# LEGAL AND COMPLIANCE POLICY



# MANAGING LEGAL RISKS AND DISPUTES

Our ambition is to manage legal risks and disputes properly and in the best interest of PGS.

### We shall:

- Not commit PGS to material bids and contracts without approval from the legal department
- Ensure early involvement of the legal department in claims handling and threatened disputes

# TRADE SECRETS AND INTELLECTUAL PROPERTY

PGS is committed to protecting its confidential information, trade secrets and intellectual property and to respect those of others.

#### We shall:

- Not without authorization disclose PGS' trade secrets or confidential information to others, or use them for the benefit of others
- Not without authorization, use for PGS' benefit the trade secrets or confidential information of others
- Not knowingly infringe the valid intellectual property rights of others

# **INSIDER INFORMATION**

As an issuer of shares and financial instruments, PGS is committed to comply with applicable securities laws and regulations, and rules of the regulated market place.

### We shall:

- Abstain from trading or giving trading advice with respect to PGS' shares or financial instruments if privy to insider information
- Treat any insider information confidentially and with due care

# EXPORT CONTROLS AND SANCTIONS

PGS is committed to complying with applicable export control, trade sanctions and anti-boycott laws.

### We shall:

- Not export any controlled item, software, service, technology or data unless permitted under a license or otherwise authorized by law
- Ensure that business transactions do not violate relevant trade sanctions and anti-boycott laws

## COMPETITION AND ANTI-TRUST

PGS is committed to complying with applicable competition and anti-trust laws.

### We shall:

- Not engage in any practice which has the purpose of restricting competition, or which unlawfully has such effect
- Not disclose or discuss sensitive information with any competitor, unless necessary in relation to lawful collaboration

# PERSONAL DATA PROTECTION AND PRIVACY

PGS is committed to process personal data in a manner fully compliant with applicable data privacy laws.

### We shall:

- Protect all personal data in our care and custody and respect the rights of the data subjects
- Not process personal data other than for its limited and lawful purposes
- Ensure that personal data is sufficient, adequate, accurate, updated and timely deleted

Rune Olav Pedersen	Gottfred Langseth	Nathan Oliver	Berit Osnes	Rob Adams
President & CEO	EVP & CFO	EVP Sales & Services	EVP New Energy	EVP Operations