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COMPLIANCE PROGRAM

Consistent with our commitment to demonstrate the highest ethical behavior possible in our business conduct with our customers, competitors, suppliers, and governmental agencies, and to operate with integrity and in compliance with all applicable laws, Continental Shelf Associates, Inc. (CSA) and all of its affiliated companies (collectively "CSA" or "Company") have established a comprehensive compliance program in accordance with the Resource Guide to the U.S. Foreign Corrupt Practices Act published by the U.S. Department of Justice and U.S. Securities & Exchange Commission (the "FCPA Guide").

The purpose of our Compliance Program is to prevent and detect violations of law or Company policy. However, as the FCPA Guide recognizes, the implementation of such a program cannot guarantee that improper employee conduct will be entirely eliminated. Nonetheless, it is CSA's expectation that employees will comply with our Code of Conduct and the policies established in support thereof. In the event that CSA becomes aware of violations of law or Company policy, we will investigate the matter, and, where appropriate, take disciplinary action and implement corrective measures to prevent future violations.

Described below are the fundamental elements of our Compliance Program. In accordance with the voluntary standards established by the FCPA Guide and as explicitly recognized in the FCPA Guide, we have tailored our Compliance Program to fit the unique industry and size of our Company.

Moreover, this is a description of our Compliance Program. A Compliance Program is dynamic, involving not only multiple policies, procedures, and programmatic activities, but also the commitment of senior management and the support of all employees, vendors, and agents to make the program effective. Our policies have taken into consideration the nature of our business as an environmental consulting firm, and are consistent with the CSA Code of Conduct and Ethics (the "CSA Code").

We regularly review and enhance our Compliance Program and policies and procedures to meet our evolving compliance needs.

Overview of the Compliance Program

1. WRITTEN STANDARDS

- CSA's Code of Conduct and Ethics is our statement of ethical and compliance principles that guide our daily operations. The CSA Code establishes that we expect management, employees, vendors, and agents of the Company to act in accordance with law and applicable Company policy. The CSA Code articulates our fundamental principles, values, and framework for action within our organization.
- We have identified several potential risk areas for international environmental firms. These risk areas include, (1) data integrity pertaining to government reimbursement practices, (2) kickbacks and other illegal remuneration, and (3) compliance with anti-bribery and anti-corruption laws. CSA's Third Party Intermediary policies and procedures address these and other risk areas.

2. LEADERSHIP AND STRUCTURE

- **Chief Compliance Officer.** We have designated the Chief Financial Officer to serve as our Chief Compliance Officer. We are committed to ensuring that the Chief Compliance Officer has the ability to effectuate change within the organization as necessary and to exercise independent judgment. The Chief Compliance Officer is charged with the responsibility for developing, operating, and monitoring the comprehensive Compliance Program.
- **Compliance Committee.** CSA has established a Compliance Committee to advise the Chief Compliance Officer and assist in the implementation of the Compliance Program. Staff in the Contracts, Library Resources, Human Resources, HSSE, and Programs departments represents the members of the Compliance Committee.

3. EDUCATION AND TRAINING

A critical element of our Compliance Program is the education and training of our employees and agents on their legal and ethical obligations under applicable program requirements, and on our CSA Code policies and procedures. CSA is committed to taking all necessary steps to effectively communicate our standards and procedures to all affected personnel. Moreover, CSA regularly reviews and updates its training programs, as well as identifies additional areas of training on an "as needed" basis.

4. INTERNAL LINES OF COMMUNICATION

CSA is committed to fostering dialogue between management and employees. Our goal is that all employees, when seeking answers to questions or reporting potential instances of violations of law or our policies, should know who to turn to for a meaningful response and should be able to do so without fear of retribution. To that end, we have adopted an open-door policy, as well as confidentiality and non-retaliation policies. In order to further encourage open lines of communication regarding potential violations, we have established procedures to allow individuals who want to report anonymously to do so by visiting our corporate website www.port.conshelf.com or by contacting Human Resources or the Chief Compliance Officer.

5. AUDITING AND MONITORING

CSA's Compliance Program includes efforts to monitor, audit, and evaluate compliance with the Company's policies and procedures, including efforts to monitor the activities of third party intermediaries, such as agents, subcontractors, and vendors. We note that in accordance with the FCPA Guide, the nature of our reviews as well as the extent and frequency of our compliance monitoring and auditing varies according to a variety of risk factors, including new regulatory requirements, changes in business practices, and other considerations. We will utilize ongoing assessment of compliance programs to identify new and emerging risk areas and address these risks.

6. RESPONDING TO PAST AND POTENTIAL VIOLATIONS

CSA's Compliance Program includes procedures to screen potential employees, vendors, and agents, and CSA will not do business with persons or organizations that have not successfully passed our internal risk assessment. CSA's Compliance Program also includes the imposition of disciplinary action for employees that violate the law or Company policy. Although each situation is considered on a case-by-case basis, we will consistently undertake appropriate disciplinary action to address inappropriate conduct and to deter future violations.

7. CORRECTIVE ACTION PROCEDURES

A Compliance Program increases the likelihood of preventing, or at least identifying unlawful and unethical behavior. However, it is recognized that even an effective Compliance Program may not prevent all violations. As such, our compliance program requires CSA to respond promptly to potential violations of law or Company policy, take appropriate disciplinary action, assess whether the violation is in part due to gaps in our policies, practices, or internal controls, and take action to prevent future violations.

Declaration

Recognizing that compliance is a dynamic concept that must be adapted to the characteristics of a particular company, we are constantly reassessing our comprehensive Compliance Program to improve it. As such, we will be making modifications to our policies and procedures to address any changes in, or interpretations of, the laws, regulations, advisory opinions, case law, FCPA Guide, CSA Code, or other sources that may become known to us from time to time. The description of our Compliance Program, provided above, reflects our program. Policies and procedures have been implemented to ensure compliance with our Code of Conduct.

This Declaration is made as of August 21, 2018, and as noted above, we will be updating our Compliance Program on an ongoing basis.