



GMS MANAGEMENT SYSTEM

WORKPLACE HARASSMENT AND ONBOARD COMPLAINT POLICY

It is the policy of the Chouest Companies to provide our employees with a positive, cooperative, non-coercive work environment, free of harassment, discrimination or retaliation. This policy recognizes that harassment, discrimination or retaliation of any kind directed at an employee, including harassment of a sexual nature, is improper and will not be tolerated. The Chouest Companies prohibit retaliation and also discrimination or harassment of employees on the basis of race, color, gender, age, sexual orientation, religion, disability or national origin. Verbal, visual or physical conduct that creates an intimidating, hostile or offensive work environment is an example of the type of conduct, which is prohibited by this policy. Examples of actions that may constitute discrimination or harassment in violation of this policy include epithets, slurs or negative stereotyping. Written materials in the workplace showing hostility toward an employee because of the employee's race, color, gender, age, sexual orientation, religion, disability or national origin are also prohibited.

As to the prohibition of sexual harassment of employees, sexual harassment has been defined as follows:

Unwelcome sexual advances, requests for sexual favors, and other physical, verbal or visual conduct based on sex constitute sexual harassment when (1) submission to the conduct is an explicit or implicit term or condition of employment, (2) submission to or rejection of the conduct is used as the basis for an employment decision, or (3) the conduct unreasonably interferes with an individual's work performance or creates an intimidating, hostile or offensive working environment.

Each employee has not only a right, but also a duty, to report conduct which he or she believes may constitute harassment, discrimination or retaliation. The Chouest Companies will not condone or authorize any kind of retaliation against any employee



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who has made a good faith report of conduct which he or she believes may constitute harassment, discrimination or retaliation in violation of this policy.

All employees of Chouest Companies are responsible for helping to assure that we avoid discrimination, harassment and retaliation. If, as an employee of one of the Chouest Companies, you have been subjected to any type of discrimination, harassment or retaliation, it is your responsibility to notify someone who can address this issue. All complaints regarding harassment, discrimination, retaliation and/or general complaints by any supervisor, manager or fellow employee should be immediately reported to the Chouest Fraud and Abuse Hotline, via phone at (866) 925-5161 or online at chouest.ethicspoint.com.

Those employees who want to make a complaint while at sea should follow the procedures set forth below. The procedure will allow the complaint to be made directly to the Master of the vessel while the vessel is at sea.

If you have been subjected to any type of discrimination, harassment or retaliation while at sea, you should immediately report your complaint to the Master of the vessel. The Master will record the complaint in writing, provide a copy to the employee and shall communicate within 24 hours to the Chouest Fraud and Abuse Hotline the nature of the complaint and shall report, investigate and respond to the complaint to the best of his ability under the circumstances. As soon as reasonably possible under the circumstances, but no later than 24 hours from the time that the complaint is reported to the Master, the Master shall provide the complaining employee with access to the vessel's particular communication device used to communicate with the Chouest Companies, so that the complaining employee may confidentially contact the Chouest Fraud and Abuse Hotline.



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If the Master is the person or one of the people accused of the harassment, discrimination or retaliation, the Mate will be the designated recipient of the employee's complaint and will follow the procedures designated above.

The individual who receives the complaint as stated above shall provide protection to the complaining employee, which may include providing that employee transportation from the vessel where practicable under the circumstances.

The Chouest Companies will further respond to employee harassment, discrimination or retaliation complaints that were made while a vessel is at sea by continuing the investigation into the complaint(s) and if a violation is found, ensuring that appropriate, corrective action is taken in response to the complaint(s) upon the vessel's return to home port.

Employees who believe that they have been subjected to a violation of this policy by a member of management or a co-employee have the right to contact the Equal Employment Opportunity Commission (EEOC) to seek information or to file a charge of discrimination, in addition to any internal administrative remedies they may have by virtue of their employment with one of the Chouest Companies.

Our policy is to investigate all such complaints thoroughly and promptly. To the fullest extent practicable with a thorough investigation, the Chouest Companies will keep complaints confidential. If an investigation confirms the harassment, discrimination or retaliation has occurred, the Chouest Companies will take appropriate corrective action, which may include termination. Likewise, false accusations may result in disciplinary action up to and including termination.

The Chouest Companies view any type of sexual relationship between employees to be a clear violation of our business philosophy and this Workplace Harassment and



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Discrimination Policy. Both parties involved in the relationship are violating our philosophy and policy with respect to credibility, fairness, and example setting. If a relationship of this type develops, you must immediately contact Dionne Chouest Austin, General Counsel, via phone at (985) 601-4111 or via email at dionne@chouest.com, to review possible alternatives, such as transfers. This does not apply to employees who are legally married to each other. Failure to abide by the requirements of this policy may result in disciplinary action up to, and including, termination.

Gary Chouest

Gary Chouest

President

Galliano Marine Service, L.L.C.