

**CODE OF BUSINESS CONDUCT**



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# CEO MESSAGE



An unwavering commitment to ethics and integrity is the foundation that has fueled McDermott for more than a century. To carry this tradition onward, we must each be consistent examples of how this organization delivers excellence throughout the world.

McDermott's Code of Business Conduct is one of the tools that guides our daily interactions and practices. It is a resource to help you represent the standards with which McDermott conducts business. It empowers employees and contractors to do the right thing, to speak up and it encourages employees and contractors to make suggestions for improvements.

Integrity is one of McDermott's five values. It's how we build trust between ourselves and those with whom we do business. The Code of Business Conduct is essential to maintaining our integrity and our integrity is essential to maintaining our future success.

Read it. Refer to it often. It will help you make the right choices at every turn and to be accountable for those around you.

A handwritten signature in black ink, appearing to read "Michael McKelvy". The signature is fluid and cursive, with a large, stylized "M" and "K".

Sincerely,

**Michael McKelvy**  
President and Chief Executive Officer

# Our Code



At McDermott, our vision is one. We are one company – **One Team** with a shared purpose to develop innovative solutions that solve tomorrow’s problems – today. This vision requires an unwavering **Commitment** to our Values.

You help bring our Values to life in your daily work, and our Code is here to help. Consider it the cornerstone of the way we do business, a statement of what we believe and a guide to operating openly and honestly – with **Integrity**.

Though it may not offer an answer for every situation, the Code points you to the resources you need to make ethical decisions. Refer to it often in your work, use good judgment and always seek guidance if you need additional assistance.

Also, keep in mind that our Code applies to everyone who works at McDermott, including full-time and part-time employees in all our locations as well as those who perform work for us or on our behalf, such as business partners, consultants, agents, vendors, suppliers of material, services or labor and other third parties.

## What are your responsibilities as an employee?

All employees are expected to:

- Know and follow our Code and any relevant policies, laws and regulations.
- Handle every interaction with the highest degree of **Integrity**.
- Cooperate fully with any investigations into misconduct.
- Speak up if misconduct is seen or suspected.
- Ask questions if unsure of what to do.

## What are your responsibilities as a manager?

Managers have additional responsibilities. If you’re a manager:

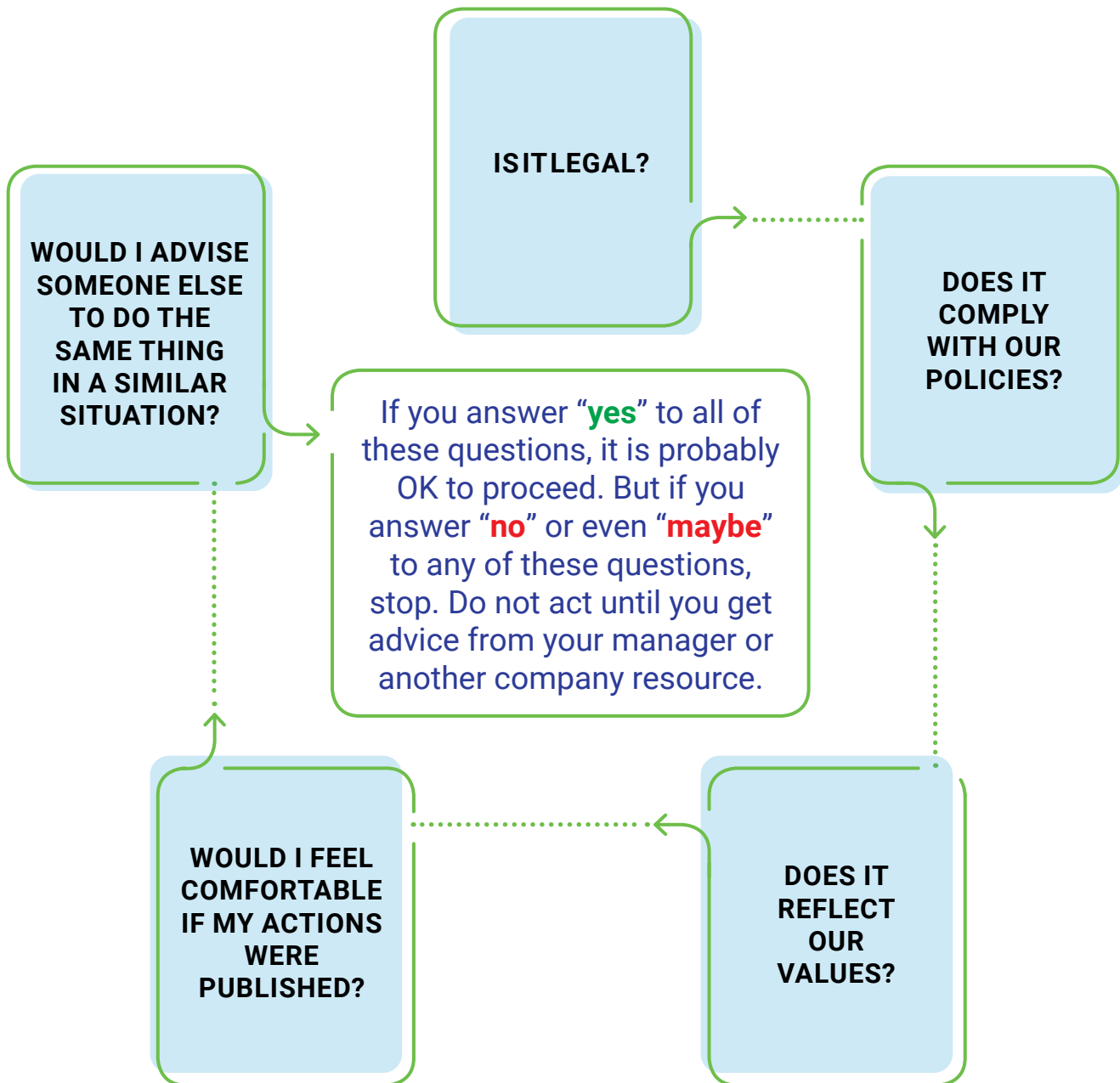
- Be a model of **Integrity** by upholding our Code and our Values and talking about them frequently.
- Have an open-door policy and be prepared to answer employee questions about the Code.
- Encourage members of your team to refer to the Code often and reinforce it by discussing Code topics in your team communications.
- Take prompt, appropriate action when you see or suspect a violation of our Code, but do not conduct your own investigation.
- Never retaliate or allow others to retaliate against employees who have shared concerns.

## What happens when our Code is violated?

Anyone who violates our Code could face serious consequences, including anything from additional training and written or verbal warnings to probationary periods or termination.

# Make the Right Decision

We don't expect that you'll automatically know the right way to handle every situation, but if something comes up that you're unsure about, first ask yourself:



# Our Values

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As members of the McDermott team, we count on each other to build on our tradition of excellence and to live the Values that empower our company.

Do your part to uphold our Values:



## Integrity

We maintain a firm adherence to legal and ethical conduct.

- Do the right thing ... even when no one is watching.
- Lead by example.
- Respectfully speak up when you see something wrong.
- Communicate openly and honestly.
- Be willing to admit when you are wrong.



## One Team

We are one company, where everyone is equally important.

- Make decisions for the best outcome of the entire company; break down silos.
- Purposefully include all stakeholders affected when making decisions; be transparent.
- Build a diverse team; the best solutions come from obtaining different viewpoints.
- Recognize the efforts of the team and celebrate successes.
- Share your ideas, best practices and lessons learned; listen and respect other people's input.



## Go Beyond

We seek courageous and creative solutions.

- Be open to new ways of doing things.
- Teams and individuals constantly challenge each other to stretch beyond the norm.
- Employees are empowered and supported to step out of their comfort zone and feel safe.
- Individuals are encouraged to develop and demonstrate agility and creativity and are recognized and rewarded for it.
- Collaborate to develop innovative solutions.



## Well-Being

We promote all forms of well-being.

- Safety guides all of our decisions.
- It is everyone's responsibility to act safely and look out for others.
- Mental health is as important as physical health.
- Support work/life harmony.
- Protect and preserve the environment and communities in which we live and work.



## Commitment

We are reliable and dependable in delivering quality solutions.

- Provide certainty on schedule, quality, cost and safety through clear and realistic plans.
- Take ownership and accountability; address problems head on.
- Be cost-conscious.
- Develop our employees.
- Accept challenges and look forward to achieving successful outcomes even in the face of adversity.

# INTEGRITY

WE LIVE OUR VALUES AND DO THE RIGHT THING – WHETHER OR NOT ANYONE IS WATCHING US. HONOR OUR LEGACY AND HELP ENGINEER OUR FUTURE BY REMAINING HONEST, LEADING BY EXAMPLE AND WORKING WITH INTEGRITY IN ALL THAT YOU DO.

# BUSINESS CONDUCT

## In This Section:

- Preventing Corruption, Bribery and Money Laundering
- Avoiding Conflicts of Interest
- Exchanging Appropriate Gifts and Entertainment
- Avoiding Insider Trading
- Following Antitrust, Import, Export and Trade Compliance Laws



# Preventing Corruption, Bribery and Money Laundering

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## ONE PURPOSE

We never compromise our Values to get ahead. By gaining success through the quality of our products and services – and not through any unethical or illegal activity – we protect our communities, our brand and one another.

## OUR PURPOSE IN ACTION

We follow anti-corruption and anti-bribery laws wherever we do business. Regardless of what local laws may permit, we never offer, pay, promise to pay or accept anything of value – either directly or indirectly – to improperly influence the judgment or actions of others.

We are proactive when it comes to spotting financial transactions that might signal money laundering. Money laundering is a process where funds generated through criminal activity – such as terrorism and drug dealing – are moved through a legitimate business in order to hide their criminal origin. Similarly, “reverse” money laundering disguises an otherwise legal source of funds for illegal use, such as avoiding taxes or paying a bribe.

We are committed to building honest and transparent relationships with government and public officials wherever we operate; and to adhering to the highest ethical standards. We contract with them fairly and comply and cooperate with all government inspections, investigations or requests for information.

Our goal is to conduct business in a way that prevents corruption, bribery and abuse of power. To avoid even the appearance of inappropriate behavior, we keep the following in mind.

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### Preventing Corruption and Bribery:

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- **Learn to spot a bribe** – A bribe is anything of value offered in exchange for favorable treatment or other improper advantage. A bribe can take many forms, including:
  - Cash or cash equivalents (like gift cards)
  - Meals or entertainment
  - Gifts (however small)
  - Offers of employment
  - Benefits or favors
  - Charitable, political or industrial contributions
- **Resist requests for facilitating payments** – Facilitating payments are also known as grease payments. Keep in mind that:
  - In some countries, low-level officials may request payment of a small amount of cash to expedite their performance of non-discretionary duties, such as stamping your exit visa. This is usually an illegal bribe request.
  - McDermott does not make facilitating payments, except in extraordinary circumstances when it is both legal and appropriate – and only with Chief Ethics & Compliance Officer pre-approval.
- **Obtain necessary approvals** – We are responsible for following our policies and obtaining approvals when required. Make sure you obtain appropriate approvals when:
  - Giving gifts or entertainment to [public officials](#).
  - Giving the company’s money to charitable, political or industrial causes.

# Preventing Corruption, Bribery and Money Laundering

- **Monitor third parties** – We are responsible not only for the acts of our employees, but also for the actions of third parties who represent us.
    - If you hire third parties, ensure due diligence is conducted prior to signing a contract.
    - If you manage third parties, monitor their work and speak up if you see or suspect a bribe or other improper influence.
- 
- **Keep accurate records** – Never make false or misleading entries in company records or create false documentation.
- 
- **Seek guidance when needed** – Before offering or accepting anything of value, ask yourself if it carries some future expectation and seek help if you're unsure of what is appropriate and permissible.



## Preventing Money Laundering:

- Look for warning signs. Speak up if you see:
    - Attempts to avoid recordkeeping requirements
    - Attempts to pay in cash
    - Payments made by or to entities who are not parties to the transaction
    - Requests to ship to a country other than the one where the payment originated
    - Suspicious changes in the pattern of a third party's transactions
- 
- Remain alert – Know the types of transactions, activities and third parties in your department that are more susceptible to acts of money laundering and increase your monitoring when needed.

## Working With Public Officials:

- Know and follow the rules that apply to your work and the country in which you work. Pay extra attention to any unique legal requirements and restrictions.
- Speak up about any activity that could put our company at risk.
- Make sure all contract terms are in writing and that they clearly and accurately describe the agreement.
- Consult the [Sustainability & Governance \(S&G\) Team](#) before providing any gifts, entertainment or hospitality to a public official.
- Notify the S&G Team of any governmental investigation or request for information immediately.

# Preventing Corruption, Bribery and Money Laundering



**When identifying “public officials” remember that the term is broad and applies not only to elected or appointed officials, but also to employees of government agencies and government-owned companies or entities. Examples include:**

- Employees of state-owned businesses or national oil companies
- Customs, immigration or tax officials
- Regulatory agency officials
- Political candidates and political parties
- Military personnel
- Employees of a public international organization, such as the United Nations, European Union or World Bank
- Any person performing a public service on behalf of any government or arm of the government, such as an auditor issuing an independent report to a government agency



## ONE MCDERMOTT WAY > THE RIGHT CHOICE

**Q.** I am working with an official at our client, a government-owned oil company. We are in a contractual dispute about the sufficiency of our request for an extension due to delays beyond our control. The official has suggested we hire his brother as an adviser to help us prepare our best case for success at our informal hearing. What should I do?

**A.** Had we already hired the brother as best-qualified after selecting among multiple qualified candidates and without any expectation he would exert family influence, this might have been permissible under some circumstances if reviewed by the [Sustainable & Governance \(S&G\) Team](#). Under these circumstances, however, it is clear the official is trying to benefit his brother by implying there will be some benefit to McDermott. Receive the brother’s information without agreeing to anything and immediately contact the S&G team.



## LEARN MORE

[LCR-EC-PL-00200.00/Anti-Bribery Policy](#)

[COMN-GEN-PR-00100.00/Third-Party Contribution Policy](#)

# Avoiding Conflicts of Interest



## ONE PURPOSE

We aim to succeed as **One Team** – so, we work in ways that protect the interests of our coworkers, our customers and our company.

## OUR PURPOSE IN ACTION

We avoid and disclose all situations that could cause our interests or those of a family member or other external interest to conflict with McDermott's interests.

These situations are called conflicts of interest, and even the appearance of a conflict can harm McDermott.

To avoid conflicts of interest, it's helpful to understand when they typically happen. Although it is not possible to list every conflict scenario, there are certain situations where conflicts are more likely to occur.

For instance, speak to your manager before taking on:

### Outside or part-time work



work for a competitor or a company that either does or wants to do business with us.

### A financial interest



an investment in a competitor or a company that either does or wants to do business with us.

### Personal relationships



involvement in hiring, promoting or supervising family members, friends, business partners, cohabitants or romantic partners.

### An outside opportunity



an opportunity discovered through your work here at McDermott that you take for yourself.

### A board membership



a role (e.g., as director, advisory member or officer) that interferes with your obligations at McDermott.

# Avoiding Conflicts of Interest

## Spotting Conflicts of Interest:

Because we can't list all possible scenarios, before pursuing a relationship, interest or activity that could benefit you or someone you know, ask yourself:

Could it place me in a position where I could use my position for personal gain?

Could it interfere with decisions I make for McDermott?

Could it compete against McDermott's interests?

Could it appear to others that it's a conflict even if it is not?

If you respond to any of these questions with "yes," "maybe" or "I'm not sure," then the situation may present a conflict of interest. Speak to your manager about it **immediately**.



## ONE MCDERMOTT WAY > THE RIGHT CHOICE

**Q.** I am in charge of selecting which labor subcontractor to send requisitions for additional labor demand at my project site. My point of contact at one of the labor subcontractors has suggested that they might have a position for me when my project is completed and asked for my resume. Should I send it?

**A.** While this may be a completely innocent request, to others it may look like an offer of something in the future and, therefore, an incentive for you to award more business to the subcontractor than might have otherwise occurred. Before you send your resume, gather all relevant information about the request and the extent of our business with the subcontractor and your prior interaction with them and their employees. Contact the [Sustainability & Governance \(S&G\) Team](#) before sending your resume. Like gifts and entertainment, most requests are approved, and it is your transparency that will protect you from suspicion of potentially having done something improper. Your request will be treated confidentially.



**LEARN MORE**

[LCR-EC-PL-00200.00/Anti-Bribery Policy](#)

# Exchanging Appropriate Gifts and Entertainment

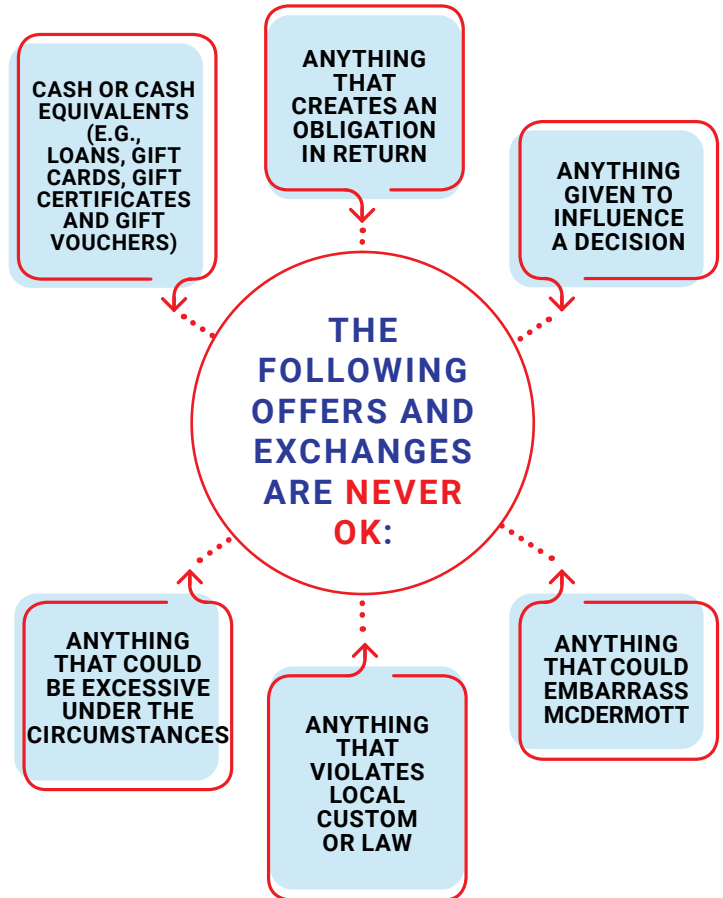
## ONE PURPOSE

To protect our brand, we work with those who share our passion for ethical innovation – and we never trade our **Integrity** for inappropriate gifts or offers.

## OUR PURPOSE IN ACTION

We understand that an occasional gift, a reasonably priced dinner or a modest outing can all foster positive business relationships, but we avoid anything that could even appear to be improper.

We offer or accept items of value only when doing so would be considered legal, ethical, reasonable and consistent with our policies.



# Exchanging Appropriate Gifts and Entertainment



Also, use extra care when dealing with public officials. The rules defining what you can give to a public official are very strict. Current limits are found in the policy linked below. If offering something of value to a public official in excess of the policy limits, you must obtain approval from the [Sustainability & Governance \(S&G\) Team](#) before making the offer.



## ONE MCDERMOTT WAY > THE RIGHT CHOICE

**Q.** I just received an expensive gift worth over \$100USD from a service provider to the company. I know it would be considered inappropriate to accept it – what should I do?

**A.** In most cases, you should return the gift with a note politely explaining our policy. However, in some instances, it may be considered discourteous to return a gift. If so, accept the gift on behalf of McDermott then turn it over to your manager, who will work with the Area or Corporate S&G Team to handle it properly.



## LEARN MORE

[LCR-EC-PL-00800.00/Gifts and Entertainment Standards](#)

# Avoiding Insider Trading



## ONE PURPOSE

We promote fair markets by avoiding insider trading, believing everyone should make investment decisions based on the same set of rules.

## OUR PURPOSE IN ACTION

As part of our jobs, we may come into contact with “material nonpublic information” about McDermott or about companies with which we deal. Material nonpublic information is information that has not been released to the public that would affect the value (usually stock price) of a company.

We do not buy or sell stock (or other securities) or engage in any other action to take advantage of material nonpublic information. We also never provide tips to others, such as friends and family, so they can benefit from it. Both acts are examples of insider trading and are prohibited by our policy and law.

**To avoid insider trading, learn to recognize inside information. Examples include news about:**

- Changes in executive leadership
- Financial performance
- Achievement or non-achievement of significant project milestones
- Potentially significant business deals or transactions

 **ONE MCDERMOTT WAY > THE RIGHT CHOICE**

**Q.** My job requires me to deal with suppliers, some of which are publicly traded. During a meeting with a publicly traded supplier, a senior employee of the supplier told me that their quarterly results were going to significantly beat market expectations. This seems like a great investment opportunity. Can I buy the supplier's stock?

**A.** No. This information is considered “material nonpublic information” because if it were known publicly, it would positively affect the stock price of the supplier company. Be careful not to use for your personal benefit information you learn in the course of performing your duties as an employee.



**LEARN MORE**

[LCR-EC-PL-00500.00/Insider Trading Policy](https://www.mcdermott.com/insider-trading-policy)



# Following Antitrust, Import, Export and Trade Compliance Laws



## ONE PURPOSE

Our ability to compete commercially and trade internationally is a privilege, not a right. We operate responsibly to earn and maintain that privilege.

## OUR PURPOSE IN ACTION

We comply with competition and antitrust laws everywhere we do business, avoiding collaboration – or anything that could give the appearance of an improper agreement – with competitors.

We also import and export products legally and ethically, following all applicable trade control laws, regulations, boycott laws and trade sanctions in the countries where we operate.

By competing fairly and trading responsibly, we promote ethical business practices that help sustain our success. Do your part by keeping the following tips in mind:

### Following Antitrust Laws:

- Gather information appropriately – only use legitimate public sources and refuse information you suspect was improperly obtained.
- Communicate with **Integrity** – never make untrue statements about our competitors.
- Avoid certain discussions – never enter into any agreement or understanding, whether formal or informal, with a competitor, customer or supplier to:
  - Raise, set or hold (“fix”) prices on our services
  - Divide territories, markets or customers
  - Prevent another company from entering the market
  - Refuse to deal with a customer or supplier
  - Interfere with the competitive bidding process

# Following Antitrust, Import, Export and Trade Compliance Laws

## Following Import, Export and Trade Compliance Laws:

- Determine the right path – if the laws of more than one country apply in cross-border transactions, seek guidance before proceeding.
- Work diligently – accurately describe, classify and document, in advance, the value of goods and the country of origin for every import and export.
- Monitor our supply chain – communicate our policies to all who conduct business on our behalf and speak up if you see any questionable activity.
- Avoid boycotts – we don't participate in or promote boycotts that the United States does not support.
- Contact the [Sustainability & Governance \(S&G\) Team](#) when necessary – forward any inquiries about boycotts, requests to participate in them, or if you learn one of our business partners may be participating in a boycott, to the S&G Team. We expect our business partners to comply with the laws of the United States and the countries in which we operate.



### ONE MCDERMOTT WAY > THE RIGHT CHOICE

**Q.** I am reviewing a contract, and there is language in it that implies we need to avoid goods of Israeli origin. I know U.S. law prevents us from agreeing to boycott Israel, but this just says "avoid." Is it OK to sign the agreement?

**A.** No. U.S. export and tax regulations prohibit McDermott from participating in any boycott not sanctioned by the United States. Contact your Area S&G Team to review the contract's terms and, if necessary, request modification. A boycott request can take many forms and need not be in writing.



## LEARN MORE

[LCR-GEN-PL-00800.00/Antitrust Compliance Policy](#)

[SCM-GTC-PL-00100.00 - Version 3.00/Global Trade Compliance Policy Statement](#)

[LCR-EC-PL-00100.00/Compliance With Applicable Sanctions Law](#)

[LCR-EC-PR-00100.00/Anti-boycott Compliance Procedure](#)

# ONE TEAM

ALTHOUGH WE REPRESENT MANY IDEAS, EXPERIENCES AND BACKGROUNDS, WE ARE STILL **ONE TEAM**. VALUE EVERY TEAM MEMBER'S CONTRIBUTIONS AND DO YOUR PART TO ENSURE WE EACH HAVE AN **EQUAL OPPORTUNITY TO SUCCEED**.



# WORKING TOGETHER

## In This Section:

- Promoting Respect, Diversity, Equity and Inclusion
- Maintaining a Harassment-free Workplace
- Promoting Positive Supplier Relationships
- Competing and Contracting Fairly
- Cooperating With Audits and Investigations

# Promoting Respect, Diversity, Equity and Inclusion



## ONE PURPOSE

McDermott embraces differences in our employees and harnesses their authentic abilities to help them progress and achieve in their respective careers.

## OUR PURPOSE IN ACTION

At McDermott, we recognize, value, and respect different points of view in a diverse and inclusive environment where we promote psychological safety and trust.

Our diversity, equity, and inclusion program and initiatives serve to shape both our internal policies and practices on recruitment and selection; compensation and benefits; professional development and training; and career progressions, as well as external practices such as supplier diversity and marketing to ensure fair and transparent treatment of our stakeholders. We provide employee-wide training which serves to educate and promote the behaviors, attitudes, and actions that drive and sustain a strong culture of inclusion and belonging at our workplace.

**We are committed to fair employment practices and will not unlawfully discriminate in our employment decisions on factors such as:**

- Age
- Citizenship
- Color
- Disability
- Gender
- Marital status
- Medical condition
- National origin
- Pregnancy
- Race
- Religion
- Sexual orientation
- Veteran status

If you believe someone has been treated unfairly, please speak up. We are **One Team** and that means always looking out for each other, especially when someone is in need of assistance.

# Promoting Respect, Diversity, Equity and Inclusion



## ONE MCDERMOTT WAY > THE RIGHT CHOICE

**Q.** I was diagnosed with an eye disease that is causing me to lose my vision. I can no longer read my manager's written feedback. What should I do?

**A.** Speak to your manager and Human Resources about a reasonable accommodation. If your manager or Human Resources cannot accommodate you, then you may also speak to another manager or pursue another one of our resources.



## LEARN MORE

HR-DEI-PL-00400.00\_McDermott Equal Employment Opportunity Policy

HR-DEI-PL-00100.00\_Diversity Equity and Inclusion Policy

LCR-EC-PL-01500.00 American with Disabilities Act - Americans with Disabilities Amendments Act, Collectively Known as the ADA

# Maintaining a Harassment-free Workplace

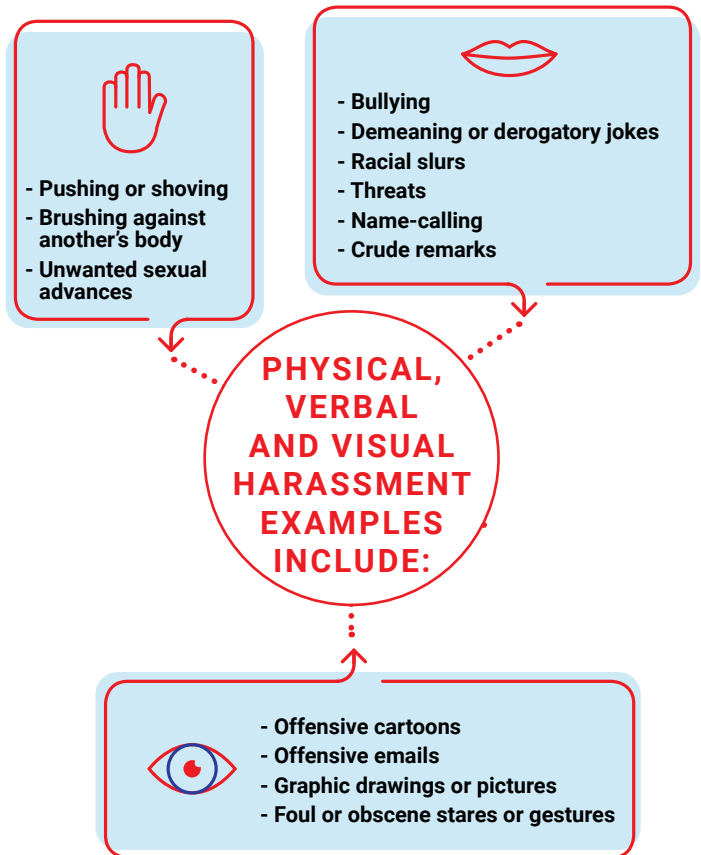
## ONE PURPOSE

We work hard to provide a safe and positive workplace so that every member of our team can feel valued and motivated to be their very best.

## OUR PURPOSE IN ACTION

Our goal is to treat others the way we would like to be treated – always remaining courteous, considerate and constructive. We avoid and discourage behavior that is threatening, bullying or abusive; and we speak up if we see or suspect any form of discrimination or harassment, such as offensive conduct that interferes with an employee’s ability to do their job – whether **physically, verbally or visually abusive**.

Keep in mind that when it comes to harassment, it’s the impact of our actions – not our intentions – that matter. In other words, if you’ve offended someone, saying, “That’s not what I meant” – although polite and even when true – won’t always make it OK.



# Maintaining a Harassment-free Workplace



## Maintaining a Harassment-free Workplace:

- Understand what harassment is and how it affects others, so you can spot it immediately.
- Be on alert for any type of discrimination or harassment. Speak up when you see something wrong.
- Treat everyone with respect and dignity and show appreciation for the contributions of all team members. Remember, even close coworkers may be particularly sensitive to certain topics based on prior experiences you may not understand.
- Never treat someone differently based on any individual characteristic. See [Promoting Respect, Diversity, Equity and Inclusion](#).
- Never access, store or transmit anything that's intimidating, obscene or discriminatory.



### ONE MCDERMOTT WAY > THE RIGHT CHOICE

**Q.** One of my colleagues keeps telling inappropriate jokes. Everyone else laughs, but they make me uncomfortable. I confronted him about it, and he just rolled his eyes and said, "Loosen up." He won't stop. What should I do?

**A.** First, you did the right thing by raising the issue with your colleague. We realize that not everyone will feel comfortable enough to do so. In those situations, or in instances where the poor behavior continues, speak to your manager, your Human Resources representative or another one of our resources.



## LEARN MORE

LCR-EC-PL-00700.00/Open Door Communication, Non-Retaliation and Non-Retribution Policy

HRF-OMER-PL-00500.00/Prohibition of Unlawful Discrimination Including Harassment Policy



# Promoting Positive Supplier Relationships

## ONE PURPOSE

We maintain our reputation of trustworthiness by working with those who meet our high standards.

## OUR PURPOSE IN ACTION

The suppliers with which we do business are often seen as a reflection of our company. Sometimes, we can even be held liable for their actions.

That's why we exercise caution and perform due diligence in the procurement process. We make sourcing decisions fairly, ethically and based on objective criteria.

During the contracting phase, we put all terms in writing and make sure that everything is as clear and accurate as possible.

Once work with a supplier is underway, we monitor their actions so that we can spot any warning signs and promptly and thoroughly investigate potential misconduct.

Throughout our partnership, we treat all suppliers fairly.

### Promoting Positive Supplier Relationships:

- Avoid [conflicts of interest](#) in the selection process.
- Ensure positive efforts are made to use small, Veteran-owned, minority-owned or women-owned businesses whenever practicable, for purposes of socioeconomic advancement.
- Know and understand our procurement policies and procedures if acquiring goods or services is part of your job.
- Follow our policies and the law in any competitive bidding situation and treat all suppliers fairly.
- Protect any proprietary data provided to us by a supplier or potential supplier.
- Guard against [corruption, bribery and money laundering](#).



#### ONE MCDERMOTT WAY > THE RIGHT CHOICE

**Q.** I was reviewing an invoice submitted by a supplier and noticed a large line item on the invoice. We would normally pay half as much for what was provided. What should I do?

**A.** Look for supporting documentation and talk to the person responsible for supplier management to gather additional information. If the payment still seems unreasonable, report your findings to a manager or to another one of our resources.



#### LEARN MORE

[Suppliers and Subcontractors](#)

# Competing and Contracting Fairly



## ONE PURPOSE

We aim to ensure the best possible outcomes for our customers by supporting a free market and transparent business relationships. They help drive innovation.

## OUR PURPOSE IN ACTION

We recognize our duty to compete vigorously, fairly and legally. We follow competition laws everywhere we do business.

When we contract with a government, we are committed to building honest relationships with the government and adhering to the highest ethical standards.

By respecting both roles, we let our **Integrity** and abilities, not unfair business practices, drive our success.

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### Competing Fairly:

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- Understand how competition laws apply to you and your role.
- Use good judgment in any interaction with business partners, customers and competitors.
- Use only appropriate (e.g., public) sources when gathering information about competitors and never use proprietary or confidential information from a prior employer without their permission.
- Refuse information you suspect was improperly obtained and report the incident to your manager.
- Never discuss or agree with competitors to:
  - Fix prices or terms of sale.
  - Divide markets, customers or territories.
  - Prevent competitors from entering the market.
  - Refuse to deal with a customer or business partner.
- Seek guidance if you ever have any questions about what is appropriate.

# Competing and Contracting Fairly



## Working With the Government:

- Make sure all contract terms are in writing and that they clearly and accurately describe the agreement.
- Know and follow the rules that apply to your work and the country in which you work.
- Consult the [Sustainability & Governance \(S&G\) Team](#) before providing anything of value to a government official.
- Immediately notify the S&G Team of any governmental investigation or request for information, and provide complete, timely and accurate information.



### ONE MCDERMOTT WAY > THE RIGHT CHOICE

**Q.** I am at an industry conference, and a couple of our competitors approached me to meet with them for dinner later. They said that we should all discuss “territory strategy” so that we can get through a current slump in sales. How should I respond?

**A.** You should decline the invitation. We never discuss territory division with competitors because it would violate our policies and likely the law. Share with the competitors your objection to the discussion then report their request as soon as possible.



### LEARN MORE

[LCR-GEN-PL-00800.00/Antitrust Compliance Policy](#)

# Cooperating With Audits and Investigations



## ONE PURPOSE

We comply with internal investigations, internal audits and requests from the government, knowing that doing so protects both us and our customers.

## OUR PURPOSE IN ACTION

We honor our duty to always cooperate and provide honest information to governmental bodies and regulatory agencies.

Whenever questioned as part of an audit or investigation, we respond appropriately and interact in ways that are open and transparent.

## Cooperating With Audits and Investigations:

- Promptly contact the [Sustainability & Governance \(S&G\) Team](#) with any inquiries from a government official.
- Conduct due diligence for any third parties interacting with a government official on our behalf.
- Always provide truthful, accurate and complete information.
- Never impede, obstruct or improperly influence the audit or investigation.
- Never lie or make false or misleading statements – verbally or in writing.
- Never attempt to persuade someone else to provide false or misleading information.



### ONE MCDERMOTT WAY > THE RIGHT CHOICE

**Q.** A government official arrives at our office for a surprise audit. What do I do?

**A.** You politely and professionally greet them, then contact someone in the S&G Team so they can help. They are well-equipped to respond to the government official's needs.



## LEARN MORE

[LCR-EC-PL-00300.00/Ethics and Compliance Program](#)

[LCR-GEN-PR-00400.00/Compliance Investigations Protocol](#)

# GO BEYOND

**THE STORY OF MCDERMOTT IS AN EXCEPTIONAL ONE – ONE THAT REFLECTS COURAGE, CREATIVITY AND COLLABORATION. HELP US WRITE THE NEXT CHAPTER BY REMAINING OPEN, AMBITIOUS AND READY TO GO BEYOND WHAT'S STANDARD IN OUR INDUSTRY.**



# PROTECTING PEOPLE AND THE ENVIRONMENT

## In This Section:

- Managing Our Records
- Safeguarding Our Physical, Electronic and Financial Assets
- Promoting the Quality and Safety of Our Projects
- Speaking on Behalf of Our Company
- Using Social Media
- Maintaining a Healthy, Safe and Secure Workplace
- Promoting Environmental Protection
- Promoting Social Responsibility and Human Rights
- Engaging Politically

# Managing Our Records

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## ONE PURPOSE

Our success, in large part, depends on how well we manage the records we create to support our customers. Records are one of our most critical assets, so we make sure they are clear and complete. Doing so helps us make faster, better-informed decisions ahead of our competition and comply with legal requirements and regulations.

## OUR PURPOSE IN ACTION

By following all internal controls in recording and maintaining company books and business records, we fulfill our financial commitments and provide a useful picture of our overall financial health – helping us with future management decisions and planning.

In every transaction, whether you are filing an expense report, preparing a financial statement, approving an inspection or simply recording your time, do so honestly, accurately and completely.

Be sure you know and follow our records management and records retention policies. All official records must be retained according to our records retention schedule to ensure the records are stored and destroyed in compliance with legal regulations. Records that have met the end of their lifecycle should only be disposed of in accordance with our policies. Records subject to a legal hold should not be destroyed until such time that the hold notice is released.

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## UNIFI MANAGEMENT SYSTEM



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### Examples of Business Records Include:

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- Emails and other correspondence
- Meeting minutes
- Regulatory filings
- Timesheets and invoices
- Supplier invoices
- Accounting reports
- Contracts, leases, agreements, bids and proposals
- Expense reports
- Personnel files
- Tax filings
- Company policies, procedures and directives
- Corporate organization charts
- Environmental compliance documents
- Purchase orders
- Patents
- Emails documenting company business

# Managing Our Records



## Keeping Accurate Records:

- Don't create any undisclosed, secret or unrecorded funds, liabilities or assets, and never misreport or mischaracterize information that relates to our business.
- Protect, store, manage and dispose of information in accordance with our records management policies.



### ONE MCDERMOTT WAY > THE RIGHT CHOICE

**Q.** We are out of storage space on our network drive. Can I just delete everything that is old to make room for the new stuff?

**A.** Probably not. Depending on your job function or the function of the person who creates the records, each record may require review prior to deletion. This is why it is a good idea to identify and group like-records by time period and disposition date. If you are unsure or records management is beyond your responsibilities, seek guidance from your manager or from your records manager, liaison or coordinator.



## LEARN MORE

IT-GEN-PL-00100.00/Records and Information Management Policy



# Safeguarding Our Physical, Electronic and Financial Assets



## ONE PURPOSE

We work hard to preserve the tools and resources needed to support and inspire our work.

## OUR PURPOSE IN ACTION

It's important that we only use our physical, electronic and financial assets for their intended purposes.

We must work in ways that prevent damage, loss and improper use of our assets and always act in accordance with our policies.



**PHYSICAL ASSETS ARE PHYSICAL ITEMS OF VALUE AND INCLUDE:**

- Properties
- Buildings
- Office furnishings
- Equipment
- Project materials
- Inventory
- Office supplies
- Phones
- Computers



**ELECTRONIC ASSETS ARE ITEMS ACCESSED OR STORED IN ELECTRONIC FORM, SUCH AS:**

- Our network
- Email and internet access
- Files and data
- Databases
- Mobile and desktop software



**FINANCIAL ASSETS ARE NON-PHYSICAL ITEMS OF VALUE, INCLUDING:**

- Bank deposits
- Bonds
- Stocks
- Cash and cash equivalents
- Equity instruments

# Safeguarding Our Physical, Electronic and Financial Assets

## Protecting Company Assets:

- Report any physical property or equipment that is damaged, unsafe or in need of repair.
- Do not take, lend, sell, donate or give away anything without authorization.
- Keep computers and mobile devices physically and electronically secure.
- Lock your workstation when stepping away.
- Use strong passwords and keep them safe.
- Accept and install company security software and updates as directed.



### ONE MCDERMOTT WAY > THE RIGHT CHOICE

**Q.** Our IT department provides anti-virus protection. Will that protect me if I click on a link in an email from an unknown sender?

**A.** No. No matter how strong our network and systems defenses are, you must be wary of attachments and links. Even anti-virus protection can't protect us from certain online attacks and new malicious code.



## LEARN MORE

[IT-SEC-PR-01400.00/Data Loss Prevention and Monitoring Policy](https://www.mcdermott.com/IT-SEC-PR-01400.00/Data%20Loss%20Prevention%20and%20Monitoring%20Policy)

# Promoting the Quality and Safety of Our Projects



## ONE PURPOSE

We dedicate ourselves to excellence at every phase of the process so that each project, from concept to commissioning, is safe and meets our high standards.

## OUR PURPOSE IN ACTION

Because we each have a responsibility to deliver safe projects, every time, we never sacrifice quality to meet a target or deadline.

For managers, this means leading with **Integrity** and providing the necessary resources for high-quality projects. For employees, this means speaking up if we have any questions.

We are committed to following our management system processes and procedures and to identifying any potential changes that could improve the way we work.

## Promoting Quality and Safety:

- Help improve our projects by regularly reviewing our processes for continual improvement.
- Be honest about your qualifications to perform a certain task.
- Ask for help if you need it.
- Speak up if you become aware of any safety, quality or performance issues.



### ONE MCDERMOTT WAY > THE RIGHT CHOICE

**Q.** I think there may be an issue with one of the welding processes at my facility, but we are behind schedule. If I say anything, we will be delayed further. What should I do?

**A.** Report the matter immediately to your manager so that the issue can be investigated. We never sacrifice quality to meet a deadline or target.



## LEARN MORE

[Taking the Lead with QHSES](#)

## UNIFI MANAGEMENT SYSTEM

# Speaking on Behalf of Our Company



## ONE PURPOSE

We build our brand and our reputation by ensuring that the information communicated about McDermott is reliable, consistent and accurate.

## OUR PURPOSE IN ACTION

We recognize our responsibility to protect our company's reputation, so we communicate responsibly.

To do so, we each refrain from speaking on McDermott's behalf unless we have been given permission by the Corporate Communications Department; and we forward all requests to the proper resource.

## Speaking for McDermott:

- Be careful in situations where someone may assume you are speaking on behalf of McDermott.
- Refer all media requests to the Corporate Communications Department.
- Refer all requests from financial analysts and investors to the Corporate Investor Relations Department.
- Never discuss confidential or proprietary information publicly.
- Never take photos or videos of company property or projects without proper authorization.



### ONE MCDERMOTT WAY > THE RIGHT CHOICE

**Q.** I was invited to participate in a speaking engagement on behalf of the company. What should I do?

**A.** Speak to your manager before accepting the engagement. We want to ensure the right messaging is communicated.



## LEARN MORE

CMN-GEN-PR-00100.00/Corporate Disclosure

# Using Social Media

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## ONE PURPOSE

We strive to conduct ourselves responsibly at all times, both at work and when away. We use social media responsibly – to build relationships, exchange ideas and stay informed.

## OUR PURPOSE IN ACTION

Your family, friends, coworkers and community likely know you as a McDermott employee. Your conduct away from the workplace, if disreputable, can harm us all. Likewise, social media, when used correctly, can be a great tool for communication – but we must make sure our online messaging, like our personal conduct, is consistent with our Values, policies and the law. Poor social media discipline and a lack of accountability for your actions or words can adversely affect and reflect upon you, your family, friends, coworkers and McDermott.

Be aware that we are responsible for everything we do, say or publish; and that things we publish electronically may remain evident even when deleted from your account. We must always use good judgment, practice common sense and be honest and ethical in the ways we interact and communicate.

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### Conducting Yourself Outside the Workplace:

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- Think twice before publicly sharing controversial opinions regarding classes of people, political views or on subjects that can be polarizing.
- Act lawfully and responsibly at all times, knowing you are an ambassador of McDermott and your coworkers – both at work and away.

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### Using Social Media:

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- Never use social media to intimidate, harass or discriminate against anyone.
- Respect copyright. When posting someone else's work, make sure you attribute the work properly.
- Never (either accidentally or intentionally) disclose confidential business information.
- Never (either accidentally or intentionally) post company material (e.g., workplace photographs) on any social media platform, such as SnapChat or Instagram Live.
- Never use ethnic slurs, personal insults, obscenity or anything else considered unacceptable in our workplace.
- When posting about the company, disclose your relationship to McDermott and label responsible posts as purely your own views.
- Note that nothing in our Code is intended to interfere with, or limit, your lawful right to engage in protected activities, such as speaking out about matters of public concern.
- For the sake of your own reputation and credibility, verify sources and check facts before you repost, "like" or share someone else's claims regarding sensitive or potentially divisive issues, especially regarding politics, religion or other topics of social interest.

# Using Social Media



## ONE MCDERMOTT WAY > THE RIGHT CHOICE

**Q.** I want to start a blog about my day-to-day life. It may touch on some stories from work. Is this OK?

**A.** It should be OK. Just be sure that your postings don't violate any of our policies, and make it clear that any opinions you express don't represent those of McDermott.



## LEARN MORE

[CMN-GEN-PL-00200.00/Social Media Policy](https://www.mcdermott.com/CMN-GEN-PL-00200.00/Social-Media-Policy)

# Maintaining a Healthy, Safe and Secure Workplace



## ONE PURPOSE

We put the **Well-being** of employees above all else. Well-being includes our health, safety and security – recognizing that without people working together, we cannot accomplish our business objectives.

## OUR PURPOSE IN ACTION

Because we do not accept safety incidents as a “cost of doing business” and know that most occupational incidents are preventable, we have established the “Taking the Lead with QHSES” culture – to help us reach our goal of an incident-free workplace.

We can reach this goal when we work together – each of us, at all times, following health and safety procedures, regulations and laws. They are there to protect our coworkers, our facilities, our neighbors and ourselves.

It’s also important to stay alert to surroundings, maintain situational awareness, observe good security practices and immediately report situations that pose a health, safety or security risk.

## Maintaining a Healthy, Safe and Secure Workplace:

- Complete all training necessary for your job.
- Read and understand all required policies and procedures that relate to the work you do.
- Routinely inspect equipment necessary to preserving life, limb or property.
- Stop any work that you feel may be unsafe by using your Stop Work Authority.
- Make safety a personal value by protecting yourself and your coworkers and modeling safe work behaviors for those around you.
- Never work under the influence of drugs or alcohol.
  - There is no place for illicit drugs at work. Report anyone’s suspected use of illicit drugs or abuse of prescription medications immediately.
  - No matter what your duties, speak with a manager if you are taking any prescription medication or have any condition that may impair your work.
- Help prevent workplace violence.
  - Firearms and dangerous devices are strictly prohibited on company property or worksites. Know your local rules and obey all posted signage.
  - Report any threatening or intimidating behavior.

# Maintaining a Healthy, Safe and Secure Workplace



## ONE MCDERMOTT WAY > THE RIGHT CHOICE

**Q.** A coworker keeps talking about how he'd like to hurt his manager. He says he's just joking. What should I do?

**A.** Take action and speak up. Even if meant as a joke, comments like these could escalate into real violence.



## LEARN MORE

[QHSES-GEN-PL-00100.00/QHSES Policy](#)



# Promoting Environmental Protection



## ONE PURPOSE

We work to make lives better by protecting tomorrow today – for our children, communities and planet.

## OUR PURPOSE IN ACTION

All of us should live and work in an environmentally responsible manner. We can do so by running a cleaner, more efficient business, complying with environmental laws and regulations and looking for ways to promote more environmentally sustainable solutions.

We accomplish this by ensuring the activities we perform are evaluated for potential environmental impacts and processes are in place to identify controls to manage associated impacts to protect our employees, neighbors and environment. We develop environmental systems, processes and assurance monitoring to maintain compliance with environmental laws and regulations, established corporate processes and Go Beyond by implementing best management practices where conditions warrant it.

**If considering new business opportunities, consider environmental risks and the required resources to manage them.**

- Identify opportunities in your work to reduce our environmental footprint
- If planning work, consider environmental risk and have mitigation steps in place.
- Have assurance reviews in place and captured lessons learned to evaluate compliance, performance and promote an environment of constant improvement.
- If you work with or select our third parties, make sure they share our Commitment to environmental responsibility.
- When purchasing products, consider the life cycle from the acquisition of the raw material to final disposal.



### ONE MCDERMOTT WAY > THE RIGHT CHOICE

**Q.** I recently learned that one of our engineering designs has a flaw that may cause it to leak fluids that can harm the environment. What should I do?

**A.** You should speak up. Whenever you learn of a practice that could have a negative impact on the environment, tell your manager or someone from QHSES right away.



### LEARN MORE

QHSES-GEN-PL-00100.00/QHSES Policy

QHSES-ENV-PG-00000.00 Environmental

# Promoting Social Responsibility and Human Rights

## ONE PURPOSE

We believe in having a positive impact on people and our world, so we set high standards for ourselves and our business partners and respect and promote human rights.

## OUR PURPOSE IN ACTION

We seek opportunities to promote local development and invest strategically in communities.

At times, our social investment may include voluntary or regulatory contributions to community development initiatives. This social investment is part of our “**ONE MCDERMOTT WAY**” of operating to mitigate our impact to communities and promote local development, often in partnership with local non-profit or government agencies. If you are involved in social investment, please be aware of, and carefully follow, the company process for social investment.

Other initiatives may include charitable donations to causes that McDermott finds worthy. This can include social events to raise funds for charitable causes, in-kind contributions or volunteer events. It is important that our charitable work never conflicts with our work at McDermott. To that end, we never use company time, equipment or resources for charitable causes without following company processes.

We respect human rights in our global operations. It's up to each of us to ensure McDermott demonstrates the utmost respect for human rights by working hard to comply with all applicable policies, laws and regulations. Our **Commitment** also includes promoting respect for human rights with our business partners and demonstrating a preference for working with those who share our Values.

Never conduct business with an individual or company that participates in human rights abuses, and speak up if you suspect someone has engaged in any such abuses.



Human rights abuses include:

- Forced or child labor
- Restricting access to identity documents, such as passports
- Human trafficking, sexual abuse or exploitation
- Physical or inhumane punishment
- Unequal treatment and unfair discrimination
- Unsafe working conditions
- Security abuses in the community

# Promoting Social Responsibility and Human Rights



## Promoting Human Rights:

- Stand up against all forms of slavery, including involuntary or forced labor, child labor, human trafficking and the funding of groups engaged in human rights abuses.
- Do not tolerate any act of recruiting, harboring or transporting someone for unlawful purposes within our company or its supply chain.
- Monitor our relationships with third parties closely to ensure they comply with the laws, our policies and our **Commitment** to treating everyone with dignity and respect.
- Follow laws that require disclosure of conflict mineral use and encourage everyone we do business with to do the same.
- Never be complicit in human rights abuses. Speak up if you see or suspect abuse.



## ONE MCDERMOTT WAY > THE RIGHT CHOICE

**Q.** I heard that a third party we are considering partnering with has a reputation for engaging in questionable labor practices, but I'm not involved in the selection process. Should I say anything?

**A.** Yes. Whenever you learn about an activity that goes against our policies or our Values or could reflect negatively on our company, speak up. Let your colleagues who are involved in the decision know what you learned.



**LEARN MORE**

PED-GEN-PL-00000.01/Social Responsibility

# Engaging Politically



## ONE PURPOSE

We value participation in the political process, while recognizing and respecting the various viewpoints of our fellow employees.

## OUR PURPOSE IN ACTION

We encourage you to participate in the political process, always keeping in mind that the law as well as company policy requires that your political activity be an entirely personal matter.

We don't let our personal political activities interfere with our work responsibilities, taking care to keep them separate from our association with McDermott.

We also respect the diversity of thought and opinions at McDermott and never coerce coworkers to support a cause that we care about.

## Engaging Politically:

- Only act or speak on political matters on your own behalf – do not speak for McDermott.
- Do not use the company's name, resources or your position for political purposes.
- Do not expect to be compensated for any personal political contributions.
- Remember that McDermott does not provide gifts or any items of value in support of political candidates or parties, except as permitted by law and only in extraordinary circumstances.



### ONE MCDERMOTT WAY > THE RIGHT CHOICE

**Q.** I was invited by a local news station to discuss work that I have been doing on a political campaign. The station wants to introduce me by providing my name, occupation and place of work. Is this OK?

**A.** You are right to be concerned. Reach out to your manager and Communications first to get approval and then, if approved, ensure that your participation complies with our policies. Make it clear that any opinions you express are your own.



## LEARN MORE

COMN-GEN-PR-00100.00/Third-Party Contribution Policy

# WELL-BEING

WE TAKE PRIDE IN OUR ACCOMPLISHMENTS AS A COMPANY. HOWEVER, WE KNOW THE TRUE MEASURE OF OUR SUCCESS IS THE HEALTH, HAPPINESS AND WELL-BEING OF EACH OF OUR FELLOW EMPLOYEES.

# OUR COMMITMENT

## In This Section:

- Being Cost-Conscious
- Leading and Developing Employees
- Employee Giving and Volunteering
- Protecting Our Information and Identity
- Speaking Up
- Zero Retaliation

# Being Cost-Conscious



## ONE PURPOSE

We work in ways that generate value for the entire company – thinking beyond individual geographical areas or business units and finding ways to promote our overall financial health.

## OUR PURPOSE IN ACTION

We set cost-cutting goals and develop tactics that will help us reach them. When we stay the course, we reap the reward of a more cost-conscious culture committed to efficiency and profitability.

McDermott relies on each of us to be responsible stewards of our financial assets. We should aim to keep operating costs low by replacing or buying only what we need. We should also submit informed and competitive bids that accurately reflect our delivery costs and anticipated profits.

Each of us impacts our company's bottom line – whether we purchase supplies, work with vendors or even consume office supplies. No matter what job we hold, we should all work in ways that keep the company's whole budget in mind. After all, we are **One Team**, so when McDermott succeeds – we all succeed.

## Being Cost-Conscious:

- Follow budgetary goals, guidelines or spending caps applicable to your position.
- If you are responsible for sourcing or purchasing products and services, search for the best possible value and look for ways to eliminate waste and redundancy.
- Consider ways to improve efficiency in what you do.



### ONE MCDERMOTT WAY > THE RIGHT CHOICE

**Q.** I am the project manager for a project in the Middle East. Part of the project requires utilization of a vessel. My options are a McDermott-owned vessel or a third-party vessel. The McDermott vessel is the best option for the company as a whole, but the third-party vessel is slightly cheaper. If I use the third-party vessel, the profitability of my project will increase, but the McDermott-owned vessel will sit idle. What should I do?

**A.** McDermott rises or falls as **One Team**, not as individual projects, geographical areas or business units. Elevate the situation to someone with common managerial responsibilities over both units.



## LEARN MORE

PMC-PC-PR-50000/Cost Control & Analysis

# Leading and Developing Employees



## ONE PURPOSE

We are committed to providing learning solutions to our workforce in support of McDermott's core and operational values, strategies and initiatives. This contributes to McDermott's growth and profitability by providing effective employee training and development programs. In addition, through an integrated talent management model, this plays an important role in the business strategy – managing a key asset, an organization's people. Through processes such as talent reviews, performance management and succession planning, McDermott is dedicated to developing and retaining employees to meet current and future business goals.

## OUR PURPOSE IN ACTION

Development opportunities are available at all levels of leadership to support growth and development, to build capability internally to support the needs of the business today and into the future.

Our leadership programs develop leaders at McDermott through mentoring and course offerings with strategically targeted skill-building exercises, simulations, case studies and by fostering meaningful connections. For example, our early-career leadership program develops early-career employees with the knowledge, skills and behaviors to increase their current leadership effectiveness and to develop a greater understanding of themselves, their colleagues and the business at large to increase their ability to lead with impact at McDermott.



# Leading and Developing Employees

Rotational opportunities are available to upskill the workforce and provide on-the-job development. We further promote internal movement for development through on-the-job rotations, which we incorporate into programs such as our Graduate Development Program (GDP) and Exchange Engineering Program. The GDP is for recent graduates who are interested in our business, offering a series of position rotations to gain exposure to McDermott's core functions.

Other opportunities are available to support the culture of development including a structured mentoring program, online learning paths and assessment tools which provide insights into capabilities and readiness for critical business priorities.

Performance Management is an ongoing process to align individual and team goals with the strategic goals of the organization, build capabilities and review and assess progress. HR LaunchPad is the talent management system used to manage your own performance, as well as your team's performance, throughout the year.

Employees are encouraged to take ownership of their career and build a career development plan with targeted actions to build specific capabilities. This is completed in partnership with the employee's manager. This process is automated using our talent management system, and employees can leverage the online development planning and performance mechanisms.

## Leading and Developing Employees:

- Consider cross-training with coworkers to teach a coworker new skills or to broaden your own.
- Be a mentor; recruit or develop someone; accelerate deserving careers, even beyond your own when warranted.
- Engage in regular feedback discussions with team members.



### ONE MCDERMOTT WAY > THE RIGHT CHOICE

**Q.** I was recently speaking to a coworker who mentioned McDermott University. Where can I learn more about the university's offerings?

**A.** Visit the [McDermott University page](#).

**Q.** Where can I learn more about Talent & Organizational Development at McDermott?

**A.** Visit the [T&OD page](#).

**Q.** Who can I talk to about development at McDermott?

**A.** Contact your manager, Area T&OD contact or your local HR business partner.

# Employee Giving and Volunteering



## ONE PURPOSE

We are committed to supporting the communities where we live and work.

## OUR PURPOSE IN ACTION

We highly value fundraising and volunteering our time to support various community organizations and causes – both locally and globally.

As a company, we have donated funds in assistance and in-kind contributions around the world to programs that promote education, health, welfare and other causes that our employees are passionate about.

We recognize our responsibility to manage not only our corporate performance, but our social impact. We work toward this goal through programs such as <https://www.globalgiving.org/>. GlobalGiving is a vehicle for McDermott and its employees to support charitable organizations around the world. Feel encouraged to use it as a means to give to the causes you care about. You will be creating a positive impact globally.

## When Giving and Volunteering:

- Do so in ways that do not conflict with the work you do for us.
- Make sure your contributions are ethical and transparent.
- Never use company time, equipment or resources for charitable causes without following company processes.



**ONE MCDERMOTT WAY >  
THE RIGHT CHOICE**

**Q.** I am involved in a personal charitable activity in my community. May I use our company's letterhead to solicit some of our suppliers for contributions?

**A.** No, soliciting our suppliers for personal charitable activities may create the appearance of impropriety or a conflict of interest. Relationships with suppliers and the procurement process should be based solely on legitimate business concerns.



**LEARN MORE**

[Get Involved – Sustainability](#)

# Protecting Our Information and Identity

## ONE PURPOSE

Compliance with data protection laws and regulations is fundamental to doing business. We are committed to privacy and data protection. We preserve the privacy of our personal data and confidential information to protect our employees, customers and brand.

## OUR PURPOSE IN ACTION

As a global company, McDermott is increasingly required to create, store and transfer high volumes of personal data. As a result, we have established a set of policies and procedures to keep us in compliance with such laws. In order to protect our information and identity, we must properly store private and confidential information and keep it secure, whether it belongs to the company, our employees or to third parties.

Never share confidential information, such as intellectual property and personally identifiable information, with anyone who does not need it in order to do his or her job or without the proper authorization.

If you acquired access to trade secrets or other confidential or proprietary information from a prior employer, that intellectual property belongs to your prior employer – and not to you or to McDermott. Whether or not you signed a confidentiality agreement with your prior employer, you may be legally obligated to protect your prior employer's intellectual property from compromise.

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**Confidential information is information that is not known to the public. It might be useful to competitors or harmful to our company or our customers if disclosed. It can include:**

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- Human resources information, such as employment, wage and salary data
  - Sales and marketing information, such as customer information and contract terms
  - Financial information, such as costs and profit margins
  - Strategic information, such as supplier lists and quality data
- 

**Intellectual property (IP) is a type of confidential information that refers to things we create that are protected by copyright, patent and trademark laws. Examples of IP include:**

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- Inventions
  - Literary or artistic works
  - Proprietary processes
  - Systems
  - Documents with proprietary information
  - Marketing secrets
  - Branding Identity
- 

**Personally identifiable information is another type of confidential information (whether electronic, hard copy or any other readable/transerable format) that involves information that identifies a person or could make it possible to identify a person in the future, such as someone's:**

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- Name
- Email address
- Physical address
- Identifying number or biographical information (e.g., government-issued number, date of birth, passport or driver's license number)
- Employment history
- Photograph

# Protecting Our Information and Identity

## Protecting Our Information and Identity:

- If you are unsure if certain information is confidential information, ask for help before disclosing it – or simply treat it as if it is.
- Never email confidential information to your personal email account.
- Avoid discussing confidential information in public places where others can hear.
- Only access confidential information if you need it in order to do your job.
- Honor confidentiality agreements and never share anyone else's confidential information with any third party.
- Immediately report suspected theft or abuse of confidential information to your manager.
- Never share personally identifiable information via open/unsecured email. Always password-protect such information in secure files (or ideally use secure File Transfer Protocol), especially prior to transferring or sharing with approved third-party service providers in other countries.



### ONE MCDERMOTT WAY > THE RIGHT CHOICE

**Q.** I found a document with confidential HR records. I believe it was saved on an accessible file by accident. What should I do?

**A.** Notify your manager or someone in IT to ensure the information is removed or protected. If the information is important to keep, we want to ensure the right people have it so it can be properly protected.

**Q.** I am not sure if something I learned during my work with my former employer constitutes a trade secret or other confidential or proprietary information. Who may I consult?

**A.** You can begin by asking yourself whether what you learned is unique to your former employer, such as a patent, process or system they (or you, during employment) developed and that is not publicly known or reasonably knowable. McDermott attorneys can help you locate resources that might resolve your uncertainty, but they cannot advise you on the facts of your specific concern because your duty to protect intellectual property exists between you and your prior employer, and not between McDermott and you (or between McDermott and your prior employer). If you remain concerned, you should consult with an attorney at personal expense.



## LEARN MORE

[IT-SEC-PR-00900.00/Information Security Management System Policy](#)

[LCR-EC-PL-00400.00/Data Privacy](#)

# Speaking Up

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If you see or suspect a Code violation or if you have a question about a situation in which you are involved, speak up. Doing so is essential in protecting our reputation.

There are many ways to speak up and you should use the method with which you feel most comfortable. You can always start with your manager, but if you need another option you can contact:

- Another manager or a trusted colleague
- Your Human Resources representative
- Your Area Compliance Officer or another member of the Area Sustainability and Governance (S&G) Team
- The Corporate Ethics & Compliance Team
- The Chief Ethics & Compliance Officer

You can make reports in person, by emailing at [ethics@mcdermott.com](mailto:ethics@mcdermott.com), and via the [web](#) or by telephone through the McDermott International Helpline (800) 493-0458.

The Ethics HelpLine is also available as a means to report concerns regarding questionable accounting or auditing matters to the Ethics & Compliance Team. An independent organization answers the Ethics HelpLine 24 hours a day, seven days a week and provides an interpreter if needed. If they don't speak your language in-house, they will find an interpreter within just a few minutes.

When reporting a concern, you will be asked to provide your location, the incident location, the names of the people involved and other details so that the company can investigate. Every report is handled promptly, discreetly and professionally with a thorough investigation and appropriate action.

Please note that all calls to the Ethics HelpLine are handled as confidentially as possible. If you prefer, you may remain anonymous, although this may make it more difficult to investigate and resolve your concern. If you report anonymously, you will receive a secure code to log in and check the status of your case, which you should check frequently to provide answers to any clarifying questions the investigator may have.

## Zero Retaliation

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Rest assured that we will not tolerate any kind of retaliation against anyone who reports a concern in good faith. Even if your report turns out to be untrue or cannot be verified, you are protected against retaliation when you come forward in good faith. Do your part to help McDermott perform with **Integrity** by stepping up and being heard.

# COMMITMENT

**COMMITMENT IS AT THE HEART OF EVERYTHING WE DO. WHEN WE DEDICATE OURSELVES TO OUR VALUES, OUR WORK AND EACH OTHER, WE SUCCEED BOTH INDIVIDUALLY AND AS A TEAM.**

