

Code of Conduct

BMS-IGS-COR-POL_001 · REVISION 01 · ISSUED 20 FEBRUARY 2026

PURPOSE

For the purposes of this Interocean Group (“Interocean”) Code of Conduct (the “Code”), “Interocean Group” means Interocean Holdings Limited and all its subsidiaries, branches and controlled or affiliated entities worldwide.

The Code sets out our commitment to conducting business with integrity. It provides a clear framework that guides how all Interocean Representatives (defined below) are expected to act and make decisions, helping us maintain trust and uphold our reputation as a responsible, respected organisation.

The Code directly supports Interocean’s Corporate Mission, Vision & Goals (“MVG”). It defines the behavioural, ethical, and cultural expectations required to achieve our strategic ambitions. Our shared commitment to integrity, respect, sustainability, and operational excellence enables us to deliver on our Mission, advance our Vision of being a leading provider of integrated asset solutions, and uphold the Values and Goals set out in the MVG framework. Every Interocean Representative is expected to conduct themselves in a way that reflects and reinforces these corporate commitments.

The Code is supported by Interocean’s policies, processes, and procedures, which together form the foundation of our governance system. These documents should be read alongside the Code to ensure a full understanding of the standards expected across our business.

While the Code cannot address every situation, you are expected to exercise sound judgement, act ethically, and seek guidance whenever you are uncertain. If you have questions or concerns about how the Code applies in a specific context, please speak with your Interocean contact, line manager, the Legal Team, or HR.

MESSAGE FROM THE CHIEF EXECUTIVE

Understand and apply the code of conduct. At Interocean, our Code of Conduct is not simply a set of rules to follow during working hours it reflects our core values and must guide our behaviour at all times, both professionally and personally. Integrity is not a temporary state; it is a continuous commitment that shapes every decision we make, whether we are at work, representing the company externally, or engaging within our communities.

Integrity requires more than compliance with policies or regulations. It is about consistently choosing to do what is right, even when it is difficult or when no one is watching. Each of us faces unique integrity risks in our roles, and it is essential to proactively identify these risks, understand how to manage them, and know where to seek guidance when uncertain. If you encounter a situation that challenges your ethical judgement, do not hesitate to seek support from your manager, the Legal Team, or other trusted advisors within Interocean. By doing so, you help protect yourself, your colleagues, and the reputation of our organisation.

DOCUMENT CONTROL

REFERENCE

BMS-IGS-COR-POL_001

REVISION

01

ISSUED

20 February 2026

OWNER

HSEQ Department

APPROVED BY

Fraser Moore, Chief Executive Officer

APPLIES TO

Global – all units

This statement is drawn from the controlled document of the same reference in Interocean's Business Management System, which remains the official version. Interocean Group — Move. Manage. Maintain.

Follow the Code of Conduct without compromise. Integrity is the foundation upon which our business is built, and it begins with everyone. We are all responsible for upholding the highest standards of ethical conduct in every aspect of our work. This includes respecting cultural differences, honouring the rights and dignity of everyone we interact with, and fostering an environment where diversity and inclusion are valued and celebrated.

Our commitment to integrity extends beyond our internal operations. We work to make a positive impact in the societies where we operate, ensuring that our actions contribute to sustainable development and responsible business practices. Sustainability is not merely a corporate objective; it is a guiding principle that influences our decisions and helps us create long-term value for our stakeholders and the wider community.

Speak up without fear. A culture of integrity can only thrive when everyone feels empowered to raise concerns and report potential breaches of this Code. At Interocean, we are committed to maintaining an open and transparent environment where individuals can speak up without fear of retaliation. If you witness or suspect any behaviour that may violate our Code or our values, you are encouraged to report it promptly, whether to your manager, senior management, or through our whistleblowing policy.

Every report is taken seriously being recorded and managed with the utmost confidentiality and care. By speaking up, you play a vital role in safeguarding our culture of compliance and ensuring that Interocean remains a trusted partner in the energy and maritime sectors. Thank you for your dedication to upholding our standards of integrity, compliance, and ethical leadership. Together, we will continue to build a company respected for its values and trusted by clients, partners, and communities around the world.

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Fraser Moore
CHIEF EXECUTIVE OFFICER