

OCTOMAR ANTI-CORRUPTION POLICY

OCTOMAR is committed to conducting its business with honesty and integrity and in compliance with the law of Republic of Angola. This includes compliance with all laws, domestic and foreign, prohibiting improper payments or inducements to any person, including public officials. To ensure compliance with these laws and the related requirements the Company has adopted this Anti-Corruption Policy. This Policy applies, subject to and in accordance with any applicable local law or legal requirement, to each director, officer and employee of OCTOMAR and of each of its direct or indirect subsidiaries to which the Code of Business Conduct applies, and to each agent, representative, consultant and independent contractor acting on behalf of the OCTOMAR or any such subsidiary. Subsidiaries not covered by the OCTOMAR Code of Business Conduct are expected to adopt their own policies equivalent to this Policy.

Company Personnel shall not:

- make, or authorize anyone to make on behalf of the OCTOMAR,
- any payments or gifts or offers or promises to pay money or give anything of value to or for the benefit of any person, including any "Public Official",
- that is or may appear to be related to obtaining or retaining business with any person, directing business to any person, obtaining any other advantage in the conduct of business, or inducing or rewarding the "improper" performance by any person of any function or activity,
- or consent to, or connive in, any of the above.

The performance (or failure to perform) any function or activity is "improper" if it breaches the expectations of good faith or impartiality or breaches a position of trust.

- Company Personnel shall not make contributions of funds, facilities or services of any kind to political parties or officials or candidates for office to obtain their support for executive, legislative, administrative or other action favorable to the Company.
- Company Personnel shall not give or offer to give on behalf of the Company any money, gift or thing of value to a third party if he or she knows or has reason to believe that it will be offered to a Public Official or any other person to obtain or retain business with any person, to direct business to any person, to obtain any other advantage in the conduct of business, or to induce or reward the improper performance by any person of any function or activity.
- The books and records of the Company must reflect, accurately and fairly, the transactions of the Company and dispositions of its assets. No undisclosed or unrecorded funds or assets are to be established for any purpose.
- Company Personnel who are involved in international business transactions must become familiar with the anti-corruption laws of the countries and are responsible for seeking the advice of the Legal Department in any situation involving questionable payments.

It is a matter of the highest priority for the Company, and vital to the interests of our shareholders, customers and employees, that all Company Personnel scrupulously observe this Policy.

Luis Lago de Carvalho

On behalf of the Board of Directors



Luanda, June 2014

Note: It will be revised and reissued in case of any changes.

All business units, marine craft and work locations shall conform to this policy and its objectives to their best of their ability and as appropriate to their own circumstances.