

H2 Offshore AS Anti-Fraud, Bribery, and Corruption Policy

1. Introduction
2. H2 Offshore AS ("the Company") is committed to conducting its business with integrity, transparency, and in compliance with all applicable laws and regulations. As part of this commitment, the Company adopts a zero-tolerance approach towards fraud, bribery, and corruption in any form. This policy outlines the principles and procedures to prevent, detect, and address instances of fraud, bribery, and corruption within the organization.
3. Scope
4. This policy applies to all directors, officers, employees, contractors, consultants, agents, and representatives of H2 Offshore AS, regardless of their position or level within the organization. It also extends to interactions with clients, suppliers, partners, governmental authorities, and any other external stakeholders.
5. Definitions
 1. Fraud: Any intentional deception or misrepresentation, whether by omission or commission, that results in an unauthorized benefit to the perpetrator or another party.
 2. Bribery: The offering, giving, receiving, or soliciting of anything of value to influence the actions of an individual or entity in a position of trust or authority.
 3. Corruption: Abuse of entrusted power for private gain, including but not limited to bribery, extortion, nepotism, and embezzlement.
 4. Conflict of Interest: Any situation in which an individual's personal interests or loyalties could, or could appear to, conflict with the interests of the Company.
6. Policy Statements
7. a. Compliance with Laws and Regulations: The Company shall comply with all applicable anti-fraud, anti-bribery, and anti-corruption laws and regulations in all jurisdictions where it operates.
8. b. Prohibition of Bribery and Corruption: The Company prohibits offering, giving, receiving, or soliciting bribes or kickbacks in any form, whether directly or indirectly, and in dealings with both public and private entities.

9. c. Gifts, Entertainment, and Hospitality: Any gifts, entertainment, or hospitality offered or received in the course of business must be of modest value, transparent, and comply with applicable laws and regulations. Employees must not offer or accept gifts that could be perceived as influencing business decisions.
- 10.d. Conflict of Interest: Employees must promptly disclose any actual or potential conflicts of interest to their supervisor or the designated compliance officer. Conflicts of interest shall be managed and mitigated to prevent any adverse impact on the Company.
- 11.e. Reporting Suspected Violations: All employees have a duty to report any suspected or observed violations of this policy to their supervisor, the compliance officer, or through the Company's whistleblower hotline. Reports will be investigated promptly and confidentially, and appropriate action will be taken.
- 12.f. Consequences of Violations: Violations of this policy may result in disciplinary action, up to and including termination of employment, as well as legal action, where applicable.
13. Training and Awareness
14. The Company shall provide regular training and awareness programs to ensure that all employees understand their responsibilities under this policy and are equipped to identify and prevent fraud, bribery, and corruption.
15. Monitoring and Review
16. The effectiveness of this policy shall be periodically reviewed and updated as necessary to ensure its continued relevance and adequacy in preventing and detecting fraud, bribery, and corruption.
17. Conclusion
18. Upholding the highest standards of integrity and ethics is essential to the reputation and success of H2 Offshore AS. All employees are expected to familiarize themselves with this policy and adhere to its principles in all aspects of their work.

This policy shall be communicated to all employees and made available on the Company's internal systems for reference. For any questions or clarification regarding this policy, employees are encouraged to contact the compliance officer or the legal department.