

The Shelf Subsea Group of Companies (SHELF) is a provider of Marine, Survey, Positioning, and Subsea Services, including Inspection, ROV and Diving to the offshore oil and gas, offshore renewables & submarine cable sectors.

We actively promote a culture of Marine, Safety, Quality and Integrity throughout our companies.

Our mission is to provide Marine, Offshore Survey, Positioning and Subsea Diving, ROV and Inspection services within the Asia-Pacific region, with a reputation for delivering high quality services that consistently exceed client requirements and expectations, safely, effectively and within budget.

Our vision is to be the leading provider of Marine, Survey, Positioning, and Subsea Diving, ROV and Inspection services through the eyes of our customers, employees, shareholders, suppliers and the general public.

We aim to exceed our customer's expectations, by providing practical, timely, accurate and cost effective services and solutions at all times.

We will work as a team to build long term relationships with our clients, employees and suppliers, and satisfy the requirements of all parties.

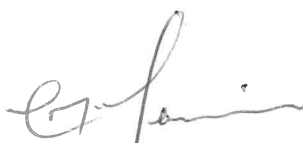
We aim to apply our **STAR** core values throughout all areas of our operations:

Safety, Quality, and Environmental performance and commitment

Technically leading solutions and teamwork

Aim for continual improvement and exceeding our customers' expectations

Respect for our customers, employees, shareholders, suppliers and the public

A handwritten signature in black ink, appearing to read 'Colin McGinnis'.

Colin McGinnis
Chief Executive Officer
Date: 25th March 2019

The Shelf Subsea Group of Companies (SHELF) values the safety and health of all people involved with its activities. The Company operates in the offshore services industry, providing marine, survey, ROV, diving and construction services, and is committed to achieving the highest standard of occupational safety and health performance. This is achieved through the establishment and periodic review and assessment of objectives, monitoring, measurement and reporting processes, with a commitment to continual improvement and to the prevention of injury and ill-health to a level that is tolerable and as low as reasonably practicable.

Hazard identification, risk assessment and risk control are considered to be the cornerstone of the Work, Health and Safety Management System (WHSMS).

The Directors maintain that no operation is so important that it has a higher priority than the safety and health of employees.

Management will work together with supervisors and employees to ensure compliance with all relevant Work, Health and Safety Legislation and best safe practices in the marine and offshore industries.

Safety and Health at work is both an individual and shared responsibility of all employees. All levels of management and employees shall undertake their responsibilities to ensure the successful implementation of this Work, Health and Safety Policy:

Senior Management and Managers' Responsibilities

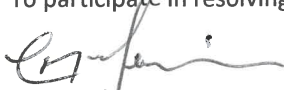
- To provide and maintain a Safe and Healthy working environment in which employees' exposure to risk and hazards are minimized to a level 'As Low As Reasonably Practicable'
- To provide ways for employees to be informed and involved in workplace safety and health.
- To ensure compliance with Work, Health and Safety Legislation
- To make available the necessary resources to meet the objectives of the WHSMS

Line Management, Superintendents and Supervisors' Responsibilities

- Ensure that no work is started without the appropriate risk identification and assessment processes and safe work procedures and practices being applied
- Supervise employees to ensure no work is undertaken unless safety and health procedures, practices and instructions are followed
- To ensure employees receive the required HSE induction prior to project start-up, emergency and rescue training prior to commencement of offshore tasks, training briefs prior to operation of systems or equipment
- To ensure employees receive safety precautions by toolbox talks and close supervision at work
- To provide the initiative and follow-up actions to maintain this policy within their own work environment
- To ensure proper safe planning is provided at the work site after risk assessments
- To account for the safety and health of employees and working conditions under their control
- To support and encourage the SHELF "STOP WORK POLICY"

Employees' Responsibilities:

- Ensure that no work is undertaken unless safe worksite practices and procedures are followed
- To ensure his/her own safety, as well as the safety of his/her co-workers
- To follow safety and health instructions and the use of personal protective equipment provided by the employer for his/her own safety and health
- To STOP work they consider to be unsafe or know systems and processes are missing or have not been followed
- To report workplace incidents (including near misses) and hazards to his/her supervisor promptly
- To participate in resolving safety and health issues at his/her workplace

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Colin McGinnis
Chief Executive Officer
Date: 25th March 2019

Shelf Subsea Group of Companies (SHELF) believes that the irresponsible use of alcohol or prohibited drugs has the potential to impact on the worksite and:-

- Cause death or injury to personnel
- Cause damage or loss of assets
- Compromise the effectiveness of the safe working culture and safety management

For these reasons, all employees and others associated with worksite activities (e.g. sub-contractors and visitors) are prohibited from being in possession of, or under the influence of, alcohol or drugs at the worksites.

For the purpose of this policy, prohibited drugs include all illegal drugs such as, but not limited to, amphetamines, cannabinoids, ecstasy, hallucinogens, cocaine, opiates, benzodiazepines, steroids, synthetic drugs, and all legal prescription drugs used in a non-prescription fashion.

The Company has a zero tolerance policy for personnel found in possession of, or under the influence of or, who return a confirmed positive test result for alcohol or drugs at any worksite. These employees will be immediately stood down pending an investigation and may be terminated. This policy serves as the first and final warning on this subject.

All Management and supervision shall ensure that this policy, together with any procedures implemented in support of this policy, from time to time, are properly explained and adhered to by employees, visitors, sub-contractors, and subordinates.

Management reserves the right to search personnel baggage at the worksite at any time in the search for drugs and alcohol, or, conduct drug and alcohol testing of any means it deems appropriate on any potential employee for pre-employment checks or any employee involved in an offshore accident or incident, and conduct random testing of employees as required by Company, Client or Regulatory requirements in the various areas of the Company's operations.

It is a requirement for all employees to present for work in a fit state, ready, willing and able to perform their duties as directed. Anyone who has a substance that could potentially impair their ability in their system could endanger the worksite and those associated with the worksite. It should be noted that this includes legal, required, prescription or over the counter medication. Employees who are taking either of these substances must self-report to their manager or supervisor so that a risk analysis can take place.

Any employee who feels that they may have a problem related to drugs and / or alcohol, are encouraged to seek assistance from the Company's Employee Assistance Program via their Supervisor, Manager or HR Representative.


A handwritten signature in blue ink, appearing to read 'Colin McGinnis'.

Colin McGinnis
Chief Executive Officer
Date: 27th March 2018

It is Shelf Subsea Group of Companies (SHELF) policy to ensure that risks to the health and safety of all personnel at any SHELF controlled worksite are reduced to a level that is tolerable and as low as reasonably practicable. This Policy will be achieved through hazard identification, risk assessment and application of the hierarchy of controls. In all circumstances at an operational or worksite, Personal Protective Equipment (PPE) shall be worn as the final line of control.

All SHELF personnel, contractors and visitors shall wear PPE in accordance with the SHELF Personal Protective Equipment Procedure SG-HSEQ-PR-09. The procedure describes the types of PPE and the circumstances in which the PPE must be worn. Compliance with the requirements of the Policy and Procedure is mandatory at all SHELF's operations, including workshop, onshore, offshore and in-water operations.

At client or third party controlled work-sites, SHELF personnel and sub-contractors shall wear PPE as required by the site procedures or SHELF's procedures, whichever is the more stringent.

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Colin McGinnis
Chief Executive Officer
Date: 27th March 2018

The management of the Shelf Subsea Group of Companies (SHELF) is committed to providing a safe and healthy work environment for all staff, contractors, visitors and customers.

SHELF gives its business and Health, Safety and Environmental objectives equal status at all times, and we believe safe operations are the responsibility of all personnel.

Every employee has the right to stop work, or refuse to work if they feel unsafe for themselves or someone else, or there is an unacceptable negative risk to the environment or assets, or believe there is a reasonably practicable safer way to work.

When any person requests to stop the work on the grounds of a negative HSE risk and where safe to do so, all people working on the task shall be halted immediately and the existing conditions and procedures reassessed. Resumption of work will only commence once the sub-standard conditions and practices have been resolved to the satisfaction of all persons involved.

The management of SHELF will support all staff, contractors and customers in their actions, and are committed to working in the safest possible manner.

A handwritten signature in blue ink, appearing to read 'Colin McGinnis'.

Colin McGinnis
Chief Executive Officer
Date: 28th March 2018

Shelf Subsea Group of Companies (SHELF) is committed to ensuring systems and procedures are in place to promote and maintain all employees, contractors and visitor's ability to perform tasks safely and efficiently.

An individual's role and their ability to work safely can be directly affected by a number of factors, including the amount and quality of rest periods between work shifts, the duration of work shifts, level of personally induced and work induced stress, overall medical, physical, mental and emotional fitness of the individual and the use of alcohol or prescribed and non-prescribed medication or drugs.

"Fit For Work" means that an individual is in a state, physically, mentally and emotionally, that allows them to perform their work competently and in a manner that doesn't negatively affect their or others health and safety.

The objectives of this Policy Statement are to provide and promote a safe working environment at SHELF by;

- Raising awareness of issues affecting a person's fitness for work;
- Improving and maintaining SHELF's ability to meet its duty of care obligations;
- Improving and maintaining an awareness of fitness for work responsibilities amongst employees;
- Providing appropriate assistance to overcome problems that could impair fitness for work;
- Providing effective, fair and constructive procedures for dealing with people who are unfit for work; and
- Monitoring compliance and enforcement of this Policy and its procedures, including drug and alcohol testing

Management (including Supervisors) are responsible for ensuring, within their level of control, the health and safety of personnel under their supervision, and the provision of education and guidance to ensure people adhere to the 'Fitness for Work Policy' and its procedures.

All employees are required to take reasonable care for their own health and safety, and that of any other person that may be affected by their work activities. Employees are also required to comply with all reasonable instructions and directions established to provide a safe and healthy working environment.

A handwritten signature in blue ink, appearing to read 'Colin McGinnis', is written over a vertical line that extends from the signature down to the name below.

Colin McGinnis
Chief Executive Officer
Date: 27th March 2018

Shelf Subsea Group of Companies (SHELF) recognises the importance of employee safety and is committed to preventing injury and illness through providing a safe and healthy work environment. Notwithstanding this, we also recognise that workplace incidents may happen from time to time and in the event that employees do sustain an occupational injury, SHELF is equally committed to the process of workplace injury management and occupational rehabilitation.

This will be achieved through:

- Nomination of a Return to Work Coordinator
- Nomination of approved rehabilitation providers
- Ensuring that effective procedures are in place to support occupational rehabilitation
- Ensuring that rehabilitation services and return to work activities commence immediately, or as soon as is necessary to ensure the earliest possible return to pre-injury employment
- Ensuring that suitable meaningful duties, including modified or alternate duties, are made available where practicable to assist the injured employee to remain at work or to return to work at the earliest opportunity
- Maintaining a register of incidents
- Maintaining the confidentiality of information relating to employees participating in occupational rehabilitation in accordance with privacy legislation
- Ensuring that a rehabilitation program is voluntary and does not prejudice an injured worker

RESPONSIBILITIES

The Return to Work Coordinator is responsible for:

- Assisting injured employees where practicable to remain at or return to work
- Commencing rehabilitation as early as possible in accordance with medical advice
- Liaising with injured employees, their supervisors and their treating medical and health professionals
- Monitoring the progress of injured employees
- Preparing a return to work plan where appropriate in consulting with all parties concerned

Heads of Department are responsible for:

- Where practicable providing or identifying suitable meaningful duties for injured employees
- Ensuring the work environment is suitable or that appropriate modifications are made or equipment is provided to enable a safe return to work
- Supporting the employee and the return to work program
- Liaising with the HSE department on matters relating to the employee's return to work program

Employees are responsible for:

- Promptly reporting all injuries or illness to their supervisor
- Cooperating with SHELF to enable it to meet its rehabilitation obligations
- Promptly submitting all relevant medical certificates and reports, together with leave applications for absences
- Attending medical examinations relating to the actual injury or illness as arranged by SHELF Subsea or its insurers
- Cooperating in reasonable workplace changes designed to assist the rehabilitation to another employee

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Colin McGinnis
Chief Executive Officer
Date: 27th March 2018

Shelf Subsea Group of Companies (SHELF) is committed to the well-being of its personnel through the identification and management of situations where fatigue may impact on the health or safety of each individual.

Fatigue is associated with the following factors:

- Spending long periods of time awake.
- Obtaining an inadequate amount of sleep over an extended period.
- Obtaining an insufficient quality of sleep over an extended period.

Fatigue is also caused by prolonged periods of physical and/or mental exertion without enough time to rest and recuperate.

Contributors to the level of fatigue include:

- Workload.
- Length of the shift.
- Previous hours and days worked.
- Time of day or night worked.

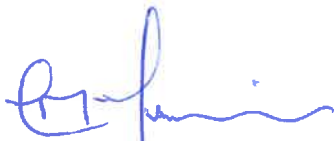
There is a direct correlation between the likelihood of an incident and the length of time a person works, and SHELF requires that all Directors, Managers, Supervisors and Employees implement and maintain the following Policy at all worksites:

- All personnel shall be educated on the fatigue hazards and its prevention including the need to avoid driving after prolonged work or travel.
- Generally, the maximum continuous period permitted to be worked at an offshore facility by any employee will be 45 days.
- The maximum permitted shift that can be worked offshore by any employee will normally be 12 hours, followed by a minimum of 8 hours uninterrupted rest.
- Where employees are required to work longer than 12 hours for operational reasons, this shall occur for not more than 3 consecutive days, and is subject to management approval.

All senior personnel shall be trained/required to:

- Recognise signs of sleep deprivation and/or fatigue and the impact on themselves and others.
- Report to appropriate individuals (supervisors, managers, directors) the circumstances in which fatigue and lack of sleep are impacting on individual well-being and workplace safety.

Any employee who feels that fatigue is impacting on his/her personal safety or health is encouraged to bring this to the notice of his/her supervisor immediately.

A handwritten signature in blue ink, appearing to read 'Colin McGinnis'.

Colin McGinnis
Chief Executive Officer
Date: 27th March 2018

The Shelf Subsea Group of Companies (SHELF) is committed to protecting the company's employees, properties, information, reputation and customer's assets from potential threats. This policy is guided by the company's basic core values, code of conduct, and business ethics, and it dictates the way we operate throughout the supply chain. All security activities will adhere to the general principles laid down below:

- All employees and contractors must always be aware of and take responsibility for the security aspects of the company's business activities.
- Threats analysis and risk evaluations should be conducted on continuous basis.
- Security procedures and guidelines should be seamlessly integrated with business activities.
- "Incident prevention" must be the first priority.
- Security measures and procedures must be subject to regular inspections, validations and audit
- The level of professionalism, knowledge and integrity of staff involved in security matters must be tightly controlled.
- Appropriate training plans, customer screening, recruitment, contracting and termination procedures must be established and implemented.
- All incidents, including security breaches and irregularities must be reported and investigated. Corrective action will be taken to improve security standards where needed.

This policy has been approved by the Senior Management. It will be reviewed, and if necessary revised, annually. All employees will be advised of this policy.

A handwritten signature in blue ink, appearing to read 'Colin McGinnis'.

Colin McGinnis
Chief Executive Officer
Date: 27th March 2018

The Directors and Management of Shelf Subsea Group of Companies (SHELF) recognise that its services could have a negative impact on the environment through its work related to onshore and offshore operations, and is committed to minimising that impact by pursuing the best environmental practice whenever and wherever practicable.

The Company will therefore:

- Set objectives and, wherever possible, quantitative targets to demonstrate continual improvement in environmental performance and prevention of pollution
- Communicate these objectives, through this policy and/or separate documents, to both employees, contractors and other interested parties
- Review the objectives and the Environmental Policy on annual regular basis to ensure its continued applicability to our operations
- Provide training or circulate information to our employees and contractors in order that they understand the Policy and objectives and can work efficiently, with no or minimum harm to the environment
- Ensure all sub-contractors operate in line with the principles of our Environmental Policy
- Meet all legislative requirements and, wherever possible, exceed these requirements
- Co-operate and communicate openly with our Clients and all other interested parties towards the shared goal of protecting the environment

In line with these principles, the Company has established the following objectives:

- To reduce wasting energy at source
- Ensure the Policy objectives are resourced effectively
- To review existing services to eliminate or minimise the potential for negative environmental impact
- To minimise or segregate waste during manufacture and maintenance processes more effectively and use safe storage and disposal techniques
- To reduce atmospheric pollution by incomplete combustion from badly maintained equipment through the implementation of a planned maintenance system
- To review the selection of lubricants and chemicals used in offshore services to minimise the impact on marine flora and fauna

A handwritten signature in blue ink, appearing to read 'Colin McGinnis', is written over the printed name and title.

Colin McGinnis
Chief Executive Officer
Date: 27th March 2018