CIVEO ANTI-BRIBERY POLICY

PURPOSE

The objective of this policy is to ensure that Civeo Corporation and its family of businesses ("Civeo" or "the Company") business is conducted in strict compliance with any and all laws related to bribery.

POLICY

It is Civeo policy to comply with all applicable anti-bribery laws, including the Canadian Corruption of Foreign Public Officials Act, the U.S. Foreign Corrupt Practices Act, the Australian Criminal Act of 1995 and all applicable local laws where Civeo operates. It is also Civeo policy to require consultants, representatives, contractors, distributors and joint venture partners who work on Civeo's behalf to comply with these same laws.

Bribes can take on many different shapes and forms, but typically they involve corrupt intent. There will usually be a "quid pro quo", where both parties will benefit. A bribe could be the:

- Direct or indirect promise, offering, or authorization, of anything of value
- Offer or receipt of any kickback, loan, fee, reward or other advantage
- Giving of aid, donations or voting designed to exert improper influence

In the eyes of the law, bribery and corrupt behavior can be committed by:

- An employee, officer or director
- Any person acting on behalf of Civeo (e.g. our business partners)
- Individuals and organizations where they authorize someone else to carry out these acts

Acts of bribery and corruption will commonly, but not always, involve public or government officials (or their close families and business associates). For the purposes of this policy, a government official could be:

- A public official, whether foreign or domestic
- A political candidate or party official
- A representative of a government-owned/majority-controlled organization
- An employee of a public international organization (e.g. World Bank)
- A person who, by virtue of local culture, laws or traditional rights, exercises influence on the decision making of a public official, including tribal chiefs, shamans, spiritual leaders and members of band councils and other indigenous leadership bodies

Bribery is a criminal offense in most countries where Civeo operates, and penalties can be severe for both Civeo and any individuals involved. The Foreign Corrupt Practices Act of 1977 is a United States federal law known primarily for two of its main provisions, one that addresses accounting

controls and transparency requirements and another concerning bribery of foreign officials. In Australia, the Criminal Act of 1995 is an Act that covers the criminal law relating to bribery in both the public and the private sector. In Canada, the Corruption of Foreign Public Officials Act prohibits the bribery of foreign public officials, and makes it a criminal offence to manipulate books and records to facilitate or conceal such bribery. In addition, provisions of the Canadian Criminal Code prohibit the improper influencing of domestic officials. It is a condition of your employment to strictly comply with all such laws.

Civeo requires that its directors, officers, employees and business partners:

- Not engage in acts or omissions that pay, offer, promise, or authorize money or anything of value to any person to get business, keep business or gain an unfair business advantage for Civeo;
- Take affirmative steps to prevent those doing business directly or indirectly on Civeo's behalf from engaging in bribery;
- Adhere to the Civeo Code of Business Conduct and Ethics policy;
- Scrutinize activities of acquisition targets and business partners to identify and address potential bribery issues; and
- Promptly report to Civeo any suspected violations by Civeo directors, officers, employees or business partners.

A violation of this Policy will be treated by Civeo as a serious matter, and will be enforced through disciplinary action up to and including dismissal or termination of engagement, and/or other legal action.

Civeo monitors and audits its businesses as appropriate for potential bribery activities and risks. In addition to the Civeo oversight, Operating Division Management teams are responsible for taking the following steps to prevent bribery:

Risk Assessment

Effective risk assessment lies at the very core of the success or failure of this policy. Risk identification pinpoints the specific areas in which we face bribery risks and allows us to better evaluate and mitigate these risks. Business practices around the world can be deeply rooted in the attitudes, cultures and economic prosperity of a particular region, any of which can vary. Operating Division Management must assess the vulnerability of their business to these risks on an ongoing basis, subject to review by the Civeo Corporate Controller and Internal Audit.

The risk assessment is intended to be an ongoing process with continuous communication between Operating Division Management and the Civeo Corporate Controller and Internal Audit.

Accurate Books and Record Keeping

Many serious global bribery and corruption offenses have been found to involve some degree of inaccurate record-keeping. We must ensure that we maintain accurate books, records and financial reporting within all Civeo operating divisions and for our business partners working on our behalf. Our books, records and overall financial reporting must also be transparent and must accurately reflect each of the underlying transactions.

Effective Monitoring and Internal Control

Our operating divisions must all maintain an effective system of internal control and monitoring of transactions. Once bribery risks have been identified and highlighted via the risk assessment process, procedures can be developed within a comprehensive control and monitoring program, in order to help mitigate these risks on an ongoing basis.

Operating Division Management must ensure that their business units engage in effective risk assessment and implement the necessary steps to prevent bribery. As these steps will vary by geography and division, Operating Division Management should consult with the Audit and Compliance Department, who will make available guidelines, principles and methodologies for the identification, mitigation and monitoring of these risks.

PROCEDURE

Any violation of this policy should be reported immediately to the Civeo Chief Financial Officer upon discovery. Reports may also be made via Civeo's confidential Ethics Line reporting tool, details of which are provided at the end of this Policy.

Facilitation Payments

Facilitation payments, also known as "expediting payments" or "grease payments," are paid to induce government officials to perform routine functions they are otherwise obligated to perform. Examples of such routine functions include issuing licenses or permits and installing telephone lines and other basic services.

Civeo directors, officers, employees and business partners are not permitted to make facilitation payments. In addition, any request made by a government official for such a payment should be reported to the Civeo Chief Financial Officer at the earliest opportunity.

If a payment is made in violation of this policy it must be reported to the Chief Financial Officer at the earliest opportunity.

Use of Business Partners

Business partners are defined as persons or entities that actually perform services for Civeo, or on behalf of Civeo. This includes consultants, representatives, contractors, distributors and joint venture partners. We need to be aware that these arrangements can potentially present Civeo with significant risks.

Risk can be identified where a business partner conducts business on Civeo's behalf, so that the result of their actions can be seen as benefiting Civeo. Business partners who act on Civeo's behalf must be advised of the existence of and operate in full compliance with this policy and the Gifts and Entertainment Policy. Operating Division Management is responsible for the evaluation of each relationship and determining whether or not it falls into this category.

Where risk regarding a business partner arrangement has been identified, Operating Division Management must:

- Evaluate the background, experience and reputation of the business partner
- Understand the services to be provided and methods of compensation and payment
- Evaluate the business rationale for engaging the business partner
- Take reasonable steps to monitor the transactions of business partners appropriately
- Ensure there is a written agreement in place which acknowledges the business partner's understanding and compliance with this policy

Civeo is ultimately responsible for ensuring that business partners who act on our behalf are compliant with this policy as well as any local laws.

Gifts, Entertainment and Hospitality

Refer to Gifts and Entertainment Policy, which is to be construed in light of this policy. Gifts, entertainment and hospitality include the receipt or offer of gifts, meals or tokens of appreciation and gratitude, or invitations to events, functions, or other social gatherings, in connection with matters related to business. These activities are acceptable provided they are modest in amount and are given infrequently.

1. How to evaluate what is acceptable:

    - What is the intent – is it for the purpose of promoting or demonstrating Civeo's products and services (which is permissible), or for some other reason?
    - How would this look if the details were front page news?
    - What if the situation were reversed – would there be a double standard?

    If you find it difficult to answer one of the above questions, there may be a risk involved which could potentially damage Civeo's reputation and business. This action could be unlawful.

Although no two situations are the same, the following guidance should be considered globally:

2. Never acceptable:

   Circumstances which are never permissible include examples that involve:

   - A "quid pro quo" (offered for something in return)
   - Gifts in the form of cash/or cash equivalent

   As a general rule, Civeo employees and business partners should not provide gifts or anything of value to, or receive them from, a government official. However, we do understand that in certain countries gift giving and receiving with these individuals is a cultural norm. If you are faced with this situation, consult with the Civeo Chief Financial Officer before proceeding.

3. Usually acceptable:

   Possible circumstances that are usually acceptable include:

   - Modest/occasional meals with someone with whom we do business
   - Occasional attendance at ordinary sports, theatre and other cultural events
   - Gifts of nominal value, such as pens, or small promotional items

   A variety of cultural factors such as customs, currency and expectations may influence the level of acceptability. If you feel uncertain at any time regarding cultural acceptability of gifts, entertainment or hospitality, consult with the Civeo Chief Financial Officer.

Other Business Expenditures

Other business expenditures which are proportionate and reasonable given the nature of your business are acceptable, provided they fall within reasonable bounds of value and occurrence. Other business expenditures must be for reasonable, properly documented expenses as discussed below.

1. Travel Expenses incurred on behalf of a customer, prospective customer or government official are allowable provided they are:
   - directly related to promotion, demonstration or explanation of products or services, or the execution or performance of a contract;
   - in accordance with Civeo's travel policy;
   - reasonable;
   - legal under the laws, regulations and rules of the relevant country; and
   - not given in the appearance of an improper payment
2. Political contributions are only permitted if allowed by U.S., Australian and Canadian law, as well as the law of the jurisdiction in which the contribution is made. Any such

contribution must also be approved in advance by the Civeo Chief Financial Officer and the Board of Directors.

3. Charitable donations are only permitted if they are approved in advance according to your Operating Division's guidelines.

Local Adaptation

In order for this policy to be effective, it is necessary for it to be applied across the Civeo group of companies' worldwide, taking into consideration the diverse cultural environments in which we operate. This may require each business unit to adapt certain sections of this policy – such as gifts, entertainment and hospitality – to ensure they are fair, appropriate and applicable.

Operating Division Management is responsible for reporting and confirming any local adaptations to this global policy with the Civeo Chief Financial Officer.

How to Raise a Concern

If you are concerned this policy is not being followed, report the concern to your immediate supervisor and the Civeo Chief Financial Officer. For those who wish to remain anonymous, Civeo offers a 24-hour-a-day, 7-day-a-week, multilingual global Ethics Line and online reporting tool. The hotline and online reporting tool are administered by a third-party provider and anyone reporting a concern in good faith is protected from retaliation under Company Policy and in a number of countries by legislation.

Employees and others are encouraged to report potential, suspected or actual violations of this policy by using one of the following methods:

- Employees may report known or suspected violations using the Ethics Line

Australia	1800-245-177
Canada	1-833-724-7532
United States	1-855-866-2133

To call from a country not listed please visit http://www.business.att.com/bt/access.jsp to find your country access code. Once the access code is found, dial the code and when you hear the English-speaking operator or series of prompt tones, dial the Hotline number 1-855-866-2133 to connect with the Ethics Line.

- Employees may report known or suspected violations online at: https://civeo.ethicspoint.com.

- Employees may communicate their concerns (anonymously or otherwise) directly to Civeo by sending an email to ethics.hotline@civeo.com or an envelope marked "confidential" to Civeo:

  Civeo Corporation
  Three Allen Center
  333 Clay Street, Suite 4400
  Houston, Texas 77002
  Attn: Chief Financial Officer or Audit Committee (as appropriate)

SCOPE

This policy applies to all directors, officers, employees, consultants, representatives, contractors, distributors and joint venture partners (the latter five terms will be collectively referred to as business partners) of Civeo.

REFERENCES

None.

ANNEX A

CERTIFICATION

TO CIVEO CORPORATION:

I have received a copy of Civeo Corporation's Policy on Anti-Bribery (the "Policy"). I have read and understand the Policy. I will comply with the policies and procedures set forth in the Policy. I understand and agree that, if I am an employee of Civeo Corporation or one of its subsidiaries or other affiliates, my failure to comply in all respects with Civeo Corporation policies, including the Policy, is a legitimate basis for termination for cause of my employment with Civeo Corporation and any subsidiary or other affiliate to which my employment now relates or may in the future relate.

I am aware that this signed Certification will be filed with my personal records in the Human Resources Department of Civeo Corporation.

X_____

(Signature)

_____

(Type or Print Name)
Date: _____