

**ANTI-BRIBERY POLICY STATEMENT**

Hughes Subsea Services Limited (Hughes Subsea) recognises its duty to ensure that all operations are transparent, reliable and trustworthy; Hughes Subsea has implemented measures to ensure the highest standards of corporate ethics and integrity are adopted throughout the company. Strong corporate ethics are essential to ensure a culture of trust and confidence is maintained, to increase the company's good reputation, and to foster strong working relationships with clients.

The Hughes Subsea anti-bribery policy ensures that:

- Compliance with the Bribery Act 2010 is maintained
- Gifts and hospitality are managed appropriately
- The integrity of workers is maintained and protected
- Conflicts of interest are identified and dealt with appropriately
- The reputation of Hughes Subsea is safeguarded

**Gifts and Hospitality**

It is recognised that the exchange of corporate gifts and hospitality is a common occurrence in business. It is Hughes Subsea policy to allow the exchange of gifts and hospitality within reasonable limits, and on the condition of good faith.

When considering the receipt or exchange of gifts and hospitality, the following shall be considered:

- The exchange complies with the law
- The exchange should be a corporate exchange (not a personal one)
- The exchange is appropriate to the time of year (e.g. festival periods such as Christmas)
- The exchange is declared and registered
- There is no exchange of money
- There is no intent on the part of either party to influence business decisions or advantages in the favour of either party

If there is any suspicion or expectation of preferential treatment in exchange for gifts and hospitality, it is Hughes Subsea policy to refuse such offerings. Exchanges offered by official public bodies or representatives (political parties, local councils) must not be accepted without careful consideration and authorisation from the Managing Director.

Corporate hospitality shall be acceptable under certain circumstances. Refreshments shall be acceptable when offered in the pursuit of business activities (e.g networking, meetings, seminars) on the condition that the refreshments are made available to all attendees and are not provided with an expectation of reciprocation.

Prior to acceptance of gifts and hospitality, approval should be sought from the Managing Director.

Hughes Subsea shall maintain records of all gifts and hospitality with a value of over £500. The record shall note a description of the exchange offered, details of the involved parties, details of approval and details of the value of the exchange.

Non-compliance with this policy shall be considered grounds for disciplinary action. Where breaches of this policy are identified this shall be reported to the local police or to the National Crime Agency. Individuals are able to report concerns directly to the agency should they feel unable to approach Company Management. Further guidance can be found on the Nation Crime Agency website:

- [nationalcrimeagency.gov.uk/what-we-do/crime-threats/bribery-corruption-and-sanctions-evasion/how-to-report-international-bribery-and-corruption](https://nationalcrimeagency.gov.uk/what-we-do/crime-threats/bribery-corruption-and-sanctions-evasion/how-to-report-international-bribery-and-corruption)

This policy, and the company's exposure to bribery and corruption risk, shall be reviewed annually.

Signed,

Ian Hughes  
Managing Director  
Date: 07/03/2022

