MEG OFFSHORE Ltd
P: Unit 6 Enterprise House, Ashby Road, Coalville LE67 3LA
W: www.megoffshore.com

Ethical Policy

DOCUMENT REF	VERSION	ISSUE DATE	OWNER
POL-ETH	1.0	01.10.2026	MEG Offshore Ltd

PURPOSE

1. MEG Offshore Ltd ("the Company") is committed to the promotion and protection of human rights and the practice of responsible corporate behaviour.
2. The Company is also committed to follow internationally recognised business standards and practice. The Company adheres to international and national laws and regulations, including (but not limited to) the Human Rights Act, the Money Laundering Act, and the Penal Code with related regulations. Our guidelines for ethics, anticorruption and conflict of interest are described in the Company's Corporate Social Responsibility policies, which sets the expectation for personal conduct and business practice.
3. Through its business practices the Company seeks to protect and promote the human rights and basic freedoms of all its employees, agents and employees and agents of suppliers.
4. Further the Company is committed to protecting the human rights and basic freedoms of local communities in the countries where the Company operates and of all of those whose work contributes to the success of the Company.
5. The Company is also committed to a zero tolerance regarding bribery and corruption. It is essential that all employees and persons associated with the Company adhere to this policy and abstain from giving or receiving bribes of any form.
6. In an effort to identify, prevent, mitigate human rights violations and abuses, we conduct integrity due diligence processes, and we strive to enable the remediation of any adverse human rights impacts that our products and operations may cause. This policy is non-exhaustive, and all aspects of the Company's business should be considered in the spirit of this policy.

HUMAN RIGHTS

1. The Company is vehemently opposed to the use of slavery in all forms; human trafficking, cruel treatment, inhuman or degrading punishments; and any attempt to control or reduce an individual's physical freedom as well as freedom of thought, belief, conscience and religion.
2. The Company will ensure that all of its employees, agents and contractors are entitled to their human rights and set out in the Universal Declaration of Human Rights and all European Human Rights legislation set forth in Art. 1.1.
3. The Company will not enter into any business arrangement with any person, company or organisation which fails to uphold the human rights of its workers or who breach the human rights of those affected by the organisation's activities.

WORKERS' RIGHTS

1. The Company is committed to complying with relevant employment legislation and regulations. The Company regards such regulations and legislation as the minimum rather than the recommended standard.
2. No worker should be discriminated against on the basis of age, gender, race, sexual orientation, religion or beliefs, gender reassignment, marital status or pregnancy. All workers should be treated equally.
3. No worker should be prevented from joining or forming a staff association or trade union, nor should any worker suffer any detriment as a result of joining, or failing to join, any such organisation.
4. Workers should be aware of the terms and conditions of their employment or engagement from the outset. In particular workers must be made aware of the wage that they receive, when and how it is to be paid, the hours that they must work and any legal limit which exists for their protection and any overtime provisions. Workers should also be allowed such annual leave, sick leave, maternity / paternity leave and such other leave as is granted by local legislation as a minimum.
5. The Company does not accept any corporal punishment, harassment in any form, or bullying in any form.

ENVIRONMENTAL ISSUES

1. The Company is committed to keeping the environmental impact of its activities to a minimum and has established an Environmental Policy in order help achieve this aim.
2. As an absolute minimum, the Company will ensure that it meets all applicable environmental laws in whichever jurisdiction it may be operating.

CONFLICTS OF INTEREST

1. The Company holds as fundamental to its success the trust and confidence of those with whom it deals, including clients, suppliers and employees. Conflicts of interest potentially undermine the relationship of the Company with its partners.
2. In order to help preserve and strengthen these relationships the Company has rules and guidelines concerning the conduct of its officers and employees aimed at minimising the possibility of conflicts of interest and at avoiding risks associated with bribery and corruption.
3. All officers, employees and representatives of the Company are expected to act honestly and within the law.

INFORMATION AND CONFIDENTIALITY

1. Information received by employees, contractors or agents of the Company will not be used for any personal gain, nor will it be used for any purpose beyond that for which it was given.
2. The Company will at all times ensure that it complies with all applicable requirements of data protection legislation.

SHAREHOLDERS AND INVESTORS

1. The Company, its officers, employees and representatives are committed to ensuring that no act or omission which is within their power and which would have the effect of deliberately, negligently or recklessly misleading the shareholders, creditors or other investors in the Company occurs.

SUPPLIERS AND PARTNERS

1. The Company expects all suppliers and partners to work towards and uphold similar ethical and moral standards.
2. The Company will investigate the ethical record of potential new suppliers before entering into any agreement. Further, the Company reserves the right to request information from suppliers regarding the production and sources of goods supplied.
3. The Company reserves the right to withdraw from any agreement or other arrangement with any supplier or partner who is found to have acted in contravention of the spirit or principles of this Ethical Policy.

BRIBERY AND CORRUPTION

1. The Company is fundamentally opposed to any acts of bribery and to the making of facilitation payments as defined by United Kingdom and relevant territory anti-bribery and anti-corruption legislation.
2. Employees and any other persons associated with the Company such as agents, subsidiaries and business partners are not permitted to either offer or receive any type of bribe and/or facilitation payment.
3. All employees are encouraged to report any suspicion of corruption or bribery within the Company in accordance with the Whistleblowing Policy.
4. Should any employee or associated person be in doubt when receiving or issuing gifts and hospitality, he/she must contact the Managing Director.
5. The Company uses its reasonable endeavours to implement the guidance principles on bribery management that are published, from time to time, by the relevant anti-bribery and anti-corruption legislation.
6. If an employee or associated person is found guilty of giving or receiving a bribe, he/she will be personally criminally liable and may be subject to disciplinary action.
7. Anyone found guilty of bribery, will be responsible for bearing any related remedial costs such as losses, court fees or expenses.

REMEDIES

1. The Company shall refrain from executing commercial agreements and/or carrying on an export transaction if a risk of violation of this Ethical policy is present.
2. The Company shall implement grievance mechanisms for a secure, accessible, and responsive communications channel for both internal and external actors to report potential violation of this Ethical policy and other Corporate Social Responsibility policies.