

Rev. 02

Date: 14/01/2025

SML-ADM-POLC-06

HUMAN RIGHT POLICY

Seakey Marine Ltd. (SML) is dedicated to providing Marine Support Services, Marine Logistics Services, and Marine Security Services to the maritime sector. As part of our commitment to upholding human rights, Seakey Marine Ltd. acknowledges and respects the fundamental rights of all individuals, regardless of their position or circumstance.

Seakey Marine Ltd. complies with international law on the protection of human rights, including the United Nations Guiding Principles on Business and Human Rights, the International Code of Conduct Association (ICoCA) Code, and human rights laws established by the Nigerian Constitution and other relevant legislation.

Purpose:

To ensure that Seakey Marine Ltd. respects and upholds the human rights of all clients, employees, and individuals working on our behalf, in compliance with international and national laws and standards.

Scope:

This policy applies to all employees, customers, and stakeholders involved in Seakey Marine Ltd.'s operations, including outsourced security personnel.

This policy outlines our stance on various human rights issues and our commitment to ensuring compliance with international law and standards.

a. Policy on Restriction of Apprehending Persons: Arbitrary restriction of individuals' freedom or apprehension without lawful justification is strictly prohibited. Our Outsourced security personnel are trained to respect the rights and freedoms of all individuals. Apprehension or detention must be lawful and carried out with respect for human dignity.

b. Prohibition of Torture or Other Cruel, Inhuman, or Degrading Treatment or Punishment:

Torture or any form of cruel, inhuman, or degrading treatment is categorically condemned.

All cases must be reported to the appropriate authorities.

c. Prohibition of Sexual Exploitation and Abuse and Gender-Based Violence (SEA-GBV):

SML maintains Zero tolerance for any acts of sexual misconduct or violence.

All Personnel are prohibited from engaging in SEA or GBV.

SML will continue to provide training and re-training on local cultural context, gender dynamics, and relations to all its Personnel's.

SML will adopt a survivor-centered approach for handling SEA and GBV complaints.

SML will ensure Existing support mechanisms for survivors are identified, and immediate and long-term assistance is considered if allegations are substantiated.

All instances of SEA-GBV at the office or vessel must be reported to top management and authorized authorities.

d. Prohibition of Human Trafficking:

Human trafficking in any form is strictly prohibited in SML.

SML ensures that all personnel, including subcontractors and vendors, are treated fairly and are not subjected to coercion or exploitation.

e. Prohibition of Slavery and Forced Labor:

Slavery and forced labor are unequivocally rejected.

All personnel, including subcontractors and vendors, must be treated fairly and not subjected to coercion or exploitation.

f. Prohibition of the Worst Forms of Child Labor:

SML is Committed to protecting children from exploitation and child labor.

SML Adheres to international standards and national laws prohibiting child labor.

Employment of individuals below 18 years is prohibited in SML.

g. Prohibition of Discrimination:

SML shall Foster an inclusive and diverse workplace.

Discrimination based on race, ethnicity, color, gender, age, religion, disability, sexual orientation, or any other characteristic protected by law is prohibited in SML. SML shall guarantee Promotion of equal opportunities for all personnel.

h. Prohibition of Harassment:

SML is Committed to a work environment free from harassment for all personnel, vendors.

Prohibition of verbal, physical, sexual, or psychological harassment.

Training and support mechanisms will be provided to all personnel to prevent and address harassment.

i. Reporting and Enforcement:

Any use of force must be reported to the appropriate authorities and the company top management by the Marine Security Liaison Officer (MSLO) as soon as it is safe to do so.

The MSLO is responsible for providing security briefings on human rights laws to all outsourced security personnel.

Violations of this policy will be thoroughly investigated, and violators will face consequences, including termination of employment or contractual relationship, following a fair hearing.

j. Monitoring and Enforcement:

SML will ensure Regular review of this policies, procedures, and practices to ensure alignment with international standards and best practices.

Any breaches of this policy will be thoroughly investigated, and appropriate disciplinary measures will be taken.

Seakey Marine Ltd. remains steadfast in its commitment to upholding human rights and ensuring that all operations are conducted in a manner that respects and protects the dignity of all individuals.



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Managing Director

14th January 2025

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Date