

**Sist endret av**  
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**Prosesseier**  
Lene Bakken

**Prosess**  
Ledelsesprosesser

**Avdeling**  
KHMS

**Dokumenttype**  
Prosedyre

**Potensiell risiko**

4

**Beskrivelse av endringer**  
Nytt dokument

Vedlegg

**Beskrivelse**



Saga Subsea

# Code of Conduct

Guidelines for safe, legal, ethical decision-making everywhere we do business

## Management Statement

Saga Subsea's staff is the reason why we have reputation as a company to rely on. This reputation is influenced every day by the conduct of each and every one of our employees.

Saga Subsea is a growing company in a very competitive market. Our growth is depended on our constant commitment to uncover fault in our services, processes and products.

Our competitive ability starts with our reliability. Where it is crucial that all our employees think and act in accordance with our core values.

The managers of Saga Subsea has a general responsibility to exercise leadership that creates a culture in which good conduct is recognized, valued and complied with. This code of conduct shall be used in organizational development processes in order to establish such a culture, generate commitment and develop expertise.

We have reason to be proud of this company that we have created. It has been built up from the scratch but can be torn down by individual events. Due to this we need to be uncompromising when it comes to following our code of conduct and act in accordance with our core values.

Saga Subsea core values:

- **Work safe** and pursue the goal of zero harm to people, environment and assets.
- **Respect** legal statutes, human ethic and culture in the region we are working
- **Excellent** customer service and respect our clients by:
  - Taking initiative
  - Show responsibility in our work
  - Achieve first class results
  - Respect our co-workers and their inequalities
  - Be honest
- **Be curious**, learn more and increase our knowledge
- **Be happy** 😊

## Managing Director

## Code of conduct

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### Purpose and scope

This Code of Conduct describes Saga Subsea's ethical commitment and requirements. It aims to build trust and demonstrate our commitments to be a respected and trusted business.

The Code applies to all Saga Subsea staff, as well as those acting for or on behalf of Saga Subsea (including hired staff, consultants, agents and other intermediaries).

The Code is a guideline for safe, legal, ethical decision-making, everywhere we do business.

There are no exceptions to the principles and commitment that are established in this code. Any breach must be reported. If you are in doubt or in a difficult situation, please contact your manager or Saga Subsea's managing director.

### Compliance with laws and regulations

Saga Subsea shall comply with all applicable laws and regulations and conduct its business with integrity, respecting cultures, dignity and rights of individuals everywhere we operate.

### Your responsibilities

As Saga Subsea staff, it is your responsibility to familiarize yourself with the Code, Saga Subsea's policies, processes and procedures as well as other governing documents and applicable laws relevant to your work.

You shall strive to exercise good judgment, care and consideration.

If you are uncertain of how to resolve a particular problem, you shall consult your manager or other appropriate authority. You shall understand the risk in your role and how to manage the risk.

### Human rights

Each and every employee is an important member of the Saga Subsea team, and we value a diversity of people. We are committed to create an environment with equality, and all shall be treated with fairness, respect and dignity.

Saga Subsea prohibits any discrimination of colleagues or others affected by our operations. Discrimination includes all unequal treatment, exclusion or preference on the basis of race, gender, age, disability, sexual orientation, nationality, political opinions, religion or ethnic background, or any other basis prohibited by law.

Saga Subsea does not tolerate harassment or degrading treatment in any form by or towards employees.

Saga Subsea has a zero-tolerance approach towards child labor, forced labor and human trafficking.

### Acting with integrity

Saga Subsea's reputation relies on the collective behavior of all Saga Subsea Representatives and our Business Partners. Saga Subsea expects that everyone who works for, or on behalf of the company will do so in accordance with applicable rules, as well as this Code.

### Conflict of interest

Each employee will act in the best interests of Saga Subsea and our Clients when representing the company and take appropriate steps to avoid situations and positions that may create or appear to create conflict of interest.

A conflict of interest could be a financial interest in other companies or in a transaction, personal relationship, including but not limited to immediate family, or any other interest or relationship that could improperly affect our judgment and decision-making.

### Anti-Corruption

Saga Subsea has zero tolerance for all forms of corruption in our business operations. We shall operate in an open and transparent manner. Engaging in corruption may not only have serious effects on Saga Subsea, but also on the individuals and may result in criminal charges, penalties or sanctions.

Saga Subsea Representatives shall not, either directly or indirectly through a third party, offer, give, accept receive, request or agree to receive any form of improper advantage of any kind.

Improper advantages do not only come in the form of monetary gifts, but can include such things as travel, accommodation, access to assets, favorable terms on products or services, an offer for a family member or a loan.

Offering or accepting hospitality, such as social events, meals and entertainment, may however be acceptable if there is a clear business rationale behind it, and provided that the cost of such hospitality is reasonable. All Saga Subsea Representatives must exercise caution and good judgment in relation to the reasonableness and proportionality of offering or accepting hospitality.

### Sensitive information and confidentiality

All Saga Subsea staff have a duty of confidentiality, both by law and by written agreement. Refer to Saga Subsea Non-Disclosure Agreement.

### Drugs and alcohol

## Code of conduct

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Saga Subsea is a drug and alcohol-free workplace. Use and influence of drugs or alcohol while working for Saga Subsea will not be tolerated.

Limited amounts of alcohol may be accepted for official events after working hours. But be conscious and show moderation.

Always remember you are still representing Saga Subsea when you are travelling home from work. Test for drugs and alcohol may be conducted whenever deemed necessary and in accordance with applicable law.

### Media and communication

Saga Subsea's public communications shall be clear, open and accurate, and with a view to strengthening Saga Subsea's vision, values, strategy, goals and reputation.

All communication with the media on behalf of Saga Subsea, including postings on social media must be approved by Saga Subsea Management.

Private use of social media must not breach confidentiality obligations and should not compromise with Saga Subsea's reputation or business interest.

Show respect towards Saga Subsea, your colleagues and Business Partners in all external communications.

### Protecting Saga Subsea's resources

All of Saga Subsea's employees must act with integrity, vigilance and common sense to ensure that Saga Subsea's resources and opportunities are not misappropriated or wasted. These resources include work time, intangible assets and confidential information.

All equipment, information, ideas and data that you use or to which you have access in your work belongs to Saga Subsea and must only be used solely for professional purposes.

### Consequences of breaches

Violation of the Code of Conduct or the law will not be tolerated and may lead to internal disciplinary action, dismissal or criminal prosecution.