

Workplace Harassment and Grievance Policy

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It is the policy of the Company to provide our employees with a positive, cooperative, non-coercive work environment that is free of harassment, discrimination, and 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 Company prohibits 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 that 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 for any of the reasons listed above are also prohibited.

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

Unwelcomed 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/she believes may constitute harassment, discrimination, or retaliation. The Company will not condone or authorize any kind of retaliation against any employee who has made a good faith report of conduct which he/she believes may constitute harassment, discrimination or retaliation in violation of this policy.

All employees of the Company are responsible for helping to ensure that we avoid discrimination, harassment, and retaliation. If, as an employee of the Company, you have been subjected to any type of discrimination, harassment, or retaliation, it is your responsibility to notify someone who can address this issue. Any grievances regarding harassment, discrimination, or retaliation, and/or general grievances 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 report a grievance while at sea should follow the procedures set forth below. This procedure will allow the grievance 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 grievance to the Master of the vessel. The Master will record the grievance in writing and provide a copy to the employee, shall communicate within 24 hours to the Chouest Fraud and Abuse Hotline the nature of the grievance, and shall report, investigate and respond to the grievance to the best of his/her ability under the circumstances. As soon as reasonably possible under the circumstances, but no later than 24 hours from the time that the grievance is reported to the Master, he/she shall provide the reporting employee with access to the vessel's particular communication device used to communicate with the Company, so that the reporting employee may confidentially contact the Chouest Fraud and Abuse Hotline.

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 grievance and will follow the procedures designated above.

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

The Company will further respond to employee harassment, discrimination, or retaliation grievances that were made while a vessel is at sea by continuing the investigation into the grievance(s). If a violation is found, the Company will ensure that appropriate corrective action(s) is taken in response to the grievance(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 Companies.

Our policy is to investigate all such grievances thoroughly and promptly, to the fullest extent practicable, while keeping the grievance(s) confidential. If an investigation confirms the harassment, discrimination, or retaliation has occurred, the Company will take appropriate corrective action, which may include termination. Likewise, false accusations may result in disciplinary action, up to and including termination.

The Company views any type of sexual relationship between employees to be a clear violation of our business philosophy and this Workplace Harassment and Grievance 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.

