Policy Statement

Subsea 7’s Commitment

Subsea 7 is committed to fulfilling its responsibility to respect and uphold human rights. 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.

Subsea 7 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 Subsea 7 Group. We are also committed to working with suppliers and partners whose human rights standards are consistent with our own.

Principles

Subsea 7 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:

- 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.
- Treating everyone who works at Subsea 7 with dignity and respect and to providing a working environment free from harassment and bullying.
- Recruiting, selecting and developing our people on merit, irrespective of their race, colour, religion, 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. We also support the International Labour Organisation’s standards regarding child labour and minimum age.
- Not using forced or involuntary labour, and we believe that employment should be freely chosen.
- 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 the health, safety and security of everyone involved in or affected by our activities whilst minimising our impact on the environment wherever we operate.
- 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.

Governance

We expect these principles to be embedded in the policies and procedures in accordance with which our business is governed and managed.

We encourage you to raise any questions and concerns related to any practices or conduct inconsistent with this Policy Statement through your local management, human resources or compliance officer. You may raise such concerns in confidence and, where local laws permit, anonymously if desired.

John Evans  
Chief Executive Officer