

PO-GL-HR-040

Global Grievance Procedure

1	30-Sep-23	Anika Brannen	Kate Lyne
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PO-GL-HR-040	Human Resources	30-Sep-23
Revision:1	Global Grievance Procedure	Page 2 of 6

AMENDMENTS

Revision	Revision Date	Section	Description of Amendment
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PO-GL-HR-040	Human Resources	30-Sep-23
Revision:1	Global Grievance Procedure	Page 3 of 6

TABLE OF CONTENTS

- 1. INTRODUCTION 4**
 - 1.1 purpose..... 4
 - 1.2 scope..... 4
 - 1.3 definitions..... 4
 - 1.4 References..... 4
- 2. RESOLVING COMPLAINTS INFORMALLY 5**
 - 2.1 MEDIATION 5
- 3. PRINCIPLES 5**
- 4. PROCEDURE 6**
 - 4.1 STAGE 1..... 6
 - 4.2 STAGE 2..... 6
 - 4.3 STAGE 3..... 6

PO-GL-HR-040	Human Resources	30-Sep-23
Revision:1	Global Grievance Procedure	Page 4 of 6

1. INTRODUCTION

1.1 PURPOSE

The purpose of this Procedure is to provide a fair and effective process for employees to raise grievances, and to ensure such individuals are treated fairly, in line with Company practices and in accordance with applicable local laws and regulations.

A grievance is any complaint, dispute or issue relating to the terms and conditions of employment, workplace safety, or any other matter concerning the workplace or the employer-employee, manager-employee, or employee-employee relationship.

Normally, the individual raising a grievance is the victim of the alleged mistreatment or circumstances.

This Procedure shall be interpreted and applied in compliance with, and to the extent consistent with, any applicable, local employment laws.

1.2 SCOPE

This Procedure applies to all employees of Subsea7 group companies globally. Any employee wishing to raise a grievance should do so in accordance with this Procedure and any local grievance policy and mechanism.

This Procedure does not cover "whistle-blowing" or speaking up about public interest disclosures or other material breaches of the Code of Conduct by the Company, which are covered by the Speak Up Policy.

1.3 DEFINITIONS

The definitions for industry- or company-specific terms and abbreviations used in this document are included within the [BMS Glossary](#).

When used throughout this document, terms below shall have the following meaning:

"Company" or **"Subsea7"** shall mean Subsea 7 S.A. and all of its direct and indirect subsidiaries, and the "Subsea7 group of companies" shall be construed accordingly.

1.4 REFERENCES

Reference	Description
PO-GL-COR-006	Global Human Rights Procedure
PO-GL-COR-003	Speak Up Policy
PO-GL-COR-005	Code of Conduct

PO-GL-HR-040	Human Resources	30-Sep-23
Revision:1	Global Grievance Procedure	Page 5 of 6

2. RESOLVING COMPLAINTS INFORMALLY

The Company believes that many routine complaints and grievances can be resolved informally in discussion with the employee's immediate line manager and so, even if the complaint is not made in writing, we encourage employees and their managers to try to resolve matters in this way.

However, we recognise that this may be unsuccessful or not appropriate, and we respect the right of the employee to make a written complaint without pursuing matters informally first, or if they have tried and failed to resolve the matter informally. In such an event, we are obliged to treat any complaint submitted in writing as a "Grievance" and will manage it in accordance with this procedure.

2.1 MEDIATION

At any time during the grievance process, it may be appropriate for the Company to offer mediation services. Although the mediation process is voluntary, it is an expectation that both parties will agree to mediation when it is suggested as a possible remedy to the complaint. The Company appreciates, however, that there may be some circumstances in which it is not a reasonable expectation for parties to engage in mediation and may exercise its discretion in this regard.

3. PRINCIPLES

The following principles underpin our approach to handling grievances:

- We will apply this Procedure so as to deal with grievances in a fair and timely manner, and at the appropriate level within the Company;
- We will seek to balance the interests of confidentiality and natural justice to get to the root of the issue in question;
- We treat matters discussed with appropriate confidentiality, and expect employees who make use of this Procedure to do likewise;
- We will follow local grievance procedures and ensure compliance with local legislation and employment practices, which take precedence over this Procedure.
- Retaliation against an employee who, in good faith, raises a grievance or participates in the investigation of a grievance, will not be tolerated. If, however, it is found that the complaint was brought maliciously, disciplinary action may be taken against the complainant.
- Employees who wish to raise concerns they may have about material breaches of the Code of Conduct of which they themselves are not the victim, such as potential dishonest or criminal conduct, or dangers to health and safety are encouraged to do so in accordance with the Global Speak Up Policy. The Company will protect such employees from any retaliation or detriment if they raise such concerns in good faith or on the basis of an honest and reasonable belief, as stated in that policy.

PO-GL-HR-040	Human Resources	30-Sep-23
Revision:1	Global Grievance Procedure	Page 6 of 6

4. PROCEDURE

4.1 STAGE 1

Employees should set out the grievance in writing and submit it to their immediate manager and relevant HR Business Partner/ Advisor.

Any grievance should include the following information:

- The employee's name, job title, and contact information
- The date(s) on which the relevant issue arose
- A detailed description of the grievance
- The employee's proposed solution, if any.

4.2 STAGE 2

All grievances will be investigated by an independent individual, with support from HR, in a fair and timely manner, and at the appropriate level within the Company.

Employees will be invited to attend meetings to discuss their grievance, in line with local legislation and employment practices. Every step of the grievance procedure will be taken without unreasonable delay. The timing and location of meetings must be reasonable, and the employee must take all reasonable steps to attend the meetings arranged.

4.3 STAGE 3

Employees will be formally notified in writing of the outcome of their grievance, in line with local legislation and employment practices. Where appropriate, any corrective action that has been taken will be summarised in such notification.