



Policies for Trainees and Observers (pg. 2 of 7)
(Available on SEAPA website)

Introduction

SEAPA is an unincorporated association of marine pilots recognized by the Alaska Board of Marine Pilots. SEAPA contracts with Sea Pilots Inc., a management company, to manage affairs for SEAPA. Sea Pilots, Inc. provides SEAPA with offices, chart rooms, supplies, telephone systems, computer hardware and software, meeting space, bookkeeping services, employees, and equipment as required by SEAPA to meet SEAPA's business, operational and dispatch needs to meet SEAPA's income and expense pooling functions, and maintain a 24-hour pilot dispatch organization. The workplace is maintained by Sea Pilots, Inc. for SEAPA's benefit and these Policies are intended to apply to the Sea Pilots, Inc.'s office employees and the Sea Pilots, Inc. workplace where SEAPA does its business. While not specific, these policies are also intended to apply to both SEAPA and Sea Pilots, Inc., even though Sea Pilots, Inc., may not be specifically designated when the policies refer to SEAPA.

Training Program

SEAPA's Training Program is performance based. The performance of a Trainee encompasses both conduct and demonstrated skills as outlined in Volume II of the Training Program. Volume II sets forth the minimum requirements for demonstrating the skills necessary for licensing as a Deputy and Marine Pilot. The Training Committee may require additional training to those minimum requirements contained in Volume II of the Training Program to correct deficiencies as documented in the Training Process. Completion of the Training Program and State licensing is not guaranteed. It is up to the Trainee, to the best of their ability, to fulfill the requirements of the Training Program. A Trainee unable to fulfill the requirements for licensing, in accordance with the Training Program or violations of the policies contained herein may be dismissed in accordance to Due Process for the Training Program.

Voice, Video, Computer or Digital Recording

A Trainee may not record, video tape, photograph or otherwise make or retain information, discussions, advice or instruction from or with pilot(s) or trainee(s) without the express consent of all those present. The use and recording of navigational data or other digital information during training is prohibited without the express consent and fore knowledge of the pilot(s) present. Any violation of this policy is grounds for dismissal from the Training Program.

Confidentiality Policies

Information pertaining to the business of SEAPA, including information concerning SEAPA and its Training Program, SEAPA's principals, vendors, and suppliers, is strictly confidential and must not be provided to or disseminated to parties or individuals who are not associated with, or who are not members of, SEAPA.

Confidential information includes, but is not limited to, Pilot Dispatch, trade secrets, customer lists, contracts, income to any individual or SEAPA, and any financial information related to SEAPA. Trainees shall take the following precautionary measures to prevent disclosure of confidential information:

- 1 Discuss work matters only with other SEAPA members, office employees, and other Trainees who have a specific business reason to know or have access to such information.
- 2 Do not discuss confidential information in public places including public radio frequencies.

SEAPA's Training Committee Conduct Policies for Trainees for Awareness Of Policies Concerning Confidentiality of Information, Anti Discrimination & Harassment, Drug and Alcohol, Ethical and Legal Business Practices, Zero Tolerance of Workplace Violence.

Adopted April 10, 2009

Page 2

Policies for Trainees and Observers (pg. 3 of 7)
(Available on SEAPA website)

- 3 Monitor and supervise visitors to SEAPA's offices to insure that they do not have access to confidential information.
- 4 Destroy hard copies of documents containing confidential information that are not filed or archived.
- 5 Secure confidential information in desk drawers and cabinets after use and at the end of every business day.

Trainee cooperation is particularly important because of SEAPA's obligation to protect the security of our principals, customers, and SEAPA's confidential information. Use of sound judgment and good common sense is always important to maintain confidentiality, but if you are ever unsure whether information may be divulged, or if you have any questions, please consult the Training Chair.

Anti Discrimination & Harassment

Americans with Disabilities Act

It is SEAPA's policy not to discriminate against qualified individuals. Some disabilities may disqualify Trainees and are evaluated through licensure under the United States Coast Guard and or Application to the State of Alaska for License.

Equal Opportunity Policy

SEAPA provides equal opportunity in all of our practices to all qualified Training Program applicants without regard to race, color, religion, gender, national origin, age, marital status, military status or any other category protected by federal, state, and local laws. This policy applies to all aspects of the relationship, including recruitment, application, training, membership, and disciplinary actions. All decisions will be made without unlawfully discriminating on any prohibited basis.

Policy Prohibiting Harassment and Discrimination

SEAPA strives to maintain an environment free from discrimination and harassment, where persons treat each other with respect, dignity, and courtesy. This policy applies to all phases including but not limited to recruiting, testing, selection, training, membership and dispatch.

Prohibited Behavior

SEAPA does not and will not tolerate any type of harassment of office employees, applicants for dispatch, Trainee applicants, observers, deputy marine pilots, pilots, or SEAPA's customers. Discriminatory conduct or conduct characterized as harassment as defined below is prohibited.

The term harassment includes, but is not limited to, slurs, jokes, and other verbal or physical conduct relating to a person's gender, ethnicity, race, color, creed, religion, sexual orientation, national origin, age, disability, marital status, military status, or any other protected classification that unreasonably interferes with a person's work performance or creates an intimidating, hostile work environment.

Sexually harassing behavior includes unwelcome conduct such as sexual advances, requests for sexual favors, offensive touching, or other verbal or physical conduct of a sexual nature. Such conduct may constitute sexual harassment when it:

- 1 is made an explicit or implicit conditional for return of any action;

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Adopted April 10, 2009

Page 3

Policies for Trainees and Observers (pg. 4 of 7)
(Available on SEAPA website)

- 2 is used as the basis for training or training decisions;
- 3 unreasonably interferes with an individual's work performance; or
- 4 creates an intimidating, hostile or offensive working environment.

The types of conduct covered by this policy include demands or subtle pressure for sexual favors accompanied by a promise of favorable treatment or a threat concerning treatment.

Specifically, sexual harassment includes sexual behavior such as:

- 1 repeated sexual flirtations, advances or propositions;
- 2 continued and repeated verbal abuse of a sexual nature;
- 3 sexually related comments and joking, graphic degrading comments about an office employee's or Trainee's appearance or displaying sexually suggestive objects or pictures including cartoons and vulgar email messages; and
- 4 any uninvited physical contact or touching, such as patting, pinching or repeated brushing against another's body.

Such conduct may constitute sexual harassment regardless of whether the conduct is between members, Trainees, applicants, office employees, or other persons conducting business with SEAPA, regardless of gender or sexual orientation.

Harassment by Nonemployees or Members

SEAPA will also endeavor to protect persons, to the extent possible, from reported harassment by nonemployees or members in the office or workplace, including customers, clients, and suppliers.

Complaint Procedure and Investigation

Any Trainee, who wishes to report a possible incident of sexual harassment, or other unlawful harassment or discrimination, should promptly report the matter to the Training Chair. If that person is not available or you believe it would be inappropriate to contact that person, contact the President of SEAPA.

SEAPA will contact a Human Resource Consultant to begin the process of dealing with the reported incident. Persons who raise concerns and make reports in good faith should do so without fear of reprisal; at the same time persons have an obligation to cooperate with SEAPA and its Human Resource consultant with enforcing this policy and investigating and remedying reported incidents.

Any Trainee who becomes aware of possible sexual harassment or other illegal discrimination against others shall promptly advise the Training Chair or President of SEAPA. This matter will then be referred to a Human Resource Consultant for resolution. Any incident or complaint that cannot be resolved through the services of the Human Resource Consultant will be resolved through arbitration pursuant to the Alaska Arbitration Act and the rules then obtaining of the American Arbitration Association. Any conflict between the Alaska Arbitration Act and the rules of the American Arbitration will be resolved under the Alaska Arbitration Act.

Retaliation

Any Trainee who, in good faith, files a complaint of sexual harassment or other illegal

SEAPA's Training Committee Conduct Policies for Trainees for Awareness Of Policies Concerning Confidentiality of Information, Anti Discrimination & Harassment, Drug and Alcohol, Ethical and Legal Business Practices, Zero Tolerance of Workplace Violence.

Adopted April 10, 2009

Page 4

Policies for Trainees and Observers (pg. 5 of 7)
(Available on SEAPA website)

discrimination will not be adversely affected in terms and conditions of training. Trainees will not be retaliated against or discharged because of complaints made in good faith.

SEAPA will not tolerate retaliation against any Trainee who, in good faith, cooperates in the investigation of a complaint. Anyone who engages in such retaliatory behavior will be subject to appropriate discipline.

Drug and Alcohol Policy

SEAPA strives to maintain a working area free of drugs and alcohol and to discourage drug and alcohol abuse. Misuse of alcohol or drugs by Trainees can impair the ability to perform duties, as well as adversely affect SEAPA's customers and customers' confidence in SEAPA. All Trainees shall participate in the SEAPA Drug and Alcohol Testing Program. To the extent that any federal or state drug or alcohol laws or policies apply to a Trainee, the Trainee is under an obligation to familiarize themselves with those laws and policies and comply with them. If those laws and policies are stricter than those set by SEAPA, then those laws and policies shall supersede these policies.

A Trainee shall report to the Training Chair any conviction of a crime involving that Trainee's personal consumption of alcohol or a controlled substance or possession or illegal sale of a controlled substance. SEAPA will, in its discretion, investigate each report and recommend whether disciplinary action should be considered. Failure of a Trainee to file a report with the Training Chair within 30 days after a conviction is grounds for disciplinary action.

Ethical and Legal Business Practices

SEAPA expects the highest standard of ethical conduct and fair dealing from each Trainee, member, officer, Director and all others associated with SEAPA. Our reputation is a valuable asset and we must continually earn the trust, confidence, and respect of our members, our customers, and our community.

This policy provides general guidance on the ethical principles that we all must follow, but no guideline can anticipate all situations. Trainees should also be guided by basic honesty and good judgment, and be sensitive to others' perceptions and interpretations.

If you have any questions about this policy, consult the Training Chair.

You are expected to promptly disclose to the Training Chair anything that may violate this policy. SEAPA will not tolerate retaliation or retribution against anyone who brings violations of this policy to the SEAPA's attention.

Complying With Laws and Regulations

All of SEAPA's activities are to be conducted in compliance with the letter and spirit of all laws and regulations. Trainees are charged with the responsibility of understanding the applicable laws, recognizing potential dangers, and knowing when to seek advice.

Trainee Privacy and Other Confidential Information

SEAPA collects information about Trainees that relates to their participation in the SEAPA Training Program. Only people with a business-related "need to know" are given access to this information. Personal information required to verify training, or to satisfy legitimate investigatory

SEAPA's Training Committee Conduct Policies for Trainees for Awareness Of Policies Concerning Confidentiality of Information, Anti Discrimination & Harassment, Drug and Alcohol, Ethical and Legal Business Practices, Zero Tolerance of Workplace Violence.

Adopted April 10, 2009

Page 5

Policies for Trainees and Observers (pg. 6 of 7)
(Available on SEAPA website)

or legal requirements, may be released.

Trainees, who have access to any confidential information, including private or training information, are responsible for acting with integrity. Unauthorized disclosure or inappropriate use of confidential information is prohibited.

Account and Customer Information

Trainees are prohibited from distributing account, client, or customer information to anyone, in any form.

Grievances

Trainees are encouraged to bring concerns, problems, and grievances to the Training Chair. Trainees are also obligated to report any wrongdoing of which a Trainee becomes aware, if the situation warrants, to the Training Chair or SEAPA's President.

Zero Tolerance for Workplace Violence

SEAPA has a zero-tolerance policy concerning threats, intimidation, and violence of any kind in the workplace. Trainees who engage in such conduct may be subject to immediate dismissal from the Training Program.

Trainees are not permitted to bring weapons of any kind onto SEAPA premises or to SEAPA functions. Any Trainee who is suspected of possessing a weapon will be subject to a search, at SEAPA's discretion. Such searches may include, but are not limited to, the Trainee's personal effects, desk, and workspace.

If a Trainee feels they have been subjected to threats or threatening conduct by another Trainee, member, vendor or customer, the Trainee should notify the Training Chair or the SEAPA President. Trainees will not be penalized for reporting such concerns.

Due Process Procedures

Grievances, disciplinary actions, dismissals, sanctions, and any other action taken against a person subject to these Policies shall be under the jurisdiction of the Training Committee. Due Process Procedures for dealing with grievances, disciplinary actions, sanctions, dismissals, or any other action taken against a person subject to these Policies by the Training Committee shall be according to Part X of SEAPA's Training Program.

SEAPA's Training Committee Conduct Policies for Trainees for Awareness Of Policies Concerning Confidentiality of Information, Anti Discrimination & Harassment, Drug and Alcohol, Ethical and Legal Business Practices, Zero Tolerance of Workplace Violence.

Adopted April 10, 2009

Page 6

Policies for Trainees and Observers (pg. 7 of 7)
(Available on SEAPA website)

Acknowledgement and Receipt of Understanding

I acknowledge that I have received SEAPA's Training Committee Conduct Policies for Trainees for Awareness of Policies Concerning Confidentiality of Information, Anti Discrimination & Harassment, Drug and Alcohol, Ethical and Legal Business Practices, Zero Tolerance for Workplace Violence.

I understand that these Policies are not inclusive, that other policies contained within the SEAPA Training Program may apply to me and that SEAPA retains the right to change these Policies as it deems advisable.

I understand that the information I come into contact with as a Trainee is proprietary and may be confidential to SEAPA. Accordingly, I agree to keep confidential all proprietary information. I will not discuss, disseminate, or otherwise convey proprietary information to a non-member or non-Trainee of SEAPA in the performance of my training duties, or otherwise disclose proprietary information to any person or entity outside of SEAPA without the expressed consent of SEAPA.

I understand that I must comply with the provisions of these Policies to have access to and use of SEAPA training resources. If I do not comply with the provisions of these Policies, my access to training resources may be revoked and I may be subject to disciplinary actions including dismissal.

Signature

Date

Please Print Your Name

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Adopted April 10, 2009

Page 7