

What we value, how we behave



Our Code of Conduct for Suppliers Implementation Guidelines

What makes us who we are



Safety



Integrity



Sustainability



Performance



Collaboration



Innovation

About the Code of Conduct for Suppliers Implementation Guidelines

For Subsea7, building partnerships with our suppliers, managing risks within our supply chain and continually leveraging opportunities for long-term value creation are central to our goal of sustainable delivery. Our supply chain represents a significant proportion of our work and is essential to our strategy of being a trustworthy, socially and environmentally responsible business.

These **Code of Conduct for Suppliers Implementation Guidelines** (the “**Guidelines**”) outline how suppliers can meet the minimum standards of ethical and socially responsible conduct set out in the [Code of Conduct for Suppliers](#) (the “**Suppliers’ Code**”). As our suppliers, you agree to uphold these standards when working with us (Subsea7) and to ensure your suppliers do likewise. The Guidelines clarify how we expect you to do this.

We understand that certain aspects of these Guidelines may be more relevant to certain suppliers, and the potential risks will depend on the nature and origin of the goods or services supplied, as well as the scope and scale of operations for each supplier. We want to work with suppliers that show commitment towards embedding these principles and standards in their workplace, for the benefit of their people, the communities where they work and the environment.

We appreciate your continued support and look forward to collaborating with you towards mutual growth and sustainable business practices within our supply chain.

For any questions regarding the interpretation of the Suppliers’ Code or these Guidelines, please contact your Subsea7 relationship manager.

Thank you.

Note: Throughout this document, “**we**”, “**our**” and “**us**” refers to Subsea7, and “**you**” and “**your**” refers to your organisation, as our supplier.



How we work together

We aim to build collaborative relationships with our suppliers. We encourage you to engage with us at any stage of the procurement lifecycle to identify and develop continual improvements, working together to promote a responsible supply chain. When necessary, we may request evidence of your compliance with these standards and your efforts to demonstrate continual improvements.

WHAT THE SUPPLIERS' CODE REQUIRES

There are five key principles under the Suppliers' Code that we expect our suppliers to uphold.

These principles are:

- **Business Ethics**
- **Human Rights and Labour Practices**
- **Health, Safety and Security**
- **The Environment**
- **Cybersecurity and Data Protection**

Under each key principle, our expectations of you as a supplier are differentiated as follows:

'We expect you to' outlines the minimum standards or actions we expect from our suppliers. Our expectations are intended to be proportional to the nature and scale of the perceived, potential impact, risk or opportunity represented by each supplier, given the scope of your work for us;

'We encourage you to' outlines aspirations and longer-term goals, beyond minimum compliance requirements, which we would like our suppliers to progress towards;

'We may ask you to report' outlines the information and indicative key performance indicators ("KPIs") that we may ask you to report on, in order for us to monitor performance as well as satisfy our own reporting obligations.

We have also mapped out the United Nation's Sustainable Development Goals linked to the five key principles, which are highly relevant to our commitments and ambitions and our ability to create sustainable value.

It is important that you effectively communicate these principles and standards to your staff, sub-contractors and agents involved in providing goods or services to us.

BUSINESS ETHICS

Our principle

We are committed to doing business with integrity and to complying with all applicable laws in all jurisdictions in which we operate – including trade sanctions, export controls and laws against corruption and tax evasion.

Code of Conduct

We expect you to:

- comply with our Suppliers' Code as a condition of doing business with us and to cascade equivalent requirements to your supply chains;
- comply with all laws and regulations where you operate, including tax evasion, export controls and sanctions;
- not offer, accept or participate in any form of bribery or corruption, including facilitation payments, or improper payments or benefits of any kind;
- identify potential conflicts of interest and have a system to manage such potential conflicts;
- compete fairly, honestly and lawfully;
- maintain accurate financial books and records reflecting our contractual arrangements and in compliance with applicable laws and regulations.

We encourage you to:

- maintain an appropriate compliance and ethics programme to manage material business ethics and compliance risks within your operations as they relate to your work for us.

We may ask you to report:

- information regarding your programme and actions to ensure compliance with our Suppliers' Code, contractual requirements, applicable laws and regulations;
- KPIs to help us fulfil our reporting obligations.



HUMAN RIGHTS AND LABOUR PRACTICES



Our principle

We are committed to fulfilling our responsibility to respect and protect human rights of all people working in or impacted by our operations, including people who work in our supply chain. We are committed to fair and lawful labour practices across Subsea7 and throughout our supply chain.

Human Rights Policy Statement

Slavery and Human Trafficking Statement

We expect you to:

- comply with international laws and best practice regarding modern slavery and human trafficking, and not work with anyone who does not comply;
- not engage workers under the age of 15 (unless legally compliant to do so) or under the age of 18 working in hazardous conditions;
- ensure all workers have a written employment contract which, as a minimum, complies with applicable national legal requirements regarding wages and working hours, are free to change employment without penalty, are not subject to unlawful recruitment fees, and do not have their identification documents withheld unlawfully;
- treat all workers fairly, with dignity and respect, and afford equal opportunities free from all forms of discrimination, harassment or bullying;
- make appropriate whistle-blowing and grievance mechanisms available to your workers, whilst ensuring those that speak up do not suffer any form of retaliation.

We encourage you to:

- implement a programme to ensure child labour, slavery and trafficking, or other forms of forced or involuntary labour is not taking place throughout your operations or your supply chain, as they relate to your work for us.

We may ask you to report:

- number of reported allegations/incidents where human rights and labour practice standards have been breached.

HEALTH, SAFETY AND SECURITY



Our principle

We are committed to an incident-free workplace providing a safe and secure environment to those involved in or affected by our activities. In all our activities we are actively committed to our health, safety and security standards. We need everyone to look after each other, to stay alert and challenge, stop and report unsafe behaviour or equipment whenever you see it.

HSSEQ Policy

We expect you to:

- commit to safe operations by adopting a systematic approach to health and safety through clear documented policies and processes, as well as complying with all applicable health and safety laws and regulations;
- provide your workers with a safe and healthy work environment, appropriate training and personal protection equipment (PPE) to allow them to perform work safely and competently;
- never start work unless you are certain it can be done without harming people or the environment;
- empower your workers to stop work if it becomes unsafe and report issues straight away, without fear of reprisal, and continually reinforce a safety-first culture;
- continually improve your health and safety performance by setting improvement-orientated occupational health, safety and security objectives.

We encourage you to:

- adopt a health and safety management system suitable for your operations, as they relate to your work for us which is in line with internationally recognized standards and industry best practices.

We may ask you to report:

- number of work-related injuries, major incidents or lost-time injuries;
- number of prosecutions and fines paid.

THE ENVIRONMENT



Our principle

We are committed to protecting the environment by complying with applicable environmental laws and regulations in all jurisdictions in which we operate, supporting a lower-carbon future and minimising the impact of our operations on the environment and the communities where we operate. We seek to be more efficient in the way that we work and invest in solutions that mitigate or minimise adverse impacts on the environment.

HSSEQ Policy

We expect you to:

- comply with applicable environmental laws and regulations;
- assess the environmental impacts of your operations, products and services, and take appropriate measures to mitigate risks and minimise negative impacts;
- empower your workers to challenge and report any work activity which may cause harm to the environment.

We encourage you to:

- adopt a system or an approach suitable for your operations, in line with internationally recognised standards to ensure environmentally responsible operations;
- take reasonable steps to improve energy efficiency, optimise use of resources, minimise waste and address the carbon footprint of your products and services.
- track and measure your energy consumption and greenhouse gas emissions, including those of your value chain, using appropriate metrics and indicators as they relate to your work for us.

We may ask you to report:

- information related to your energy sources and emissions;
- other KPIs to help us track and manage our environmental impacts.

CYBERSECURITY AND DATA PROTECTION

Our principle

We are committed to ensuring our information and communications systems are used properly and securely, comply with the relevant laws, standards and guidance, and that the personal data of our people, clients and supply chain are not put at risk. Personal information is confidential and shall be collected, processed/used, disclosed, stored and disposed of in compliance with applicable privacy and data protection laws in all jurisdictions in which we operate.

We expect you to:

- comply with applicable privacy and data protection laws;
- use and process personal data only as permitted by law or any necessary authorisation, for the legitimate purposes initially intended, and always use the least amount of personal data necessary;
- inform us immediately of any cyber security incident that affects or has the potential to affect our data or systems;
- adopt strong authentication protocols and best practices, such as Multi-Factor Authentication and strong password policies.

We encourage you to:

- adopt effective systems for cybersecurity and data protection suitable for your operations, in compliance with applicable laws and best practice;
- appoint a contact person within your organisation to whom data protection and cyber security queries can be directed.

We may ask you to report:

- information on your systems, processes and actions to ensure compliance with our Suppliers' Code, contractual requirements and applicable laws and regulations;
- number of reported allegations/incidents where data privacy obligations have been breached.



“ TOGETHER WE ALWAYS DO WHAT IS RIGHT ”

FREQUENTLY ASKED QUESTIONS

What do we mean by “we expect you to uphold our ... principles and standards”?

As a valued supplier to Subsea7, we expect you and your supply chain to support our commitment to ethical leadership. This includes familiarising yourself with and adhering to the five principles outlined in the Suppliers' Code.

As a supplier, how can I ensure that my own supply chain is aligned with these principles?

We ask you to share the Suppliers' Code with your suppliers by directing them to the Business Ethics section on our website at www.subsea7.com/en/about-us/business-ethics/business-ethics-downloads.html. Additionally, engage in dialogue with them about our mutual expectations and what they mean for all of us.

What if I can't comply with all the principles or standards, but only some of them?

We understand that some suppliers may be on a journey to fully meet the expectations outlined in the Suppliers' Code. If you are not yet compliant with all the expectations, we encourage you to inform us. Our team can support you in developing solutions for areas where you may have gaps. Please send an email to your Subsea7 relationship manager with an overview of your concern or question.

These principles and standards are all very well, but will you treat us fairly in return?

We endeavour to honour our contractual obligations, including prompt payment of sums due in accordance with the terms of our agreements with our suppliers. But please ensure that all invoices, applications for payments, variations or extensions of time, financial records and reports accurately reflect our contractual agreements and the business transactions between us.

Where can I find more information on the Suppliers' Code and other areas of compliance?

You can find all relevant information and documents by visiting our website, specifically the Suppliers section at www.subsea7.com/en/about-us/business-ethics/business-ethics-downloads.html.

For compliance with applicable laws and regulations, and your contractual obligations to Subsea7, we recommend consulting your professional and/or legal advisors.



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