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Amendment Record

Rev.	Date	Amendment By	Approved By	Amendment Description	Pages Affected
0	17/01/17	SR	JH	New Policy	N/A
1	23/01/19	LG	CAR	Addition of GDPR statement and general updates	8
2	13/06/19	SR	CAR	Additional wording in paragraph 7	7
3	23/08/21	HP	AG	New format and amended due to company acquisition and integration.	All
4	26/03/24	B. Tetkowska	R. Alan	General Review New Format and Logo	All



1. PURPOSE

The overarching goal of a supplier code of conduct is to instil financial and social transparency in the supply chain, with the intention of creating accountability and full disclosure around issues such as human rights, health and safety and environmental impacts. In support of this OEG Group (OEG) have implemented this Supplier Code of Ethics which details our expectations for all members of our supply chain.

This policy applies to all suppliers working for OEG, or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and businesses.

2. SCOPE

This Procedure applies to all suppliers working for OEG Group (OEG).

3. DEFINITIONS

Suppliers Code of Ethics

A Supplier Code of Conduct, also known as “Code of Ethics” or “Code of Practice”, is a set of rules defining the tolerated processes and best practices applied by one’s suppliers.

Human Rights

Human rights are the fundamental rights and freedoms that belong to every single one of us. The Human Rights Act protects these rights and allows us to challenge authorities if they violate them.

4. REFERENCES

- UK Bribery Act 2010
- US Foreign Corrupt Practices Act
- International and Foreign Law on Bribery and Corruption
- Declaration of Human Rights – Amnesty International UK

5. RESPONSIBILITIES

5.1 CEO

OEG's CEO has overall responsibility for ensuring that this policy complies with our legal and ethical obligations, and that all those under OEG's control comply with it.

5.2 Managers

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate training.

5.3 All Staff

The prevention, detection and reporting of modern slavery and other forms of corruption are the responsibility of all those working for the Company or under its control. All Staff are required to avoid activity that breaches this policy

5.4 Suppliers

All Suppliers under OEG Group provision must comply with the requirements set out in this policy.

6. CODE OF ETHICS FOR SUPPLIERS

We aim for high ethical and environmental standards, both within OEG Group ("OEG") and throughout our supply chain. Our people and our suppliers are required to operate in an ethical, legally compliant and professional manner. We require all our Suppliers to commit to our Code of Ethics for Suppliers ("Code") and to promote the same high standards in their supply chains.

The Code covers commitments against corrupt practices and commitments to ethical and environmental standards. The Code is based on statutory requirements and internationally recognised standards set out in the UN Universal Declaration of Human Rights, the International Labour Organisation Conventions and the Modern Slavery Act 2015 (UK).

This Code relates to all suppliers to our local & global operations and forms part of our approach to corporate responsibility in OEG. The Code is mandatory for all suppliers. It exists to protect the relationship between OEG and our suppliers and to help us maintain the high standards we expect:

- OEG's Ethical Standards;
- We work to the highest standards of professional competence and integrity;
- We operate a purchasing process which is fair and equitable to all parties;

- We aim to protect OEG people from exposure to, or the appearance of, participation in collusive or unethical practice;
- We recognise the legitimate interests of all parties and operate our purchasing process in good faith;
- We do not accept or give gifts, hospitality or entertainment which might affect, or which is intended to affect, business judgment. This prohibition applies equally to cash gratuities, goods and services, in kind or at preferential rates;
- OEG people do not accept gifts, hospitality or entertainment outside the scope of their employment which might affect, or which is intended to affect, their judgment on a matter that is within the scope of their employment. This prohibition applies to cash gratuities, personal discounts, gift vouchers, loans, favorable terms on any product or service intended for personal use, share options, to name just a few;
- We only accept hospitality offered in a business context, and this must be offered on a reciprocal basis;
- We do not seek to influence business decisions by offering gifts, hospitality or entertainment or by any other inappropriate means;
- We do not engage in, whether directly or indirectly, any transaction involving trade sanctioned countries;
- We are committed to complying with all anti-bribery and anti-corruption laws applicable to our business, including the UK Bribery Act 2010 and the US Foreign Corrupt Practices Act;
- We respect the confidentiality of our suppliers' information and expect our suppliers to keep confidential all aspects of our relationship;
- We are committed to supporting the elimination of acts of Modern Slavery and accordingly acknowledge The Modern Slavery Act 2015.

7. SUPPLIER COMMITMENTS AGAINST CORRUPT PRACTICES

We expect that your organization:

- Works and will, in all its dealings with OEG, work to the highest standards of professional competence and integrity;
- Operates in a fair and equitable manner;
- Aims to protect its people from exposure to, or the appearance of, participation in collusive or unethical practice;
- Recognises the legitimate interests of all parties and, in all its dealings with OEG, acts in good faith;
- Does not accept or give gifts, hospitality or entertainment which might affect, or which are intended to affect, business judgment. This prohibition applies equally to cash gratuities, goods and services, in kind or at preferential rates;
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- Shall ensure that your people do not accept gifts, hospitality or entertainment outside the scope of their employment which might affect, or which is intended to affect, their judgment on a matter that is within the scope of their employment. This prohibition applies to cash gratuities, personal discounts, gift vouchers, loans, favourable terms on any product or service intended for personal use, share options, to name just a few;-
- Will only accept hospitality offered in a business context, and only if offered on a reciprocal basis;
- Does not seek to influence business decisions by offering gifts, hospitality or entertainment or by any other inappropriate means;
- Does not and will not offer or give any OEG person any personal gift, hospitality or entertainment which might affect, or which is intended to affect, the business judgment of that OEG person. This prohibition applies to cash gratuities, personal discounts, gift vouchers, loans, favourable terms on any product or service intended for personal use, share options, to name just a few;
- Does not engage in, whether directly or indirectly, any transaction involving trade sanctioned countries;
- Is committed to complying with all anti-bribery and anti-corruption laws applicable to your business, including, where relevant, the UK Bribery Act 2010 and the US Foreign Corrupt Practices Act; and
- Respects the confidentiality of our information and keeps confidential all aspects of our relationship;
- Is committed to supporting the elimination of acts of Modern Slavery and accordingly acknowledge the Modern Slavery Act 2015.

8. SUPPLIER COMMITMENTS TO ETHICAL STANDARDS

Compliance with all laws

As a supplier or potential supplier to OEG, we expect you to comply with all local national, European Union and International laws and regulations in relation to ethical employment and trading.

Exploitative Child Labour is Eliminated

We believe giving young people opportunities in the working environment is crucial for their development, and would not wish to limit this; however, we believe it must be done subject to national laws on the employment of minors and in any event in a responsible way.

We expect that your organization

- Employs no person below the minimum legal age for employment.
- Does not employ any young persons (under 18 years) at night or for any hazardous work.
- Will make the best interests of the young person your primary consideration where a young person of less than 18 years is employed, and will ensure the employment does not adversely harm the young person's education, health or physical, mental, spiritual, moral or social development; and

- Supports and develops policies and programmes that assist any child found to be performing child labour to enable the child to remain in education until no longer a child.

9. EMPLOYMENT IS FREELY CHOSEN

We expect that your organization

Does not use forced, bonded or compulsory labour and workers are able to leave their employment after reasonable notice has been served; and does not require workers to lodge deposits of money to secure their position.

No Discrimination is Practiced:

- You must ensure that all workers are treated fairly and with dignity and respect.
- You must ensure that no worker receives less favourable treatment in respect of their employment on the grounds of race, gender, religion or belief, any disability, marital status, national origin, sexual orientation, age or the fact that they are a part time or fixed term worker, or is disadvantaged by conditions or requirements which cannot be shown to be justifiable.

These commitments apply to recruitment of persons from outside the workplace and the treatment of contract workers.

Freedom of Association

- All workers must be free to join, or not to join trade unions or similar external representative organisations.
- All workers must be informed and consulted in accordance with national laws

10. WORKING CONDITIONS ARE HEALTHY AND SAFE

We expect your Organisation to:

- Provide a healthy and safe working environment for all workers in accordance with international standards and national laws;
- Provide access to clean toilet facilities, drinkable water and, if applicable sanitary facilities for food storage;
- Provide a work environment for all workers that is free from health and safety risks as far as is reasonably practical;
- Identify hazards at the earliest opportunity and the most effective, preventative action implemented immediately; and
- Provide the appropriate level of health and safety information, instruction, training and supervision to all workers as and when required to minimise all risks.

11. APPROPRIATE WAGES ARE PAID

We expect your organization to:

- ensure all workers receive written understandable information on their employment conditions prior to entering employment and the particulars of their wages for the pay period concerned each time that they are paid;
- ensure that wages paid for a standard working week meet or exceed national legal standards; and
- prohibit the deductions from wages as a disciplinary measure.

Working Hours must not be Excessive

- Standard working hours shall comply with national laws and not be excessive.

Regular Employment Entitlements

- To every extent possible, we expect you to ensure that any work undertaken is performed on the basis of a recognised employment relationship established through national law and practice;
- We expect you to meet your obligations to employees under labour or social security laws, and regulations arising from the regular employment relationship should not be avoided. Examples include the abuse of labour-only contracting or sub-contracting, excessive repetition in the use of fixed term contracts where there is no intent to provide regular employment.

Respect for the Individual

We expect you to treat your workers with respect and dignity. Physical or verbal abuse or harassment on the grounds of race, gender, religion or belief, disability, marital status, national origin or age and any threats or other forms of intimidation must be prohibited.

12. SUPPLIER COMMITMENTS TO ENVIRONMENTAL STANDARDS

Compliance with all Environmental Laws

As a supplier or potential supplier to OEG, we expect you to comply with all national, European Union or International laws in relation to the environment.

Environmental Efficiency

We are committed to proactively managing and reducing the impact of our business on both the local and global environment and to increasing its environmental sustainability.

We Expect you to have in place and apply Policies and Processes to continuously identify and act on Opportunities to:

Reduce your business' resource consumption including:

- Water;
- Energy (gas, electricity and solid fuels);
- Office materials such as paper, toner cartridges, plastic cups and containers, drink cans, fluorescent tubes;
- Any other finite raw materials applicable to your business;
- Minimise the waste generated by your business and seek to reduce, recover or recycle waste generated by your business;
- Where waste from your business is disposed of to seek and use an environmentally sound disposal option;
- OEG expects our key suppliers to have ISO 14001 certification or be actively working towards this international environmental standard.

13. MONITORING AND COMPLIANCE

- This Code is a mandatory requirement for working with OEG. From time-to-time OEG may conduct ad hoc assessments to ensure the Code is being upheld;
- We expect our suppliers to provide their employees with adequate training and guidelines and to implement the recognised standards reflected in this Code and to have a process in place to ensure the standards are upheld;
- We expect our suppliers to provide environmental data regarding their operations and they will be encouraged to improve if there are any areas of poor performance;
- If any supplier that falls below the recognised standards and does not adhere to this Code, OEG may work collaboratively with them to achieve these standards where appropriate;
- If a supplier persistently fails to take corrective action within agreed timescales, thereby failing to show a real commitment to this Code, OEG reserves the right to terminate OEG's contract with that supplier by giving seven (7) days written notice;
- If a supplier fails to meet any of the supplier commitments against corrupt practices, OEG reserves the right to terminate OEG's contracts with that supplier immediately by giving written notice and where necessary report the supplier to the appropriate authorities.



14. ATTACHMENT 1 – ACKNOWLEDGEMENT & DECLARATION FORM

Acknowledgement & Declaration Form

I hereby acknowledge that I have read and understand the content of the OEG Suppliers Code of Ethics Policy (Document reference – OEG-GLOBAL-POL-005) and declare that We fully comply with the requirements of the Document.

Please read the document fully, sign the section below and return only this page to compliance@oegoffshore.com

Signature:

Company stamp In this box

Name in Block Capitals:

Company:

Country:

Date:

Personal data processed by OEG Group as part of a documented policy or procedure is held in compliance with current data protection legislation including the General Data Protection Regulation (GDPR) and any other laws, regulations and provisions relating to Processing applicable in the United Kingdom or any other country.