



MARINE
CONTRACTORS



CODE OF CONDUCT

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CONDUCT**



We are HMC, a leading marine contractor in the offshore oil and gas industry. Ever since we launched our operations in 1963, we have been committed to pioneering and solving challenges in harsh marine conditions worldwide, using our unequalled equipment and people.

We are highly specialized in our business and can do what others cannot do. We believe in long-term relationships based on trust. Therefore our vision and strategy are based on fairness, transparency, integrity and respect for the interests of our stakeholders in a wide variety of social, political and economic environments.

Our reputation is our greatest asset. Every day we can be faced by challenging choices. It is our craftsmanship and integrity that defines our reputation. We are each accountable for our own decisions. And we are accountable to all our colleagues across the world. That is why we ask you to adopt the HMC way of working, as set out in this Code of Conduct and underlying policies.

OUR BEHAVIOURAL VALUES

Contractor mentality

We deliver. Our reputation attests to the fact that we know how to bring any project, no matter how revolutionary, to a successful conclusion. We will not stop until it works. We dare to look ahead, think solution-oriented and are straightforward in our approach to get the job done in accordance with our customers' expectation. Our approach is based on the audacity to let the responsible persons take ownership, make decisions and follow them through. The success of HMC is driven by your entrepreneurship and commitment to create value for our customers, by taking responsible risks and driving for innovation.

Create impact

Our ingenuity and adaptability are our distinctive strength. We are specialists in our field, and are driven by possibilities to turn ideas into action. Every project that we do is unique. Therefore, we invite you to take ownership and come up with solutions to our challenges. We strive for a balance between fresh eyes and clear-cut procedures. Our common goal is to deliver high quality products and services and good financial results. The combination of both allows us to continue the successes from the past, in a responsible way.

Work together

Working effectively in tough marine environments demands more than simply knowing what to do.

We depend on excellent teamwork and leading by example to solve problems and create value for our customers. Our teams consist of people from different cultures and disciplines, who are united by a shared passion for excellence. We believe that our different backgrounds and approaches keep each other on track. We need each other; every team and also our external partners contribute to our success in a unique way.

*“We are specialists in our field,
and are driven by possibilities to
turn ideas into action”*

We care for each other, support one another and pay attention to each other’s interests. By using feedback from our customers and each other, we find ways to enhance innovation, safety and performance.

Grow people

We believe that our employees are the key to our success. We take responsibility for our people and are committed to attracting, developing, and retaining the best people to ensure the optimal performance of our business. From a belief in long-term relationships with our employees, we invest in your professional development and job satisfaction. We provide you with the necessary resources, training and opportunities to maximize your potential and contributions to the business.

*“We believe that our
employees are the key
to our success”*

We encourage you to develop yourself, explore positions across our divisions and show what you are capable of. This also applies to our leaders, because strong leaders are the cornerstone of our organization. We select our leaders based on their qualities and ask them to be a role model for the people in our organization.

Be respectful

We are a reliable business partner. This requires fair dealing with each other, our customers and our environment. We reject unethical or illegal business practices and do not accept any form of bribery or corruption, because this undermines our values and our obtained trust. Being respectful starts with a safe working environment, based on awareness of each other.

Act safe

We believe that investing in safety will pay for itself. Therefore we are committed to maintaining an Incident and Injury Free workplace at all times, both onshore and offshore. Together, we minimize the probability of incidents resulting in personal injuries, illnesses, and damage to property and the environment.

If you think that work cannot be or is not being executed safely, you have the authority and obligation to halt that work and initiate action to rectify unsafe conditions. We invite anyone in our organization to enhance our work processes, based on safety, efficiency and quality.



CONTRACTOR MENTALITY

ENTREPRENEURSHIP

CUSTOMER FOCUS

DRIVE FINANCIAL PERFORMANCE

CREATE IMPACT

SHOW PRIDE

TAKE OWNERSHIP

URGE TO IMPROVE AND
DELIVER QUALITY

WORK TOGETHER

OPERATIONAL EXCELLENCE

LEAD BY EXAMPLE

PROVIDE AND ACCEPT
FEEDBACK

GROW PEOPLE

CHALLENGE AND SUPPORT

EMPOWERMENT

DEVELOP COMPETENCES

BE RESPECTFUL

INTEGRITY

DEMONSTRATE BUSINESS
ETHICS

BUILD BUSINESS
RELATIONSHIPS

ACT SAFE

SPEAK UP

COMPLY

CARE FOR PEOPLE, PROPERTY,
ENVIRONMENT

Social responsibility and care for safety, health and the environment are at the heart of our organization. We therefore endorse the internal and external rules that safeguard a responsible way of working. Below, you find a summary with essential guidelines from these internal and external policies. We ask you to familiarize yourself with these guidelines and the underlying policies of this Code of Conduct.



RESPONSIBILITY TO OUR SOCIETY

We aim to act sustainably as we believe it is the right thing to do. We provide services that create economic, environmental, and social value. We take responsibility for our own safety, health and wellbeing, and for others who may be affected by our actions. We want to minimize damage to the environment and we aim to make sustainability an integral part of how we do business, benefiting the company, our clients, and society. We stimulate and develop practical improvement initiatives within projects and offshore execution to lower our operational footprint. Since our vendors are important to our success, we also expect them to act responsibly towards society.

Respecting Human Rights is a key requirement for us, working as we do in varied, often complex environments. Due to the impact of our operations, we pay special attention to the rights and concerns of local communities in countries where we work.



RESPONSIBILITY TO EACH OTHER

At HMC, everyone should feel safe and free to be themselves. We therefore do not tolerate any form of discrimination, intimidation, harassment or bias, whether committed by or against a manager, co-worker, customer, supplier or visitor. We reject any form of illegal, unethical, or dishonest behaviour that could result in personal advantages or could harm our company or another party. We take all reasonable measures to protect HMC's property and assets from loss or damage.



RESPONSIBILITY TO OUR CUSTOMERS

We compete fairly and honestly. We believe that customers and society as a whole benefit from fair, free and open markets. We believe in competing on the merits of our business and wish to avoid even the appearance of improper conduct with our customers. We do not accept payments or items of value if this could reasonably be viewed as influencing our decisions. We are alert for personal and professional conflicts of interest and take immediate and appropriate steps to resolve or manage any that may arise. We take proactive measures to safeguard our documents, computers and other data devices that contain personal or confidential information and we do not use confidential information for personal gain.

CODE OF CONDUCT **POLICIES**

Our responsibilities towards one another, our customers and our society are described in more detail in the HMC policies below:

1. Human rights
2. Discrimination
3. Harassment
4. Fair competition
5. Data protection
6. Bribery & corruption
7. Gifts & hospitality
8. Government officials
9. Fraud
10. Waste, abuse & theft
11. Money laundering
12. Trade restrictions
13. Compliance reporting

Speak up

Please feel free to speak up when you see any behavior that does not live up to our Code of Conduct or to our policies. If you suspect misconduct, have a look at our Compliance Reporting policy to see what you can do. We deal with reports and complaints in strict confidence and investigate promptly through management or an appointed person. We do not retaliate nor undertake any action against an employee for filing a report or complaint under our Code of Conduct or related policies.