

PR-GL-COR-006

Global Human Rights Procedure

1	30-Sep-23	Andrew Hayward	Kate Lyne
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AMENDMENTS

Rev.	Date	Section	Amendment
1	30-Sep-23	All	New Document

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1. INTRODUCTION AND SCOPE

1.1 Introduction

Subsea7 is committed to fulfilling its responsibility to respect and uphold Human Rights. To underpin this commitment, we have a set of clear Principles as written in the Human Rights Policy (PO-GL-COR-018). This document further elaborates on these principles.

To further understand and manage the impact of our operations on Human Rights, we aim to prioritise those Human Rights risks that could have the biggest impact, namely modern slavery, human trafficking, child labour and other forms of forced or involuntary labour.

This document provides a global overview of Subsea7's process to identify and address Human Rights risks and gives practical advice on what aspects to focus on when selecting and recruiting people, both directly and by entering into an agreement with a third-party manning agency; how to manage the associated risks to workers employed or engaged by suppliers and sub-contractors; and how to verify that controls are in place during the duration of the relevant contract. This document effectively sets a minimum acceptable standard for our operations.

1.2 Scope

This procedure underpins the Human Rights Policy and sets out in more detail how the company manages the most egregious, potential human rights impacts of its operations and supply chain: child labour, slavery and trafficking, and other forms of forced or involuntary labour. Other human rights aspects, such as labour practices, health and safety, the environment, and anti-corruption are addressed by a range of other policies and procedures.

This document relates to all workers, either employed directly by Subsea7, through labour agencies, or employed by suppliers and subcontractors and working on Subsea7 sites or vessels. It also applies to Subsea7 suppliers and the way in which they treat their own workers. Examples include:

- An engineer employed directly as a salaried employee in a Subsea7 office.
- A HSE Advisor contracted through a labour agency for HSE services to our vessel.
- A cleaning contractor working in our office, employed through a cleaning company.
- A supplier of materials, such as a valve supplier.

1.3 Glossary

High-risk Countries	From a Human Rights perspective, means any country with a score below 5 (out of 10) on the Verisk Maplecroft Human Rights index.
Medium-risk Countries	From a Human Rights perspective, means any country with a score between 5 and 7.5 (out of 10) on the Verisk Maplecroft Human Rights Country Risk Index.
Human Rights Risk Assessment	A comprehensive appraisal of Human Rights risk posed by a Supplier.
Low-skilled worker	A worker working in a job that does not require high qualifications or skills. Examples include, without limitation: drivers, cleaners, security and catering personnel, waiters, helpers, riggers, low-skilled factory workers. It would not normally include a qualified welder or a Non-Destructive Testing operator.

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Vulnerable Migrant Workers	Low-skilled workers from a High- or Medium-risk Country, working in another country of which they are not a permanent resident, or working offshore.
Labour Agencies	A third party that provides recruitment and placement services to Subsea7 where the individuals remain as employees of the agency. This can include providing services such as advertising vacancies, proposing candidates, arranging medical and visas, and providing contractual support to agency staff.
High-risk Materials or Services	High-risk materials or services from a Human Rights perspective are those listed as such in the Material Service Group Category Register maintained by SCM.
Modern Slavery	Umbrella term covering practices such as forced labour, debt bondage, forced marriage and human trafficking. Essentially, it refers to situations of exploitation that a person cannot refuse or leave because of threats, violence, coercion, deception and/or abuse of power.
Child Labour	Child labour is a form of exploitation that is a violation of Human Rights, and it is recognized and defined by the International Labour Organisation. The term "child labour" should not be confused with "youth employment" or "student work".
Subsea7 workforce	All salaried employees of Subsea7 or its subsidiaries.
Subsea7	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

PO-GL-COR-018 - Human Rights Policy Statement
 PO-GL-COR-005 - Subsea7 Code of Conduct
 PO-GL-COR-016 - Subsea7 Code of Conduct for Suppliers
 MTX-GL-SCM-003 – Material Service Group Category Register
 PR-GL-SCM-006 – SCM Process for Procurement
 PO-GL-COR-003 – Speak Up Policy
 PR-GL-LAW-009 – Compliance & Ethics Investigations Procedure
 PO-GL-HR-019 - Equal Opportunities & Diversity in Employment Policy
 PO-GL-HR-026 - Bullying and Harassment Policy
 PO-GL-HR-019 – Recruitment and Selection Policy
 PO-GL HR-024 – Global Employee Consultation and Relations Policy
 PO-GL-HR-040 - Global Grievance Procedure
 PO-GL-COR-004 – HSEQ Policy Statement

United Nations Global Compact: [Homepage | UN Global Compact](#)

Building Responsibly Worker Welfare Principles: [Building Responsibly \(building-responsibly.org\)](#)

International Labour Organisation Declaration on Fundamental Principles and Rights at Work: <https://www.ilo.org/declaration/lang--en/index.htm>

Manning Agency Guidelines – International Chamber of Shipping. Sept 2021

2. SUBSEA7'S HUMAN RIGHTS PROGRAMME

Subsea7 has a Human Rights programme designed to:

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- embed the Human Rights Policy Statement and the relevant aspects of the Code of Conduct; and
- identify and manage Human Rights risks across Subsea7’s own operations and within the supply chain, with a particular emphasis on the risks with the most egregious impacts, namely child labour, slavery and trafficking, and other forms of forced or involuntary labour; and thereby
- give effect to Subsea7’s commitments under (a) the UN Global Compact, (b) the ILO Standards in relation to child labour and minimum working age, and (c) the Building Responsibly Worker Welfare Principles; and
- address existing and emerging stakeholder and regulatory expectations and requirements, such as the UK Modern Slavery Act, The Norwegian Transparency Act and applicable EU diligence laws.

The programme is informed and underpinned by Subsea7’s Values and the Board’s determination to manage the Human Rights impacts of our business and provide working conditions aligned with international best practice with respect to Human Rights and labour practices.

This programme is summarised in this graphic:



More details about this programme can be found on www.Subsea7.com

3. 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 periodically. 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.

Risk assessment and due diligence are also built into our supply chain management procedures, as well as our procedures for selecting and appointing business partners and other third parties.

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3.1 Internal risk assessment process

To ascertain whether and where risks of modern slavery, human trafficking, child labour and other forms of forced or involuntary labour could exist in our operations, an internal Human Rights risk assessment questionnaire has been developed. It has been completed by all Subsea7 regions, business units and wholly-owned subsidiaries and will be refreshed regularly.

This questionnaire is designed to assess whether we could be exposed to any such risks within our own operations and what steps we are taking to mitigate any such risks. It covers workers in or on Subsea7's offices, vessels or other sites, whether such workers are directly employed by Subsea7, provided by labour agencies, or employed by suppliers or sub-contractors and working in or on such Subsea7 offices, sites or vessels. It does not seek to address the rest of our supply chain, which is the subject of different risk assessment questionnaires and mitigation measures (see section 3.2).

Every region, country or business unit is responsible for highlighting the areas of highest risk, keeping their risk assessment up-to-date and implementing appropriate mitigation measures when required.

3.2 Risk assessment and due diligence for suppliers

As per PR-GL-SCM-006 (*SCM Process for Procurement*), all suppliers must go through a prequalification process, which includes risk assessment and due diligence for those based in high- or medium-risk countries from an anti-bribery / anti-corruption perspective.

Also, in order to identify more precisely and address any potential Human Rights risks in our supply chain, a Human Rights risk assessment and due diligence process for all high-risk suppliers has been developed. This includes a Human Rights questionnaire and a risk-scoring mechanism.

The questionnaire is designed to assess whether Subsea7 could be exposed to any Human Rights risks within its supply chain and what steps the suppliers are taking to mitigate any such risks. Subsea7's approach aims to be pragmatic by targeting high-risk suppliers. Suppliers are risk-tiered by reference to the category of materials or services supplied and the country in which they are based.

Identified high-risk suppliers shall complete the questionnaire, which generates a risk score. If that score is below a certain threshold, a remedial action plan is required and, if they are in the lowest scoring tier, they will not be used without escalated approval and until the remedial plan has been implemented to lift them into the relevant scoring tier.

There is also a short-form risk assessment questionnaire for suppliers provisionally deemed medium risk, to check whether in fact they should be treated as higher risk. Both these questionnaires assess risk by reference, primarily, to child labour, slavery and trafficking, and other forms of forced or involuntary labour, with underaged and Vulnerable Migrant Workers as the biggest factors.

High-risk suppliers may be subject to auditing and monitoring from time to time in accordance with a risk-based assessment. The Subsea7 terms and conditions for suppliers include a right of audit.

For more details on Human Rights risk assessment and due diligence for suppliers, refer to PR-GL-SCM-006 - *SCM Process for Procurement*.

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3.3 Speak-up channels and grievance procedures

3.3.1 Grievance procedures

Grievance policies and mechanisms are established to provide, in line with the Global Grievance Procedure and local legislation, a fair and effective procedure for resolving individual grievances on matters such as working practices, health and safety, fair treatment, or terms and conditions of employment. Any grievance relating to labour practices can be raised according to these procedures.

3.3.2 Speak-up channels

In addition, any Human Rights breach can alternatively be raised in accordance with Subsea7's Speak Up Policy. Employees and others are encouraged to follow this policy and speak up, if they believe there is a breach of the Code of Conduct or the Human Rights Policy. The fastest and best way is simply for them to talk to their manager or supervisor. If that is not appropriate, they can also get in touch with the local human resources, legal or compliance contact, or an indirect supervisor or manager. If they don't feel comfortable with any of those options, then they can contact our confidential reporting helpline, Safecall, which is operated by a company independent of Subsea7. Suppliers and their workers (if they work on our sites or vessels) are also encouraged to use these speak up channels.

3.3.3 Investigation and remediation of Speak-up cases

The Speak Up Policy includes a commitment to investigate concerns raised in good faith or on the basis of a reasonable belief. The Group Investigations Procedure provides appropriate governance and guidance.

Any remedial action taken to prevent or remedy Human Rights impacts shall be carefully assessed on a case-by-case basis and depend on the role of Subsea7, whether the company is directly causing the impact, is contributing to the impact or is indirectly causing the impact (see section 8).

4. SUBSEA7 WORKFORCE

For employees and other, directly contracted, temporary workers, including any Vulnerable Migrant Workers, our policy with regard to Human Rights is as follows;

- We do not utilise child labour anywhere in our operations. When recruiting staff, verification of age should be a key step in the hiring and onboarding process. NOTE: child labour should not be confused with student work or youth employment, which can take place with the correct controls in place (e.g., internship or work placement agreement).
- All contracts of employment should be written in a language the employee can understand.
- Wages and benefits shall meet or exceed all national or other applicable regulations, including minimum wage limits where they exist.
- On initial recruitment, it should be made clear to new employees that:
 - They have a right to refuse the contract offered
 - They can terminate their contract by serving notice in accordance with its terms without administrative or financial penalties
- Where Vulnerable Migrant Workers are employed, assistance should be considered for them to travel home if needed and agreed.

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- Passport and other official documentation should not be withheld from the worker or only retained for the minimum necessary time (e.g. to take copies or process a visa).
- No restrictions on movement, other than those to protect their safety and/or security, should be placed upon them outside of normal working hours.
- Salaries and benefits shall be paid on time and transparently to the bank account of the employee's choosing.
- Processes should be in place to monitor general working hours and overtime.
- When a loan or advance is provided to a Vulnerable Migrant Worker by Subsea7, we do not charge any interest or fee.
- No recruitment fees shall be required or requested at any point during the recruitment process. This does not include any legitimate agency fees paid by Subsea7 to external recruitment agencies for legitimate services.
- Any support offered for accommodation, food or travel shall not result in the employee being bonded to reimburse debts and forced to pay off extortionate fees.
- The appropriate personnel responsible for recruitment should be trained to identify issues relating to worker welfare and potential Human Rights issues.
- The background checks of new hires shall be made in accordance with the Group Recruitment and Selection Policy and/or local policy and legislation.

5. LABOUR AGENCY WORKERS

Many of our workers are provided through labour agencies. These agencies are outside of our recruitment process for direct hires and are not necessarily managed by SCM. The workers in question are hired, inducted and paid by the labour agency and not directly by Subsea7.

5.1 Selection of labour agencies

The time when we have the most leverage to include requirements on Human Rights is during selection and contracting of labour agencies. From early on in engagements, it should be made clear that Subsea7 has a zero tolerance of child labour, slavery and trafficking, and other forms of forced or involuntary labour.

During pre-selection, all proposed labour agencies that may be supplying migrant labour from high-risk countries should go through the human rights risk assessment and due diligence process referred to in section 3.2. Among other things, this helps provide assurance that they are reputable and have not had any previous convictions, credible allegations or ongoing cases against them.

Contracts with high-risk labour agencies should include the items listed in Appendix 1.

5.2 During contract execution

Once an agreement has been signed, it is important that performance against the above requirements be monitored, using a risk-based approach. This may mean, for example, that agencies based in high-risk countries or which are associated with any "red flags" may require more monitoring than those in low-risk countries or with no red flags.

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During regular discussions with the agency, it is important that the topic of Human Rights be kept visible and that assurance about their human rights procedures be obtained on a regular basis. Good agencies that have robust procedures in place should be able to demonstrate some processes for all of the following:

- Verifying wages are paid on a timely basis and in the correct amount.
- Conducting regular assurance checks on workers to see whether they are being treated fairly and that they are complying with legal working time limits.
- Logging and following up on grievances or speak up concerns from workers. This should include an independent investigation process if required.
- Tracking changes in national legislation to ensure all legal requirements are being complied with.
- Ensuring that freedom for Vulnerable Migrant Workers to return home is standard. This should include situations such as emergency bereavement leave or annual leave to return home and see family.
- In addition, they should be required to provide to Subsea7 an annual certification in the form set out in Appendix 1, duly signed by an appropriate, authorised signatory.

6. SUPPLIERS' WORKFORCE

All suppliers should be risk-assessed in accordance with the process referred to in section 3.2, and those assessed to be medium- or high-risk should complete the appropriate questionnaire. This is to ensure they understand the standards we require of them and demonstrate a willingness and ability to uphold those same standards.

Standard Human Rights clauses will be included in contracts with suppliers, which are also required to comply with our Code of Conduct for Suppliers. In addition, it is important that the Subsea7 people responsible for managing high- and medium-risk suppliers are aware of the signs of potential Human Rights issues and so can ask the correct questions at the right time.

Human Rights, specifically in the areas of modern slavery, human trafficking, child labour and other forms of forced or involuntary labour, should be a topic with suppliers during performance reviews, audits or contract renewal discussions.

7. SUPPLIERS' WORKERS WHO WORK ON OUR SITES OR VESSELS

High-risk supplier categories include cleaning, catering, security and facilities management, as such suppliers can utilise Vulnerable Migrant Workers who work in or on our offices, sites or vessels. Suppliers providing these high-risk services should undergo the same risk assessment process, be required to complete the appropriate questionnaire and be held to the same contractual requirements to uphold our standards vis a vis their workers. (See sections 6 and 3.2.) In addition:

- they are required to provide the annual certification in Appendix 1; and
- there is a greater onus on Subsea7 staff to observe and monitor such suppliers' workers, when they work in or on our offices, sites or vessels, and to be alert to signs that they may be victims of child labour, slavery or trafficking, or other forms of forced or involuntary labour.

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8. REMEDYING HUMAN RIGHTS IMPACTS

The previous sections of this Procedure relate to identifying and preventing or mitigating Human Rights risks. However, an appropriate response should be sought and found, should negative impacts occur. In the event that Subsea7 or its suppliers causes or contributes to a negative Human Rights impact on people outside the company or on communities where the company operates, the company shall take reasonable steps to remedy such impacts.

The aim of remedies is to make good any Human Rights harms that have occurred. The goal should be to restore affected individuals and communities to the situation they would have been in had the harm not occurred – or as close to that as possible.

Those harmed can be provided compensation or other forms of remedy that try to make amends for the harm caused. For example: apologies, restitution, rehabilitation, financial or non-financial compensation, and non-repetition.

An impact may be caused directly by Subsea7, where the company's action or operations solely and directly result in a negative impact on people or communities. Subsea7 can also contribute to an impact, i.e. when the company's operations are not the only cause of an impact, but there is a convergence of factors involving several parties.

The response and remedy provided by Subsea7 will depend on Subsea7's level of responsibility for an impact. When Subsea7 is directly and solely responsible, the company shall solely bear the responsibility of the remedy. However, in a situation where Subsea7's actions and decisions or inactions incentivize or facilitate a third party to cause a negative impact on people, the responsibility of finding and implementing a remedial solution will be shared with the third party.

When trying to determine Subsea7's role in an impact, we should consider:

- Did a decision or action made by Subsea7 alone lead to the impact?
- Has Subsea7 done anything to incentivize or motivate another party to cause the impact?
- Has Subsea7 done anything to facilitate or enable the impact occurring?
- What steps has Subsea7 undertaken to try to prevent the impact from occurring or to mitigate the impact?

Any individuals or groups outside Subsea7 can raise concerns about Human Rights impacts of Subsea7's business or operations. They can do so by contacting the company directly or by using the Speak Up Policy and channels referred to in section 3.3.2.

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APPENDIX 1

ANNUAL HUMAN RIGHTS CERTIFICATION

I, [name], a duly authorized representative of [name of Company] (the "Company") do hereby certify for and on behalf of the Company that, to the best of my knowledge and belief (having made the appropriate investigations):

- The Company is committed to respecting and upholding Human Rights;
- The Company complies with all applicable laws in relation to employment and Human Rights;
- All the Company's employees freely accept to work for the Company;
- The Company does not employ child workers (as defined by the International Labour Organisation standards);
- All workers engaged by the Company have transparent written contracts in a language they understand, setting out terms of employment;
- Workers' wages and benefits are in compliance with local labour laws and regulations;
- Payment of wages and benefits is made direct to the individual and not to third parties, and on time;
- Workers are not charged any recruitment fee;
- The Company prohibits the deduction of any money from any worker's wages (except social statutory deductions as necessary or reimbursement of cash advances made onboard Subsea7's vessels) or requiring any worker to pay their employer a proportion of their wages;
- Workers have access to their passports and personal documentation at all times (passports can be held for temporary administrative reasons, such as to take copies or process a visa);
- The Company ensures that any worker is in possession of a valid work permit and/or residence permit and therefore has the right to work in the country where he/she works.
- The Company operates a process to check on working hours, overtime and rest periods.

We hereby confirm that, should we learn of any activity which comprises non-compliance with any of the above in relation to work performed for Subsea7, we will promptly notify Subsea7.

Executed for and on behalf of the Company

At _____

On the _____ day of _____,

By _____ [signed]