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Whistleblowing Policy

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

1 INTRODUCTION

1. Employees may, in properly carrying out their duties, have access to, or come into contact with, information of a confidential nature. Their terms and conditions provide that except in the proper performance of their duties, employees are forbidden from disclosing, or making use of in any form whatsoever, such confidential information.
2. However, the law allows employees to make a 'protected disclosure' of certain information. In order to be 'protected' a disclosure must relate to a specific subject matter (clause 2), and the disclosure must also be made in an appropriate way (clause 3). Whistleblowing protection is confined to a disclosure which, in the reasonable belief of the employee making the disclosure, is made in the public interest.
3. MEG Offshore Ltd ("the Company") is committed to be in compliance with all European anti-bribery and anti-corruption legislation. The Company actively encourages a culture of honesty and openness and therefore all employees are required to bring up to their manager or other designated person any issue that, in the employee's opinion, might constitute bribery or corruption.

2 SPECIFIC SUBJECT MATTER

If, in the course of employment, an employee becomes aware of information which they reasonably believe tends to show one or more of the following, they must use the Company's disclosure procedure set out below:

1. That a criminal offence has been committed, is being committed or is likely to be committed.
2. That a person has failed, is failing or is likely to fail to comply with any legal obligation to which they are subject.
3. That a miscarriage of justice has occurred, is occurring, or is likely to occur.
4. That the health or safety of any individual has been, is being, or is likely to be endangered.
5. That the environment has been, is being, or is likely to be damaged.
6. That information tending to show any of the above is being or is likely to be deliberately concealed.
7. That the business or any associated person has been, is being, or is likely to be receiving or offering bribes.
8. That any foreign official has been, is being, or is likely to be bribed or offered facilitation payment by the company or any associated person.

3 DISCLOSURE PROCEDURE

1. Information which an employee reasonably believes tends to show one or more of the above should promptly be disclosed to their line manager so that any appropriate action can be taken.
2. If it is inappropriate to make such a disclosure to the manager, the employee should speak to the Managing Director, use our compliance email compliance@megoffshore.com or report anonymously to our office drop-box.
3. Employees will suffer no detriment of any sort for making such a disclosure in accordance with this procedure.
4. However, failure to follow this procedure may result in the disclosure of information losing its 'protected status.'
5. For further guidance in relation to this matter or concerning the use of the disclosure procedure, employees should speak in confidence to the Managing Director.