

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 (together 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, as reflected in our [Core Values](#), [Code of Business Conduct and Ethics](#) and related policies and procedures (altogether, our “Code of Conduct”). All of our directors, officers and employees are expected to adhere to our Code of Conduct in the performance of their responsibilities on behalf of Oceaneering, including appropriate reporting of any indications of illegal or improper conduct.

Slavery and human trafficking are incompatible with our Core Values and Code of Conduct. 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, and to report any indications of illegal or improper conduct, as provided in our Code of Conduct.

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 defense, entertainment and aerospace 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.

OUR POLICY AGAINST SLAVERY AND HUMAN TRAFFICKING

We are committed to minimizing the chance of slavery and human trafficking occurring in our supply chains or other parts of our business. Our Code of Conduct reflects our commitment to pro-active compliance with all applicable laws and regulations affecting Oceaneering and its business. We are committed to acting ethically and with integrity in all our business relationships and to implementing

and enforcing effective systems and controls to ensure that slavery and human trafficking do not take place in our supply chains or other parts of our business.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our efforts to identify and mitigate risk in our supply chain:

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

We use the following key performance indicators (KPIs) 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 Supply Chain Management and Quality Assurance Departments;
- use of labor monitoring and payroll systems; and
- ongoing communication with our vendors and suppliers.

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 via 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.