



Code of Conduct

May 2022

Code of Conduct

We are highly committed to achieving excellence at every level. Rooted in our core values, this Code of Conduct offers guidance by which to meet this goal.

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Introduction: our joint responsibility

Our success at Bluestream depends on the professionalism and integrity of our employees, subcontractors, third parties and partners. We have a bright future ahead of us, as long as our clients and stakeholders continue to trust us and our way of working.

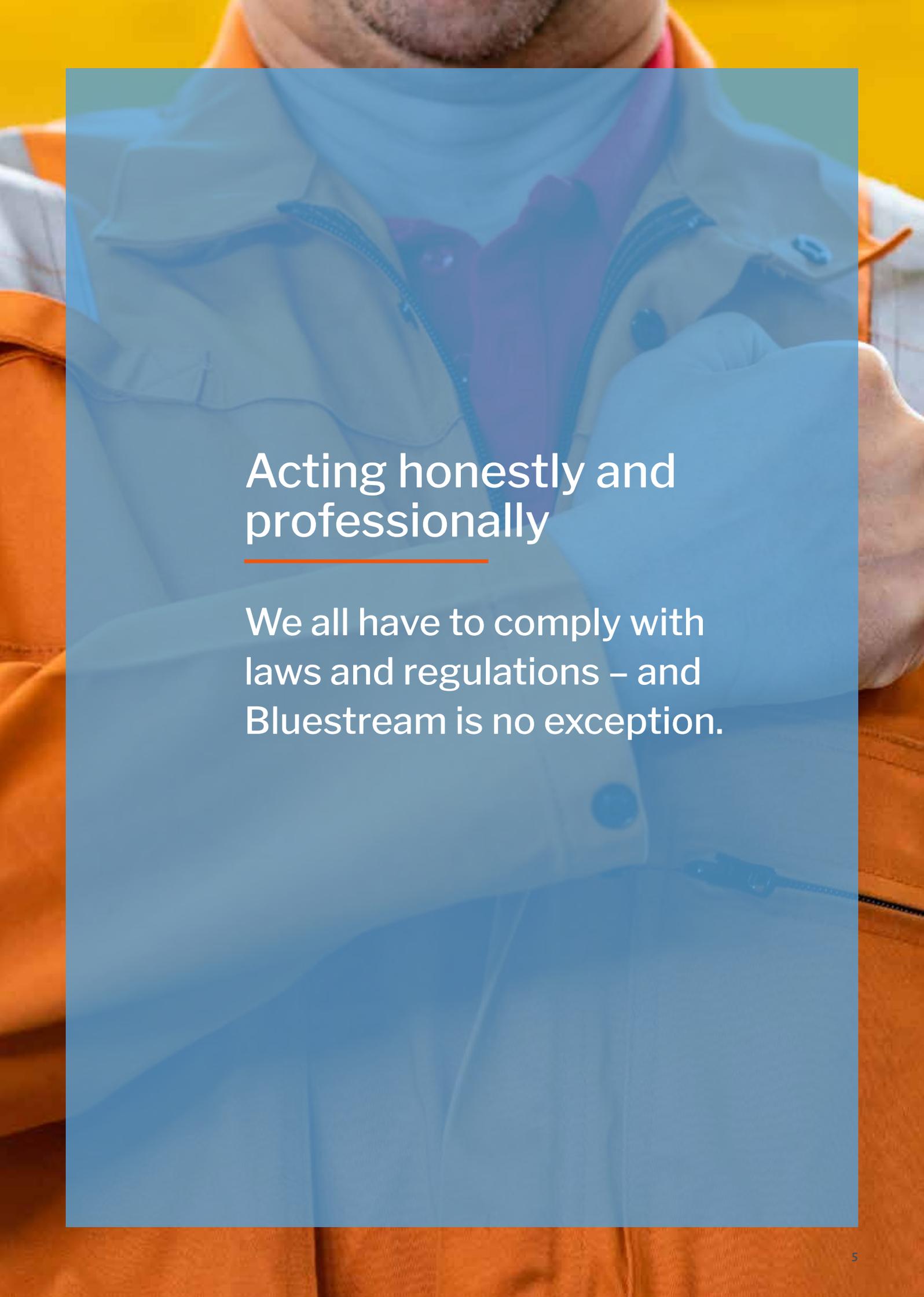
Our reputation is determined by things like our track record, the quality of our service and our performance on Quality, Health, Safety and Environment (QHSE). But even more important are the ways we behave, how we put our values into action, and our understanding of our rights and obligations towards the environment and our community.

We are highly committed to achieving excellence at every level.

Rooted in our core values, this Code of Conduct offers guidance by which to meet this goal. It sets out the standards for professional and honest behaviour, which we expect from all our employees, subcontractors, third parties and partners.

The whole is made up of the sum of its parts. It's down to each of us to speak up and safeguard our rights, even if we find ourselves in challenging situations.



A close-up photograph of a person's torso. They are wearing a light blue button-down shirt, a red tie, and an orange high-visibility safety vest. Their hands are visible, adjusting the knot of the tie. The background is a solid yellow color.

Acting honestly and professionally

We all have to comply with laws and regulations – and Bluestream is no exception.



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Compliance with legal obligations

We all have to comply with laws and regulations – and Bluestream is no exception. As an organisation, we must comply with local legislation and regulations, which generally relate to health, safety, environment, finance, tax and trading principles.

It is essential that all our employees, subcontractors, third parties and partners comply with all laws and regulations applicable to their work. It's also crucial to comply with Bluestream's Code of Conduct and policies, and to be aware of the obligations arising from your position and/or duties.

As Bluestream is based in the Netherlands, we must comply with Dutch legislation and regulations. However, we also work in other countries, which means we need to comply with legislation and regulations in all the countries in which we work.

Ignoring an obligation is never an excuse for non-compliance. We all have the responsibility to understand the laws and regulations of the location in which we work. If you need advice or assistance on complying with laws and regulations, please contact your direct manager, Bluestream focal point of contact or QHSE Manager.

Avoiding conflicts of interest

Anyone directly or indirectly working for Bluestream should avoid conflicts of interest.

This entails situations in which your actions or loyalties are divided between your personal interests and those of Bluestream or any other stakeholder, which could influence your impartiality and decision-making.

Common conflicts of interest include:

- Conducting business with organisations that are owned or represented by you, your family or friends;

- Using (confidential) information obtained via your position at Bluestream for personal gain;
- Holding an external position or role that might affect your representation of Bluestream or your performance at the company.

Not dealing appropriately with such conflicts of interest poses risks to Bluestream, its reputation in the market and its client relationships. But such situations are not always black and white. It is therefore very important that you carefully consider your responsibilities for Bluestream – especially when it comes to grey areas.

Competition and antitrust

Bluestream is committed to fully complying with competition and antitrust laws in all jurisdictions in which we operate.

There are many legitimate business reasons for having contact with competing parties, such as meetings, discussions or networking events.

However, the following topics should not be discussed, either directly or indirectly, with any competing party under any circumstances:

- Strategic and confidential information;
- Financial figures and pricing;
- Allocating markets or clients.

Confidential information

Unauthorised use of confidential information may damage Bluestream's reputation in the market, as well as our relationships with clients and suppliers.

Confidential information includes:

- Information concerning business or financial conditions of the organisation, clients or market that is categorised as confidential and/or information that is not publicly available;
- Personal information or information about individuals relating to the performance of work that is subject to privacy guidelines.

Everyone is expected to keep sensitive and private information confidential, to discuss confidential matters only where such conversations cannot be overheard by others, and to ensure that subcontractors, third parties and partners deal with such information in the same way.

Sanctioned countries or individuals

Bluestream is committed to conducting business in accordance with EU guidelines on sanctioned countries.

Countries may be subject to sanctions for undesired behaviour with regard to the use of chemical weapons, cyber-attacks, violation of human rights, terrorism and so on. The list of sanctioned countries and the EU sanctions map can be found on the website of the European Commission: sanctionsmap.eu.

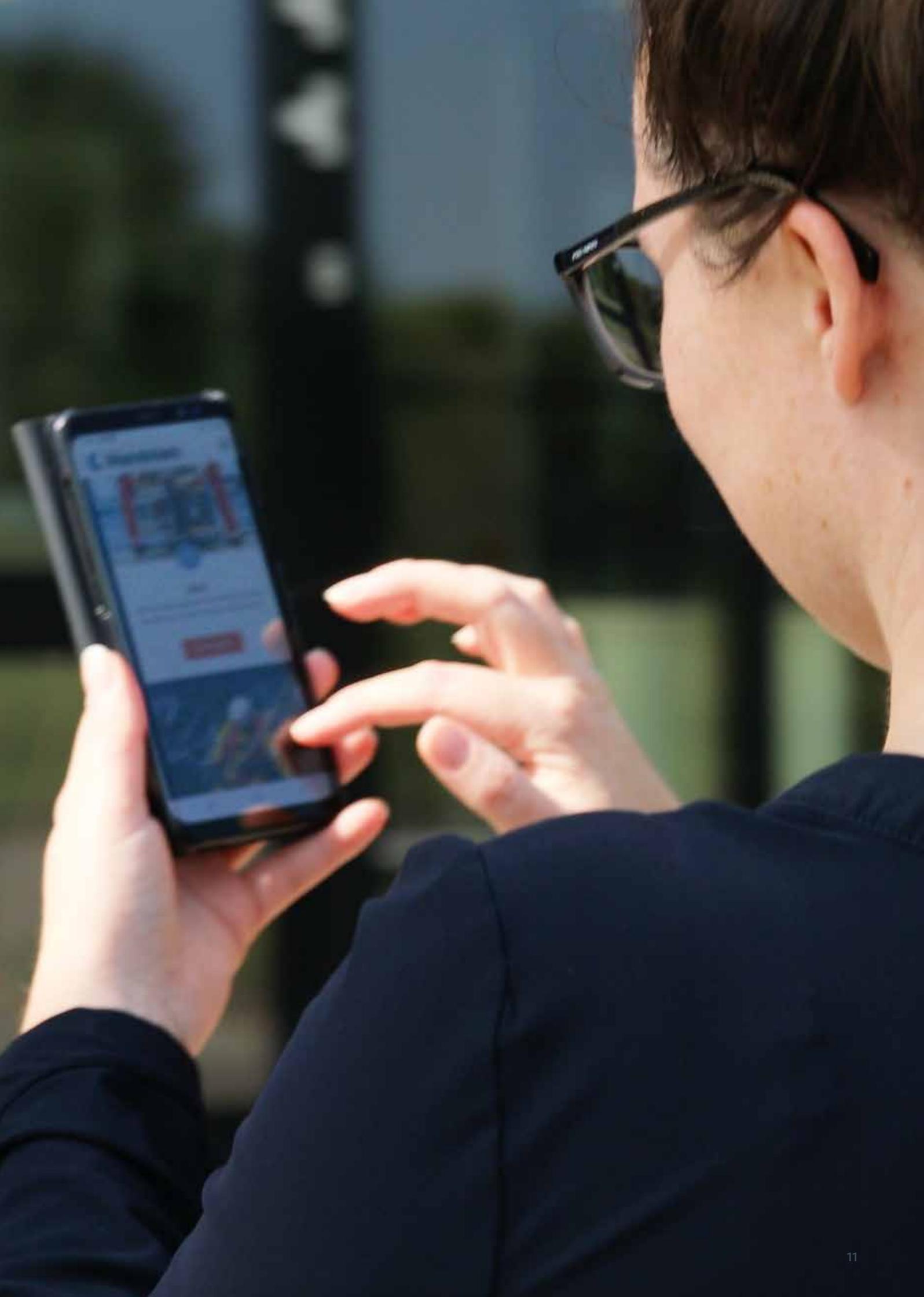
No-one within Bluestream – regardless of their position, seniority or location – must engage in any dealings with any country or individual subject to embargoes or sanctions.





Respecting assets, resources and information

In a world in which digital information plays an increasingly prominent role, it is important that you take the same care of digital information as you would of physical assets and resources.



Respecting assets, resources and information

In order to carry out your work, we provide various assets and resources in a variety of media, such as documents, data, software, plant & equipment, infrastructure and other facilities. These are all made available solely for the purpose of conducting Bluestream's business.

It is important that you protect these assets and resources from misuse, loss, theft and unauthorised access. No distinction is made between owned, hired or freely issued items.

In a world in which digital information plays an increasingly prominent role, it is important that you take the same care of digital information as you would of physical assets and resources.

To keep digital information secure, you are expected to:

- Create and frequently update strong passwords, and keep these confidential;
- Use the IT infrastructure and software only for the purposes for which it is intended;
- Be careful about what to print, where you take calls and where data is shared.

Preventing bribery, fraud and corruption

Bribery can have a devastating effect on the company, including companies and individuals.

Anti-bribery

A bribe is an inducement, advantage, benefit or reward of any kind that is offered, promised or provided, either directly or through an intermediary, in order to influence a decision or act, or to facilitate or expedite a routine function by the party concerned.

Bribery can have a devastating effect on the company, including companies and individuals. Based on our core values and legal compliance, giving or accepting bribes is totally unacceptable and will not be tolerated.

Senior managers at Bluestream are obliged to take anti-bribery training. In addition, we expect anyone who works for or on behalf of Bluestream to refrain from giving or accepting bribes.

Preventing fraud and corruption

To protect our interests and prevent fraud and corruption, we have various processes in place for financial controls and audits. The prevention, detection and reporting of fraud is the responsibility of all employees, subcontractors, third parties and partners. In addition, Bluestream managers are expected to be familiar with the types of misconduct that might occur within their areas of responsibility, and to be alert for any indication of fraud or corruption.

Common examples of fraud include:

- Misappropriation of funds, securities, supplies or other assets;
- Impropriety in the handling or reporting of money or financial transactions;
- Intentional fraudulent reporting of the company's financial position;
- Profiting from insider knowledge of company activities;
- Accepting or seeking anything of material value from contractors, vendors or parties providing services/materials to the company with the intent or result of personal gain;
- Destruction, removal or inappropriate use of records, furniture, fixtures and equipment;
- Any similar or related inappropriate conduct.

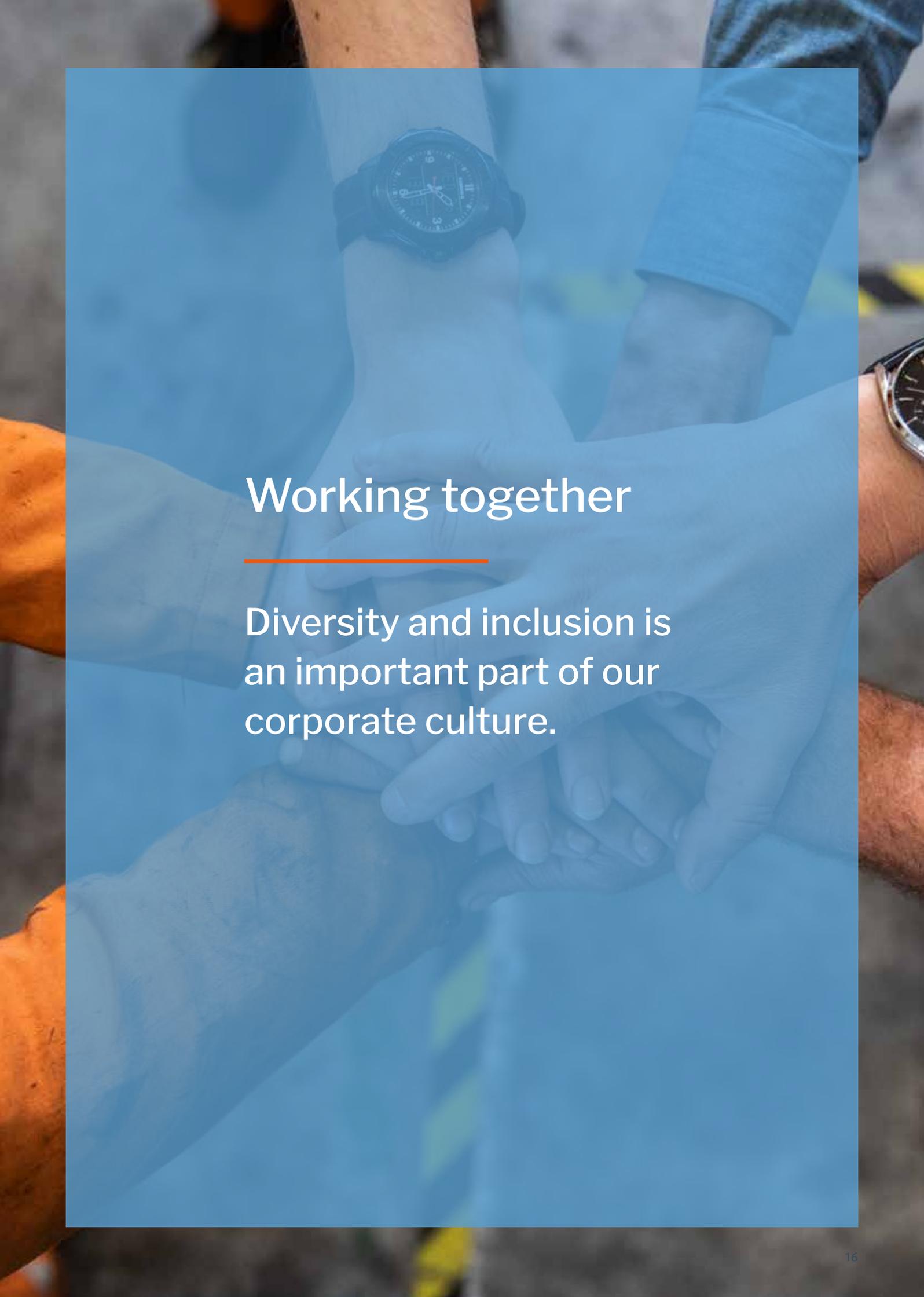


Prudent handling of gifts, entertainment and hospitality

Giving and receiving gifts, entertainment and hospitality require extra vigilance, as the limits of what is acceptable often fall in a grey area and can differ per stakeholder. While it is customary in some countries, industries or sectors to offer gifts, entertainment or hospitality, the giving or accepting of these may in some instances be considered as a bribe.

Giving and accepting gifts, entertainment and hospitality in equitable form is not prohibited within Bluestream. However, both the giving and receiving parties should at all times consider the purpose of the gifts, entertainment and hospitality, and whether the monetary value is equitable.

Giving and accepting excessive or questionable gifts, entertainment or hospitality is strictly prohibited, as is giving or accepting cash.



Working together

Diversity and inclusion is an important part of our corporate culture.

Diversity and inclusion

Our success and continuity depends on attracting, developing and retaining the best people, who identify with the norms and values of the organisation, and who are able to bring out the best in themselves and their team. Bluestream's core values act as guidance for our people.

Diversity and inclusion is an important part of our corporate culture. We are committed to providing fair and equal opportunities to each individual, and to including all ages and cultures. We seek to leverage as much diversity as possible to drive organisational success and continuity.

Discrimination, harassment and intimidation

Bluestream is committed to providing all its employees with a safe and healthy working environment, and expects the same from its subcontractors, third parties and partners. We respect and promote human rights in our operations and supply chain, in line with the United Nations Guiding Principles.

We embrace the diversity and inclusion of all employees and we respect their dignity, individuality and privacy. We are strongly committed to keeping our working environment free from discrimination, harassment and intimidation.

Discrimination, harassment or intimidation in any form, based on age, gender, nationality, race, religion or sexual orientation, whether verbal or physical, is never tolerated.

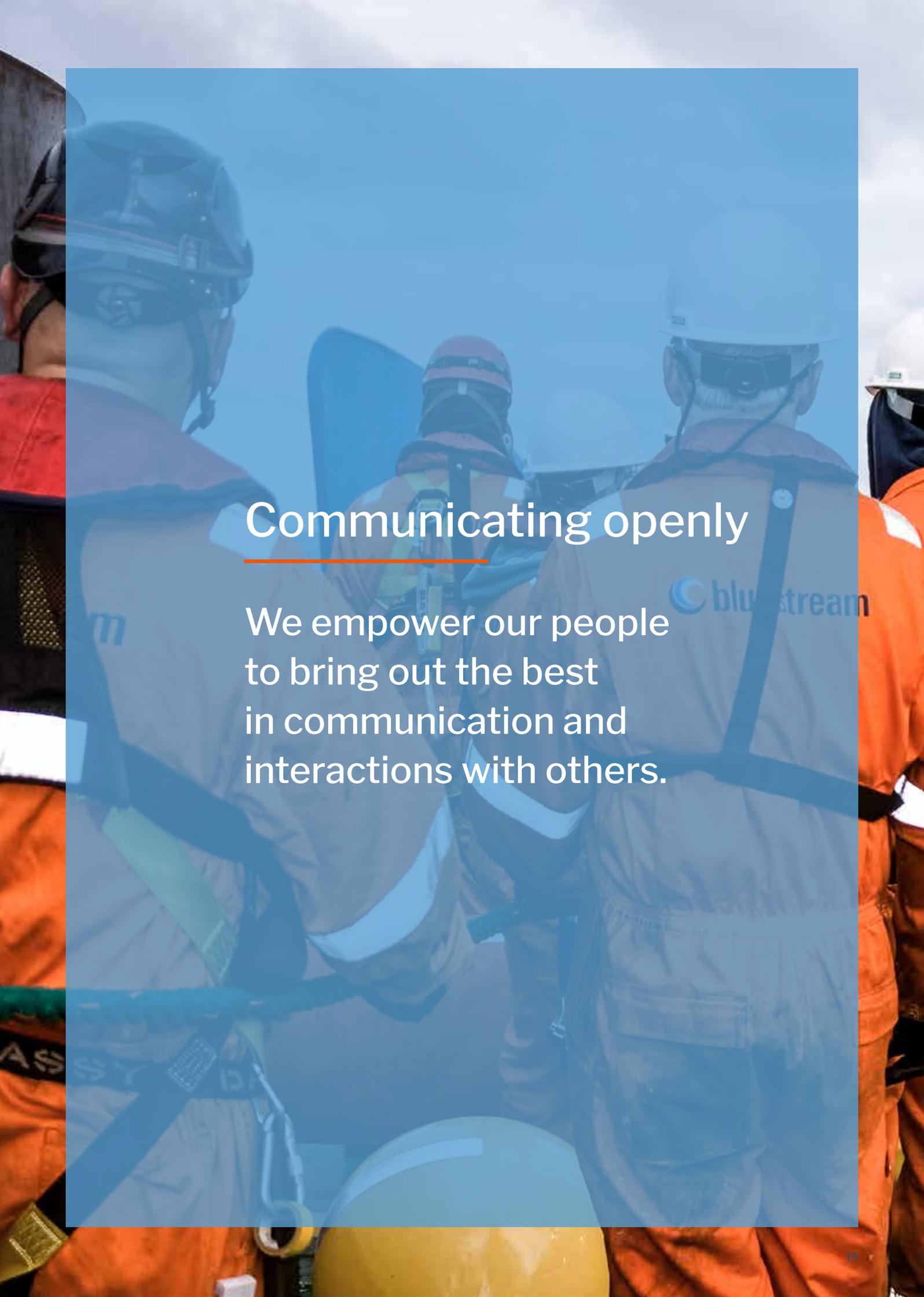
Health and safety

We are committed to preventing incidents, accidents, injuries and illness related to work, and to protecting our employees, subcontractors, third parties and partners involved in our operations.

We expect everyone involved in Bluestream's operations to meet the highest possible safety standards, and we understand that we all have a duty to promote and maintain a safe and healthy working environment.

We continuously monitor and evaluate the health and safety performance of our employees, as well as that of our subcontractors, third parties and partners.





Communicating openly

We empower our people to bring out the best in communication and interactions with others.



Communicating openly

We promote fair and open communication, and respect the fact that everyone has the right to speak up about any subject. We empower our people to bring out the best in communication and interactions with others.

Our standard practice is to listen when others speak, to communicate non-judgmentally from our own expertise and experience, to show understanding for others and to allow everyone to the time to speak.

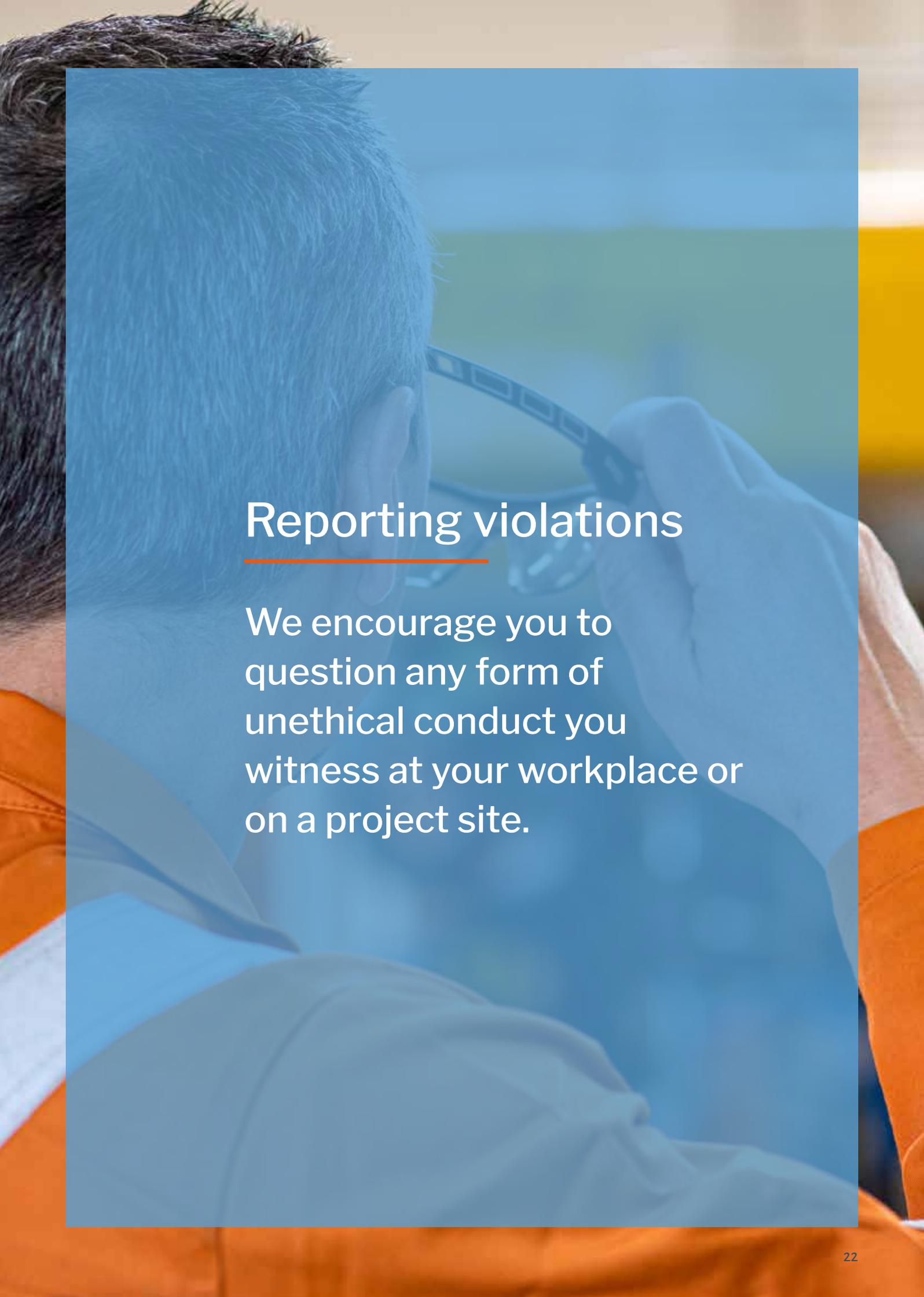
Communicating for others without permission, making generalisations, or assuming that everyone shares the same opinions, beliefs, values and conclusions does not belong in our communication style. Offensive language, disrespectful speech and talking behind people's backs are not tolerated.

Respecting data and privacy laws and regulations

We embrace lawful and correct handling of any information relating to an identifiable person (personal data) in line with the General Data Protection Regulation (GDPR).

We take great care in protecting personal information collected for business purposes of all our stakeholders – including current and former shareholders, directors, employees, subcontractors, suppliers, customers and any related family or next of kin – in line with the GDPR.

In accordance with the requirements of applicable privacy and data protection legislation, personal data is subject to controls to prevent unauthorised or unlawful processing, accidental loss, destruction or damage.

A person wearing safety glasses and an orange safety vest is shown from the back, looking down at a document. The image is overlaid with a semi-transparent blue filter. The text is centered on the page.

Reporting violations

We encourage you to question any form of unethical conduct you witness at your workplace or on a project site.



Reporting violations

All employees, subcontractors, third parties and partners are encouraged to question any form of unethical conduct they witness at their workplace or on a project site. You are specifically requested to report any violation or potential violation of the Code of Conduct.

If you believe that a violation of the Code of Conduct has occurred, or could potentially occur, please contact your manager (for employees) or Bluestream focal point of contact (for suppliers, third parties and partners) immediately. Together, we will then prepare a report for further investigation.

For this report, it's important to gather all the facts:

- The date, time, location and person/people involved in the incident;
- The details of the project, plant and equipment or environment in which the incident took place;
- The nature of the violation or potential violation, including all details of the incident;
- The identity of any witnesses who could contribute to a correct and complete report of the incident.

If your direct manager or Bluestream focal point of contact is not available, please contact the QHSE Manager. If the violation concerns your direct manager, Bluestream focal point of contact or QHSE Manager, please report it to another member of the Management Team or the Managing Director.

What happens after you file a report

The QHSE Manager and/ or external investigator will contact you to review your report and to fully understand the violation or potential violation, so that appropriate follow-up can be arranged.

We do everything in our power to keep your report confidential, including your personal details. However, in the interests of a full investigation or settlement, it may be necessary to disclose some information – with your permission. If the investigation requires further involvement from you, we expect you to cooperate fully and honestly.

Victimhood or retaliation

We understand that someone who files a report does so with the best of intentions, and that this person should feel safe. Any retaliation towards a person who has reported a violation or potential violation will not be tolerated.

We embrace the diversity and inclusion of all employees and we respect their dignity, individuality and privacy. We are strongly committed to keeping our working environment free from discrimination, harassment and intimidation.

If you experience – or see someone experiencing – retaliation, report this to your direct manager or Bluestream focal point of contact. If the retaliation concerns your direct manager, Bluestream focal point of contact or QHSE Manager, please report it to another member of the Management Team or the Managing Director.



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