

1 INTRODUCTION

Seagems Group and its subsidiaries (hereafter “Seagems”) is an equal opportunities employer and is committed to diversity, equality, and providing a safe and productive environment that fosters open dialogue and free expression of ideas, free of harassment, discrimination, and hostile conduct. It is within our best interest to promote diversity and eliminate discrimination in the workplace.

2 PURPOSE

This policy reinforces our commitment to providing equality and fairness to all in our employment and not provide less favorable facilities or treatment on the grounds of age, sex, disability, marital status, pregnancy and maternity, sexual orientation, religion or beliefs, gender identification or expression, race (including color, nationality, and ethnic or national origin), political opinion or any other status protected by applicable law. This policy is designed to ensure that Seagems complies with all its obligations under current legislation, including the Equality and Discrimination Act and the Working Environment Act chapter 13.

3 SCOPE

The Equal Opportunities Policy applies to all permanent, hired, part-time and temporary employees. It applies to all aspects of employment, including recruitment, training, appraisals, promotion, conduct of work, disciplinary and grievance procedures, and termination of employment. This policy applies in the workplace, outside the workplace (when dealing with customers, suppliers, or other work-related contacts), and on work-related trips and events, including social events.

4 DEFINITIONS

- a) **Direct discrimination:** when someone is treated less favorably than others because they possess a protected characteristic, or because they are perceived to have, or they are associated with someone who has, a protected characteristic.
- b) **Indirect discrimination:** when there is a policy, rule, or procedure in place at work that applies equally to everyone but puts someone who possesses a protected characteristics at an unfair disadvantage when compared with others.
- c) **Harassment:** when someone’s dignity is being violated at work through unwanted conduct linked to a protected characteristic, or where this conduct creates an intimidating, hostile, degrading, humiliating or offensive environment for them.
- d) **Victimization:** when someone is being treated unfairly at work because they have complained about, or supported a complaint in relation to, discrimination or harassment.

5 OUR COMMITMENTS

All employees will be treated fairly and with respect and dignity. Neither indirect nor direct discrimination shall occur, nor harassment or victimization.

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When we select candidates for employment, promotion, training, or any other benefit, the selection will be based on their aptitude and ability. All employees will be given help and encouragement to develop their full potential and utilize their unique talents. Therefore, the skills and resources of our organization will be fully utilized, and we will maximize the efficiency of our whole workforce. We are at all times committed to:

- To work actively with equality in accordance with the Equality and Discrimination Act chapter 26, including fulfillment of the activity and reporting obligations.
- To promote equality in the workplace, which Seagems believes is good management practice and makes sound business sense. This applies for example in relation to recruitment, negotiation of terms and condition, wages and benefits, promotion and transfer opportunities, training, and dismissal.
- To prevent involuntary part-time work and wage differences based on gender.
- To create an environment in which individual differences and the contribution of all team members are recognized and valued.
- To create a working environment that promotes dignity and respect for every employee.
- Not to tolerate any form of intimidation, bullying, or harassment, and to discipline those that breach this policy.
- To make training, development, and progression opportunities available to all employees.
- To encourage anyone who feels they have been subject to discrimination to raise their concerns so we can apply corrective measures.
- To encourage employees to treat everyone with dignity and respect.
- To regularly review all our employment practices and procedures so that fairness is always maintained.

6 COMMUNICATION

Seagems will inform all employees that an equality and diversity policy is in operation and that they are obligated to comply with its requirements and promote fairness in the workplace. The policy will also be drawn to the attention of our stakeholders, customers, and job applicants. In Seagems, the equality and diversity policy are fully supported by the senior management and by the Board of Directors.

7 REMEDIES

Violations of this policy, regardless of whether an actual law has been violated, will not be tolerated. Seagems Group and its subsidiaries will promptly, thoroughly, and fairly investigate every issue that is brought to its attention.

All employees are therefore expected to respect and act in accordance with the guidelines, where any discriminatory behavior may lead to measures being taken against them.

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8 REVIEW

This policy will be monitored and reviewed annually to ensure that equality and diversity is continually promoted in the workplace. This policy does not form part of any employee's contract of employment, and we may thus amend this policy at any time.

9 REFERENCES

- SG-DMS 2.1 - Employee Code of Conduct*
- SG-DMS 2.2 - Human Rights Policy Statement*
- SG-DMS 2.3 - Ethical Policy Statement*
- SG-DMS 2.8 - Whistleblowing & Grievance Policy*

Seagems Group CEO

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