

Policy Statement

Subsea7's Commitment

Subsea7 is committed to fulfilling its responsibility to respect and uphold human rights and labour practices. We do not tolerate slavery, trafficking or other forms of forced or involuntary labour. We strive to protect the dignity of all individuals working in or impacted by our operations, including people who work for our suppliers or who live in the communities where we work.

Subsea7 will comply with all applicable laws of the jurisdictions in which we operate. Our Human Rights Policy is guided by international human rights principles encompassed in the International Bill of Human Rights and The International Labour Organisation's Declaration on Fundamental Principles and Rights at Work. We recognise our responsibility to respect human rights and avoid complicity in human rights abuses, as stated in the UN Guiding Principles on Business and Human Rights.

This Policy Statement applies to every employee, officer and contract worker of the Subsea7 Group. We are also committed to working with suppliers and partners whose human rights standards are consistent with our own.

Principles

Subsea7 has a clear set of values that underpin everything we do. These shared values describe what is most important to us as we conduct our business. The way we behave - with each other, our people, clients and suppliers - must reflect these values:

Safety - Integrity - Sustainability - Performance - Collaboration - Innovation

We also have a set of commitments which underpin the way we do business. We are committed to:

- Not tolerating slavery, trafficking, or other forms of forced or involuntary labour, and we believe that employment should be freely chosen.
- Supporting and upholding the International Labour Organisation's standards regarding child labour and minimum age.
- Treating everyone who works at Subsea7 with dignity and respect and providing a working environment free from harassment and bullying.
- Equal opportunities and diversity and seek to promote them in every aspect of our operations – in our governance, management systems and operational activities, and within our workforce.
- Recruiting, selecting and developing our people on merit, irrespective of their race, colour, religion, political beliefs, gender, age, sexual orientation, marital status, disability or any other characteristic protected by applicable laws.
- Fair employment practices across the company and throughout our supply chain. These include, as a minimum, complying with national legal requirements regarding wages and working hours.
- Open and constructive dialogue with our employees and, if applicable, their representatives. Our employees are free to join organisations of their choice that represent them, consistent with local laws.
- Protecting personal data in accordance with data protection legislation.
- Working with suppliers and partners who uphold similar standards when dealing with people who work for them, including in their supply chain, or who live in communities impacted by their work.
- Addressing any negative human rights impacts on communities caused by our operations, preventing their recurrence and providing appropriate remediation.
- Providing procedures that enable people to speak up or to raise grievances.

Governance

The Company has an Ethics Committee, which is attended by senior executives and oversees all ethical matters, including human rights. We expect the principles set out in this Policy Statement to be embedded in the policies and procedures in accordance with which our business is governed and managed.



John Evans
Chief Executive Officer