

## **ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT**

This Anti-Slavery and Human Trafficking Statement is provided in response to Section 54(1) of the Modern Slavery Act 2015 by Oceaneering International Services Limited (referred to as “Oceaneering,” “we” or “us”). This Statement discloses the steps we have taken during the current year to ensure that slavery and human trafficking are not taking place in Oceaneering’s operations or supply chain.

### **INTRODUCTION**

Oceaneering is committed to complying with all applicable legal requirements, and to conducting its business in accordance with a high level of honesty and integrity. This is reflected in our [Mission, Vision and Values](#), our [Code of Business Conduct and Ethics](#) and our related policies and procedures.

All of our directors, officers and employees are expected to adhere to our Code of Business Conduct and Ethics in the performance of their responsibilities on behalf of Oceaneering.

#### **Mission, Vision and Values**

Our Mission, Vision and Values represent how we interact with our customers, suppliers and employees. In particular, they highlight our focus on safety and acting with integrity towards ourselves, our teams, our industry partners, our shareholders and our communities. A more detailed description of Oceaneering’s Mission, Vision and Values can be found on our [website](#).

#### **Code of Business Conduct and Ethics**

Our Code of Business Conduct and Ethics applies to our directors, officers and employees. We expect our joint venture partners, consultants, agents, subcontractors and other business partners to act in a manner which is consistent with the principles set out in this Code. The Code reflects our commitment to pro-active compliance with applicable laws and regulations affecting Oceaneering and its business.

The Code also underlines the importance of conducting our business in accordance with high levels of honesty and integrity and with high ethical standards. It encourages all employees to report any indications of illegal or improper conduct, which would include any suspected issues of slavery or human trafficking or any other inappropriate behavior in our business or supply chains. It also makes clear that employees will not be subject to any adverse action if any such issues are raised in good faith. In order to encourage this behavior, we provide an anonymous reporting system which is operated by a third party and is accessible twenty-four a day, seven days a week.

#### **Oceaneering International Services Limited**

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Building 3, Levels 2 and 3, Aberdeen International Business Park, Dyce Drive, Dyce, Aberdeen AB21 0BR| Tel: +44 (0)1224 758500

Registered office: 100 New Bridge Street | London, EC4V 6JA, UK | Registered in England | Reg. No.01023217

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Any form of slavery and human trafficking is incompatible with both our Mission, Vision and Values and our Code of Business Conduct and Ethics. Understanding that slavery and human trafficking may take many forms, we expect our directors, officers and employees to be alert to the risk, however small, of slavery and human trafficking occurring in our supply chains, or other parts of our business.

## **OUR ORGANIZATION AND SUPPLY CHAIN**

Oceaneering is a global provider of engineered services and products, primarily to the offshore oil and gas industry, with a focus on deepwater applications. Through the use of its applied technology expertise, Oceaneering also serves the aerospace, entertainment, material handling, defense and renewable energy industries. Oceaneering's business offerings include remotely operated vehicles, built-to-order specialty subsea products, deepwater intervention and manned diving services, non-destructive testing and inspection, and engineering and project management. A more detailed description of Oceaneering's business offerings can be found on our [website](#) and in Oceaneering International, Inc.'s [Annual Report](#).

Our supply chain does not generally include the sourcing of any raw commodities. We do, however, source processed metals and manufactured materials from reputable suppliers.

## **DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

As part of our efforts to identify and mitigate risk in our supply chains and to help ensure that slavery and human trafficking do not take place in our supply chains or other parts of our business:

- our suppliers are subject to screening in accordance with our supply chain procedures and appropriate approvals based on risk;
- the selection and approval process includes supplier quality audits, compliance-related questions and screening and background checks by external corporate investigation and risk consultants;
- our suppliers and business partners who are engaged, or who might be engaged, in areas of heightened risk (based on service type, value or geographical location) are subject to further background checks and compliance training;
- contracts with our business partners, suppliers, contractors and vendors require compliance with all applicable laws and with Oceaneering's Code of Business Conduct and Ethics (and our customer's policies, as required);
- we have implemented policies and systems to encourage the reporting of concerns and the protection of whistleblowers including a global Ethics Hotline.

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We also use the following Key Performance Indicators to measure our effectiveness in preventing slavery and human trafficking in our supply chains or other parts of our business:

- completion of vendor audits by the Internal Audit and Quality Assurance Departments;
- use of labor monitoring and payroll systems;
- ongoing communication with our vendors and suppliers; and
- annual certificates of compliance from our agents.

#### **SUPPLIER ADHERENCE TO OUR VALUES**

We have zero tolerance for slavery and human trafficking. We expect all those in our supply chain to comply with our policies and standards. We regularly communicate our expectations to our suppliers. We seek assurance of compliance through regular supplier audits.

#### **TRAINING**

To ensure an understanding of the risks of modern slavery and human trafficking in our supply chain and our business, we have developed and deliver training for our relevant directors, officers and employees.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2019.

A handwritten signature in blue ink, appearing to read "Stewart".

Oceaneering International Services Limited

Date: 31/03/2020

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