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Business Management System

MANDATORY NOTIFICATION

Report of Share Transaction by Primary Insider



SUBSEA 7 S.A. MANDATORY NOTIFICATION

The notice must be sent no later than 8.59 AM CET (Central European Time) the day after the business day the trade was made (<u>ma@ose.no</u> or via fax +47 22 41 65 90).

1.1.1 Mandatory Notification of Transaction by Primary Insider

| PURCHASE OF SHARES | | |
|----------------------------|--|--|
| Name of Primary Insider | Oeyvind Mikaelsen | |
| Position in Subsea 7 SA | EVP, Southern Hemisphere and Global Projects | |
| Date of Transaction | 19/11/2015 | |
| Type of Transaction | Exercise of share option | |
| Type of Security traded | Subsea 7 S.A. shares | |
| Number of shares purchased | 18,750 | |
| Price purchased at | 67.75 NOK | |

| SALE OF SHARES | | |
|-------------------------|--|--|
| Name of Primary Insider | Oeyvind Mikaelsen | |
| Position in Subsea 7 SA | EVP, Southern Hemisphere and Global Projects | |
| Date of Transaction | 19/11/2015 | |
| Type of Transaction | Sale of shares | |
| Type of Security traded | Subsea 7 S.A. shares | |
| Number of shares sold | 18,750 | |
| Price sold at | 69.8457 NOK | |

| AFTER THIS NOTIFICATION | |
|--|---|
| Number of Shares owned by Primary Insider | Owned Shares: 17,313 Performance Shares: 113,000 Restricted Shares: Nil |
| Number of options available to Primary Insider | • Options: 45,000 |



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Breach of the notification requirement is a punishable offence. The notification requirement is not satisfied until the appropriate notification has been delivered to Oslo Børs and made publicly available. If you fail to deliver a required notification within the stipulated timetable, you must nonetheless deliver the notification, even if it is received after the deadline, in order to avoid the matter becoming more serious. This is necessary to satisfy the market's need for information on transactions carried out by primary insiders. Any breach of the requirements in respect of the content of a notification is also a punishable offence. If Oslo Børs suspects any breach of the notification requirement, it will routinely notify Kredittilsynet of this together with details of the personal information mentioned above. Kredittilsynet will investigate such a referral and reach a decision on whether the matter shall be referred to the prosecuting authorities. For more information please refer to the Insider Trading Factsheet.