

# ON BOARD COMPLAINT PROCEDURE

French version PR-HVL-RES003F

<b>Purpose</b>	<ul style="list-style-type: none"> <li>In compliance with MLC 2006 convention this procedure is designed to ensure of fair, effective and expeditious handling of seafarer complaints when alleging breaches of convention requirements (including seafarers' rights).</li> </ul>
<b>Objective</b>	<ul style="list-style-type: none"> <li>To allow seafarers to enforce their rights under MLC 2006 convention.</li> </ul>
<b>Circulation</b>	<ul style="list-style-type: none"> <li><b>LD ARMATEURS</b> Head Office personnel</li> <li>Vessels managed by <b>LD ARMATEURS</b></li> </ul>

Versions	Main Amendments
13	§2 Reference Cerfa 16006 (Art. L. 5534-1, R. 5534-1 à R. 5534-8, R. 5534-15 à R. 5534-17 du code des transports)
12	§5 reference to dedicated poster
11	§5 Contacts updated
10	§4 Crew MLC Referent
9	§5 Contacts updated
8	§5 Contacts updated
7	§5 Contacts updated
6	§5 Contacts updated
5	§4 Crew MLC Referent updated & §5 Contacts reviewed
4	§5 List of contacts updated (Vietnamese contacts)
3	§4 Designation of a MLC Referent §5 List of contacts updated
2	Update contact DOLE for Filipino Seafarers
1	Création

## SUMMARY

<b>1 MLC REQUIREMENT</b>	<b>2</b>
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## 1 MLC requirement

This procedure is issued in line with Maritime Labour Convention 2006 (MLC 2006). Its objective is to deal effectively and efficiently with any breach in the MLC convention or seafarers' rights.

## 2 Process

The seafarer shall first approach the head of Department in which he / she is assigned to explain his / her grievance.

Complaint form: the seafarer shall make his/her grievance in writing and in a orderly manner and shall choose a time when his/her complaint or grievance can be properly heard. Record of the complaint is made using form **FO-ALL-RES022E Complaint Form** and is registered in the complaint book.

The Department head shall deal with the complaint and when a solution is not found at this level, refer the complaint or grievance to the Master who shall handle the case personally

If no satisfactory result is achieved, the seafarer concerned may appeal to the management of the Company (Crew Manager).

If no satisfactory result is achieved, the Company shall afford all facilities necessary to enable the seafarer to transmit his/her appeal to alternative option such as Government representative, Labour Office, lawyers etc...For this purpose, the form **CERFA 16006** "Complaint to public authorities by seafarers working on French ships" allows to inform the Labour inspection or the Ship safety center. This document will be provided by the Master if needed and available online.

### 3 Code of conduct

At anytime, the seafarer may also ask the assistance of the designated on board crew MLC Referent ([see § 4 of this procedure](#)) or a person of his/her choice on board.

No seafarer should suffer of victimization for filing complaint. The term “victimization” covers any adverse action taken by any person with respect to a seafarer for lodging a complaint which is not manifestly vexatious or maliciously made.

Each complaint will be treated fairly, effectively and expeditiously, giving the complainant full support during the whole process

When availed by the seafarer, the grievance procedure and all actions or decisions agreed upon shall be properly documented for the protection and interest of both parties.

Seafarers and crew MLC Referent shall not be sanctioned dismissed or subject to discrimination for bringing a claim or complaint filed directly or through its representatives, or for attending a seafarer the exercise of this right.

Any provision or action taken in relation to a seafarer without knowledge of these provisions is void.

Seafarers need to know and keep in mind that some complaints may be unjustified, in particular - but not limited to these following cases - complaints in order to:

- Satisfy a personal revenge,
- Discrediting a third party,
- Highlight her / his own integrity to the detriment of others,
- Benefit from higher individual rights than the others and in order to have unjustified rights,
- Anticipate any possible prosecution or reprimand for carelessness or breach of its obligations,
- In the exclusive purpose to establish personal power, to derive personal satisfaction and to give himself / herself importance.

In addition, any false complaint (and not simply erroneous) prevents the seafarer to benefit from the prohibition of victimization.

### 4 Crew MLC Referent

To provide seafarers with impartial advice on their MLC complaint and assist them in following the complaint procedures, several crew members are nominated as CREW MLC REFERENT. The appointment of these crew members is done after an election process implemented by the Master.

The number of crew representative (full or alternative) is established according the number of crew on board. (1+1 from 11 to 30 crew members / 2+2 from 31 to 54 crew members / 3+3 over 55 crew members)

Election must be renewed every time half of the crew has changed or when all of the elected members have disembarked.

In case there is no volunteer to the election for this role, Master will designate 2 crew members as Crew MLC Referent.

The name and position of CREW MLC REFERENT are displayed on board at the same location as others relevant information regarding MLC convention.

### 5 Contacts

➤ See [PO-ALL-RES002EF MLC Contacts](#)

Procedure	PR HVL RES003E	Company	Version	14	November 2025
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