

Helix Energy Solutions Group, Inc.

Global Tax Strategy

Introduction

Helix Energy Solutions Group, Inc. and subsidiaries (the “Group”) are an international offshore energy services group that provides specialty services to the offshore energy industry, with a focus on well intervention and robotics operations. Our services are centered on a three-part business model consisting of production maximization, decommissioning and renewable energy support. We provide services primarily in deepwater in the Gulf of Mexico, Brazil, North Sea, Asia Pacific and West Africa regions, and have expanded our service capabilities to shallow waters in the Gulf of Mexico.

Our Global Tax Strategy (this “Tax Strategy”) encompasses all companies in the Group including all United Kingdom (“UK”) companies as per our publication of a UK Tax Strategy, pursuant to the UK Finance Act 2016. This Tax Strategy applies specifically to Helix Energy Solutions (U.K.) Limited and all of its UK subsidiaries, Helix Robotics Solutions Limited, Helix Oil and Gas (U.K.) Limited, Energy Resource Technology (U.K.) Limited and to ERT Camelot Limited.

Our Level of Risk and Approach to Tax Risk Management and Governance

The Group’s profile is generally conservative with a low tolerance for tax risk. Tax risk is considered as part of the Group’s overall risk management process, and risks are identified, escalated and addressed in accordance with the reporting channels outlined herein.

We are a U.S. Securities and Exchange Commission-listed Group, subject to regulatory requirements across our controls and reporting. As part of this process, we document our controls and review them annually with our Internal Audit team to ensure alignment with and changes to our business.

We have an experienced and professionally qualified in-house tax team. The parent company’s Vice President-Tax, who reports directly to the parent company’s Chief Financial Officer (“CFO”), is the tax team leader globally. The CFO, in conjunction with the Vice President-Tax, decides which substantive tax issues require review by the parent company’s Board of Directors (the “Board”).

Our tax team reviews changes to tax laws and regulations on a global basis to assess and manage the potential tax impact and implications to the Group. The Vice President-Tax meets with the Board’s Audit Committee to review the present tax status of the Group several times per year. If there are any significant tax matters that need further review then the Vice President-Tax brings them to the attention of the CFO, who in turn interfaces with the Board. Significant tax changes or positions, across any jurisdiction, are communicated to the Board on a timely basis.

Our Attitude to Tax Planning

We are a generally conservative Group that prioritizes our global tax responsibilities and compliance obligations. Our primary tax planning goal is to harmonize the level of tax in each operating jurisdiction with the profitability, functions and risks borne in such jurisdictions. Transactions are operationally based, and material transactions are reviewed by our tax team to for appropriate tax treatment that is within with the spirit and letter of tax laws in relevant jurisdictions.

Given the complexity of each jurisdiction's tax laws and the potential for simultaneous application of multiple jurisdiction's tax laws, from time to time we may rely on credentialed tax advisors to support our experienced tax group and provide updates on relevant tax law changes.

Our Relationship with Tax Authorities

We endeavor to be open and maintain transparent relationships with tax authorities in the jurisdictions in which we operate. We communicate key developments in our business to tax authorities and seek clarification or clearance for specific tax matters when merited.

In the UK, we participate in Business Risk Review meetings with HMRC with active participation of the Vice President-Tax. In addition, we fall within the Senior Accounting Officer regime in the UK and at all times endeavor to be compliant with our filing requirements.

In accordance with Paragraph 19, Schedule 19 of the UK Finance Act 2016, we regard the publication of this Tax Strategy as applicable to all our UK Group subsidiaries in respect of the financial year ending 31 December 2022.

This Tax Strategy has been approved by the Board and will be reviewed and updated on an annual basis.