



## Trade Compliance Policy Statement

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As a responsible citizen in the global marketplace, Seabed Geosolutions B.V., its personnel, and its subsidiaries ("SBGS") are committed to comply with all applicable U.S./International laws and regulations relating to trade compliance to include:

- Controls for import and/or export transactions;
- Embargoes and sanctioned countries;
- Denied parties; and
- Manufacture/use of dual use or controlled equipment

Further, SBGS is committed to full compliance with controls administered by the U.S. Department of State's Directorate of Defense Trade controls ("DDTC"), U.S. Department of Commerce's Bureau of Industry and Security ("BIS"), U.S. Department of Treasury's Office of Foreign Assets Controls ("OFAC"), and other applicable agencies. It is SBGS's firm policy that no sales will be made contrary to the International Traffic in Arms ("ITAR"), Export Administration Regulations ("EAR"), and other export control laws.

To insure compliance, SBGS is committed to supporting our personnel and to provide them with the tools and training to allow for sufficient knowledge to comply with this Policy to include the following guidelines and principles:

- Supporting responsibility to insure compliance for export to re-exports, imports, and similar activities of both U.S. and non-U.S. persons while in the U.S. or overseas, which relate to the transfer of physical items, information, and technology;
- Compliance by all SBGS personnel with all applicable laws or regulations relating to trade compliance in connection with any of the above-described activities;
- Communication to maintain awareness for trade compliance;
- Training and support for global compliance with these laws and regulations requires coordination and planning within SBGS and with our suppliers and vendors; and
- The expectation that all SBGS employees and managers will take time to individually understand and raise questions on how import and/ or export controls impact their responsibilities and the steps required to ensure compliance, no matter where you are located.

I ask each of you to take this matter very seriously and to support me in this effort. If you have any questions concerning the legitimacy of a transaction or potential violations, please immediately contact Justin Mitchell, General Counsel at [jmitchell@sbg.com](mailto:jmitchell@sbg.com).

Kind regards,

  
Stephan Midenet  
Chief Executive Officer