

# GLOBAL

## CODE OF CONDUCT

Global Industries, Ltd and its subsidiary companies (the “Company”) is committed to conducting its business fairly, impartially, in an ethical and proper manner, and in full compliance with all applicable laws and regulation. In conducting its business, integrity must underlie all Company relationships, including those with customers, suppliers, communities and among employees. The highest standards of ethical business conduct are required of Global employees in the performance of their company responsibilities. The Global Code of Conduct outlines required behaviors for all of Global’s employees and the Board of Directors (“Company Personnel”). Company Personnel will not engage in conduct or activity that may raise questions as to the company’s honesty, impartiality, reputation or otherwise cause embarrassment to the Company.

Company Personnel will ensure that:

- They do not engage in any activity that might create a conflict of interest for the Company or for themselves individually.
- They do not take advantage of their Company position to seek personal gain through the inappropriate use of Global or non-public information or abuse of their position. This includes not engaging in insider trading.
- They will follow all restrictions on use and disclosure of information. This includes following all requirements for protecting Company information and ensuring that non-Global proprietary information is used and disclosed only as authorized by the owner of the information or as otherwise permitted by law.
- They observe that fair dealing is the foundation for all of our transactions and interactions.
- They will protect all company, customer and supplier assets and use them only for appropriate company approved activities.
- Without exception, they will comply with all applicable laws, rules and regulations, including, but not limited to, the US Foreign Corrupt Practices Act (FCPA).
- Employees will promptly report any illegal or unethical conduct to management or other appropriate authorities (i.e., Compliance, Law, Security, EEO, FCPA). Members of the Board of Directors will bring any illegal or unethical conduct to the Lead Director, Chairman of the Audit Committee or to the Chairman of the Board as appropriate.

Every Company Personnel has the responsibility to ask questions, seek guidance and report suspected violations of this Global Code of Conduct. Retaliation against employees who come forward to raise genuine concerns will not be tolerated.