

**Global Industries, Ltd.
Policies & Procedures**

POLITICAL CONTRIBUTIONS POLICY

Effective: May 16, 2005

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Revised: 8/5/09

1. GENERAL POLICY STATEMENT

Global Industries, Ltd and its subsidiary companies (the "Company") is prohibited from contributing any funds to candidates for political office, officials of political parties or organizations for the election of a particular candidate to any federal or state political office in the United States or in foreign countries. In certain local elections political contributions of corporate funds may be made in accordance with applicable law but must be approved by the Chief Executive Officer and the Chief Administrative Officer & General Counsel.

2. PURPOSE

To explain the Company's policy on political contributions and to ensure that the Company complies with all laws governing political contributions and with the U.S. Foreign Corrupt Practices Act.

3. COVERAGE

This policy applies to all of the Company's Directors, employees, agents and any third party acting on behalf of the Company (collectively, "Company Personnel").

4. POLICY

Individual participation in the political process is the foundation of a free and democratic society, and as such is encouraged by the Company. However, the United States Federal Government, the individual states and other countries have enacted laws regulating campaign contributions in an effort to lessen the influence of certain contributors and corporations.

- A. Company Personnel may make political contributions with their own funds and on their on behalf. Company Personnel may also support political parties and candidates on their own time. The Company encourages its Company Personnel to be responsible citizens and actively participate in the political process.
- B. Political contributions of the Company's funds are subject to more strenuous requirements. In general, the Company does not make political contributions of the Company's funds, property or services in its own name or on its own behalf. However, in certain local elections political contributions of corporate funds may be made in accordance with applicable law but must be approved by the Chief Executive Officer and

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the Chief Administrative Officer & General Counsel. The Company retains no lobbyists directly, nor does it have any Political Action Committees (PACs) to advance its interests. The Company does, however, belong to industry-specific trade groups that may employ lobbyists or fund PACs. Such groups must comply with all laws governing registration of lobbyists and political contributions.

- C. Internationally, the U.S. Foreign Corrupt Practices Act (FCPA) prohibits direct or indirect payments or giving other things of value to foreign officials, members of political parties, political candidates and officials of international organizations for the purpose of influencing a foreign government or government instrumentality to assist in obtaining or retaining business with any person or to otherwise secure "improper advantages." The Company will in all ways comply with the spirit and letter of the FCPA.

(See: **Foreign Corrupt Practices Act** and **Charitable Contributions** policies for additional information.)

This policy may be revised or cancelled at the discretion of the Company.