

Conflicts Minerals Program Policy

Oceaneering International, Inc. (including its consolidated subsidiaries, "Oceaneering") has adopted a policy of: (a) supporting industry efforts toward conflict-free supply chains, and (b) complying with related reporting requirements imposed on Oceaneering by applicable law. We expect our suppliers to support us in these endeavors.

Oceaneering has selected the EICC®/GeSI Conflict Minerals Reporting Template ("CMRT") as its basis for the collection of sourcing information from its suppliers. **Using communication channels established by Oceaneering, each supplier will be expected to submit a CMRT on an annual basis and promptly notify Oceaneering in writing in the event that such Supplier is or becomes aware of any reason to believe that its goods are not DRC Conflict Free**, as defined in the U.S. Securities Exchange Act of 1934, as amended by Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act and the related rules and regulations of the U.S. Securities and Exchange Commission.