

Disciplinary Policy:

Introduction:

1. Purpose and Scope

This procedure is designed to help and encourage all Officer Trainees to achieve and maintain standards of conduct, attendance, academic performance and practical training. Both the company Code of Conduct and this procedure apply to all Officer Trainees. The aim is to ensure consistent and fair treatment for all involved with Ship Safe Training Group Ltd (SSTG) training programmes.

2. Principles

2.1 No disciplinary action will be taken against an Officer Trainee until the alleged incident has been fully investigated.

2.2 At every stage in the procedure, the Officer Trainee will be advised in writing of the nature of the complaint against him or her and will be given the opportunity to state his or her case before any decision is made.

2.3 At all stages of the procedure, the Officer Trainee will have the right to be accompanied by a Trade Union representative and or colleague provided they are not a family member.

2.4 No Officer Trainee will have their sponsorship terminated for a first breach of discipline except in the case of gross misconduct, when the penalty will be termination of sponsorship without notice.

2.5 An Officer Trainee will have the right to appeal against any disciplinary decision.

2.6 The procedure may be implemented at any stage if the Officer Trainee's alleged misconduct warrants such action.

3. Procedure

3.1 a) Unsatisfactory Performance

3.1.1 In cases of unsatisfactory performance, an Officer Trainee may be given an Improvement Note. This will set out the issue of performance, the improvement that is required, the timescale for improvement and any counselling, guidance and or additional training that the SSTG feels appropriate to aid individual improvement. A copy of the Improvement Note will be filed on record but will be disregarded for disciplinary purposes after six months, subject to achievement and sustainment of satisfactory performance.

3.1 b) Stage One: Misconduct: First Written Warning

3.1.2 If the conduct of an Officer Trainee does not meet acceptable standards or for failure to improve performance following the issue of an Improvement Note, the individual may be issued with a First Written Warning. This will set out the nature of the misconduct and the change in conduct or performance required. A copy of the First Written Warning will be filed on record but will be disregarded for disciplinary purposes after nine months subject to achievement and sustainment of satisfactory conduct or performance.

3.2 Stage 2: Final Written Warning

3.2.1 Failure to improve conduct or performance in response to the procedure so far, a repeat of misconduct for which a warning has previously been issued, or a first instance of serious misconduct or serious poor performance, may result in the Officer Trainee being issued with a Final Written Warning. This will give details of the complaint, the improvement required and the timescale. It will also warn that failure to improve may lead to termination of sponsorship and will refer to the right of appeal. A copy of this Written Warning will be filed on record but will be disregarded for disciplinary purposes after twelve months subject to achievement and sustainment of satisfactory conduct or performance, although it should be noted that dependent upon the nature of the misconduct, this period can be extended at the discretion of the company.

3.3 Stage 3: Termination of Sponsorship

3.3.1 Failure to meet the requirements set out in a Final Written Warning or offence under gross misconduct will normally lead to the Termination of Sponsorship. All decisions to terminate sponsorship will be taken by an SSTG Senior Manager. The Officer Trainee will be provided, as soon as reasonably practicable, with written reasons for the termination of sponsorship, including the date on which the sponsorship will terminate, and the right of appeal. The decision to terminate sponsorship will be confirmed in writing.

3.4 Gross Misconduct

3.4.1 Offences under this heading are so serious that an Officer Trainee who commits them will normally have their sponsorship terminated immediately. In such cases, SSTG reserves the right to terminate sponsorship without notice of termination.

3.4.2 The following list provides examples of offences which are normally regarded as Gross Misconduct:

- Theft, fraud, deliberate falsification of records or any other form of dishonesty.
- Wilfully causing harm or injury to another person, physical violence, bullying or grossly offensive behaviour.
- Deliberate damage to Company property including Academic Institutions, Vessels and the SSTG.
- Incapability through alcohol or being under the influence of illegal drugs.
- A serious breach of health and safety rules.

- Serious act of insubordination.
- Harassing or victimising another person on the grounds of race, colour, ethnic or national origin, nationality, religion or belief, sex, sexual orientation, gender reassignment, marital status, pregnancy, maternity, age and/or disability.

(The above is intended as a guide and not an exhaustive list).

3.4.3 Individuals, who are accused of an act of Gross Misconduct, may be suspended from their Academic Institution and or Vessel, normally for no more than five working days, whilst the alleged offence is investigated. If, on completion of the investigation and, where appropriate, the full Disciplinary Procedure, the SSTG is satisfied that Gross Misconduct has occurred, the SSTG reserves the right to terminate sponsorship without notice of termination.

3.5 Appeals

3.5.1 An individual who wishes to appeal against a disciplinary decision must do so in writing within five working days. All individuals will be given the right to be accompanied at an appeal hearing by a Trade Union representative or a colleague, provided they are not a family member.

3.5.2 A Senior Manager from SSTG will hear all appeals and will review any disciplinary penalties imposed at the hearing, however this will not be the same Senior Manager that made the original disciplinary decision.

3.5.3 Following the appeal the individual will be informed in writing of the result. The SSTG's decision on an appeal will be final.

4. Collective Clause

4.1 This Disciplinary Procedure can either form a standalone process or work in tandem with the appropriate Disciplinary Procedure and Code of Conduct from the Officer Trainee's Academic Institution and or Sponsoring Company.

4.2 Accordingly SSTG can undertake its own independent investigation based on the Officer Trainee's performance and or misconduct with reference to the Officer Trainee's Academic Institution and or Sponsoring Company.

4.3 Accordingly following on from an investigation, SSTG can instigate its own disciplinary hearing linked to any breach of conduct and or poor performance that has previously been dealt with by the Officer Trainee's Academic Institution or Sponsoring Company. Furthermore the SSTG may take appropriate action on cumulative incidents occurring at the Officer Trainee's Academic Institution or Sponsoring Company, relating to any stage of the Disciplinary Process up to and including termination of sponsorship.

4.3.1 For example: If an Officer Trainee receives a Written Warning at his or her Academic Institution and subsequently receives a Written Warning on board his or her Sponsoring Vessel, albeit for different breaches of the Code of Conduct, SSTG may invoke its own Disciplinary Procedure resulting in a further and possibly more serious disciplinary action.

5. Disciplinary Process

The Disciplinary Process aims to provide a clear and transparent framework to deal with difficulties which may arise as part of the working relationship between Officer Trainees and their Academic Institution, Sponsoring Company and or SSTG. The Process is necessary to ensure that all individuals, in similar circumstances are treated fairly and reasonably.

5.1 When a disciplinary issue arises within the Officer Trainee's Academic Institution, individuals are required to comply with the Academic Institution's Disciplinary Process and appeals procedure. A copy of the process will be available from the Academic Institution.

5.2 When a disciplinary issue arises whilst the Officer Trainee is on board a Vessel, the individuals are required to comply with the Disciplinary Process applying on that Vessel. A copy of the process will be available to the Officer Trainee from the Master or Designated Shipboard Training Officer.

5.3 For any disciplinary issue that arises while the Officer Trainee has an active "Training Agreement" with the SSTG, the SSTG reserves the right to investigate and / or hold a disciplinary hearing based upon the following Disciplinary Process:

5.3.1 Investigation: When an alleged disciplinary issue occurs, SSTG will conduct an Investigation to establish the facts of the case and the potential for disciplinary action. On completion of the investigation, SSTG will make a decision based on the evidence (if any) as to whether there is the need for disciplinary action. If there is a disciplinary case to be brought against an Officer Trainee, the Trainee Officer will be informed in writing and invited to a disciplinary hearing.

5.3.2 Hearing: Prior to the meeting, the Officer Trainee is to be presented with the Investigation Report and any supporting material (i.e. witness statements) in order to prepare his or her case.

5.3.2.1 All Officer Trainees are entitled to be accompanied to a disciplinary hearing by a Trade Union representative or colleague, provided they are not a family member.

5.3.3 Decision: After the hearing, the SSTG will decide on the appropriate action to be taken and will inform the Officer Trainee accordingly. Please see clauses 3.1 to 3.3.

5.3.4 Appeals: Officer Trainees may appeal against a disciplinary decision. Please see clause