



Anti-Corruption Policy Statement

Seabed Geosolutions, its employees, and its subsidiaries ("SBGS") comply with all applicable anti-bribery laws, including the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act, and all other applicable local laws where SBGS operates, and, to this end, SBGS accurately reflects all transactions on SBGS' books and records. SBGS' also require all third party business partners (including agents, consultants, contractors, vendors, suppliers and other parties acting on SBGS' behalf) to comply with these same laws and practices.

In view of the nature, scale and geographic range of our activities, we are committed to prepare, train, and answer queries from SBGS personnel on bribery and corruption in order for SBGS to protect our reputation and reduce the risk of criminal and civil punishments. We realize that bribery and corruption is a major global issue, causing damage to societies and individuals worldwide and undermines the rule of law and distorts markets. We are therefore committed to supporting and training SBGS personnel so that SBGS adheres to laws as well as contract provisions relating to the prevention of bribery and corruption.

SBGS is committed to a zero-tolerance approach by which bribery and corruption are never acceptable or tolerated by or on behalf of SBGS.

Our Global Anti-Corruption Policy supports our anti-bribery and anti-corruption commitments. It sets out in practical terms how you should behave and what you should do if you are confronted with bribery and/or corruption. We will support and expect all of you to actively comply with the Policy at all times and in all aspects of your work. This means not turning a "blind eye" to suspicious circumstances or looking the other way. If you have any questions or concerns relating to bribery and corruption, please refer to the Policy or contact Justin Mitchell, General Counsel at jmitchell@sbgs.com.

We expect your cooperation in helping to protect you and SBGS from the risk of bribery and corruption.

Sincerely,

A handwritten signature in blue ink, appearing to read "Stephan Midenet", is written over a blue horizontal line. The signature is stylized and includes a flourish at the end.

Stephan Midenet
Chief Executive Officer