



Supplier Code of Business Conduct

Introduction: At McDermott, we take pride in fostering relationships with suppliers who share our commitment to safety, operational excellence, ethics, integrity and sustainability.

At the heart of our company's ethos is a dedication to conducting business with the utmost professionalism, integrity and social responsibility. Our core value of integrity reflects our belief that ethical conduct not only strengthens our relationships with clients and other stakeholders, but also contributes to a sustainable and resilient global business environment. Our employees, contractors and suppliers are the driving force behind our success, and we expect nothing short of the highest ethical standards from them all, in all aspects of their work.

In our continued efforts to promote sustainable business behavior, we encourage our suppliers to align with us by signing our Supplier Code of Business Conduct. This document outlines important principles and expectations in areas such as ethical business practices, social responsibility, environmental stewardship and compliance with applicable laws and regulations. By formalizing this commitment, together, we can collectively contribute to a more sustainable and responsible global supply chain.

Thank you for your time. We look forward to your agreement, affirming our shared dedication to excellence and sustainability.

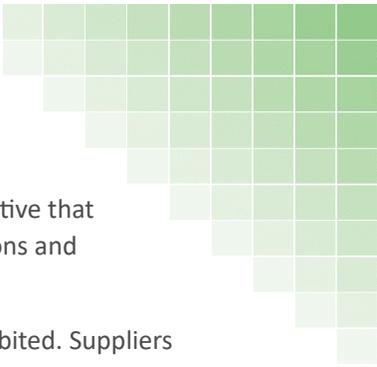
Ethical Business Conduct: We are committed to conducting business with the highest ethical standards, and we expect our suppliers to share in this commitment. Our suppliers must adhere to anti-corruption and anti-bribery laws in all regions where they operate, and must never offer, pay, promise to pay or accept anything of value – either directly or indirectly – to improperly influence the judgment or actions of others. We have a zero-tolerance policy towards bribery, corruption, facilitation payments and other unethical practices.

Conflicts of Interest: Our suppliers must ensure that nothing they do interferes or appears to interfere with their responsibilities to McDermott. Our suppliers must disclose any conflict of interest, or potential conflict, including relationships their company or an employee of their company may have with any McDermott employee, officer, director and/or anyone who represents McDermott, such as the following or other similar circumstances:

- if a McDermott employee, family member or anyone who represents McDermott owns a portion of a supplier's business;
- if a family member of a McDermott employee is, or will be, working in a supplier's company on McDermott business;
- if a supplier's company has provided anything of value to any McDermott employee, officer, director and/or anyone who represents McDermott.

Money Laundering: Any operations or activities that support organized crime, terrorism or other criminal activity are prohibited. Suppliers must refrain from engaging in money-laundering activities and must not serve as a source for money laundering. Money laundering is defined as the process of concealing the origins of illegally obtained funds, typically by means of transfers involving foreign banks or legitimate businesses. Suppliers are expected to have a clear understanding of this definition and actively work to prevent any involvement in such illicit activities.

Compliance with Trade Control Laws McDermott manages a complex, multi-tiered, global supply chain, with goods and materials moving between and across geographies at every moment in support of our projects around the world. Suppliers are required to import and export products in a legal and ethical manner,



following all applicable trade control laws, boycott laws and sanctions regulations. It is imperative that suppliers maintain a comprehensive understanding of the relevant trade compliance restrictions and requirements to ensure their operations align with applicable legal restrictions.

Improper Agreements: Any actions that does or could compromise fair competition are prohibited. Suppliers must refrain from engaging in collaborations or activities that could give the appearance of an improper agreement with their competitors. This includes but is not limited to dividing territories, markets or customers; preventing another company from entering the market; and interfering with a competitive bidding process.

Information Gathering: Upholding the highest ethical standards in information gathering ensures the integrity of business practices and promotes a fair and competitive marketplace. Suppliers should gather information appropriately and responsibly, using only legitimate sources. It is essential to refuse information that is suspected to be improperly obtained or could violate any laws, regulations or principles of fair competition.

Communication with Integrity: At McDermott, integrity and truthfulness guide our daily interactions and practices. Suppliers are expected to communicate with integrity and truthfulness. Making untrue statements about clients or competitors, engaging in false advertising or disseminating misleading information is strictly prohibited. Honest and transparent communication fosters a business environment built on trust and credibility.

Fair Recruiting and Hiring Practices: We expect all of our suppliers to cultivate an equal-opportunity workplace that values diversity and inclusion. You must adhere to fair recruiting and hiring practices that prohibit discrimination against individuals based on factors such as race, color, ethnicity, gender, religion, orientation or any other characteristic protected by applicable laws. Unfair hiring or recruiting practices, including those that disadvantage underrepresented members of the population, are prohibited.

Promoting Inclusivity and a Harassment-Free Environment: Suppliers are required to maintain a harassment-free environment that fosters and promotes inclusivity and prohibits any form of bullying, disrespectful behavior or harassment based on race, ethnicity, gender, gender identity or expression, sexual orientation, religious beliefs or any other protected characteristic. It is essential to promote a workplace culture where all individuals feel valued, respected and able to contribute their unique perspectives without fear of discrimination or retaliation.

Data Security and Privacy: Information security is essential in a world of ever-increasing dependency on digital means to create, store, transfer and dispose of data. Suppliers must implement robust data security processes and controls to prevent data loss and unauthorized access, particularly for data containing Personally Identifiable Information (PII). Suppliers must also consider the risks associated with any relationships with other entities that handle such data, establishing clear agreements (e.g., controller-to-controller agreements) to safeguard the privacy and security of sensitive information.

Quality, Health, and Safety: We hold our company, our employees and our suppliers to the highest standards of quality, health and safety. All McDermott suppliers must implement and maintain comprehensive and effective policies, programs and procedures to ensure that the goods and services they provide meet the agreed specifications reliably while prioritizing the health, safety and well-being of employees.

Environmental Protection: McDermott values environmentally conscious practices and encourages suppliers to contribute to a cleaner and more sustainable future. Suppliers should conduct their operations in an environmentally responsible manner, seeking opportunities to enhance efficiency and minimize their





environmental impact. It is imperative that they comply with all applicable environmental laws and regulations while actively exploring sustainable solutions.

Respect for Human Rights: We are committed to an absolute stance against forced or child labor in our supply chain. It is paramount that McDermott suppliers uphold the highest standards of human rights and social responsibility, including a commitment to never engage in, or tolerate, human trafficking, slavery, illegal or unethical recruitment practices, sexual abuse or exploitation, other physical or verbal abuse or inhumane treatment.

See Something / Say Something: We encourage anyone to speak up if they see or suspect a violation of our McDermott codes and policies or applicable laws and regulations or want to suggest an improvement to our business practices. At McDermott, our Speak Up Program is open to all our suppliers' employees. There are many ways to speak up. Suppliers needing to report an issue to McDermott, can start with the McDermott point of contact or contact our Ethics and Compliance team by emailing the ethics@mcdermott.com mailbox. Additionally, McDermott provides the [McDermott International Helpline](#) to report issues online or by phone.

Reporting Mechanisms: All McDermott suppliers should have in place appropriate and effective reporting mechanisms for any incidents related to violations of law, harassment, or other non-compliant, unethical or unfair treatment. It is crucial to promptly address and resolve such matters, reinforcing a commitment to a workplace that is free from discrimination and supportive of diversity.

Policies, Processes and Employee Education We believe that a collective commitment to ethical behavior strengthens our partnerships and contributes to the overall well-being of the global business community. To ensure the effective implementation of these ethical business practices, suppliers are required to establish and maintain policies, processes and controls within their organizations, designed to ensure that employees are informed about ethical guidelines, understand their responsibilities and adhere to high standards of conduct.

Conclusion: Our Supplier Code of Conduct serves as the cornerstone of our commitment to maintaining a supply chain that supports ethical, responsible and sustainable business practices. By asking our suppliers to agree to and abide by this code, we emphasize the importance of fostering a collaborative ecosystem built on integrity, quality, health and safety, environmental sustainability and respect for human rights.

Adherence to these principles not only aligns with our values but also contributes to the creation of a global business community that prioritizes ethical conduct and social responsibility. We invite our suppliers to reach out with any questions or concerns, fostering open communication as we work together towards shared success.

Thank you for your commitment to these principles. We look forward to building a mutually beneficial and enduring partnership with your organization.

