

Harassment Prevention Policy

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Contents

1. Purpose	3
2. Scope	3
3. Policy	3
4. What is Harassment?.....	4
5. What is Sexual Harassment?.....	5
6. Retaliation	7
7. Reporting Harassment	7
8. Supervisory Responsibilities	8
9. Complaint and Investigation of Harassment	8
10. Reference: Complaint Form.....	9

1. Purpose

SEACOR Marine is committed to maintaining a workplace free from any form of harassment, including unlawful harassment based on a characteristic specifically protected by local laws and regulations (“protected characteristic”), such as for example, age, race, color, creed, belief or 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. 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 and is to be read in conjunction with the employee’s employee handbook and applicable local laws.

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 a protected characteristic 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 by following the Complaint and Investigation of Harassment procedures (Refer to section 9).
- 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, and should be read in conjunction with the employee handbook and other documentation provided by SEACOR Marine.

4. What is Harassment?

Harassment is any inappropriate conduct, which has the purpose or effect of creating an intimidating, hostile or offensive work environment. Harassment may take the form of words, gestures or actions.

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 a protected characteristic:

- 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 harassment based on a person's sex is unlawful. Sexual harassment is any unwelcome sexual advance, request for sexual favor, verbal or physical conduct or gesture of a sexual nature, or any other behavior of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation to another, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment. While typically involving a pattern of behavior, it can take the form of a single incident. Sexual harassment may occur between persons of the opposite or same sex. 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 by any employee and may be made verbally or in writing (Refer to section 9). A form for submission of a written complaint is attached to this policy (Refer

to section 10). Employees who are reporting harassment on behalf of other employees may also 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 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 and by navigating to the Investors – Corporate Governance page and choosing the Whistleblower link);
- Emailing the Corporate Secretary at 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, 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 and by navigating to the Investors – Corporate Governance page and choosing the Whistleblower link);
- Emailing the Corporate Secretary at 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 person making 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 harassment is made about:

Name:

Title:

Work Address:

Work Phone:

Relationship to you: Supervisor Supervisee Co-Worker Other (please specify)

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) 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: _____