

HEIDMAR MARITIME HOLDINGS CORP.

WHISTLEBLOWING POLICY

Introduction

Heidmar Maritime Holdings Corp. (the “Company”) is committed to the highest levels of ethics, integrity and professional behavior and has developed this Whistleblowing Policy to demonstrate its commitment to open and accountable management and to maintaining a culture with the highest standards of honesty, transparency and accountability.

The Company’s Whistleblowing Policy (“Policy”) is an important element in detecting corrupt, illegal, or other undesirable conduct. The Policy is designed to allow employees who become aware of or suspected wrongdoing in the Company, to disclose information that in their reasonable belief shows malpractice, unethical conduct or illegal practices in the workplace without being penalized in any way.

With this Policy the Company undertakes to encourage, guide and protect the employees who timely blow the whistle on improper or illegal conduct within the Company. This Policy may be amended at any time, and it is not designed to support employees who wish to question financial or business decisions that have been taken by Heidmar.

Definitions

Qualifying Disclosure is a disclosure (or report) of information that in the reasonable belief of the employee making the disclosure, tends to show a wrongdoing or violation within the scope of the Policy.

Good faith is the honest belief in the veracity of the disclosure/ reported incident, i.e. the fact that the whistleblower reasonably believes the transmitted information to be true, based on reasonable facts and/or circumstances that allow for the assumption that the disclosure is sufficiently grounded.

Aim of the Policy

The Policy aims at:

- strengthening transparency, which encourages the reporting in good faith of incidents that give rise to violations of the Policies and procedures of the Company as well as the reporting of incidents of fraud, corruption coercion or other violations;
- ensuring an environment of trust and safety for the Employees and Customers and Shareholders; and
- ensuring the integrity and the reputation of the Company.

Who can report whistleblowing concern under this Policy?

The Policy applies equally to all employees, officers and directors, consultants, and contractors of the Company (“Employees”).

Employees that reasonably believe that an offence or misdeed within the scope of this Policy has been or may be committed should report it immediately.

The Employee need not be correct about their concerns or complaints as long as they have reasonable grounds for believing that the information disclosed is substantially true and that their belief was honestly held at the time of the disclosure.

In all cases, acting in good faith over the legitimacy of the disclosure is a prerequisite.

What should be disclosed/reported?

Any concern that relates to suspected wrongdoing or conduct of officers or members of the Company or others acting on behalf of the Company. These concerns might relate to:

- conduct which is an offence or a breach of the law (a criminal offence has been committed or breach of any other legal obligation or regulatory requirement),
- discrimination, harassment or misconduct of any form,
- health and safety of the public and/or other employees,
- damage to the environment,
- possible fraud and corruption,
- any unethical conduct,
- acts affecting the reputation of the Company,
- any deviation from the Company’s various policies and procedures, including the Code of Conduct, and
- any deliberate attempt to conceal any of the above.

This list is not exhaustive

How should a Disclosure be reported?

Any employee may make a good faith disclosure without fear of dismissal or retaliation of any kind. Employees may report any known or suspected violation confidential and anonymous basis through any of the following channels:

• Company’s designated online platform, to access the Whistleblowing platform click here: [Whistleblower Software ApS](#)

• Company’s Head of Legal (+30 6949 935929 or legal@heidmar.com)

The Disclosure should contain as much detailed information as possible. Some useful details include:

- date, time and location;
- names of person(s) involved, roles and their business group;

- your relationship with the person(s) involved;
- the general nature of your concern;
- how you became aware of the issue;
- possible witnesses;

The Disclosure is not expected to constitute proof of any concern/complaint of the Whistleblower.

Investigation and possible outcomes

The Company is committed to achieving compliance with all applicable laws and regulations, accounting standards, the Company's various policies and procedures and it undertakes to deal with any concerns fairly and in an appropriate way.

When a report is received, whether openly, confidentially or anonymously, it shall be properly communicated to the Chairman of the Audit Committee, who may, in his/her discretion, refer the matter to the Company's Head of Legal, consult with any member of senior management who is not the subject of the allegation and who may have appropriate expertise to assist the Audit Committee.

The Chairman of the Audit Committee shall determine how serious the alleged wrongdoing is, whether sufficient information exists to allow the allegation to be investigated and if so, the nature, scope and time line of the investigation will be considered. Possible outcomes of the investigation may include:

- Disciplinary action
- No further action
- Further investigation by any authority/Head of Legal

An action plan and line of reporting of the incident will be determined on a case by case basis and will directly depend on the significance and potential impact of the complaint.

Records

The Chairman of the Audit Committee will maintain a log of all complaints, tracking their receipt, investigation and resolution and shall prepare a quarterly summary report thereof for the Audit Committee.

The Audit Committee and/or management shall maintain records of all steps taken in connection with any investigation of a Report including investigation of Reports that are found to be unsubstantiated. Such records will be retained for retained for as long as legally required.

Whistleblowing Protection

The Company encourages employees to identify themselves when making a report to facilitate the investigation.

Whistleblowing complaints will be handled with sensitivity, discretion, and confidentiality to the extent allowed by the circumstances and the law.

Access to whistleblowing data is restricted to the Employees on a “need to know” basis and only for whistleblowing management purposes.

The Company does not in any manner discriminate against any individual who has made a complaint in good faith. Whistleblowers who believe that they have been retaliated against may file a written complaint with the CEO. Any complaint of retaliation will be promptly investigated and appropriate corrective measures taken if allegations of retaliation are substantiated.

However, if a complaint is made out of deceit or malfeasance then a disciplinary action may be taken against the individual concerned. It should be clarified that the protection from retaliation is not intended to prohibit supervisors from taking action, including disciplinary action, in the usual scope of their duties and based on valid performance-related factors.