, that are to protect and advance human dignity and human rights in all our business practices. DMS employees, contractors, subcontractors, vendors, suppliers, partners and others through whom DMS conducts business must avoid participation in any practice that constitutes trafficking in persons or slavery.

DMS also prohibits employees, subcontractors, subcontractor employees, and agents from engaging in practices relating to trafficking in persons, including:

- 1) Any form of trafficking engagement
- 2) Procuring commercial sex acts
- 3) The usage of forced labor during work of any scope
- 4) Destruction, confiscation, concealment or otherwise denial of access to any individual's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority
- 5) Giving misleading information to an employee during the hiring process. An employee must be fully aware of his responsibilities and no information or responsibility should be concealed.
- 6) Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
- 7) The charge of any recruiting fees to applicants.
- 8) Failing to provide an employment contract, recruitment agreement, or other required work document in writing, in case they are required by law.

Any violations of this policy will result in disciplinary action that may include but is not limited to termination of employment for DMS employees and termination of the relationship with DMS for non-employees. DMS through its whistleblowing policy, prohibits retaliation against any employee who reports any incident of human trafficking, or cooperates with any investigation of such reports. Employees who take part in any retaliation or other violation will be subject to corrective action up to and including termination of employment and reporting to local authorities as appropriate. In addition, all suppliers and agents must comply with this policy and failure to do so will result in actions such as termination of business relationships or even reporting to the local authorities.


DMS will implement this policy through the following:

- Policy is uploaded to our website and is easily accessible to all our employees as well as subcontractors and agents
- Incident reporting

All DMS staff are required to use their best judgement to report any suspected trafficking activity to their manager or other appropriate authority and fill an Incident Report form.

**Preventive Actions**

- The incorporation of a zero tolerance policy for human trafficking. This policy apply to both company operations and the supply chain, including business partners like private employment agencies.
- Increase employee awareness. When it comes to prevention of human trafficking, all employees must first of all pay attention to the causes that lead to the situation of trafficking, such as poverty, unemployment or domestic violence. Should any trafficking suspicion arises, then it must be immediately reported and respective authorities will be informed. Swift action will always be taken to ensure that not only human trafficking is prevented, but also terminate any case of human trafficking detected with cooperation with the responsible authorities.
- Given the enormous complexity of global supply chains, DMS is proactive in managing the increased risk to demonstrate to customers, employees, and communities that we are as committed to this issue as we are to other corporate responsibility goals, and that we are complying with international human rights standards.

Date: <b>July 2019</b>	Position: <b>Director</b>	Name: <b>K. Papaioannou</b>	Signature: 
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