## Subsea 7 Compliance and Ethics Programme Principles

<table>
<thead>
<tr>
<th>PRINCIPLES</th>
<th>PROCEDURES</th>
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| 1 Top Level Commitment | • Board responsibility for the anti-corruption programme  
  • Compliance Officer/Function |
| 2 Risk Assessment | • Enterprise risks  
  • Country risks  
  • Sector, market and work-type risks  
  • Project- and transaction-specific risks  
  • Third party risks: Intermediaries, supply chain, business partners and others |
| 3 Clear Policies | • Code of Conduct  
  • Anti-Corruption Policy incl. Facilitation Payments  
  • Gifts and Hospitality  
  • Conflicts of Interest  
  • Political, Charitable and Community Support  
  • Other high-risk areas |
| 4 Communication, Education and Training | • Internal communication  
  • Education and training  
  • "Whistle-blowing" channels  
  • External communication (business partners, supply chain and other stakeholders) |
| 5 Procedures and Controls | • Employment procedures  
  • Decision-making and approval processes  
  • Financial controls  
  • Tender controls  
  • Supply Chain Management controls  
  • Anti-corruption contract terms  
  • Due diligence |
| 6 Monitoring, Enforcement and Review | • Detection and testing (incl. Auditing and Monitoring)  
  • Investigation and corrective action  
  • Measurement and reporting  
  • Keeping records  
  • Continual improvement |
| 7 CULTURE AND VALUES | |