

# Harassment Prevention Policy

## US Employees

**As of November 1, 2023**

**Corporate Address:**  
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## 1. Purpose

SEACOR Marine is committed to maintaining a workplace free from harassment based on protected characteristics, including age, race, color, creed, and national origin. The term harassment includes sexual harassment, which is a form of workplace discrimination. All employees are required to work in a manner that prevents all types of harassment in the workplace. This policy is one component of SEACOR Marine's commitment to a discrimination-free work environment. Harassment based on protected characteristics is against the law and all employees have a legal right to a workplace free from it and are urged to report harassment by filing a complaint internally with SEACOR Marine.

## 2. Scope

This document applies to all SEACOR Marine employees located within the United States, outside of New York ("employees").

SEACOR Marine executive officers (as determined by the Board of Directors of SEACOR Marine Holdings Inc.) and SEACOR Marine employees located in the New York office should refer to the SEACOR Marine Harassment Prevention Policy – New York Employees.

SEACOR Marine employees located outside of the United States should refer to the SEACOR Marine Harassment Prevention Policy – Non-US Employees.

## 3. Policy

- 3.1 Harassment of any form, including sexual harassment, will not be tolerated. Any employee covered by this policy who engages in harassment or retaliation will be subject to remedial and/or disciplinary action.
- 3.2 Retaliation Prohibition: No person covered by this policy shall be subject to adverse action because the employee reports an incident of harassment, provides information, or otherwise assists in any investigation of a harassment complaint. SEACOR Marine will not tolerate such retaliation against anyone who, in good faith, reports or provides information about suspected harassment. Any employee of SEACOR Marine who retaliates against anyone involved in a harassment investigation will be subjected to disciplinary action, up to and including termination. All employees who believe they have been subject to such retaliation should inform their supervisor, manager, or their human resources manager.

- 3.3 Harassment based on protected characteristics is offensive, is a violation of our policies, is unlawful, and may subject SEACOR Marine to liability for harm to targets of harassment. Harassers may also be individually subject to liability. Employees of every level who engage in harassment, including managers and supervisors who engage in harassment or who allow such behavior to continue, will be penalized for such misconduct.
- 3.4 SEACOR Marine will conduct a prompt and thorough investigation that ensures due process for all parties, whenever management receives a complaint about harassment, or otherwise knows of possible harassment occurring. SEACOR Marine will keep the investigation confidential to the extent possible. Effective corrective action will be taken whenever harassment is found to have occurred. All employees, including managers and supervisors, are required to cooperate with any internal investigation of harassment.
- 3.5 All employees are encouraged to report any harassment or behaviors that violate this policy. SEACOR Marine has provided a complaint form, attached to this policy, for employees to report harassment and file complaints (Refer to section 10).
- 3.6 Managers and supervisors are required to report any complaint that they receive, or any harassment that they observe or become aware of, to human resources.
- 3.7 This policy will be provided to current employees and to employees upon hiring.

## 4. What is Harassment?

Harassment is unwelcome and offensive conduct that is tied to a protected group. The most common types of legally protected groups include race, national origin, skin color, religion, sex (including pregnancy), age, disability or genetic information.

Harassment becomes unlawful where enduring the offensive conduct becomes a condition of continued employment or the conduct is severe or pervasive enough to create a work environment that a reasonable person would consider intimidating, hostile, or abusive.

### Examples of Harassment

Harassment is a form of discrimination and can be verbal, written, visual or physical. It does not need to be intentional. Petty slights, annoyances, and isolated incidents (unless very serious) will not rise to the level of illegality. To be unlawful, the conduct must create a work environment that would be intimidating, hostile, or offensive to the recipient of the behavior and to reasonable

people in the same position. The following describes some of the types of acts that may be unlawful harassment and that are prohibited when based on protected characteristics:

- Offensive jokes, words or pranks
- Racial slurs and stereotypes
- Name-calling, bullying, intimidation or violence
- Sabotaging or destroying someone's work or work equipment
- Inappropriate texts, emails or online posts and sexual or offensive images, cartoons, objects, signs or reading materials
- Sexual touching, massaging, lewd gestures or leering

## 5. What is Sexual Harassment?

Sexual harassment is a form of sex discrimination and is unlawful under federal law, most state laws, and some local laws. Sexual harassment includes harassment on the basis of sex, sexual orientation, self-identified or perceived sex, gender expression and gender identity. Sexual harassment can be physical and/or psychological in nature.

Sexual harassment includes unwelcome conduct which is either of a sexual nature, or which is directed at an individual because of that individual's sex, when:

- Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment, even if the reporting individual is not the intended target of the sexual harassment;
- Such conduct is made either explicitly or implicitly a term or condition of employment; or
- Submission to or rejection of such conduct is used as the basis for employment decisions affecting an individual's employment.

A sexually harassing hostile work environment includes, but is not limited to, words, signs, jokes, pranks, intimidation or physical violence which are of a sexual nature, or which are directed at an individual because of that individual's sex. Sexual harassment also consists of any unwanted verbal or physical advances, sexually explicit derogatory statements or sexually discriminatory remarks made by someone which are offensive or objectionable to the recipient, which cause the recipient discomfort or humiliation, which interfere with the recipient's job performance.

Sexual harassment also occurs when a person in authority tries to trade job benefits for sexual favors. This can include hiring, promotion, continued employment or any other terms, conditions or privileges of employment. This is also called “quid pro quo” harassment.

## Examples of Sexual Harassment

The following describes some of the types of acts that may be unlawful sexual harassment and that are strictly prohibited:

- Physical acts of a sexual nature, such as:
  - Touching, pinching, patting, kissing, hugging, grabbing, brushing against another employee’s body or poking another employee’s body;
  - Rape, sexual battery, molestation or attempts to commit these assaults.
- Unwanted sexual advances or propositions, such as:
  - Requests for sexual favors accompanied by implied or overt threats concerning the target’s job performance evaluation, a promotion or other job benefits or detriments;
  - Subtle or obvious pressure for unwelcome sexual activities.
- Sexually oriented gestures, noises, remarks or jokes, or comments about a person’s sexuality or sexual experience, which create a hostile work environment.
- Sex stereotyping occurs when conduct or personality traits are considered inappropriate simply because they may not conform to other people’s ideas or perceptions about how individuals of a particular sex should act or look.
- Sexual or discriminatory displays or publications anywhere in the workplace, such as:
  - Displaying pictures, posters, calendars, graffiti, objects, promotional material, reading materials or other materials that are sexually demeaning or pornographic. This includes such sexual displays on workplace computers or cell phones and sharing such displays while in the workplace.
- Hostile actions taken against an individual because of that individual’s sex, sexual orientation, gender identity and the status of being transgender, such as:
  - Interfering with, destroying or damaging a person’s workstation, tools or equipment, or otherwise interfering with the individual’s ability to perform the job;
  - Sabotaging an individual’s work.

## Who can be a target of Sexual Harassment?

Sexual harassment can occur between any individuals, regardless of their sex or gender. Sexual harassment may involve individuals of the same or different gender and is prohibited whether directed toward men or women and regardless of whether the targeted individual accepts or rejects the advances or other offensive behavior.

Harassers can be a superior, a subordinate, a coworker or anyone in the workplace including an independent contractor, contract worker, vendor, client, customer or visitor.

## Where can Sexual Harassment occur?

Unlawful sexual harassment is not limited to the physical workplace itself. It can occur while employees are traveling for business or at employer sponsored events or parties. Calls, texts, emails, and social media usage by employees can constitute unlawful workplace harassment, even if they occur away from the workplace premises, on personal devices or during non-work hours.

## 6. Retaliation

Unlawful retaliation can be any action that could discourage a worker from coming forward to make or support a harassment claim. Adverse action need not be job-related or occur in the workplace to constitute unlawful retaliation (e.g., threats of physical violence outside of work hours).

An individual is protected from retaliation by SEACOR Marine if the person had a good faith belief that the practices in question were unlawful. However, the retaliation provision is not intended to protect persons making intentionally false charges of harassment.

## 7. Reporting Harassment

Preventing harassment, which includes sexual harassment, is everyone's responsibility. SEACOR Marine cannot remedy harassment unless it knows about it. Any employee who has been subjected to behavior that may constitute harassment is encouraged to report such behavior to a supervisor, manager or human resources. Anyone who witnesses or becomes aware of potential instances of harassment should report such behavior to a supervisor, manager or human resources.

Any employee who feels harassed, or who has witnessed harassment, should report it so that any violation of this policy can be corrected promptly. Any harassing conduct, even a single incident, can be addressed under this policy.

Reports of harassment may be made verbally or in writing. A form for submission of a written complaint is attached to this policy, and all employees are encouraged to use this complaint form (Refer to section 10). Employees who are reporting harassment on behalf of other employees should use the complaint form and note that it is on another employee's behalf.

## **8. Supervisory Responsibilities**

All supervisors and managers who receive a complaint or information about suspected harassment, observe what may be harassing behavior or for any reason suspect that harassment is occurring, are required to report such suspected harassment to human resources.

In addition to being subject to discipline if they engaged in sexually harassing conduct themselves, supervisors and managers will be subject to discipline for failing to report suspected harassment or otherwise knowingly allowing harassment to continue.

Supervisors and managers will also be subject to discipline for engaging in any retaliation.

## **9. Complaint and Investigation of Harassment**

All complaints or information about harassment will be investigated, whether that information was reported in verbal or written form. SEACOR Marine will conduct a prompt and thorough investigation that ensures due process for all parties, whenever management receives a complaint about harassment, or otherwise knows of possible harassment occurring. SEACOR Marine will keep the investigation confidential to the extent possible. Effective corrective action will be taken whenever harassment is found to have occurred. All employees, including managers and supervisors, are required to cooperate with any internal investigation of harassment.

SEACOR Marine will not tolerate retaliation against employees who file complaints, support another's complaint or participate in an investigation regarding a violation of this policy.

While the process may vary from case to case, SEACOR Marine investigations will be done in accordance with the following steps:

- Upon receipt of complaint, human resources will conduct an immediate review of the allegations and take any interim actions as appropriate. If the complaint is verbal, the



complainant will be encouraged to complete the "Complaint Form" in writing; however, if the complainant refuses, management will prepare a Complaint Form based on that verbal reporting;

- If documents, emails or phone records are relevant to the investigation, steps will be taken to obtain and preserve them;
- All relevant documents, including all electronic communications, will be requested and reviewed;
- All parties involved, including any relevant witnesses, will be interviewed;
- Written documentation of the investigation and associated documents will be kept in a secure and confidential location; and
- The individual who reported the harassment and the individual(s) about whom the complaint was made will be informed of the final determination and any corrective actions taken.

Complaints can be made to a supervisor, manager or to human resources. Employees may also report a suspected violation (including by making confidential and anonymous reports) by:

- Calling the toll-free hotline +1-866-384-4277;
- Submitting a report online at EthicsPoint (EthicsPoint can be accessed through the Company's website at [www.seacormarine.com](http://www.seacormarine.com) and by navigating to the Investors – Corporate Governance page and choosing the Whistleblower link);
- Emailing the Corporate Secretary at [corporatesecretary@seacormarine.com](mailto:corporatesecretary@seacormarine.com);
- Calling the Corporate Secretary on +1 (281) 738-3596; or
- Sending a written complaint via postal mail to the Corporate Secretary's executive offices at 12121 Wickchester Lane, Suite 500, Houston, TX 77079, United States of America.

## 10. Reference: Complaint Form

## COMPLAINT FORM

If you believe that you have been subjected to harassment, including sexual harassment or harassment based on any other protected characteristic (refer to the Harassment Prevention Policy), you are encouraged to complete this form and submit it to your supervisor, manager or to human resources. You may also report a suspected violation (including by making confidential and anonymous reports) by:

- Calling the toll-free hotline +1-866-384-4277;
- Submitting a report online at EthicsPoint (EthicsPoint can be accessed through the Company's website at [www.seacormarine.com](http://www.seacormarine.com) and by navigating to the Investors – Corporate Governance page and choosing the Whistleblower link);
- Emailing the Corporate Secretary at [corporatesecretary@seacormarine.com](mailto:corporatesecretary@seacormarine.com);
- Calling the Corporate Secretary on +1 (281) 738-3596; or
- Sending a written complaint via postal mail to the Corporate Secretary's executive offices at 12121 Wickchester Lane, Suite 500, Houston, TX 77079, United States of America.

If you are more comfortable reporting verbally or in another manner, your supervisor, manager or human resource manager can complete this form for you and provide you with a copy of it.

Investigations will be conducted as outlined in the SEACOR Marine Harassment Prevention Policy.

### Complainant Information

Name:

Work Address:

Work Phone:

Job Title:

Email:

Select Preferred Communication Method: ☐ Email ☐ Phone ☐ In person

### Supervisory Information

Immediate Supervisor's Name:

Title:

Work Phone:

Work Address:

## Complaint Information

1. Your complaint of harassment is made about:

Name:

Title:

Work Address:

Work Phone:

Relationship to you: ☐ Supervisor ☐ Subordinate ☐ Co-Worker ☐ Other

2. Please describe what happened and how it is affecting you and your work. Please use additional sheets of paper if necessary and attach any relevant documents or evidence.

3. Date(s) harassment occurred:

Is the harassment continuing? ☐ Yes ☐ No

4. Please list the name and contact information of any witnesses or individuals who may have information related to your complaint:

*The last question is optional, but may help the investigation.*

5. Have you previously complained or provided information (verbal or written) about related incidents? If yes, when and to whom did you complain or provide information?

If you have retained legal counsel and would like us to work with them, please provide their contact information.

Signature: \_\_\_\_\_

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

# Harassment Prevention Policy

## New York Employees

**As of November 1, 2023**

**Corporate Address:**  
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Suite 500  
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+1 346 980 1700

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## 1. Purpose

SEACOR Marine Holdings Inc. and its subsidiary companies ("SEACOR Marine") are committed to maintaining a workplace free from harassment and discrimination. The term harassment includes sexual harassment, which is a form of workplace discrimination that subjects an employee (as defined below) or covered individual (as defined below) to inferior conditions of employment due to their gender, gender identity, gender expression, perceived or actual, and/or sexual orientation. All employees and covered individuals, are required to work in a manner that prevents all types of harassment and discrimination in the workplace based on sex, sexual orientation, gender identity or expression, age, race, creed, color, national origin, military status, disability, pre-disposing genetic characteristics, familial status, marital status, criminal history, or status as a victim of domestic violence.

This policy is one component of SEACOR Marine's commitment to a harassment and discrimination free work environment. Harassment and discrimination based on protected characteristics is against the law and all employees and covered individuals have a legal right to a workplace free from it and are urged to report it by filing a complaint internally with SEACOR Marine, with a government agency, or in court under federal, state or local antidiscrimination laws. See further details in [section 10] below.

## 2. Scope

This policy applies to SEACOR Marine Holdings Inc.'s Board of Directors and executive officers (as determined by the Board of Directors of SEACOR Marine Holdings Inc.) and all SEACOR Marine employees, managers and supervisors, applicants for employment, and interns, whether paid or unpaid, situated in and working from the state of New York (collectively, "employees"). This policy further extends to anyone who is, or is employed by, a contractor, subcontractor, vendor, consultant or any person conducting business or providing services to SEACOR Marine who is situated in the state of New York (collectively "covered individuals").

SEACOR Marine employees located in the United States, outside of New York, should refer to the SEACOR Marine Harassment Prevention Policy – US Employees.

SEACOR Marine employees located outside of the United States, should refer to the SEACOR Marine Harassment Prevention Policy – Non-US Employees.

### 3. Policy

- 3.1 Discrimination and harassment of any form, including sexual harassment, is unacceptable. Any employee or covered individual who engages in harassment, including sexual harassment, discrimination or retaliation will be subject to action, including, but not limited to, appropriate discipline for employees through education, counseling, suspension or termination.
- 3.2 Retaliation is prohibited. Any employee or covered individual that reports on, or provides information about, an incident of harassment or discrimination with a reasonable belief that they have witnesses or experienced such behavior, is protected from retaliation. Any employee of SEACOR Marine who retaliates against anyone involved in a harassment or discrimination investigation will face disciplinary action, up to and including termination. All employees and covered individuals who believe they have been subject to such retaliation should inform their supervisor, manager or their human resources manager. All employees and covered individuals who believe they have been a target of such retaliation may also seek relief from government agencies as explained below in the section on Legal Protections.
- 3.3 Discrimination and harassment of any kind, including sexual harassment, based on protected characteristics is a violation of SEACOR Marine's policies, is unlawful, and may subject SEACOR Marine to liability for the harm experienced by targets of discrimination or harassment. Harassers may also be individually subject to liability and employers or supervisors who fail to report or act on the discrimination and harassment may be liable for aiding and abetting such behavior. Employees and covered individuals, at every level, who engage in harassment or discrimination, including managers and supervisors who engage in harassment or discrimination or allow such behavior to continue, will be penalized for such misconduct.
- 3.4 SEACOR Marine will conduct a prompt and thorough investigation of reported or suspected harassment and discrimination that is fair to all parties, which will be confidential to the extent possible. If an investigation ends with the finding that discrimination or harassment occurred, SEACOR Marine will act as required. In addition to any required discipline, SEACOR Marine will also take steps to ensure a safe work environment for the employee(s) who experienced the discrimination or harassment. All employees, including managers and supervisors, are required to cooperate with any internal investigation of discrimination or harassment.

- 3.5 All employees and covered individuals are encouraged to report any harassment, including sexual harassment, discrimination or behaviors that violate this policy. Complaints may be made verbally, by email or by completing the complaint form, attached to this policy (Refer to section 12). An employee or covered individual who prefers not to report harassment to their supervisor, manager or human resources may instead report harassment to the New York State Division of Human Rights and/or the United States Equal Employment Opportunity Commission. Complaints may be made to both the employer and a government agency.
- 3.6 SEACOR Marine managers and supervisors are required to report any complaint that they receive, or any harassment that they observe or become aware of, to human resources.
- 3.7 This policy will be provided to all employees in person or digitally, such as through email, upon hiring. The policy will also be posted in SEACOR Marine New York physical office locations, and for employees operating remotely, it will also be available on SEACOR Marine's shared network.

## 4. What is Harassment?

Harassment is unwelcome and offensive conduct that is tied to a protected group. The most common types of legally protected groups include race, national origin, skin color, religion, sex (including pregnancy), age, disability or genetic information.

Harassment becomes unlawful where enduring the offensive conduct becomes a condition of continued employment or the conduct creates a work environment that a reasonable person would consider intimidating, hostile, or abusive.

### Examples of Harassment

Harassment is a form of discrimination and can be verbal, written, visual or physical. It does not need to be intentional. Petty slights, annoyances, and isolated incidents will not rise to the level of illegality. To be unlawful, the conduct must create a work environment that would be intimidating, hostile, or offensive to the recipient of the behavior and to reasonable people in the same position. The following describes some of, but not all, the types of acts that may be unlawful harassment and that are prohibited when based on protected characteristics:

- Offensive jokes, words or pranks;
- Racial slurs and stereotypes;



- Name-calling, bullying, intimidation or violence;
- Sabotaging or destroying someone's work or work equipment;
- Inappropriate texts, emails or online posts and sexual or offensive images, cartoons, objects, signs or reading materials; or
- Sexual touching, massaging, lewd gestures or leering

## 5. What is Sexual Harassment?

Sexual harassment is a form of gender-based discrimination that is unlawful under federal, New York State and New York City laws. Sexual harassment includes harassment on the basis of sex, sexual orientation, self-identified or perceived sex, gender expression, gender identity and the status of being transgender. Sexual harassment can be physical, such as sexual contact or touching, and/or psychological, such as expressions of a sexually suggestive nature.

Sexual harassment includes all forms of gender discrimination including gender role stereotyping and treating employees differently because of their gender, gender expression and perceived identity.

Sexual harassment is unlawful and is in violation of SEACOR Marine's policy when it subjects an individual to inferior terms, conditions, or privileges of employment. Sexual harassment or discrimination based on protected characteristics does not need to be severe or pervasive to be illegal and may include any harassing behavior that a reasonable victim with the same protected characteristics believes to rise above petty slights or trivial inconveniences. The impact of the behavior on a person, rather than the intent of the behavior, is what matters.

Sexual harassment includes any unwelcome conduct which is either directed at an individual because of that individual's gender identity or expression, whether perceived or actual, or is of a sexual nature when:

- The purpose or effect of this behavior unreasonably interferes with an individual's work performance or creates an intimidating, hostile or offensive work environment. The impacted person does not need to be the intended target of the sexual harassment;
- Employment depends implicitly or explicitly on accepting such unwelcome behavior; or
- Decisions regarding an individual's employment are based on an individual's acceptance to or rejection of such behavior. Such decisions can include what shifts and how many hours an employee might work, project assignments, as well as salary and promotion decisions.

There are two main types of sexual harassment:

- Behaviors that contribute to a hostile work environment include, but are not limited to, words, signs, jokes, pranks, intimidation or physical violence which are of a sexual nature, or which are directed at an individual because of that individual's sex, gender identity or gender expression. Sexual harassment also consists of any unwanted verbal or physical advances, sexually explicit derogatory or discriminatory statements which an employee finds offensive or objectionable, causes an employee discomfort or humiliation or interferes with the employee's job performance.
- Sexual harassment also occurs when a person in authority tries to trade job benefits for sexual favors. This can include hiring, promotion, continued employment or any other terms, conditions or privileges of employment. This is also called quid pro quo harassment.

## Examples of Sexual Harassment

The following non-exhaustive list describes some, but not all, of the types of acts that may be unlawful sexual harassment and that are strictly prohibited:

- Physical acts of a sexual nature, such as:
  - Touching, pinching, patting, kissing, hugging, grabbing, brushing against another's body or poking another's body; or
  - Rape, sexual battery, molestation or attempts to commit these assaults, which may be considered criminal conduct outside the scope of this policy (please contact local law enforcement if you wish to pursue criminal charges).
- Unwanted sexual comments, advances or propositions, such as:
  - Requests for sexual favors accompanied by implied or overt threats concerning the target's job performance evaluation, a promotion or other job benefits;
  - Subtle or obvious pressure for unwelcome sexual activities; or
  - Repeated requests for dates or romantic gestures, including gift-giving.
- Sexually oriented gestures, noises, remarks or jokes, or questions and comments about a person's sexuality, sexual experience or romantic history, which create a hostile work environment, whether made in person or over virtual platforms and in messaging applications.

- Sex stereotyping occurs when someone's conduct or personality traits are judged based on other people's ideas or perceptions about how individuals of a particular sex should act or look, such as:
  - Remarks regarding an employee's gender expression, such as wearing a garment typically associated with a different gender identity; or
  - Asking employees to take on traditionally gendered roles, such as asking a woman to serve meeting refreshments when it is not part of, or appropriate to, her job duties.
- Sexual or discriminatory displays or publications anywhere in the workplace, such as:
  - Displaying or sharing pictures, posters, calendars, graffiti, objects, promotional material, reading materials or other materials that are sexually demeaning or pornographic, whether displayed on workplace computers, cell phones or other devices, or having such materials displayed in a background during a virtual meeting.
- Hostile actions taken against an individual because of that individual's sex, sexual orientation, gender identity or gender expression, such as:
  - Interfering with, destroying or damaging a person's workstation, tools or equipment, or otherwise interfering with the individual's ability to perform the job;
  - Sabotaging an individual's work;
  - Bullying, yelling or name-calling;
  - Intentional misuse of an individual's preferred pronouns; or
  - Creating different expectations for individuals based on their perceived identities, such as implementing dress codes that place more emphasis on women's attire and leaving parents or caregivers out of meetings.

### Who can be a target of Sexual Harassment?

Sexual harassment can occur between any individuals, regardless of their sex or gender. Harassment does not have to be between members of the opposite sex or gender.

Harassers can be anyone in the workplace, including but not limited to supervisors, supervisees, coworkers, independent contractors, contract workers, vendors, clients, customers or visitors.

Individuals bring personal history with them to the workplace that might impact how they interact with certain behavior. It is especially important for all employees to be aware of how words or actions might impact someone with a different experience than their own in the interest of creating a safe and equitable workplace.

### Where can Sexual Harassment occur?

Unlawful sexual harassment is not limited to the physical workplace itself. It can occur while employees are traveling for business, at employer or industry sponsored events or parties, or when working remotely away from the office workplace, such as from home.

Calls, texts, emails, and social media usage by employees can constitute unlawful workplace harassment, even if they occur away from the workplace premises, on virtual meeting platforms, in messaging applications, on personal devices or during non-work hours.

## 6. Retaliation

Retaliation is unlawful and constitutes any action by an employer, manager or supervisor that punishes an individual upon learning of a harassment claim, that seeks to discourage a worker or covered individual from making a formal complaint or supporting a sexual harassment or discrimination claim, or that punishes those who have already come forward. These actions do not need to occur in the workplace to constitute unlawful retaliation and include comments made, whether in person or not, both within or outside of work hours.

Examples of retaliation may include, but are not limited to:

- Demotion, termination, denying accommodations, reduced hours, or the assignment of less desirable shifts;
- Publicly releasing personnel files;
- Refusing to provide a reference or providing an unwarranted negative reference;
- Labeling an employee as “difficult” and excluding them from projects to avoid “drama”;
- Undermining an individual’s immigration status; or
- Reducing work responsibilities, passing over for a promotion, or moving an individual’s desk to a less desirable office location.

Such retaliation is unlawful under federal, New York State and New York City laws. These laws protect any individual who has engaged in "protected activity." Protected activity occurs when a person has:

- Made a complaint of sexual harassment or discrimination, either internally or with any government agency;
- Testified or assisted in a proceeding involving sexual harassment or discrimination under the Human Rights Law or any other anti-discrimination law;
- Opposed sexual harassment or discrimination by making a verbal or informal complaint to management, or by simply informing a supervisor or manager of suspected harassment;
- Reported that another employee has been sexually harassed or discriminated against; or
- Encouraged a fellow employee to report harassment.

An individual is protected from retaliation if the person had a good faith belief that the practices in question were unlawful. The retaliation provision is not intended to protect persons making intentionally false charges of harassment.

## 7. Reporting Harassment

Everyone must work towards preventing harassment, including sexual harassment, and discrimination. SEACOR Marine supervisors and managers have a special responsibility to make sure employees feel safe at work and that workplaces are free from harassment and discrimination. Any employee or covered individuals is encouraged to report harassing or discriminatory behavior to a supervisor, manager or human resources. Anyone who witnesses or becomes aware of potential instances of harassment should report such behavior to a supervisor, manager or human resources.

Any employee or covered individuals who feels harassed, or who has witnessed harassment, should report it so that any violation of this policy can be corrected promptly. Any harassing conduct, even a single incident, can be addressed under this policy.

Reports of sexual harassment may be made verbally or in writing. A written complaint form is attached to this policy to serve as guidance, but is not required to make a written complaint (Refer to section 12). Employees who are reporting sexual harassment on behalf of other employees may use the complaint form and should note that it is on another employee's behalf.

A verbal or otherwise written complaint (such as an email) on behalf of oneself or another employee is also acceptable.

Employees and covered individuals who believe they have been a target of sexual harassment may at any time seek assistance additional available forums, as explained below in the section on Legal Protections.

## **8. Supervisory Responsibilities**

Supervisors and managers have a responsibility to prevent harassment, including sexual harassment, and discrimination. All supervisors and managers who receive a complaint or information about suspected sexual harassment, observe what may be sexually harassing or discriminatory behavior or for any reason suspect that sexual harassment or discrimination is occurring, are required to report such suspected sexual harassment to human resources. Managers and supervisors should not be passive and wait for an employee to make a claim of harassment. If they observe such behavior, they must act.

Supervisors and managers can be disciplined if they engage in sexually harassing or discriminatory behavior themselves. Supervisors and managers can also be disciplined for failing to report suspected sexual harassment or allowing sexual harassment to continue after they know about it.

Supervisors and managers will also be subject to discipline for engaging in any retaliation.

While supervisors and managers have a responsibility to report harassment and discrimination, supervisors and managers must be mindful of the impact that harassment and a subsequent investigation has on victims. Being identified as a possible victim of harassment and questioned about harassment and discrimination can be intimidating, uncomfortable and re-traumatizing for individuals. Supervisors and managers must accommodate the needs of individuals who have experienced harassment to ensure the workplace is safe, supportive, and free from retaliation for them during and after any investigation.

## **9. Bystander Intervention**

Any employee witnessing harassment as a bystander is encouraged to report it. A supervisor or manager that is a bystander to harassment is required to report it. There are five standard methods of bystander intervention that can be used when anyone witnesses harassment or discrimination and wants to help.

- A bystander can interrupt the harassment by engaging with the individual(s) being harassed and distracting them from the harassing behavior;
- A bystander who feels unsafe interrupting on their own can ask a third party to help intervene in the harassment;
- A bystander can record or take notes on the harassment incident to benefit a future investigation;
- A bystander might check in with the person(s) who has been harassed after the incident, see how they are feeling and let them know the harasser(s)' behavior was not appropriate; and
- If a bystander feels safe, they can confront the harasser(s) and name the behavior as inappropriate. When confronting harassment, physically assaulting an individual is never an appropriate response.

Though not exhaustive, and dependent on the circumstances, the guidelines above can serve as a brief guide of how to react when witnessing harassment in the workplace. Any employee witnessing harassment as a bystander is encouraged to report it. A supervisor or manager that is a bystander to harassment is required to report it.

## **10. Complaint and Investigation of Harassment**

All complaints or information about harassment, including sexual harassment, will be investigated, whether that information was reported in verbal or written form. SEACOR Marine will conduct a prompt and thorough investigation that ensures due process for all parties, whenever management receives a complaint about harassment, or otherwise knows of possible harassment occurring. SEACOR Marine will keep the investigation confidential to the extent possible. Effective corrective action will be taken whenever harassment is found to have occurred. All employees, including managers and supervisors, and covered individuals are required to cooperate with any internal investigation of harassment.

SEACOR Marine will not tolerate retaliation against employees or covered individuals who file complaints, support another's complaint or participate in an investigation regarding a violation of this policy.

SEACOR Marine recognizes that participating in a harassment investigation can be uncomfortable and has the potential to retraumatize an employee. Those receiving claims and leading investigations will handle complaints and questions with sensitivity toward those participating.

While the process may vary from case to case, SEACOR Marine investigations will be done in accordance with the following steps. Upon receipt of a complaint, human resources:

- Will conduct a prompt review of the allegations, assess the appropriate scope for the investigation and take any interim actions as appropriate. If the complaint is verbal, request that the individual complete the complaint form in writing, however, if the individual prefers not to fill out the complaint form, human resources will prepare a complaint form or equivalent documentation based on the verbal reporting;
- Will take steps to obtain and preserve documents sufficient to assess the allegation including documents, emails or phone records that may be relevant to the investigation. Human Resources will consider and implement appropriate document request, review and preservation measures, including electronic communications;
- Will seek to interview all parties involved, including any relevant witnesses;
- Will create a written documentation of the investigation will be created (such as a letter, memo or email), which will contain the following:
  - a) A list of all documents reviewed, along with a detailed summary of relevant documents;
  - b) A list of names of those interviewed, along with a detailed summary of their statements;
  - c) A timeline of events;
  - d) A summary of any prior relevant incidents disclosed in the investigation, reported or unreported; and
  - e) The basis for the decision and final resolution of the complaint, together with any corrective action(s);
- Will keep written documentation and associated documents will be kept in a secure and confidential location;
- Will promptly notify the individual(s) who reported the harassment and the individual(s) about whom the complaint was made that the investigation has been completed and implement any corrective actions identified in the written document; and
- Will inform the individual(s) who reported the harassment of the right to file a complaint or charge externally as outlined in the next section.



Complaints can be made to a supervisor, manager or to human resources. Employees and covered individuals may also report a suspected violation (including by making confidential and anonymous reports) by:

- Calling the toll-free hotline +1-866-384-4277;
- Submitting a report online at EthicsPoint (EthicsPoint can be accessed through the Company's website at [www.seacormarine.com](http://www.seacormarine.com) and by navigating to the Investors – Corporate Governance page and choosing the Whistleblower link);
- Emailing the Corporate Secretary at [corporatesecretary@seacormarine.com](mailto:corporatesecretary@seacormarine.com);
- Calling the Corporate Secretary on +1 (281) 738-3596; or
- Sending a written complaint via postal mail to the Corporate Secretary's executive offices at 12121 Wickchester Lane, Suite 500, Houston, TX 77079, United States of America.

## 11. Legal Protections and External Remedies

Harassment, including sexual harassment, is not only prohibited by SEACOR Marine but is also prohibited by state, federal, and, where applicable, local law.

SEACOR Marine's internal process outlined in this policy are one way for employees to report sexual harassment. Employees and covered individuals may also choose to pursue legal remedies with the following governmental entities. While a private attorney is not required to file a complaint with a governmental agency, employees and covered individuals may also seek the legal advice of an attorney.

### New York State Division of Human Rights Law (HRL)

The New York State Human Rights Law (HRL), N.Y. Executive Law, art. 15, § 290 et seq., applies to all employers in New York State and protects employees and covered individuals, regardless of immigration status. A complaint alleging violation of the Human Rights Law may be filed either with the New York State Division of Human Rights (DHR) or in New York State Supreme Court.

Complaints of sexual harassment filed with DHR may be submitted any time within three years of the harassment. If an individual does not file a complaint with DHR, they can bring a lawsuit directly in state court under the HRL, within three years of the alleged sexual harassment. An individual may not file with DHR if they have already filed a HRL complaint in state court.

Complaining internally to SEACOR Marine does not extend your time to file with DHR or in court. The three years are counted from the date of the most recent incident of harassment.

You do not need an attorney to file a complaint with DHR, and there is no cost to file with DHR.

DHR will investigate your complaint and determine whether there is probable cause to believe that sexual harassment has occurred. Probable cause cases receive a public hearing before an administrative law judge. If sexual harassment is found at the hearing, DHR has the power to award relief. Relief varies but it may include requiring your employer to take action to stop the harassment, or repair the damage caused by the harassment, including paying of monetary damages, punitive damages, attorney's fees and civil fines.

DHR's main office contact information is: NYS Division of Human Rights, One Fordham Plaza, Fourth Floor, Bronx, New York 10458. You may call (718) 741-8400 or visit: [www.dhr.ny.gov](http://www.dhr.ny.gov).

Go to [dhr.ny.gov/complaint](http://dhr.ny.gov/complaint) for more information about filing a complaint with DHR. The website has a digital complaint process that can be completed on your computer or mobile device from start to finish. The website has a complaint form that can be downloaded, filled out and mailed to DHR as well as a form that can be submitted online. The website also contains contact information for DHR's regional offices across New York State.

Call the DHR sexual harassment hotline at 1(800) HARASS3 for more information about filing a sexual harassment complaint. This hotline can also provide you with a referral to a volunteer attorney experienced in sexual harassment matters who can provide you with limited free assistance and counsel over the phone.

## The United States Equal Employment Opportunity Commission

The United States Equal Employment Opportunity Commission (EEOC) enforces federal anti-discrimination laws, including Title VII of the 1964 federal Civil Rights Act, 42 U.S.C. § 2000e et seq.. An individual can file a complaint with the EEOC anytime within 300 days from the most recent incident of harassment. There is no cost to file a complaint with the EEOC. The EEOC will investigate the complaint, and determine whether there is reasonable cause to believe that discrimination has occurred. If the EEOC determines that the law may have been violated, the EEOC will try to reach a voluntary settlement with the employer. If the EEOC cannot reach a settlement, the EEOC (or the Department of Justice in certain cases) will decide whether to file a lawsuit. The EEOC will issue a Notice of Right to Sue permitting the individual to file a lawsuit in federal court if the EEOC closes the charge, is unable to determine if federal employment discrimination laws may have been violated, or believes that unlawful discrimination occurred but does not file a lawsuit.

Individuals may obtain relief in mediation, settlement or conciliation. In addition, federal courts may award remedies if discrimination is found to have occurred. In general, private employers must have at least 15 employees to come within the jurisdiction of the EEOC.

An employee alleging discrimination at work can file a "Charge of Discrimination." The EEOC has district, area, and field offices where complaints can be filed. Contact the EEOC by calling 1-800-669-4000 (TTY: 1-800-669-6820), visiting their website at [www.eeoc.gov](http://www.eeoc.gov) or via email at [info@eeoc.gov](mailto:info@eeoc.gov).

If an individual filed an administrative complaint with the New York State Division of Human Rights, DHR will automatically file the complaint with the EEOC to preserve the right to proceed in federal court.

### Local Protections

Many localities enforce laws protecting individuals from sexual harassment and discrimination. An individual should contact the county, city or town in which they live to find out if such a law exists. For example, employees who work in New York City may file complaints of sexual harassment or discrimination with the New York City Commission on Human Rights. Contact their main office at Law Enforcement Bureau of the NYC Commission on Human Rights, 22 Reade Street, 1<sup>st</sup> Floor, New York, New York; call 311 or (212) 306-7450; or visit [www.nyc.gov/html/cchr/html/home/home.shtml](http://www.nyc.gov/html/cchr/html/home/home.shtml).

### Contact the Local Police Department

If the harassment involves unwanted physical touching, coerced physical confinement or coerced sex acts, the conduct may constitute a crime. Those wishing to pursue criminal charges are encouraged to contact their local police department.

## 12. Reference: Complaint Form

## COMPLAINT FORM

New York State Labor Law requires all employers to adopt a sexual harassment prevention policy that includes a complaint form to report alleged incidents of sexual harassment.

If you believe that you have been subjected to sexual harassment or gender discrimination, you are encouraged, but not required, to complete this form and submit it to your supervisor, manager or to human resources. You may also report a suspected violation (including by making confidential and anonymous reports) by:

- Calling the toll-free hotline +1-866-384-4277;
- Submitting a report online at EthicsPoint (EthicsPoint can be accessed through the Company's website at [www.seacormarine.com](http://www.seacormarine.com) and by navigating to the Investors – Corporate Governance page and choosing the Whistleblower link);
- Emailing the Corporate Secretary at [corporatesecretary@seacormarine.com](mailto:corporatesecretary@seacormarine.com);
- Calling the Corporate Secretary on +1 (281) 738-3596; or
- Sending a written complaint via postal mail to the Corporate Secretary's executive offices at 12121 Wickchester Lane, Suite 500, Houston, TX 77079, United States of America.

If you are more comfortable reporting verbally or in another manner, your supervisor, manager or human resource manager can complete this form for you and provide you with a copy of it. Investigations will be conducted as outlined in the SEACOR Marine Harassment Prevention Policy.

All employees and covered individuals are protected from retaliation by SEACOR Marine if the complaint made had a good faith belief that the practices in question were unlawful.

### Complainant Information

Name:

Work Address:

Work Phone:

Job Title:

Email:

Select Preferred Communication Method: ☐ Email ☐ Phone ☐ In person

## Supervisory Information

Immediate Supervisor's Name:

Title:

Work Phone:

Work Address:

## Complaint Information

1. Your complaint of sexual harassment is made about:

Name:

Title:

Work Address:

Work Phone:

Relationship to you: ☐ Supervisor ☐ Supervisee ☐ Co-Worker ☐ Other

2. Please describe what happened and include as many details as possible. Please use additional sheets of paper if necessary and attach any relevant documents or evidence.

3. Date(s) sexual harassment occurred:

Is the sexual harassment continuing? ☐ Yes ☐ No

4. Please list the name and contact information of any witnesses or individuals who may have information related to your complaint:

*The last question is optional, but may help the investigation.*

5. Have you previously complained or provided information (verbal or written) about related incidents? If yes, when and to whom did you complain or provide information?

If you have retained legal counsel and would like us to work with them, please provide their contact information.

Signature: \_\_\_\_\_

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

# Harassment Prevention Policy

## Non-US Employees

**As of November 1, 2023**

**Corporate Address:**  
12121 Wickchester Lane  
Suite 500  
Houston, TX 77079  
+1 346 980 1700

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## 1. Purpose

SEACOR Marine is committed to maintaining a workplace free from harassment based on protected characteristics, including age, race, color, creed, belief or national origin, and characteristics specifically protected by local laws such as disability, gender reassignment, marital or civil partner status, pregnancy or maternity, sex or sexual orientation, political opinions and types of working arrangement. The term harassment includes sexual harassment, which is a form of workplace discrimination. All employees are required to work in a manner that prevents all types of harassment in the workplace. This policy is one component of SEACOR Marine's commitment to a discrimination-free work environment. All employees have a right to a workplace free from harassment and are urged to report harassment by filing a complaint internally with SEACOR Marine.

## 2. Scope

This document applies to all SEACOR Marine employees located outside of the United States ("employees"). This policy is to be read in conjunction with the employee's employee handbook and applicable local laws.

SEACOR Marine employees located in the United States, other than in New York, should refer to the SEACOR Marine Harassment Prevention Policy – US Employees.

SEACOR Marine executive officers (as determined by the Board of Directors of SEACOR Marine Holdings Inc.) and SEACOR Marine employees located in the New York office should refer to the SEACOR Marine Harassment Prevention Policy – New York Employees.

## 3. Policy

**3.1** Harassment of any form, including sexual harassment, will not be tolerated. Any employee covered by this policy who engages in harassment or retaliation will be subject to remedial and/or disciplinary action.

**3.2** Retaliation Prohibition: No person covered by this policy shall be subject to adverse action because the employee reports an incident of harassment, provides information, or otherwise assists in any investigation of a harassment complaint. SEACOR Marine will not tolerate such retaliation against anyone who, in good faith, reports or provides information about suspected harassment. Any employee of SEACOR Marine who retaliates against anyone involved in a harassment investigation will be subjected to disciplinary action, up to and including termination. All employees who believe they have



been subject to such retaliation should inform their supervisor, manager, or their human resources manager.

- 3.3 Harassment based on protected characteristics is offensive, is a violation of our policies, may amount to unlawful behavior, and may subject SEACOR Marine to liability for harm to targets of harassment. Harassers may also be individually subject to liability. Employees of every level who engage in harassment, including managers and supervisors who engage in harassment or who allow such behavior to continue, will be penalized for such misconduct.
- 3.4 SEACOR Marine will conduct a prompt and thorough investigation that ensures due process for all parties, whenever management receives a complaint about harassment, or otherwise knows of possible harassment occurring. SEACOR Marine will keep the investigation confidential to the extent possible. Effective corrective action will be taken whenever harassment is found to have occurred. All employees, including managers and supervisors, are required to cooperate with any internal investigation of harassment.
- 3.5 All employees are encouraged to report any harassment or behaviors that violate this policy. SEACOR Marine has provided a complaint form, attached to this policy, for employees to report harassment and file complaints (Refer to section 10).
- 3.6 Managers and supervisors are required to report any complaint that they receive, or any harassment that they observe or become aware of, to human resources.
- 3.7 This policy will be provided to current employees and to employees upon hiring. The policy should be read in conjunction with the employee handbook and other documentation provided by SEACOR Marine.

## 4. What is Harassment?

Harassment is any unwanted physical, verbal or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to harassment. It also includes treating someone less favorably because they have submitted or refused to submit to such behavior in the past.

Unlawful harassment may involve conduct of a sexual nature (sexual harassment), or it may be (depending on the relevant jurisdiction) related to age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, color, nationality, ethnic or national origin, religion

or belief, sex or sexual orientation, political opinion, types of working arrangement or genetic information. Harassment is unacceptable even if it does not fall within any of these categories.

## Examples of Harassment

Harassment is a form of discrimination and can be verbal, written, visual or physical. It does not need to be intentional. Conduct that creates a work environment that would be intimidating, hostile, or offensive to the recipient of the behavior and to reasonable people in the same position, will not be tolerated and may be unlawful. The following describes some of the types of acts that may be unlawful harassment and that are prohibited when based on protected characteristics:

- Offensive jokes, words or pranks
- Racial slurs and stereotypes
- Name-calling, bullying, intimidation or violence
- Sabotaging or destroying someone's work or work equipment
- Inappropriate texts, emails or online posts and sexual or offensive images, cartoons, objects, signs or reading materials
- Sexual touching, massaging, lewd gestures or leering

## 5. What is Sexual Harassment?

Sexual harassment is a form of sex discrimination. Sexual harassment includes harassment on the basis of sex, sexual orientation, self-identified or perceived sex, gender expression and gender identity. Sexual harassment can be physical and/or psychological in nature.

Sexual harassment includes unwelcome conduct which is either of a sexual nature, or which is directed at an individual because of that individual's sex, when:

- Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment, even if the reporting individual is not the intended target of the sexual harassment;
- Such conduct is made either explicitly or implicitly a term or condition of employment; or
- Submission to or rejection of such conduct is used as the basis for employment decisions affecting an individual's employment.

A sexually harassing hostile work environment includes, but is not limited to, words, signs, jokes, pranks, intimidation or physical violence which are of a sexual nature, or which are directed at an individual because of that individual's sex. Sexual harassment also consists of any unwanted verbal or physical advances, sexually explicit derogatory statements or sexually discriminatory remarks made by someone which are offensive or objectionable to the recipient, which cause the recipient discomfort or humiliation, which interfere with the recipient's job performance.

Sexual harassment also occurs when a person in authority tries to trade job benefits for sexual favors. This can include hiring, promotion, continued employment or any other terms, conditions or privileges of employment. This is also called "quid pro quo" harassment.

### Examples of Sexual Harassment

The following describes some of the types of acts that may be unlawful sexual harassment and that are strictly prohibited:

- Physical acts of a sexual nature, such as:
  - Touching, pinching, patting, kissing, hugging, grabbing, brushing against another employee's body or poking another employee's body;
  - Rape, sexual battery, molestation or attempts to commit these assaults.
- Unwanted sexual advances or propositions, such as:
  - Requests for sexual favors accompanied by implied or overt threats concerning the target's job performance evaluation, a promotion or other job benefits or detriments;
  - Subtle or obvious pressure for unwelcome sexual activities.
- Sexually oriented gestures, noises, remarks or jokes, or comments about a person's sexuality or sexual experience, which create a hostile work environment.
- Sex stereotyping occurs when conduct or personality traits are considered inappropriate simply because they may not conform to other people's ideas or perceptions about how individuals of a particular sex should act or look.
- Sexual or discriminatory displays or publications anywhere in the workplace, such as:
  - Displaying pictures, posters, calendars, graffiti, objects, promotional material, reading materials or other materials that are sexually demeaning or pornographic. This includes such sexual displays on workplace computers or cell phones and sharing such displays while in the workplace.

- Hostile actions taken against an individual because of that individual's sex, sexual orientation, gender identity and the status of being transgender, such as:
  - Interfering with, destroying or damaging a person's workstation, tools or equipment, or otherwise interfering with the individual's ability to perform the job;
  - Sabotaging an individual's work.

### Who can be a target of Sexual Harassment?

Sexual harassment can occur between any individuals, regardless of their sex or gender. Sexual harassment may involve individuals of the same or different gender and is prohibited whether directed toward men or women and regardless of whether the targeted individual accepts or rejects the advances or other offensive behavior.

Harassers can be a superior, a subordinate, a coworker or anyone in the workplace including an independent contractor, contract worker, vendor, client, customer or visitor.

### Where can Sexual Harassment occur?

Sexual harassment is not limited to the physical workplace itself. It can occur while employees are traveling for business or at employer sponsored events or parties. Calls, texts, emails, and social media usage by employees can constitute workplace harassment and may be unlawful, even if they occur away from the workplace premises, on personal devices or during non-work hours.

## 6. Retaliation

Retaliation can be any action that could discourage a worker from coming forward to make or support a harassment claim. Adverse action need not be job-related or occur in the workplace to constitute unlawful retaliation (e.g., threats of physical violence outside of work hours).

An individual is protected from retaliation by SEACOR Marine if the person had a good faith belief that the practices in question were unlawful. However, the retaliation provision is not intended to protect persons making intentionally false charges of harassment.

## 7. Reporting Harassment

Preventing harassment, which includes sexual harassment, is everyone's responsibility. SEACOR Marine cannot remedy harassment unless it knows about it. Any employee who has been

subjected to behavior that may constitute harassment is encouraged to report such behavior to a supervisor, manager or human resources. Anyone who witnesses or becomes aware of potential instances of harassment should report such behavior to a supervisor, manager or human resources.

Any employee who feels harassed, or who has witnessed harassment, should report it so that any violation of this policy can be corrected promptly. Any harassing conduct, even a single incident, can be addressed under this policy.

Reports of harassment may be made verbally or in writing. A form for submission of a written complaint is attached to this policy, and all employees are encouraged to use this complaint form (Refer to section 10). Employees who are reporting harassment on behalf of other employees should use the complaint form and note that it is on another employee's behalf.

## **8. Supervisory Responsibilities**

All supervisors and managers who receive a complaint or information about suspected harassment, observe what may be harassing behavior or for any reason suspect that harassment is occurring, are required to report such suspected harassment to human resources.

In addition to being subject to discipline if they engaged in sexually harassing conduct themselves, supervisors and managers will be subject to discipline for failing to report suspected harassment or otherwise knowingly allowing harassment to continue.

Supervisors and managers will also be subject to discipline for engaging in any retaliation.

## **9. Complaint and Investigation of Harassment**

All complaints or information about harassment will be investigated, whether that information was reported in verbal or written form. SEACOR Marine will conduct a prompt and thorough investigation that ensures due process for all parties, whenever management receives a complaint about harassment, or otherwise knows of possible harassment occurring. SEACOR Marine will keep the investigation confidential to the extent possible. Effective corrective action will be taken whenever harassment is found to have occurred. All employees, including managers and supervisors, are required to cooperate with any internal investigation of harassment.

SEACOR Marine will not tolerate retaliation against employees who file complaints, support another's complaint or participate in an investigation regarding a violation of this policy.

While the process may vary from case to case, SEACOR Marine investigations will be done in accordance with the following steps:

- Upon receipt of complaint, human resources will conduct an immediate review of the allegations and take any interim actions as appropriate. If the complaint is verbal, the complainant will be encouraged to complete the “Complaint Form” in writing; however, if the complainant refuses, management will prepare a Complaint Form based on that verbal reporting;
- If documents, emails or phone records are relevant to the investigation, steps will be taken to obtain and preserve them;
- All relevant documents, including all electronic communications, will be requested and reviewed;
- All parties involved, including any relevant witnesses, will be interviewed;
- Written documentation of the investigation and associated documents will be kept in a secure and confidential location; and
- The individual who reported the harassment and the individual(s) about whom the complaint was made will be informed of the final determination and any corrective actions taken.

Complaints can be made to a supervisor, manager or to human resources. Employees may also report a suspected violation (including by making confidential and anonymous reports) by:

- Calling the toll-free hotline +1-866-384-4277;
- Submitting a report online at EthicsPoint (EthicsPoint can be accessed through the Company’s website at [www.seacormarine.com](http://www.seacormarine.com) and by navigating to the Investors – Corporate Governance page and choosing the Whistleblower link);
- Emailing the Corporate Secretary at [corporatesecretary@seacormarine.com](mailto:corporatesecretary@seacormarine.com);
- Calling the Corporate Secretary on +1 (281) 738-3596; or
- Sending a written complaint via postal mail to the Corporate Secretary’s executive offices at 12121 Wickchester Lane, Suite 500, Houston, TX 77079, United States of America.

## 10. Reference: Complaint Form

## COMPLAINT FORM

If you believe that you have been subjected to harassment, including sexual harassment or harassment based on any other protected characteristic (refer to the Harassment Prevention Policy), you are encouraged to complete this form and submit it to your supervisor, manager or to human resources. You may also report a suspected violation (including by making confidential and anonymous reports) by:

- Calling the toll-free hotline +1-866-384-4277;
- Submitting a report online at EthicsPoint (EthicsPoint can be accessed through the Company's website at [www.seacormarine.com](http://www.seacormarine.com) and by navigating to the Investors – Corporate Governance page and choosing the Whistleblower link);
- Emailing the Corporate Secretary at [corporatesecretary@seacormarine.com](mailto:corporatesecretary@seacormarine.com);
- Calling the Corporate Secretary on +1 (281) 738-3596; or
- Sending a written complaint via postal mail to the Corporate Secretary's executive offices at 12121 Wickchester Lane, Suite 500, Houston, TX 77079, United States of America.

If you are more comfortable reporting verbally or in another manner, your supervisor, manager or human resource manager can complete this form for you and provide you with a copy of it.

Investigations will be conducted as outlined in the SEACOR Marine Harassment Prevention Policy.

### Complainant Information

Name:

Work Address:

Work Phone:

Job Title:

Email:

Select Preferred Communication Method: ☐ Email ☐ Phone ☐ In person

### Supervisory Information

Immediate Supervisor's Name:

Title:

Work Phone:

Work Address:

## Complaint Information

1. Your complaint of harassment is made about:

Name:

Title:

Work Address:

Work Phone:

Relationship to you: ☐ Supervisor ☐ Subordinate ☐ Co-Worker ☐ Other

2. Please describe what happened and how it is affecting you and your work. Please use additional sheets of paper if necessary and attach any relevant documents or evidence.

3. Date(s) harassment occurred:

Is the harassment continuing? ☐ Yes ☐ No

4. Please list the name and contact information of any witnesses or individuals who may have information related to your complaint:

*The last question is optional, but may help the investigation.*

5. Have you previously complained or provided information (verbal or written) about related incidents? If yes, when and to whom did you complain or provide information?

If you have retained legal counsel and would like us to work with them, please provide their contact information.

Signature: \_\_\_\_\_

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