



SUPPLIERS – CODE OF CONDUCT FOR CONTRACTORS

SUBMITTED : September 27, 2023



Copyright: The reproduction, distribution and use of this document, as well as the communication of its contents to other parties without express authorization from DISA International Holding BV or one of its affiliates, is strictly prohibited.

© DISA INTERNATIONAL HOLDING BV.

UNVERIFIED IF PRINTED AND/OR DOWNLOADED. CONFIRM VALIDITY BEFORE USE

Rev	Date	Description	Prepared	Checked	Approved
1	27/09/2023	Approved Instructions	ACM	MR/JP	DdG

1. Introduction

DISA INTERNATIONAL contains several entities with different activities (among those inshore diving, support for offshore oil & gas activities and maintenance for offshore windfarms) where the projects are the core of the business. DISA INTERNATIONAL wants to be the most competitive project company. Through a direct and open dialogue with our customers and partners. We couple this with our professional policy on cost efficiency, engineering, global expertise and focus on operational excellence. This is how DISA INTERNATIONAL arrives at groundbreaking solutions.

The projects that DISA INTERNATIONAL focuses on include much of our under- and above water expertise on projects where DISA INTERNATIONAL makes the difference for the customer through our specialist knowledge and expertise in under- and above water solutions. DISA INTERNATIONAL is an exemplary partner in subsea activities, deploying our innovative modular subsea techniques and tools and standardizing our approach.

2. General Requirements of the Code of Conduct

DISA INTERNATIONAL subscribes to the importance of corporate social responsibility as described in our business plan and implements it company-wide. Our policy is in line with industry guidelines and the principles from the European Labor Declaration on Fundamental Principles and Rights at Work. Our subcontractors and also suppliers play an important role in implementing our policy. This Code of Conduct for Subcontractors and Suppliers (hereinafter the "Code of Conduct") is therefore in line with our policy and describes how we want to work together and how we can make a positive contribution to our living environment. Therefore, we expect our subcontractors and suppliers to comply with the principles and values expressed in this Code of Conduct in addition to complying with applicable local laws and regulations.

We also expect the values and principles stated in this Code of Conduct to be declared valid for the organization of our subcontractors and suppliers.

Furthermore, all subcontractors and suppliers who enter the construction/work site (incl. DISA dive facilities) of our customer, must comply with the applicable rules and requirements regarding quality, safety, health, labor and environment in accordance with the terms and conditions of the customer and DISA INTERNATIONAL.

Also, if subcontractors and suppliers are aware of violations of the Code of Conduct or similar standards, they must take the appropriate action. In such cases, DISA INTERNATIONAL may advise in which areas corrections or improvements are necessary. Failure to comply with the Code of Conduct or repeated and unfounded refusal to provide the required information may result in suspension or termination of the agreement with DISA INTERNATIONAL.

In case of conflict, local laws and regulations will prevail over this Code of Conduct. In this case, subcontractors and suppliers shall immediately inform DISA INTERNATIONAL so that, if possible, appropriate measures can be taken.

3. Requirements of the Code of Conduct

3.1 Professionalism

Subcontractors and suppliers shall provide high quality products and services and are expected to record transactions according to established procedures and handle information with care. Subcontractors and suppliers are expected to be committed to the principles and values of DISA INTERNATIONAL and to avoid damaging the name and reputation of DISA INTERNATIONAL through their actions.

3.2 Health and Safety

Subcontractors and suppliers must comply with the legal regulations, the DISA INTERNATIONAL SHEQ (Safety, Health, Environment & Quality) policy and the DISA INTERNATIONAL Basic Rules of Conduct. We expect subcontractors and suppliers to be mindful of our and their own safety as well as that of all others present at and around the work sites. Subcontractors and suppliers are expected to make every effort to prevent unsafe situations, to report when an unsafe situation has occurred and to resolve it immediately, if safely possible. Report and record the unsafe situation with an SHOC Card.

3.3 Environment and Sustainability

We expect subcontractors and suppliers to comply with all local environmental regulations and rules, as well as the environmental requirements mentioned in the DISA INTERNATIONAL SHEQ policy, and that, at all times, damage to the environment and surroundings is minimized and even prevented.

DISA INTERNATIONAL requires its subcontractors and suppliers to contribute to environmentally friendly and energy-reducing solutions that we can offer to our customers and apply operationally. Entrepreneurship and an innovative and sustainable solution should be encouraged in this regard. Subcontractors and suppliers are expected to know their responsibilities in relation to environment and surroundings.

3.4 Cooperation

The basis for cooperation is meeting each other openly and without prejudice. Subcontractors and suppliers are expected to make an effort in the team to utilize everyone's qualities and work together successfully.

3.5 Transparency

Subcontractors and suppliers are expected to be open and accessible and to communicate in a clear and straightforward manner. Business transactions and considerations in the organization should be transparent. DISA INTERNATIONAL has the right to conduct audits to verify compliance with this Code of Conduct.

3.6 Integrity

We expect subcontractors and suppliers to keep business and private interests separate, avoiding any appearance of a conflict of interest. Gifts and gratuities, both internal and from third parties, should never influence decision-making. Subcontractors and suppliers are expected to act in good conscience at all times and abuse of power must not be permissible under any circumstances.

Employees of DISA INTERNATIONAL shall not accept or give gifts, services or other benefits that could create the appearance of impropriety. Employees of DISA INTERNATIONAL shall never accept or provide excessive lunches or dinners. This is subject to the proportionality rule: the occasion must be commensurate with the function of the persons and must never, ever be excessive in any function.

3.7 Respect

Subcontractors and suppliers should create a work environment where everyone feels comfortable and everyone approaches each other with fairness and dignity. In this work environment, everyone should be accepted as they are.

3.8 Discrimination

In no way shall a subcontractor or supplier discriminate nor act in a discriminatory manner in the hiring and employment of personnel as well as in the granting of employment related matters, including but not limited to compensation, access provision to education and training and termination of contract.

4. Specific Requirements

4.1 Terms and conditions of Employment

We expect our subcontractors and suppliers to comply, as a minimum, with all (local) laws and regulations regarding (monetary) compensation and working hours including the legal requirements regarding minimum wage, overtime compensation, sick leave, piecework compensation and other compensation arrangements.

4.2 Freedom of Association and Collective Bargaining

Subcontractors and suppliers respect the right of employees to freely establish or join a trade union, or other organization aimed at protecting and promoting the interests of employees. Subcontractors and suppliers also respect the right to engage in collective bargaining.

Where the right to freedom of association and collective bargaining is restricted by law, subcontractors and suppliers shall respect workers' rights, to the fullest extent permitted by national law, and encourage the appointment of workers' representatives and their interests.

4.3 Harassment and Punishment

We expect our subcontractors and suppliers to neither use nor permit nor encourage in any way corporal punishment and/or any other forms of mental and/or physical coercion, punishment or oppression or sexual harassment.

4.4 Child Labour

Subcontractors and Suppliers shall discourage all forms of child labor and shall under no circumstances employ or benefit from the use of children below the minimum legal age for employment (generally 15 years), taking into account local schooling and training obligations for these children. Employees of Subcontractors and Suppliers who are under 18 years of age may not perform work on DISA INTERNATIONAL's sites.

If child labor is found in the organization of Subcontractors and Suppliers, the Subcontractor or Supplier shall take the necessary measures to improve the situation and ensure the child's welfare and education. It is the responsibility of the subcontractor and supplier to report child labor to a certified aid organization, the local authorities and DISA INTERNATIONAL.

4.5 Forced Labour

Subcontractors and suppliers are expected under no circumstances to allow forced labor and/or involuntary penal labor both in their own operations and in the organization.

4.6 Corruption and Bribery

Subcontractors and suppliers shall in no way commit direct and indirect acts of corruption, including extortion, fraud and/or bribery. Subcontractors and suppliers are required to comply with all relevant anti-corruption and anti-bribery laws and regulations. Subcontractors and suppliers fully indemnify DISA INTERNATIONAL against the consequences of subcontractors' and suppliers' failure to comply with those obligations. Subcontractors and suppliers are not permitted to make expenditures other than for legally permissible purposes. Subcontractors and suppliers are not permitted to make payments/gifts or promises to officials or to principals or their representatives in connection with the award or performance of the project. Subcontractors and suppliers are required to clearly and transparently document all expenses incurred in connection with the project in DISA claim forms. These documents must be available for periodic review by DISA INTERNATIONAL .

Also, subcontractors and suppliers must make sure that these corrupt acts do not take place in the organization as well.

4.7 Competition

Suppliers and subcontractors must comply with all applicable laws and regulations regarding competition and not engage in discussions and agreements with competitors regarding prices or other similar activities.