

GULF SUBSEA Anti-corruption and Anti-bribery policy

Gulf Subsea take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate. This Anti-corruption and Anti-bribery Policy govern when we work globally.

GULF SUBSEA shall conduct all of its business in an honest and ethical manner.

We conform fully with the legal requirements of the UK Bribery Act 2010 that sets clear standards of illegal behaviour and has resulted in the introduction of the offence of corporate failure to prevent bribery. Bribery and corruption are punishable for individuals by up to ten years' imprisonment and if GULF SUBSEA are found to have taken part in corruption, we could face an unlimited fine.

GULF SUBSEA do not make, and will not accept, facilitation payments or 'kickbacks' of any kind and the Company does not make contributions to political parties.

Management commitment to Anti-corruption and Anti-bribery

GULF SUBSEA Management shall promote identification of bribery and corruption risks throughout its business and actively aim at preventing bribery and corruption occurring by:

Communication: We shall communicate this policy and relevant guidance to employees through our established internal communication channels. We shall also communicate this policy to our suppliers, contractors and business partners.

Training: We shall ensure that employees involved in operations within the scope of this policy receive training appropriate to their activities and their associated risk exposure.

Books and records: We shall maintain adequate accounts and records which document all financial transactions.

Audit: Our internal control systems shall be subject to regular internal and independent external audit.

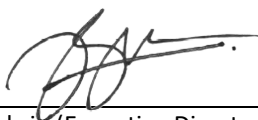
Business relationships: We shall ensure that our suppliers and business partners are fit to do business with.

Conflicts of interest (Gifts and hospitality): We shall address conflicts of interest and the risks created by gifts and hospitality through the implementation of our internal policies.

Government officials: We shall implement procedures applicable to our direct or indirect dealings with government officials and related persons or organisations as and when necessary.

This policy extends to existing and potential clients, customers, suppliers, business contacts, agents, advisers, and government and public bodies.

Signed



Alffi Syahrin (Executive Director)

Date

27th July 2022