

Harassment Prevention Policy

Non-US Employees

Corporate Address:
12121 Wickchester Lane
Suite 500
Houston, TX 77079
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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 and by navigating to the Investors – Corporate Governance page and choosing the Whistleblower link);
- Emailing the Corporate Secretary at aeverett@seacormarine.com;
- Calling the Corporate Secretary on +1 (212) 621-9283; 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 and by navigating to the Investors – Corporate Governance page and choosing the Whistleblower link);
- Emailing the Corporate Secretary at aeverett@seacormarine.com;
- Calling the Corporate Secretary on +1 (212) 621-9283; 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

US Employees

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 and by navigating to the Investors – Corporate Governance page and choosing the Whistleblower link);
- Emailing the Corporate Secretary at aeverett@seacormarine.com;
- Calling the Corporate Secretary on +1 (212) 621-9283; 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 and by navigating to the Investors – Corporate Governance page and choosing the Whistleblower link);
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- 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

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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. Employees can also file a complaint with a government agency or in court under federal, state or local antidiscrimination laws. See further details in Section 9 below.

2. Scope

This document applies to SEACOR Marine's executive officers (as determined by the Board of Directors of SEACOR Marine Holdings Inc.) and all employees situated in the SEACOR Marine New York office. This policy further extends to applicants for employment, interns, whether paid or unpaid, contractors and persons conducting business, regardless of immigration status, with the SEACOR Marine New York office. In the remainder of this document, the term "employee" includes this collective group.

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 Harassment of any form, including sexual harassment, will not be tolerated. Any employee or individual 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. All employees who believe they have been a target of such retaliation may also seek relief in other available forums, as explained below in the section on Legal Protections.

- 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 11).
- 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 will also be posted in SEACOR Marine's New York office.

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 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, 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 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.

New York Law protects employees, paid or unpaid interns, and non-employees, including independent contractors, and those employed by companies contracting to provide services in the SEACOR Marine workplace.

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).

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, either internally or with any anti-discrimination agency;
- testified or assisted in a proceeding involving sexual harassment under federal, New York State, New York City and other anti-discrimination laws;
- opposed sexual harassment by making a verbal or informal complaint to management, or by simply informing a supervisor or manager of harassment;
- reported that another employee has been sexually harassed; or
- encouraged a fellow employee to report harassment.

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 11). 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.

Employees who believe they have been a target of sexual harassment may also seek assistance in other available forums, as explained below in the section on Legal Protections.

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 will be created (such as a letter, memo or email), which will contain the following:
 - A list of all documents reviewed, along with a detailed summary of relevant documents;
 - A list of names of those interviewed, along with a detailed summary of their statements;
 - A timeline of events;
 - A summary of prior relevant incidents, reported or unreported; and
 - The basis for the decision and final resolution of the complaint, together with any corrective action(s);
- Written documentation and associated documents will be kept in a secure and confidential location;
- 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; and
- The employee who reported the harassment will be informed 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 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 aeverett@seacormarine.com;
- Calling the Corporate Secretary on +1 (212) 621-9283; 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. 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.

Aside from the internal process at SEACOR Marine, employees 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 may seek the legal advice of an attorney.

In addition to those outlined below, employees in certain industries may have additional legal protections.

State Human Rights Law (HRL)

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

Complaints with DHR may be filed any time within one year of the harassment. If an individual did not file at DHR, they can sue 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 one year or three years is counted from 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 are forwarded to a public hearing before an administrative law judge. If sexual harassment is found after a hearing, DHR has the power to award relief, which varies but may include requiring your employer to take action to stop the harassment, or redress the damage caused, including paying of monetary 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.

Contact DHR at (888) 392-3644 or visit dhr.ny.gov/complaint for more information about filing a complaint. The website has a complaint form that can be downloaded, filled out, notarized and mailed to DHR. The website also contains contact information for DHR's regional offices across New York State.

Civil Rights Act of 1964

The United States Equal Employment Opportunity Commission (EEOC) enforces federal anti-discrimination laws, including Title VII of the 1964 federal Civil Rights Act (codified as 42 U.S.C. § 2000e et seq.). An individual can file a complaint with the EEOC anytime within 300 days from the 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, at which point the EEOC will issue a Right to Sue letter permitting the individual to file a complaint in federal court.

The EEOC does not hold hearings or award relief, but may take other action including pursuing cases in federal court on behalf of complaining parties. 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 or via email at info@eeoc.gov.

If an individual filed an administrative complaint with DHR, DHR will 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 with the New York City Commission on Human Rights. Contact their main office at Law Enforcement Bureau of the NYC Commission on Human Rights, 40 Rector Street, 10th Floor, New York, New York; call 311 or (212) 306-7450; or visit 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. Contact the local police department.

11. 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 and by navigating to the Investors – Corporate Governance page and choosing the Whistleblower link);
- Emailing the Corporate Secretary at aeverett@seacormarine.com;
- Calling the Corporate Secretary on +1 (212) 621-9283; 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: _____