



## ANTI BRIBERY AND ANTI CORRUPTION POLICY

As Managers of dynamically positioned and anchored semisubmersible floatels we provide offshore accommodation and operational services to oil platforms. This Policy applies to all activities and services provided by OOS International BV.

The following is a brief summary of some of the elements of the OOS International B.V. Anti-Bribery and Anti-Corruption Policy, but it is not a substitute for the detail of the policy which follows.

- **Scope of this policy:** This policy extends to cover officers, employees and persons associated with OOS International B.V. and its subsidiaries (the “**Company**”), including third party representatives/agents, see Section 1.1.
- **Conduct covered:** It applies to improper dealings with, or attempts to influence, private citizens, as well as foreign, public or government officials (see Section 2.1, 3.1), and extends to all dealings of the Company (see Section 2.2). Improper dealings or attempts to influence come in many different forms and do not always involve payment of money. This policy includes some descriptions of conduct that are specifically prohibited, and of conduct which may be prohibited depending upon the circumstances.
- **Providing or receiving gifts, hospitality, travel or other types of benefits:** No benefit may ever be provided if doing so may influence, or appear to influence, the decision of a third party to engage in business with the Company, or the terms on which they will do business. Within certain limits and circumstances, the provision or receipt of certain types of benefits may be permissible. Please familiarize yourself carefully with the applicable limits and circumstances (see Sections 4.3 and 4.4). Outside of these, benefits may only be provided or received with written approval from the Compliance Officer.
- **Facilitating payments:** Please take special note that facilitating payments (sometimes known as “grease payments”) are prohibited (see Article V).
- **Charitable donations, sponsorships and political contributions of any nature:**
  - These are only permitted with the express advance approval of the Compliance Officer (see Articles VI and VII).
  - **Third Party Representatives:** The Company (and potentially individuals) can be held responsible for violations of anti-bribery laws by third party representatives or agents
    - acting on behalf of the Company. Accordingly, the Company has put certain procedures in place to protect against this exposure and these procedures must be followed before and throughout dealings with any third party representatives or agents. The procedures are described in detail in Article VII and Appendix II.
- **Prohibited means of payment:** Cash payments, and payments to certain types of bank accounts are prohibited, as are cheques written to cash or bearer (unless authorised by the Compliance Officer), see Article IX. All payments must be supported by properly documented invoices. It is prohibited to establish or maintain undisclosed or unrecorded funds or assets.
  
- **Books and records:** Every director, officer, employee, representative or agent has the obligation to accurately and fairly record all of his transactions involving any expense of, or



related to, the Company in accordance with the relevant internal accounting controls and procedures (see Article X).

**Violation of this policy will result in disciplinary action by the Company, potentially including dismissal, or in the case of third party representatives or agents, termination of contract or imposition of contractual penalties.**

Endorsed by:

*Leon Overdulve, CEO OOS International BV.*

A handwritten signature in blue ink, appearing to be "Leon Overdulve", is written over a faint, light blue circular stamp or watermark.