



Galliano Marine Service

Edison Chouest Offshore

QHSE Management System

Approved

Section 1 Introduction / Leadership and Commitment

GMS/QHSEMS/1/0189

Foreign Corrupt Practices Act (FCPA)

Owner	QHSE Director	Revision	02
Approved By	Billy Joe Pellegriin	Last Revision Date	11/14/17

Purpose

The purpose of this document is to provide the direction and guidance that Edison Chouest Offshore (ECO) and all affiliate company employees and “representatives” including Agents, Consultants, Vendors, and Joint Venture Partners need to represent the company in a manner that is compliant with U.S. and foreign anti-bribery and anti-money laundering laws. In doing business anywhere in the world, neither ECO or any person or entity associated with ECO, shall offer, pay, promise, authorize or receive any bribe, kickback or other illicit payment or benefit in violation of the U.S. Foreign Corrupt Practices Act (FCPA), or the anti-corruption or anti-money laundering laws of any other nation in which we do business.

Compliance with this policy is **mandatory**. This policy will be reinforced through ongoing monitoring, auditing, risk assessments, and/or annual confirmations from employees and vendors. No employee has the authority to act contrary to the provision of this policy or to authorize, direct or condone violations of it by any other employee or by an agent. The failure of any ECO employee or representative to abide by this policy will result in discipline up to and including termination of employment or representative status, if applicable.

Worldwide Application

This policy extends to all of Edison Chouest Offshore’s domestic and foreign operations, including operations conducted by “Partners” (identified as subsidiaries, agents, consultants, or other representatives). This policy extends to all of ECO’s majority-owned affiliates, including joint ventures partners.

FCPA Policy Statement

Compliance with the FCPA and the anti-corruption laws of other nations is a priority for ECO. Consistent with the FCPA’s anti-bribery provisions, it is the policy of the Company that ECO and its representatives are prohibited from paying, authorizing, offering to pay or giving anything of value to any Government official outside of the US or to any non-US political party or party official or any candidate of public office to obtain or retain business. Examples of improper actions are listed below:

1. Payment or offer of payment to influence a Government Official’s or other covered party’s decision to award a contract or other business opportunity to ECO.
2. Payment or offer of payment to influence a Government Official’s or other covered party’s decision to issue any government authorization or documentation, such as any approval, permit, or license.
3. Payment or offer of payment to influence a Government Official’s or other covered party’s decision to relieve ECO of otherwise required government obligations including but not limited to paying taxes, passing inspections, or obtaining required permits.

Note: It is ECO company policy that facilitation payments of any kind are **not** allowed (**facilitation payments** are defined as “payments to a foreign official, political party or party official for "routine governmental action," such as processing papers, issuing permits, and other actions of an official, in order to expedite performance of duties of non-discretionary nature, i.e., which they are already bound to perform. The payment is not intended to influence the outcome of the official's action, only its timing”).

Basic Anti-Corruption Policy Requirements (broken down into FCPA and other anti- bribery laws:

FCPA: The FCPA contains two principal parts.

1. **Part 1:** The FCPA makes it a criminal offense to pay, offer, or give anything of value to a foreign official, a foreign political party (or official thereof) or candidate for foreign office, for the purpose of influencing the decisions of those officials, parties or candidates. ****Note:** This is true regardless of the fact that giving anything of value may be widely accepted or even seems necessary in the country in question.
2. **Part 2:** The FCPA sets forth record keeping and accounting requirements that require ECO to maintain records that accurately and fairly reflect all transactions and disposition of assets.

***All employees, agents, representatives, and consultants, must comply with both parts of the FCPA as described above. If you have questions about Part 1 or Part 2, please contact the ECO FCPA Coordinator 985-601-5180.

Anti-Bribery laws (including UK Bribery Act, US Law, and other applicable country specific laws):

1. Laws pertaining to bribery of US Public Officials - Bribery of officials of the U.S. Government or of any state or local government in the United States are a violation of U.S. criminal law, our Code of Ethics, and this Policy, and are strictly prohibited. Corrupt payments to political parties or party officials or candidates for political office in the United States also violate U.S. law, and this policy, and are strictly prohibited.
2. UK Bribery Act – ECO has customers that operate under the law known as the UK Bribery Act which is more stringent than the FCPA, ECO employees operating with UK based companies have a responsibility to learn about this law and ensure compliance.
3. Country specific anti-bribery laws not listed above – ECO personnel should familiarize themselves with country specific laws where they will be doing business and ensure compliance, any questions about interpretations should be addressed to the ECO Legal department. No company personnel shall receive or offer any bribe, kickback, or illicit payment or benefit of any kind, from or to any customer, supplier or any other person or entity that has a business relationship with ECO.

Anti – Money laundering laws

Money laundering refers to the process of concealing the source of criminally obtained money and making it appear legal. ECO does not tolerate, facilitate, or assist in any form of money laundering and expect employees and representatives to ensure that all country laws pertaining to money laundering are not violated.

Compliance with ECO policies/procedures involving FCPA, all employees and representatives need to understand and ensure compliance with the ECO policies referenced below to ensure correct application of this policy:

1. ECO's Travel and Expense Policy
2. ECO's Code of Conduct

Please remember that as an employee, agent, consultant, representatives and/or joint venture partner of ECO you are responsible for understanding and following the letter of this Policy, and for fulfilling any recordkeeping obligations associated with it as required by the Logs and Forms program or shore-based memos. If you're unclear about the consequences of any action and feel that it could be potential violations of this Policy, do not hesitate to contact the ECO FCPA Coordinator, at (985) 601-5180 for guidance. For those who wish to remain anonymous, **ECO offers the Hot Line reporting service, which accepts calls 24 hours a day, 7 days a week (1-866-925-5161 or outside of the U.S. (1-985-601-4444).**

References

QA Document

Hotline