

## SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR SUBSEA7 FOR THE YEAR ENDED 31 DECEMBER 2022

Subsea7’s Slavery and Human Trafficking Statement sets out the steps Subsea7 has taken to address the risk of slavery and human trafficking taking place within our own operations and supply chains.

This statement is made on behalf of the Subsea7 Group, including the Seaway7 group of companies, and specifically those members of the Group listed in the Appendix.

This is the sixth such statement issued by Subsea7 on behalf of applicable members of the Subsea7 Group.

### A. RELEVANT INFORMATION ABOUT OUR ORGANISATION

#### *Our business and sector*

Subsea7 is a global leader in the delivery of offshore projects and services for the evolving energy industry. We create sustainable value by being the industry’s partner and employer of choice in delivering the efficient offshore solutions the world needs. Subsea7 provides project management, engineering and construction services for oil and gas and offshore wind farm developments. More details about our business can be found at:

<https://www.subsea7.com/en/our-business/what-we-do.html>

#### *Geographies*

Our people, onshore and offshore, can deliver solutions around the world. We have an established regional and local presence in all the major offshore energy regions worldwide, working across 35 countries. More details can be found at: <https://www.subsea7.com/en/about-us/where-we-operate.html>

#### *Employees and Other Staff*

As at 31 December 2022, the number of personnel, including direct employees, agency and contract staff working for Subsea7 was:

<b>Headcount</b>	<b>Onshore</b>	<b>Offshore</b>	<b>Grand Total</b>
Direct Employee	5,860	2,202	8,062
Contractor/Third Party	2,025	3,350	5,375

<b>Grand Total</b>	<b>7,885</b>	<b>5,552</b>	<b>13,437</b>
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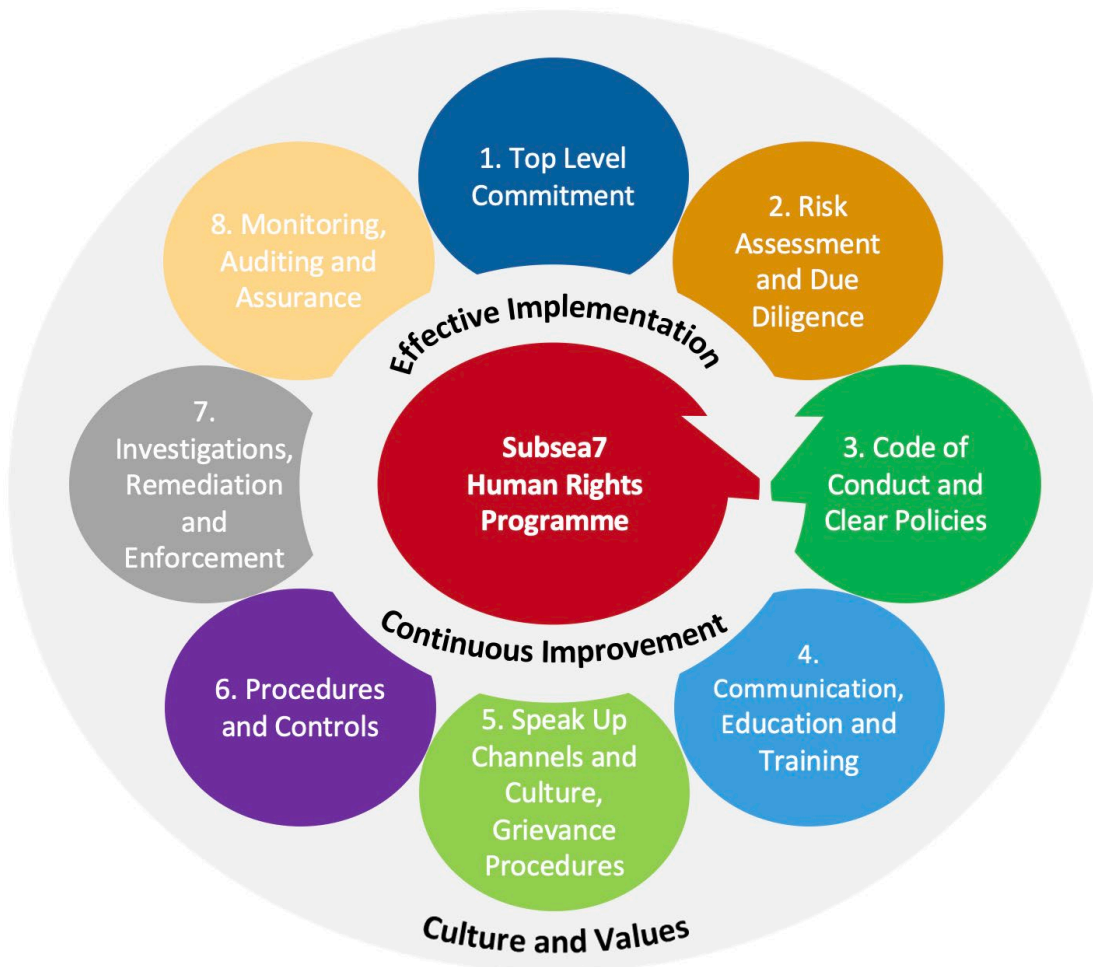
*Supply Chain*

Subsea7 has a very large and complex supply chain, comprising nearly 6,000 direct suppliers based in over 77 countries in 2022, and many sub-suppliers. These suppliers provide a broad range of materials and services, ranging from non-operational, office- and site-based services such as cleaning and security, through the provision of agency staff for offshore work, to pipeline and fabrication, vessel fabrication, logistics, and a whole range of construction and fabrication services and material supplies.

**B. RESPONDING TO THE MODERN SLAVERY ACT**

In order to respond to the UK Modern Slavery Act, as well as to evolving regulatory and stakeholder requirements and expectations (including the Norwegian Transparency Act), over the last 7-8 years Subsea7 has developed and implemented a Human Rights Programme. This programme is designed to identify and manage the risks of modern slavery and human trafficking.

Our programme is summarised in this graphic:



More details about how our Human Rights Programme manages modern slavery and human trafficking risks, as well as other human rights risks we have identified, are set out in section D below.

### C. ASSESSMENT OF MODERN SLAVERY RISKS IN OUR OWN ORGANISATION AND OUR SUPPLY CHAIN

Pursuant to the risk assessment processes described in section D2 below, we have identified the following risks or risk factors within our own organisation and/or our supply chain:

- The modern slavery risks within our own workforce are generally perceived to be low, but the risks cannot be ignored, and we need to do more work to be sure that we have assessed the risks correctly and have taken the right steps to mitigate or guard against them.
- In particular:

- Staff sourced from external agencies to work in our offshore operations may represent a risk, especially where those agencies are based in, or source people from high-risk countries and/or when those migrant workers are performing relatively low-skilled / low-paid work.
- Similarly, suppliers that manage staff working on Subsea7 sites to provide certain services, such as catering, security, cleaning etc. may be relatively high risk, even in countries considered low risk.
- One of our highest risk factors is when we have low-skilled migrant workers from high-risk countries who work in countries in which they are not resident, or on our vessels.
- Suppliers of certain materials tend to be higher risk than many of our suppliers of services, as they may have long, opaque supply chains, which are much harder to assess and gain assurance about.
- Vessel fabrication services is a category that warrants careful assessment and scrutiny, as such services can involve physically challenging working conditions, subcontracting of work and a complex supply chain.
- In 2022, just over one third of the 77 countries in which our suppliers were based are considered medium-high or high-risk from a human rights and modern slavery perspective.
- In 2022, 30% of our suppliers by number and 24% by spend were based in countries considered medium-high or high-risk from a human rights and modern slavery perspective.
- Although we cannot ignore risks farther down our supply chain, in the short term we continue to prioritise our direct suppliers, and also suppliers and categories of supply that represent significant areas of expenditure.

#### **D. THE SUBSEA7 HUMAN RIGHTS PROGRAMME**

The Subsea7 Group human rights programme is designed to:

- embed our Human Rights Policy Statement and the relevant aspects of our Code of Conduct; and
- identify and manage human rights risks across our own operations and within our supply chain, with a particular emphasis on the risks of the most egregious impacts, namely child labour, slavery and trafficking, and other forms of forced or involuntary labour; and thereby
- give effect to our commitments under the UN Global Compact and the ILO Standards in relation to child labour; and

- address existing and emerging stakeholder and regulatory expectations and requirements, such as the UK Modern Slavery Act, the Norwegian Transparency Act and applicable, forthcoming EU corporate sustainability due diligence laws.

The programme is informed and underpinned by our Values and our Board's determination to manage the human rights impacts of our business.

Wherever possible and desirable, our human rights programme seeks to learn from and leverage various aspects of our compliance and ethics programme, such as risk assessments, due diligence, training and supply chain management procedures.

The programme is described in more detail in the following 8 sections:

## **1. Top Level Commitment**

Subsea7 is proud to be a signatory to the UN Global Compact, in which the United Nations has set out 10 principles covering human rights, labour, environment and anti-corruption.

Since 2019 we have had a 'Sustainability' Value that specifically focuses on our environmental and societal behaviours and defines Labour Practices and Human Rights as one of our six Sustainability focus areas.

The Subsea7 Group has an Executive Ethics Committee, which comprises all the members of the Executive Management Team. The Ethics Committee receives reports from the Chief Ethics and Compliance Officer (CECO) and any independent assurance provider on the implementation of the human rights programme. Such reports are also provided to the Subsea 7 S.A. Board Corporate Governance and Nominations Committee, which is chaired by the Senior Independent Director.

Managing slavery and trafficking and other human rights risks is a management accountability, but Human Resources and Supply Chain Management are two functions with key roles to play. Our efforts are led by the CECO, who has overall responsibility for the design of the programme. In addition, in 2022 Subsea7 started development of a network of human rights "champions", whose role will be to help local and regional management understand and fulfil their accountability, and to provide subject matter expertise and guidance.

Subsea7 is a Board Member of the Building Responsibly organisation, a global business-led coalition committed to promoting the rights and welfare of workers in the energy and construction sectors. We support the Building Responsibly *Worker Welfare Principles*.

## **2. Risk Assessment and Due Diligence**

Our human rights programme is risk-based and is designed and implemented on the basis of risk assessments carried out for each region and business unit and updated regularly. A risk assessment is conducted for every country, and on entry into a new high-risk country. This risk assessment includes corruption and human rights risks.

In 2022, we enhanced our risk assessment process to help support a review of our own operations globally and to identify any high-risk areas or gaps in our relevant policies and procedures. 90% of our workforce was covered by this human rights risk assessment in 2022, and the goal is to reach 100% during 2023. Also in 2022, we enhanced our country risk assessment tool, which is designed to be completed for each country in which we already operate or intend to enter. Previously this focused on corruption, security and political risks, but it now includes human rights risks.

The above risk assessments assess the risks within our own operations.

Risk assessment and due diligence are also built into our supply chain management procedures (as well as our procedures for selecting and engaging business partners and other third parties). Suppliers are risk-tiered on the basis of the country in which they operate and the category of materials or services they provide. This modern slavery and human trafficking risk mapping by supplier category is informed by work commissioned with GoodCorporation™, an independent, expert firm. This work took place in 2016, as one of the first steps in our response to the Modern Slavery Act. The most significant risk factors are material and services categories which might involve underage workers, or vulnerable, low-skilled migrant workers from high-risk countries who work in countries in which they are not resident, or on our vessels.

Suppliers deemed to be high-risk must complete a human rights due diligence questionnaire; whereas those considered medium-risk complete a short-form risk assessment questionnaire, designed to validate whether they need to complete the full questionnaire. These questionnaires were enhanced and rolled out in 2022. All medium- and high-risk suppliers also undergo due diligence screening (via our third-party risk assessment and due diligence platform).

We have identified the following risks, which would have the most egregious impacts, as our priority focus areas in the short- to medium term:

- Child labour
- Slavery and trafficking
- Other forms of forced or involuntary labour

Accordingly, our risk assessments focus, in particular, on which parts of our operations or supply chain might involve vulnerable migrant or underage workers.

Our aim is to get to a point where we can understand and manage human rights risks farther down our supply chain sooner, i.e. by identifying where a low-risk tier 1 supplier may have higher-risk suppliers directly or indirectly beneath it in our supply chain. For this reason, we need to go deeper rather than broader with our risk focus.

We subscribe to the Verisk Maplecroft human rights risk indices, which we have used to provide a more granular and reliable human rights risk tiering of the countries in which we or our suppliers operate. In 2022, this risk-tiering:

- was integrated into our supply chain risk assessment and due diligence procedures;
- was integrated into our country risk assessment tool (which helps assess risk within our own operations); and
- informed our risk assessment of our own sites, vessel and operations.

### **3. Human Rights Policy Statement and Other Policies**

Our Human Rights Programme is underpinned by our Human Rights Policy Statement and Code of Conduct. Both documents have been adopted by the Board of Directors of Subsea 7 S.A. and are regularly reviewed and updated. The Human Rights Policy Statement is one of our three highest level policy statements. It sits alongside our Ethics Policy Statement and HSEQ Policy Statement, and all three statements are displayed prominently at our offices and sites.

Our Human Rights Policy Statement and Ethics Policy Statement, along with our Code of Conduct and Code of Conduct for Suppliers, can be found at:

<https://www.subsea7.com/en/about-us/labour-practices-and-human-rights.html>

<https://www.subsea7.com/en/about-us/business-ethics.html>

#### *Code of Conduct*

The Subsea 7 Code of Conduct (the Code) is applicable to all personnel working for and on behalf of Subsea 7 globally, including direct employees and agency and contract staff. The Code sets out our commitment to conducting business fairly and ethically, including by treating our employees, clients, contractors and suppliers fairly and with respect. It also provides guidance on how to ensure we uphold our commitments. Enhancements to the Code when it was refreshed in 2019 included more prominent and engaging sections on human trafficking, forced labour and other human rights abuses.

All Subsea 7 direct employees are required to sign up to the Code of Conduct on joining the business. They also take an e-learning module on the Code of Conduct.

#### *Code of Conduct for Suppliers*

The Subsea 7 Code of Conduct for Suppliers is incorporated into our standard terms and conditions for suppliers and was refreshed in 2019. It includes mutual commitments to:

- Ethical business conduct, including with regard to anti-corruption
- Health, safety and security.

- Human rights and fair and lawful employment practices across Subsea 7 and throughout our supply chain.
- As a minimum, complying with national legal requirements regarding wages and working hours.
- Support the International Labour Organisation's standards regarding child labour and minimum age.
- Prevent modern slavery and human trafficking anywhere in our business or supply chain.
- Uphold the same standards when dealing with employees, contract staff and sub-contractors.

In addition, our human rights programme includes the following policies not mentioned elsewhere in this summary:

- Our Speak Up Policy (see section 5 below)
- Our Supply Chain Management Process for Procurement (see section 6 below)

#### **4. Communication, Education and Training**

The Subsea7 Group undertakes training for relevant personnel to ensure that the Subsea7 Code of Conduct is fully understood and properly applied, and that staff understand and help to uphold the Group's commitment to doing business ethically and with integrity, including with regard to its human rights commitments. The training is overseen by the CECO, who also ensures that such training is reviewed and refreshed annually. The training is delivered by interactive e-learning.

In addition, a targeted audience participates in human rights training workshops, to ensure they understand the topic and the company's commitments and focus areas. We engaged GoodCorporation™, an independent, expert firm, to help design and quality assure that training and to co-deliver many of the sessions. The target audience comprises those whose roles mean they can and need to play a role in helping to identify and manage human rights risks.

This training workshop was rolled out in 2022 and delivered to 83% of our target audience. Further workshops will be held in 2023, aimed at ensuring we reach 100% of the target audience.

The combination of the above training and the risk assessment referred to in section D2 above also helped inform our Ethics Committee-approved strategy for managing human rights risks, which it was agreed would prioritise child labour, slavery, trafficking and other forms of forced or involuntary labour. It was agreed that these would be red lines, such that we would not tolerate breaches within our own operations or our supply chain, nor work with suppliers that cannot demonstrate that they are complying with the relevant International Labour Organisation or local law standards.

#### **5. Speak Up Channels and Culture; and Grievance Procedures**

We have a clear Speak Up Policy, which is summarised in the Code of Conduct and explained in fuller detail in a separate policy. It offers various channels for raising concerns, including an externally administered and monitored confidential reporting line (Safecall), which is extensively promoted within Subsea7, as well as to our suppliers. All personnel are encouraged to utilise one of these reporting channels if they become aware of a possible breach of our Code of Conduct or have concerns in respect of unethical conduct, including human rights breaches.

If individuals working for us (whether as employees or contract staff) have a grievance about unfair labour practices, they are encouraged to use local grievance procedures, which are widely communicated and available to all our staff.

## **6. Procedures and Controls**

All wholly-owned entities in the Subsea7 Group have adopted and implemented the Code of Conduct and are required to implement applicable parts of the Human Rights Programme, as part of the Group-wide Business Management System, which includes a system of internal controls consistent with a publicly listed company. This includes human resources and supply chain management procedures, such as for instance recruitment and induction procedures, supplier due diligence procedures, and record-keeping requirements.

We have robust qualification procedures for our direct suppliers, and for suppliers from high-risk countries this includes a risk screening and due diligence process (as mentioned above). They are contractually required to comply with our policies in relation to safety, quality, environmental and business ethics, including anti-corruption and human rights; and to require their own suppliers to operate to the same standards.

If we became aware of slavery or human trafficking concerns within our supply chain, we would seek to work with the relevant suppliers to improve conditions for their workforce. We would reserve the right to deselect suppliers if they were to fail to make the required improvements within a reasonable timeframe. In 2021 we identified certain human rights risks that we consider “red lines”, i.e. that would most likely mean we would not work with a supplier unless they had already rectified the breach and made the necessary improvements. These red lines include slavery and trafficking. In 2022 we incorporated these red lines and other risk factors into our enhanced supplier human rights risk assessment and due diligence questionnaires, along with a scoring system that identifies, and requires suppliers to implement, appropriate improvements to their human rights programmes to meet a reasonable standard.

Plans for 2023 include a Global Human Rights Procedure, which will build on the principles set out in the Human Rights Policy Statement and Code of Conduct to provide additional guidance.

## **7. Investigations, Remediation and Enforcement**

All allegations received via Safecall or internal channels are reported to the CECO, who logs them on a case management system and oversees their investigation by appropriately

independent managers, in accordance with the Group Compliance and Ethics Investigations Principles and Procedure.

If Subsea 7 received reports of concerns regarding slavery or human trafficking in our operations or our supply chain, we would undertake an urgent, thorough investigation into the concerns raised under the supervision of the CECO and, potentially, the Ethics Committee. If the investigation confirmed the concerns, we would put in place robust action plans to address the issue and protect the victims.

We use our case management system to track Speak Up and other human rights cases and investigation metrics, such as number of reports received, the types of misconduct alleged or suspected, and remedial measures taken. We use such metrics to assess areas for improvement in our programme, and we report on them to the Ethics Committee and the Corporate Governance and Nominations Committee.

Grievances are handled in accordance with the applicable grievance procedure, as mentioned in section D5.

## 8. Monitoring, Auditing and Assurance

Subsea7 Group monitors and reviews its human rights programme to ensure it is up to date, properly implemented and continually improved, consistent with current and emerging stakeholder expectations and regulatory requirements.

We monitor Speak Up and other human rights cases to spot human rights breaches, or actual or potential weaknesses or failures in our human rights programme.

As our programme matures, our human rights programme will be included within the scope of our Internal Audit function's work. We will also aim to develop efficient, cost-effective methods of obtaining a greater degree of assurance from high-risk suppliers that they have implemented the prescribed procedures to manage the potential human rights risks we have identified. Such methods would include monitoring, virtual and in-person audits, as well as evidence that the supplier has been audited by a credible, independent assurance provider.

To track progress against our focus on Human Rights and Labour Practices, including Modern Slavery and Human Trafficking, we have developed KPI's which are presented in our Sustainability Report on an annual basis and can be found here:

[Subsea7 2022 Sustainability Report](#)

Our KPI's include recording the number of human rights cases recorded and the number of suppliers with a human rights clause in their contract or that underwent human rights screening. Our targets also include:

- 100% of relevant employees trained on human rights by 2023
- 90% of our high-risk suppliers undergoing enhanced human rights risk assessments by 2025 (40% by 2023)
- 100% of our workforce covered by a human rights risk assessment within the last three years by 2023.

We will add further KPI's as our human rights programme evolves and matures.

## **E. SPECIFIC STEPS TAKEN DURING THE YEAR ENDED 31 DECEMBER 2022**

For ease of reference, specific steps taken by Subsea7 during the year ended 31 December 2022 to address the risk of slavery and human trafficking taking place within our own operations and supply chains include:

- The roll-out of the enhanced risk assessments of our own operations and of our suppliers mentioned in section D2 above  
The roll-out of the human rights training workshop for a targeted audience, mentioned in section D4 above.

We will provide annual updates to this statement.



**John Evans**  
**Chief Executive Officer, Subsea7**  
**26 June 2023**

## APPENDIX

Members of the Subsea7 Group<sup>1</sup> that carry on business or part of a business in the UK and had an annual turnover for the financial year ended 31 December 2021 of £36 million or more:

- Subsea 7 Limited
- Subsea 7 Deep Sea Limited
- Subsea 7 International Contracting Limited
- Subsea 7 Engineering Limited
- Subsea 7 Offshore Resources (UK) Limited
- Subsea 7 (UK Service Company) Limited
- Subsea 7 i-Tech Limited
- Subsea 7 Pipeline Production Limited
- Subsea 7 Crewing Limited
- Subsea 7 Shipping Limited
- Subsea 7 Crewing Services Pte. Ltd
- Seaway 7 UK Limited\*
- SHL Offshore Contractors B.V.\*
- Xodus Group Limited

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<sup>1</sup> The entities marked with an asterisk were, in 2022, wholly-owned subsidiaries of Seaway 7 ASA, which was majority-owned by Subsea7. As a result, the results of the Seaway7 group were consolidated within the Subsea7 group results.