

Company Policy Statement

6	Complex Revision	16.07.2025		
5	Updated section 6 – introduction of external tool (HinSchG)	15.12.2023		
4	Updated section 6 – Improvement of anonymization	20.06.2021		
3	Added section 6 Whistle Blower Policy	19.06.2018		
2	Update on the health, safety and environment policy	12.12.2017		
1	Initial Revision	11.07.2016		
Revision	Changes	Date		
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2 Scope

The Company Policy Statement outlines our commitment to the following aspects in alignment with our ISO obligations. It serves as a foundational document that guides objectives, responsibilities, and practices within our organisation. Additionally, it reflects our dedication to continual improvement and compliance with relevant regulations and stakeholder expectations.

3 Validity

This instruction is valid from 16.07.2025 for all employees of the covered entities, hereafter referred to as [SeaReenergy Group](#).

3.1 Distribution

Applicable	Entity
Yes	SeaReenergy Offshore Holding GmbH
Yes	Elbe 1 GmbH Renewable Energy Advisors
Yes	Con4Mare GmbH & Cie.KG
Yes	Seartec GmbH - Sustainable Maritime Design
Yes	SeaReenergy Services GmbH
Yes	SeaReenergy Engineering GmbH
No	SeaReenergy Limited
No	SeaReenergy B.V.
No	SEARENERGY SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ sp. z o.o

4 Responsibilities for process

- [Corporate Services Department](#) (Team QHSE) is responsible for policy compliance as well as content updates.
- All employees covered via Section 3.1 are responsible to comply with the Company Policy Statement, laid-down via Section 5
- Management and Team Leads are responsible to enforce compliance and provide guidance during onboarding / changes / updates.
- An Update of the process will be handled via the [Corporate Services Department](#) (Team QHSE).

5 Company Policy Statement

The SeaReenergy Group has implemented a Zero Harm Philosophy as an organizational commitment to prevent harmful workplace events and quality defects, with the ultimate goal of achieving a state of zero harm to employees, contractors, the environment, and the community. Our commitment goes beyond compliance with safety regulations. We are fostering a culture of proactive risk management, continuous improvement, and a holistic approach to safety, health, environmental, and quality performance.



Our Company Policy Statement anchors the philosophy and integrates safety, health, environmental, and quality management practices into a comprehensive framework aimed at preventing harm in every aspect of the organization. It supports a sustainable culture where safety and well-being are paramount, mistakes are treated as learning opportunities, and continuous improvement is a shared responsibility at all levels.

We are dedicated to enhancing our business practices to meet the standards of the United Nations International Bill of Human Rights. Our commitment focuses on being recognized by stakeholders for our economic, ecological, and social responsibility, ensuring excellence in service, reliability, and safety. Central to our mission is the development of our human and technical resources, which supports improved service quality, productivity, and environmental protection. We regard our employees as essential stakeholders, promoting values of quality, reliability, and expertise. We are committed to executing client projects efficiently and transparently, ensuring all necessary resources are available while communicating openly about contract fulfillment and any deviations.

We strictly prohibit discrimination and harassment based on race, gender, religion, age, or sexual orientation. Each employee is expected to perform their duties responsibly and contribute to fostering a healthy and secure work environment. We are treating all employees fairly and justly!

5.1 Our Statement to Quality

The SeaReenergy Group is committed to excellence in every aspect of our operations, always driven by [our vision](#) of innovation and sustainability. Our mission is to provide high-quality services and solutions to our clients in the relevant sectors, ensuring the highest standards are met consistently.

We believe that quality is not just an end result but a continuous journey. Our approach involves sound processes, ongoing training, and the adoption of best practices to ensure we deliver on our commitments. We engage closely with our clients and stakeholders to understand their needs and expectations, enabling us to tailor our services for optimal satisfaction.

Our dedication to quality is reflected in our sound adherence to industry standards and regulations. We foster a culture of responsibility and encourage our teams to take initiative in problem-solving, ensuring that we not only meet but exceed expectations.

We understand that our success is built on the foundation of quality. We are dedicated to maintaining our reputation as a trusted partner in the relevant sectors by delivering safe, efficient, and innovative solutions that contribute to a sustainable future. Together, we strive for excellence, embodying our commitment to quality in every project, every service, and every interaction.

5.2 Our Statement to Health

The SeaReenergy Group is dedicated to prioritizing the health and well-being through a comprehensive approach to occupational health and safety. We commit to preventing injuries and ill health. Recognizing that a healthy workforce is essential for both safety and quality, we promote and support in workplace health management, including ergonomic practices, mental health support, stress management, and preventive healthcare.

All employees are encouraged to actively participate in health programs, report non-conformities, and communicate any hazardous conditions. We are committed to ensuring adequate resources are available to maintain and enhance health performance, with the expectation that every employee conducts their duties in a manner that supports these objectives. Through this commitment, we aim to foster a supportive and healthy work environment that minimizes health risks for all our personnel.

5.2.1 Drugs & Alcohol

In the context of health, the SeaReenergy Group recognizes that substance abuse respectively D&A consumption can have significant negative consequences, not only for the individual but also for their colleagues, the workplace environment, and the overall effectiveness of our operations. We are committed to ensuring the health, safety, and well-being of all our employees, clients, and stakeholders. In alignment with our philosophy of zero harm and our duty of care, we provide specific guidance via [MS-OR-0006 Drug & Alcohol Procedure](#).

5.3 Our Statement to Safety

The SeaReenergy Group is committed to achieve Zero Harm, ensuring the protection of all personnel from accidents and injuries. We proactively identify, assess, and mitigate risks affecting our employees and third-party assets through comprehensive safety programs and robust risk management processes.

We recognize that our workforce is key to maintaining a culture of safety. Therefore, we employ qualified staff and invest in their continuous development in occupational health and safety, including emergency preparedness. Employees are encouraged to actively report non-conformities and hazards, fostering an environment where safety is everyone's responsibility. Their involvement in health and safety program development further strengthens our commitment to collective safety.

Our approach incorporates Behaviour-Based Safety (BBS), promoting positive safety behaviours among our workforce through observation and reinforcement, leading to a more safety-conscious culture. We also embrace different approaches on safety, such as focusing on resilience and learning, which shifts perspective from merely preventing incidents to understanding and enhancing how work is done. This collaborative approach strengthens our safety systems and promotes continuous improvement.

To achieve our safety objectives, we ensure the allocation of adequate resources for health and safety performance enhancement. All employees are expected to conduct their duties in a manner that upholds these crucial safety principles, creating a safer work environment for everyone involved.

5.4 Our Statement to Environment

The SeaReenergy Group is committed to the protection of the environment and employs a comprehensive Zero Harm Policy that extends beyond the workplace to include minimizing environmental impact through sustainable practices, waste reduction, energy conservation, and responsible handling of hazardous materials. To achieve these objectives, we will assess environmental influences and aspects related to our operations and involve up- and downstream stakeholders for establishing appropriate safeguards, this includes a zero-pollution approach.

All employees have a responsibility to report any conditions that might be hazardous to the environment, and they will be actively involved in determining environmental programs. We employ qualified staff and continuously improve their skills related to environmental protection, ensuring adequate resources are available to maintain and enhance environmental performance. Employees are expected to conduct their duties in a manner that aligns with these goals, integrating environmental safeguards into all processes and operations to ensure long-term sustainability.

5.4.1 Sustainability

The SeaReenergy Group is integrating sustainability into all aspects of our operations while ensuring compliance with Environmental, Social, and Governance (ESG) principles. These principles are woven into our daily activities and continually enhanced. As a service provider, we prioritize not only the purpose of our work but also the manner in which we execute our activities. Our commitment to responsible, efficient, and sustainable practices is unwavering.



To uphold this commitment, we proactively identify and assess sustainability-related risks and opportunities across our operations and supply chain. We will establish appropriate safeguards aimed at achieving our Zero Harm philosophy within the sustainability framework. Employing a holistic ESG approach, we believe in the power of collaboration and actively engage in ESG-driven projects with clients, suppliers, and industry partners to promote best practices throughout the value chain. We are committed to allocating sufficient resources and qualified personnel to support the achievement of our corporate sustainability goals. Employees are encouraged to participate actively in sustainability initiatives and propose improvements. It is the responsibility of all employees to align their efforts with these objectives to ensure we meet our sustainability commitments successfully.

5.5 Zero Harm supported by Just Culture

The SeaReenergy Group embraces a Just Culture that empowers employees to report concerns without fear of retribution, transforming mistakes into invaluable learning opportunities. By fostering open communication and collaboration, we balance responsibility with a focus on systemic issues, cultivating an environment where continuous improvement thrives. This approach not only reduces incidents but also supports our foundation as a learning organization, where training, audits, and feedback loops drive resilience and performance enhancements at every level. Together, we are dedicated to creating a culture where everyone can contribute to the ongoing pursuit of excellence.

5.5.1 Trusted flagging

Trusted flagging is enabling all concerned stakeholders to raise concerns and address and correct inappropriate conduct and actions. As a learning organization we ensure compliance with the Whistleblower Protection Act (DE: HinSchG) for sharing of insider knowledge regarding existing misconduct without fear of reprisal. We provide secure reporting channels which prohibits retaliation against reporting stakeholders. Reporting is possible via the following means:

the digital system	preferred
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• <https://searenergy.hinweisgeberexpertemeldeplattform.de/>

E-mail contact	alternatively
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• info@hinweisgeberexperte.de

telephone	alternatively
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• 089 21 52 74 33

6 Documentation of process for evidence

[Targets KPI](#)

7 Related or attached documents

[Drug & Alcohol Procedure](#)

Org.-Chart: [Company Perspective](#)

- Department: [Corporate Services](#) (SR)

[DE: Hinweisgeberexpertemeldeplattform/](#)