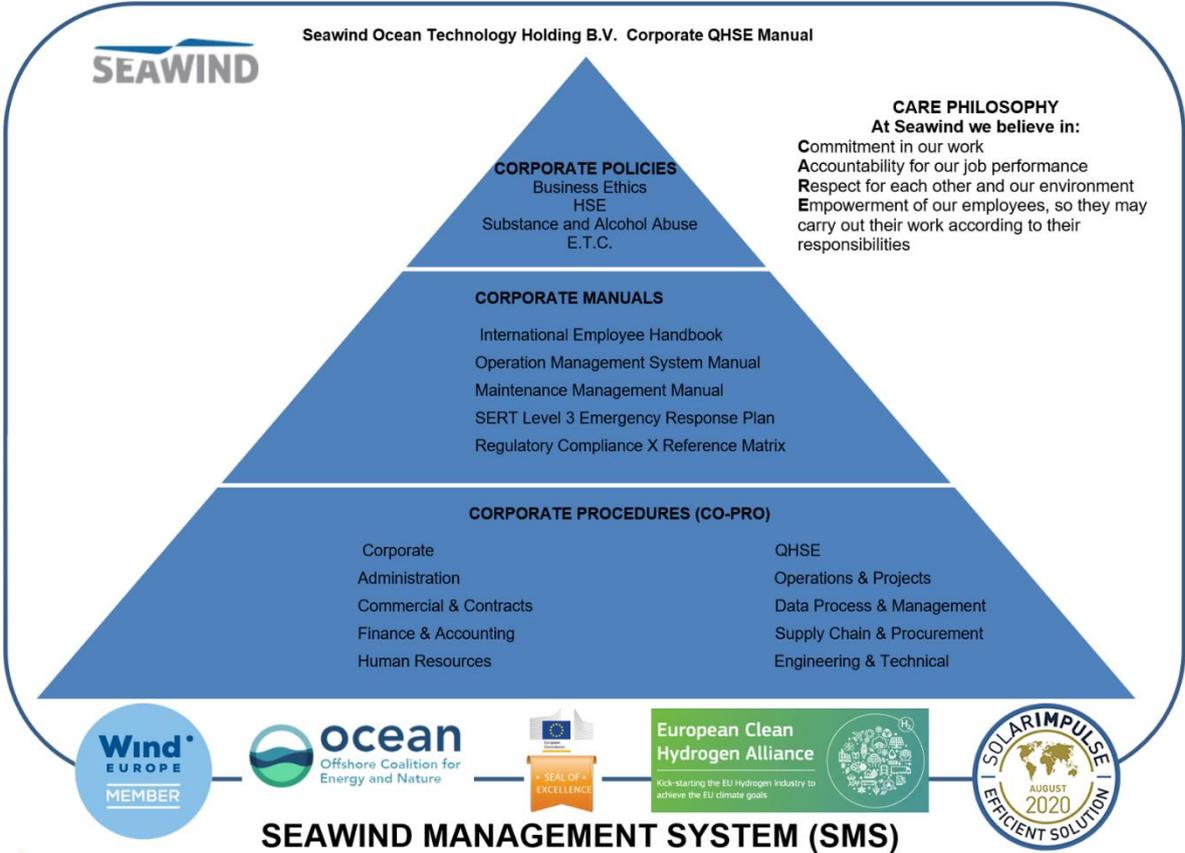


Policy No: **CO-POL-102**

Policy Title: **EQUALITY & DIVERSITY POLICY**





1. Introduction

This document sets out the Seawind's policy on equality and equal opportunities which we have introduced as a commitment to make full use of the talents and resource of all our employees and to provide a healthy environment which will encourage good and productive working operations within the organization. This policy does not form part of any contract of employment, and we may amend it at any time.

The Seawind will ensure that all managers and supervisors with responsibility for equality and equal opportunities are provided with the appropriate equality and equal opportunities training where necessary, which may be updated as required. Other staff may also be required to attend equal opportunities training. Attendance at training will be compulsory if you are notified that you should attend a course.

2. Valid for

This policy is applicable for Seawind Ocean Technology Holding B.V. and all its subsidiaries and affiliates.

3. Purpose

3.1 Seawind's statement of principle on equality and equal opportunities

"Seawind is committed to a policy of treating all its employees, workers and job applicants equally. No employee or potential employee will receive less favorable treatment because of any 'protected characteristic, namely:

- *age (or perceived age)*
- *disability (past or present)*
- *gender reassignment*
- *marriage or civil partnership status*
- *race, colour, nationality, ethnic or national origins*
- *religion or belief*
- *sex*
- *sexual orientation*
- *trade union membership (or non-membership)*
- *part-time or fixed term status*

No employee or potential employee will be disadvantaged by any conditions of employment that cannot be justified as necessary on operational grounds.

Seawind aims to encourage, value and manage diversity and is committed to equality for its entire staff. Seawind wishes to attain a workforce which is representative of the communities and areas which operates. These principles of equality of opportunity and non-discrimination also apply to the manner in which Seawind staff treat clients or customers, our business partners and visitors."

All employees are expected to work with Seawind towards these aims. In certain circumstances, an employee can be personally liable for discrimination against a fellow employee or a job applicant.

3.2 Equality principles

There should be no discrimination, whether direct or indirect, because of any of the protected characteristics set out in Seawind's statement of principle on equal opportunities.

The types of discrimination that are prohibited are explained at paragraph 3.2.1 below.

3.2.1 Discrimination may occur in the following forms

Direct discrimination — this is treating someone less favorably because of a protected characteristic. An example of this is paying someone less because of their sex or because they belong to a particular racial group. 'Because of' is very wide and includes less favorable treatment based on a perception of another person, for example that the person is gay, or is disabled, whether or not this perception is correct and even if the perpetrator knows that their perception is, in fact, wrong. It also includes less favorable treatment because someone is associated with another person who has a protected characteristic.



Indirect discrimination — this is treating people in the same way but in a way which adversely affects those with a protected characteristic. An example of this is telling all employees that they have to work late at night — although applied to everyone, it will adversely affect those employees with childcare responsibilities, and these tend to be women.

Victimization — this is treating someone less favorably because they have asserted their right not to be discriminated against because of a protected characteristic. An example of this would be an employee claiming that they had been discriminated on the grounds of their disability and then their manager deciding when they left not to give them a reference because they had claimed disability discrimination.

Harassment — this is unwanted conduct, related to a protected characteristic, which has the purpose or effect of creating an intimidating, hostile, degrading, humiliating or offensive environment for someone or violating their dignity. Harassment may also be of a sexual nature or may occur because someone has harassed the victim and the victim either rejects or submits to it and, because of that rejection or submission, that person treats the victim less favorably.

3.3 Appointments, promotions and development

Seawind will appoint, train, develop, reward and promote on the basis of merit and ability.

All employees have personal responsibility for the practical application of Seawind's equality policy, which extends to the treatment of job applicants, employees (including former employees), customers or clients and visitors.

3.4 The principles set out in this policy apply:

- In the workplace (offices, facilities, offshore units etc.); and
- Outside the workplace in a work-related context, such as on business trips, customer or supplier events or work-related social events and at any time while a member of staff is wearing a work uniform.

3.5 Special sections

3.5.1 Special responsibility for the practical application of Seawind's equality policy falls upon managers, and supervisors and the HR Director involved in the recruitment, selection, appraisal, promotion and training of employees and the way their terms of employment are fixed.

3.5.2 Seawind's Grievance Process is open to any employee who believes that they may have been unfairly discriminated against. Employees will not be victimized in any way for making such a complaint in good faith. Complaints of this nature will be dealt with seriously, in confidence and as soon as possible.

3.5.3 Disciplinary action will be taken against any employee who is found to have committed an act of unlawful discrimination. Serious breaches of this policy and serious incidents of harassment and bullying will be treated as gross misconduct. Unwarranted allegations that are not made in good faith may also be considered as a disciplinary matter.

3.5.4 In the case of any doubt or concern about the application of this policy in any instance or situation, please consult the HR Director as soon as possible.

Vincent Dewulf

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Chair of the Board

Seawind Ocean Technology Holding B.V