

# NO FEES POLICY

(MLC 2006 – Regulation 1.4 / Standard A1.4.5(b))

---

## Document Control

- 📄 **Document ID:** CB1029
- 📄 **Version:** V1.1
- 📄 **Effective Date:** 21 April 2026
- 📄 **Owner:** Managing Director
- 📄 **Review Cycle:** Annual

## 1. Purpose

This policy establishes CrewBridge Limited's commitment to ensuring that **no seafarer is charged, directly or indirectly, any fees or costs for recruitment or placement**, in accordance with the Maritime Labour Convention (MLC) 2006.

## 2. Scope

This policy applies to:

- 📄 All Clients (shipowners/operators) using CrewBridge services
- 📄 All recruitment and placement activities subject to CrewBridge oversight
- 📄 All seafarers engaged through Client systems audited by CrewBridge

## 3. Policy Statement

CrewBridge Limited strictly prohibits the charging of any recruitment or placement fees to seafarers.

This includes, but is not limited to:

- 📄 Placement fees
- 📄 Recruitment or agency fees
- 📄 Administrative or processing charges
- 📄 Fees for job applications or interviews

CB1029 V1.1



The only costs that may be borne by seafarers are those **explicitly permitted under MLC**, such as:

- ☒ National statutory costs (e.g. passports, seafarer books, visas)
- ☒ Medical certificates, where permitted by law

## 4. Responsibility Split

### Client Responsibilities

- ☒ Ensure no fees are charged to seafarers at any stage
- ☒ Maintain evidence demonstrating compliance
- ☒ Declare compliance during onboarding and audits

### CrewBridge Responsibilities

- ☒ Verify compliance through audits and sample file reviews
- ☒ Investigate any allegations of fee charging
- ☒ Record findings and require corrective action where necessary

## 5. Monitoring and Enforcement

### SOP

1. Verify no-fee compliance during Client onboarding (CB1014)
2. Assess risk via Client Risk Assessment (CB1017)
3. Conduct periodic audits using Appendix C (CB1022)
4. Review complaints via Appendix D (CB1023)
5. Investigate any suspected breaches immediately
6. Record non-conformities and initiate CAPA

## 6. Reporting and Complaints

- ☒ Seafarers may report suspected fee violations via the Complaints Form (CB1025)
- ☒ All complaints will be recorded in the Complaints Register (CB1023)
- ☒ Anonymous complaints will be accepted and investigated

## 7. Non-Compliance

Any breach of this policy will be treated as a **serious non-conformity**, including:



- ☒ Immediate investigation
- ☒ Mandatory corrective action
- ☒ Potential suspension or termination of Client relationship

## 8. Record Keeping

Evidence of compliance must be maintained, including:

- ☒ Audit records
- ☒ Complaint logs
- ☒ Client declarations

All records must be accessible for inspection.

## 9. Review

This policy will be reviewed annually or upon regulatory change.

### Approval

**Approved by:** \_\_\_\_\_  
Managing Director  
CrewBridge Limited

**Date:** \_\_\_\_\_

