



Our sustainability journey

Subsea 7 is a global leader in the delivery of offshore projects and services for the evolving energy industry, creating sustainable value by being the industry's partner and employer of choice in delivering the efficient offshore solutions the world needs.

In an ever-evolving energy industry, one of the most significant challenges we face is the increased demand society places on being able to deliver sustainable sources of energy as we transition to a lower-carbon future. Our Company is committed to meeting this challenge and to continuously improve the sustainability performance of our business.

Our Values provide the framework for how we behave and what our people, our clients, our shareholders and society can expect from us. They make us who we are. These Values are closely aligned to our six sustainability priorities, since these are the areas we have always known are important to being a preferred supplier and employer.

2019 was a significant year in Subsea 7's sustainability journey. We established a new 'Sustainability' Value that specifically focuses on our environmental and societal behaviours and our newly formed Sustainability Working Group undertook a detailed assessment to set the cornerstones of our sustainability strategy going forward.

We look ahead to 2020's sustainability plan with enthusiasm and commitment. We recognise the importance of setting strong sustainability foundations and will continue to build upon these by establishing action plans and targets. We understand the challenges, we are embracing the learnings and taking the opportunities to help Subsea 7 responsibly generate long-term sustainable value for all our stakeholders.

Inside this report

CEO's letter	2
Materiality assessment	3
Health, safety and wellbeing	4
Energy transition	6
Labour practices and human rights	8
Business ethics	10
Operational eco-efficiency	12
Ecological impacts	14
Additional sustainability topics	16
Data summary	20
Report abbreviations	22

Sustainability highlights

Health, Safety and Wellbeing:

0.02

Lost-time incident frequency rate per 200,000 hours worked

Energy Transition:

658

Cumulative number of offshore wind turbine generator foundations we have installed to end of 2019

Labour Practices and Human Rights:

80%

Our people responded positively to being treated with respect as an individual in the Subsea 7 bi-annual Employee Opinion Survey

Business Ethics:

4,791

Number of employees who have completed compliance and ethics e-learning (100% of target)

Operational Eco-efficiency:

361,164

Tonnes of scope 1 CO₂ emissions from our owned and managed vessels

Ecological Impacts:

15

Local environmental initiatives undertaken in 10 countries on 4 continents

Vision

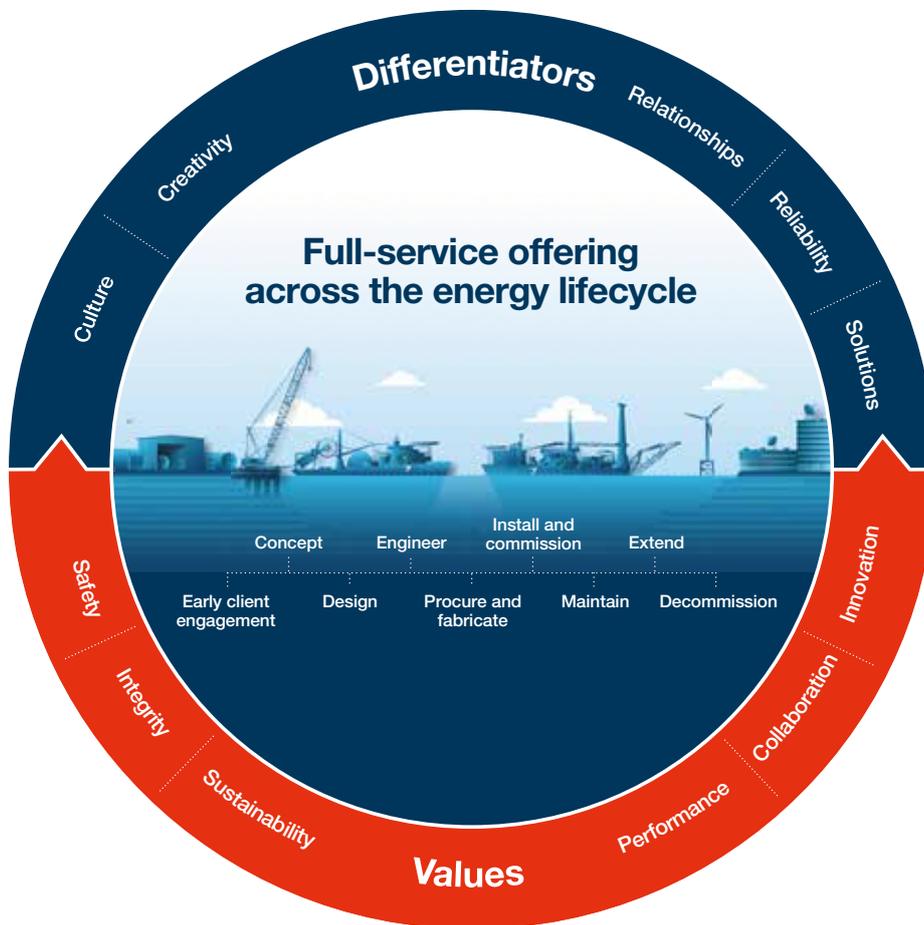
To **lead the way** in the **delivery** of **offshore projects** and **services** for the **energy industry**

Strategy

In an **evolving energy** sector, we create **sustainable value** by being the industry's partner and **employer of choice** in delivering the efficient offshore solutions the **world needs**

Stakeholders

Delivering sustainable **value** for **our shareholders, our people, our clients** and **our society**



UN Global Compact

In 2019 Subsea 7 became a signatory to the United Nations Global Compact. This is a voluntary commitment to adopt sustainable and socially responsible business policies and report on their implementation. We are committed to upholding the 10 principles in the UN Global Compact, which cover human rights, labour, environment, and anti-corruption, and to engaging in collaborative projects which advance the broader development goals of the United Nations, including the Sustainable Development Goals.



Sustainable Development Goals

The UN's 17 Sustainable Development Goals (SDGs) provide a framework for achieving the agenda and targets set by the UN Member States that collectively signpost what needs to be done to end extreme poverty, fight inequality and injustice and protect our planet. We have mapped our six Sustainability Priorities against these goals, eight of which are highly relevant to our stated ambitions.

<p>3 GOOD HEALTH AND WELL-BEING</p>	<p>Good health and wellbeing</p>	<p>7 AFFORDABLE AND CLEAN ENERGY</p>	<p>Affordable and clean energy</p>	<p>12 RESPONSIBLE CONSUMPTION AND PRODUCTION</p>	<p>Responsible consumption and production</p>	<p>13 CLIMATE ACTION</p>	<p>Climate action</p>
<p>8 DECENT WORK AND ECONOMIC GROWTH</p>	<p>Decent work and economic growth</p>	<p>9 INDUSTRY, INNOVATION AND INFRASTRUCTURE</p>	<p>Industry, innovation and infrastructure</p>	<p>14 LIFE BELOW WATER</p>	<p>Life below water</p>	<p>16 PEACE, JUSTICE AND STRONG INSTITUTIONS</p>	<p>Peace, justice and strong institutions</p>



John Evans, Chief Executive Officer

“I am confident that Subsea 7, working together with all our stakeholders, can help produce the energy the world needs from increasingly sustainable sources.”

Subsea 7 is a global leader in offshore energy services. We create sustainable value for our stakeholders by delivering the efficient offshore energy solutions the world needs. This is our inaugural Sustainability Report, but working together sustainably is not a new concept for us. Subsea 7 has a long heritage in offshore services, working with clients to help them achieve the right solution for their oil, gas and renewable energy projects.

We embrace a Values-led strategy, and our behaviours and culture are part of our differentiated service approach. Our Sustainability Priorities are closely aligned with our Values and there are material business opportunities and risks associated with our progress and performance towards the ambitions we have set.

In 2019 we enhanced our Values with the addition of sustainability as a sixth Value for the business. This calls out explicitly our commitment to protect and support the environments and societies we work in, whereas previously this was included within our other Value statements. Our people have embraced this change, increasing their contribution to society through local community initiatives such as Science, Technology, Engineering and Mathematics (STEM) events with schools and universities and environmental initiatives to reduce our greenhouse gas emissions and plastic waste. We helped our people explore the meaning of sustainability as a Value with events across the business such as the annual Senior Management Team meeting and the Graduate Development events.



UN Global Compact

We became signatories of the UN Global Compact and committed to supporting the Building Responsibly programme in 2019. The values of these global programmes are aligned to our Company Values. Our continuing support for them is a firm statement of our commitment to operating responsibly and our belief that working collaboratively with other businesses and organisations is key to ensuring real change on a global scale.

Sustainability at Subsea 7 goes beyond the way we work and the behaviours we value to include the business risks and opportunities related to the transition toward lower-carbon sources of energy. Access to affordable energy is a fundamental societal need. We play an important role in helping to supply that energy, from both renewable and non-renewable sources. In order to meet the global energy demand while reducing the climate change impact, our industry must seek better and cleaner ways to produce energy and prioritise financial and intellectual capital investment in increasing the supply of renewable energy offshore.

In 2019, Subsea 7 formed a Sustainability Working Group with senior leaders from functions across the Company working together to identify the material priorities for the business and to guide and support the Executive Management Team and Board of Directors in the development of our sustainability strategy. This working group reported to the Board at regular intervals and sustainability was included on the agenda at Board meetings.

Our Company has made significant progress already in establishing a sustainable business which stands us in good stead for the future. This is founded on our long-established company policies on Health, Safety, Environmental, Quality (HSEQ), Ethics and Human Rights which can be found on our website and which are clearly aligned with the UN Global Compact's principles.

Looking ahead to 2020 and beyond, we remain focused on the health, safety and wellbeing of our people and continue to support best practice when it comes to respecting human rights and adoption of good labour practices. We are focused on promoting greater environmental responsibility and committed to supporting the transition towards lower-carbon sources of energy. Subsea 7 continues to prioritise the importance of conducting our business to the highest ethical standards.

A new full-time senior position has been created to oversee the delivery of our sustainability ambitions, including setting key performance indicators. We have a clear focus on our sustainability priorities and are motivated to meet our ambitious targets.

Materiality assessment

Our materiality assessment established the key sustainability priorities relevant to all our stakeholders.

Subsea 7's approach to sustainability is founded on the belief that by prioritising the more material business opportunities and risks we can become increasingly sustainable in all that we do. In 2019, to support this strategy, the newly formed Sustainability Working Group undertook a review of the Company, sector and societal factors to determine which of these should take priority for us.

We worked with stakeholder feedback from our clients, our shareholders and our people and we observed the wider industry and scientific reports. This information was then analysed in detail to create a longlist of key topics. All of the topics we discussed are important to us but the longlist focused on those that are applicable to a wide range of stakeholders and have the greatest long-term impact on our future. Further scrutiny, supported by a specialist sustainability consultant, enabled us to define six Sustainability Priorities of the most

material matters: Health, safety and wellbeing; Business ethics; Labour practices and human rights; Operational eco-efficiency; Ecological impact and Energy transition.

The Sustainability Working Group and the Executive Management Team have worked together to clearly define each of the six Priorities and to set long-term ambitions. These were presented to the top eighty managers across the business at our annual Senior Management Team meeting in December 2019. Looking ahead to 2020, the Sustainability Working Group and newly appointed Senior Vice President (SVP) of Sustainability are working with the functional and regional senior leaders to determine which initiatives will have the most impact and establish the right key performance indicators to measure our progress going forwards.

Sustainability priorities

Employee health, safety and wellbeing

Creating, maintaining and promoting a safe, secure and healthy work environment.

Energy transition

Being the partner of choice for the transition of offshore energy towards a sustainable future.

Labour practices and human rights

Providing working conditions aligned with international best practice with respect to human and labour rights.

Operational eco-efficiency

Improving the environmental efficiency of our operations and our solutions in terms of greenhouse gas emissions and energy use.

Business ethics

Ensuring ethical business conduct and compliance by those working in and for the company.

Ecological impacts

Minimising the impact of our operational activities on marine and land-based ecosystems and biodiversity.

Additional sustainability topics

Human capital development

Diversity and inclusion

Community impact and relationships

Responsible supply chain management

Waste management and effluents

Stakeholders

Our stakeholders are important to us and we are aligning with their expectations on sustainability

Society

Our Society defines what is acceptable and what is expected in terms of corporate behaviour. We have a duty to respect the communities and environments we work alongside.

Clients

Our clients expect us to operate safely, cleanly and with integrity.

People

Our people expect us to keep them safe, treat them with respect and be a good employer.

Shareholders

Our shareholders expect us to be fair, balanced and transparent in our interactions with the market.

Health, safety and wellbeing

Creating, maintaining and promoting a safe, secure and healthy work environment.

Why it is important

The safety of our people is our first priority. Our workplaces are potentially hazardous, particularly when we are working offshore in harsh and remote environments. We believe that all our people and those working on our sites are entitled to the same level of protection regardless of where in the world they work. To achieve this it is essential that we have the right frameworks in place to enable our people to work safely. Our policies and training programmes are continuously reviewed to make sure that this is achieved.

We capture key lessons from across our global operations in order to improve our systems, to reduce and ultimately eliminate activities that have the potential to harm our people, the environment and cause damage to our equipment. We record all incidents and near misses in detail and investigate each and every event. Near misses can be defined as being an event where something happened, nobody was hurt and nothing was damaged; however had circumstances been slightly different it would have been an incident. By collecting this valuable information and tracking our performance in our Business Management System we are able to continually improve our safety performance. We set challenging targets to drive performance improvement with an aim of achieving an incident-free workplace every day and everywhere we work. We celebrate our safety successes with awards for worksites that achieve superior performance and communicate details of incidents when they do occur to help our people learn to be safer in all they do.

Assurance and verification of safety standards are key to a consistently strong safety performance. Subsea 7 checks activities against our internal standards and processes as well as regulatory and legislative requirements. We undertook over 250 internal safety audits in 2019 which included checking our vessels, our procedures and our documentation. We also use external auditing to ensure we are in compliance with our obligations relating to the countries and regulatory standards where we operate and to check that our projects and vessels are in compliance with our clients' requirements. In addition we use third-party auditors to enhance our oversight of our supply chain. In 2019 we performed over 135 supply chain audits.

Keeping our people safe also includes their security at work. We assess the security risks of countries, areas, hotels, airlines and other means of transportation, to make sure our people are secure and travel safely. Subsea 7 has operations around the world, and some of the places we work in are higher risk with regard to adverse environmental events such as extreme weather, as well as political or civil unrest and the threat of terrorism. We provide our people with onsite support as required to minimise the risk to personal security. This may include security personnel, company-arranged transport, travel management plans and travel guides.

We promote a healthy work-life balance through a combination of wellbeing initiatives, protecting against occupational health hazards and supporting our employees when they need it most. We recognise the importance of mental and physical health and support this with resilience training and local initiatives such as mental health first aiders, education in financial wellbeing and regular sports and social activities. Many of our people have access to a confidential Employee Assistance Programme (EAP) that provides support for coping with life's challenges including health and wellbeing, financial problems, stress or anxiety and family issues.



UN Global Compact

The UN Global Compact recognises the importance of health, safety and wellbeing through a number of its Sustainable Development Goals. We strongly support this value and ensure we create, maintain and promote a safe, secure and healthy work environment.

Our ambitions

Promoting safe and healthy workplaces across our value chain where employees feel welcome and secure

Providing a workplace that is incident- and injury-free at all times, everywhere

Providing a work environment that encourages, supports and enables healthy choices and lifestyles

Key sustainable development goals



Our initiatives and projects in 2019

In 2019 our Work Safe Home Safe training programme was delivered in person to over 1,200 senior operations people at workshops worldwide. Every workshop had a member of the Executive, Country or Business Unit leadership team involved with individual participation, sharing their stories and getting engaged in the activities. Our Work Safe Home Safe programme supports Subsea 7's fundamental priority of protecting and providing a safe environment to those involved in or affected by our activities, where everyone participates and is empowered to stop the job if they feel it is unsafe. This programme will continue to be delivered in locations around the world in 2020.

A revised 'dropped objects' operating procedure was implemented in 2019 in response to analyses of near miss events reported in prior periods. The procedure aims to minimise the risk posed by operational or equipment failure, particularly when working at heights. One improvement is the inclusion of images of items requiring inspection to make it clearer which of them need to be checked in regular site surveys.

To keep our people safe when travelling we introduced a new Travel Smart mobile phone application. This app was developed by Chubb and made available to all our people as part of our business travel insurance. It provides the user with detailed information about the destination they are travelling to, SMS alerts about how to avoid potential travel risks and direct access to medical and security assistance 24/7 wherever they are in the world. It also includes a GPS tracking option, which can be enabled when travelling to high risk locations so that the appropriate support can be swiftly provided if required.

Across the Company, some maternity and paternity policies were revised to ensure a fair work-life balance and encourage parents to stay longer with their families. Flexible working hours have also been introduced or revised in most regions.



In 2019, Subsea 7's Global Welding and Development Centre in Glasgow, UK, celebrated 10 years without any lost time incidents. This safety-first team has also achieved nine years without any recordable incidents. These milestones were achieved despite an increase in activity in 2019 with over 20 projects utilising onsite welding expertise.

Measuring our progress

0.02

Lost time incident frequency rate per 200,000 hours worked

81%

Proportion of our people who said that Subsea 7 demonstrates care and concern for employees in the 2019 bi-annual Employee Opinion Survey

Energy transition

Being the partner of choice for the transition of offshore energy towards a sustainable future.

Why it is important

Global demand for energy continues to grow and, as a preferred supplier to the offshore energy industry, Subsea 7 plans to play a proactive role in the construction of sustainable offshore energy developments around the world and to support the transition of supply towards lower-carbon sources of energy.

Seaway 7 is the renewables business unit of Subsea 7 and has an established position in the renewables supply chain, providing our clients with foundations and cable-lay services for the construction of offshore wind farms. With over 10 years of experience, we have built and installed hundreds of foundations and many kilometres of inner-array cables for fixed offshore wind farms worldwide. Having been in the offshore wind market from the early days of its commercial conception, we are one of the most experienced partners for our clients, working on a full engineer, procure, construct and install (EPCI) basis or on a transport and install (T&I) scope.

The levelised cost of electricity (LCOE) from offshore wind has decreased significantly over the last 10 years, driven by increased efficiency in transportation and installation, bigger turbines, and cost improvements in the supply chain. As a result of these cost reductions, supported by the capability and expertise of contractors such as Subsea 7, offshore wind farms are now economically viable at very low levels of, or even, no government subsidy. The global offshore wind farm market has grown rapidly with more than 18 GW of capacity already installed across the planet. Looking ahead strong growth is projected as society looks to increase investment in renewable energy and carbon-neutral alternatives.

The offshore wind farm market has become a significant part of our business. For Subsea 7, renewable energy is an important revenue stream and we aim to support our clients to accelerate the energy transition and to provide their consumers with increasing volumes of affordable wind power. We utilise our skilled people and their wealth of marine construction expertise together with our construction vessels, equipment and facilities to develop and deliver the best and most cost-efficient offshore wind farm solutions. We have many years of experience in heavy lifting and cable lay in harsh marine environments that is invaluable for the installation of offshore wind farms. Over time we expect that this will result in a growing proportion of our activity coming from renewable energy services.

Floating offshore wind is the next most promising growth area for offshore renewables. Floating wind offers the possibility to further support energy transition by allowing greater quantities of offshore wind to be developed by using areas where the water is too deep to allow the construction of fixed offshore wind farms. While there are no significant commercial farms anticipated in the short term there are a large number of demonstrators and concepts in operation with a number of smaller projects being progressed to provide clean power to remote offshore oil and gas facilities. We are actively participating in many of these projects and are growing our technical capability and expertise in this area to be ready to support future large-scale commercial developments. Floating wind farms are expected to become a significant contributor to the energy transition in a five to ten year time frame.

Gas has an important role in the transition to lower-carbon energy, as it is an energy source that releases lower carbon emissions to the atmosphere when used to generate power and helps to lessen dependence on coal. Subsea 7 has extensive expertise and experience in large offshore gas field developments, including the recently awarded Julimar and Scarborough projects offshore Australia and the recently completed West Nile Delta project offshore Egypt. Our proprietary technology and engineering capability supports our clients in developing these fields cost effectively and efficiently.



UN Global Compact

As part of the UN Global Compact's goal to ensure access to affordable, reliable, sustainable and modern energy for all, we are committed to progressing and supporting the transition towards lower-carbon sources of energy (Principles 7, 8, 9).

Our ambitions

Expanding our capabilities in the design, construction and installation of cost-effective fixed and floating wind farms and other offshore energy transition projects

Supporting our clients in their drive for lower-carbon and renewable energy solutions with our assets and our technology

Being a leading supplier of solutions to the growing offshore energy transition sector

Key sustainable development goals



Our initiatives and projects in 2019

In 2019 the globalisation of the offshore wind market accelerated with significant commitments for new developments offshore Taiwan as well as continued growth in activity offshore Europe, where the market is more established. The US market has begun to emerge, with the first wind farm developments being sanctioned and many other countries looking to evolve their plans.

Subsea 7 has had another productive year in supporting the energy transition through the installation of foundations and array cables for new offshore wind farms. By the end of 2019 we had completed the installation of more than 650 foundations and 1,500 km of array cables. This will increase further in 2020 when we will be supporting numerous wind farm developments in Europe, Taiwan and the US.

Investing in technology and working collaboratively with partners to support technology development that enables wind farms and gas fields to be developed is at the heart of our energy transition strategy. In addition, some of the patented technology we have developed for oil fields has been shown to have material benefits for lower-carbon energy production. An example is the Electrically Heat Traced Flowlines developed for long-distance tie-backs on oil fields which is also highly effective at preventing hydrates forming in gas pipelines thereby enabling more cost effective production of gas.

In order to help drive the energy transition it is essential to continue to reduce the LCOE to enable further investment to be made in fixed and eventually floating offshore wind. Increasing the cost effectiveness of foundation design, array cable design, transportation, logistics and installation are fundamental to this and are our key drivers. Innovative installation methods pioneered by Seaway 7, coming from our Research & Development (R&D) programmes, such as monopile installation with the vessel in dynamic positioning mode, have the potential to reduce seabed impact, reduce CO₂ emissions and reduce costs whilst helping to accelerate energy transition. Reducing the negative environmental and ecological impact of our operations by innovation are also high focus areas as we seek to drive energy transition sustainably.



Subsea 7 was the EPCI contractor for the installation of 84 wind turbine foundations and associated inner array cables on the Beatrice Offshore Windfarm, UK. We first started working in 2011 on the engineering and design with the client, SSE, and were awarded the EPCI contract in 2016. First power was achieved in 2018. On completion Beatrice was the world's deepest bottom-founded (fixed) windfarm at 55 metres water depth and generates 588 MW, sufficient to power, on average, 450,000 homes over a 25-year period.

Measuring our progress

658

Cumulative number of offshore wind turbine generator foundations we have installed to end of 2019

\$198m

Renewables business revenue generated in 2019

Labour practices and human rights

Providing working conditions aligned with international best practice with respect to human and labour rights.

Why it is important

Treating our people and those that work with us fairly and with dignity is fundamental to the way that we work at Subsea 7. We are committed to fulfilling our responsibility to respect and protect human rights. We strive to protect the rights of individuals working in or impacted by our operations, including people who work for our suppliers. This includes a commitment to help prevent modern slavery and human trafficking anywhere in our business or supply chain.

Respecting human rights and adopting good labour practices helps us to better manage our risks. Having a robust procedure and channels for people to raise concerns is an important feature of an effective compliance and ethics programme. It also helps us to recruit and retain talented people around the world. Maintaining good employee relations makes us a stronger and better company capable of winning market share and performing well for all our stakeholders.

Everyone at Subsea 7 must abide by our Code of Conduct. We relaunched it in 2019 with refreshed content accompanied by an awareness campaign and compulsory online training. Fundamentally our Code is all about standing up for human rights in all we do, wherever we work, so no-one is ever mistreated, abused or exploited by us or anyone we work with. Our Code makes it explicitly clear that we will not accept any abuse of human rights, including human trafficking, forced or involuntary labour and we will not work with suppliers or service providers that do.

Subsea 7 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. We have also signed up to support the Worker Welfare Principles set out by the Building Responsibly organisation. Building Responsibly was launched in 2017 as a global business-led coalition committed to promoting the rights and welfare of workers in the engineering and construction sector, it is based on the belief that collaboration is required to deliver better practices across the building and construction industry.

We are committed to fair and lawful employment practices across the Company and throughout our supply chain. We are an equal opportunities employer and seek to protect our people from discrimination and bullying. As a minimum we comply with national legal requirements regarding wages and working hours everywhere we have operations. We also apply the International Labour Organisation's standards regarding child labour and the minimum working age. We support the rights of our people to freedom of association and collective bargaining.

By working with established international compacts, standards and organisations we aim to present a united international business community where we stand alongside others in our industry and other industries worldwide to put a stop to human rights and labour abuse.

We require our suppliers to uphold the same standards when dealing with their employees, contract staff and subcontractors. We require them to commit to our Code of Conduct for Suppliers and encourage our suppliers to report any behaviour that is inconsistent with this code to their contact at Subsea 7 or our Group Head of Compliance and Ethics. If they are not comfortable reporting to Subsea 7 directly we encourage the use of our externally administered confidential reporting line, Safecall.



UN Global Compact

We are aligned with the UN Global Compact in supporting the commitment to respect and protect human rights (Principles 1 and 2).

We uphold the UN Global Compact's labour principles and commit to fair and lawful employment practices across the Company and throughout our supply chain (Principles 3,4,5,6).

Our ambitions

Applying the principles of Building Responsibly and the UN Global Compact within Subsea 7 and actively monitoring compliance

Working with our suppliers and partners to see the principles of Building Responsibly and the UN Global Compact applied across the value chain

Ensuring broad understanding of Subsea 7 expectations and commitments to the principles of Building Responsibly and UN Global Compact

Key sustainable development goals



Our initiatives and projects in 2019

In the first quarter of 2019 Subsea 7 became a signatory to the United Nations Global Compact. This international co-operative brings together almost 10,000 companies from over 160 countries to adhere to the 10 principles covering human rights, labour, environment and anti-corruption.

As part of the refresh of our Code of Conduct in 2019 we included a new section on people, communities and the planet, in which we pulled together and enhanced our commitments to upholding human rights and high labour standards.

Training our people and our suppliers is a key aspect of our responsibility to embed our respect for human rights and labour practices in all the places we work around the world.

Subsea 7 has operations in over 25 countries around the world. We identify high risk locations and perform country-level human rights risk assessments to help protect our people and our business from harm.

We require our suppliers to commit to our Code of Conduct for Suppliers. We assess each of our suppliers to determine the level of risk regarding a breach of human rights or labour practices and any that are determined to be high risk undergo due diligence screening.

To date, Subsea 7 has received no reports of concerns regarding slavery or human trafficking in our operations or those of our suppliers. If any such concerns were reported to us, we would undertake a thorough investigation under the supervision of the Ethics Committee. If the investigation confirmed the existence of issues of concern, we would put in place robust action plans to resolve them and protect the victims.



We engaged an independent, expert firm (GoodCorporation™) to oversee an assessment of modern slavery, human trafficking and other human rights risks. We used the insights gained to start the process of enhancing our relevant policies and procedures.



Subsea 7 supports the Worker Welfare Principles set out by the Building Responsibly organisation, a global business-led coalition committed to promoting the rights and welfare of workers.

Measuring our progress

80%

Proportion of our people responded positively to being treated with respect as an individual in the Subsea 7 bi-annual Employee Opinion Survey

19

Speak Up and other compliance and ethics cases logged relating to: human rights (0) labour concerns (19)

Business ethics

Ensuring ethical business conduct and compliance by those working in and for the company.

Why it is important

Integrity is one of Subsea 7's six Values, this means that we are committed to applying the highest ethical standards in everything we do, treating our clients, people, partners and suppliers fairly and with respect.

As with safety, we take a programmatic approach to embedding a culture of ethics and integrity and managing legal risks. The Subsea 7 Compliance and Ethics Programme has been developed to prevent bribery, corruption and other compliance and ethics breaches by the Company and all who work for us – including suppliers and other third parties.

The programme is underpinned by our values and is summarised in the diagram opposite. It is designed and implemented in accordance with international best practice, including the International Anti-Bribery Management System (ABMS) Standard ISO 37001:2016.

While much of our focus in recent years has been on anti-corruption, as well as competition/anti-trust, sanctions and export controls, the programme also has a broader scope which is defined by our Ethics Policy Statement and our Code of Conduct (both approved by the Board of Subsea 7 S.A.). In recent years, increased regulatory and stakeholder demands and expectations have brought other compliance and ethics risks to prominence, including tax evasion, human trafficking and modern slavery, and other human rights risks.

Our Code of Conduct for Suppliers sets out the key principles of ethical business conduct that our suppliers are required to uphold.

The Compliance and Ethics Programme and function are overseen by our Group Head of Compliance and Ethics, who has an independent reporting line to the Corporate Governance and Nominations



Committee of the Board of Subsea 7 S.A.. We have an Ethics Committee which is attended by senior executives, oversees the implementation and continual improvement of the programme, and approves the strategy and priorities. In conjunction with the Board, it also oversees our Speak Up policy, procedures and channels, and any significant compliance or ethics incidents and investigations, and reviews and approves remedial actions taken in response.

In order to monitor and continually improve our programme, we conduct internal audits of relevant financial controls, Supply Chain Management (SCM) procedures, compliance with our gifts and hospitality policy and, increasingly, other aspects of our compliance and ethics programme; and risk-assessment and monitoring visits are made to higher-risk third parties. We have also engaged an external expert firm (GoodCorporation™) to perform independent assessments of our programme, both at a Group level and in selected countries where we have had significant business activity and the corruption risks are perceived to be higher (e.g. Brazil and Egypt). Recommendations from such assessments form part of our annual action plans.



UN Global Compact

Principle 10 of the UN Global Compact identifies the importance of businesses working against corruption in all of its forms. Through a range of initiatives, policies and processes we have continued to strengthen our approach to maintaining ethical business conduct.

Our ambitions

Embedding a culture of ethics, compliance and integrity

Ensuring we make a positive impact on business ethics in our sector, including the supply chain

Ensuring only those who uphold our commitments to ethical business conduct can work with or for us

Key sustainable development goals



Our initiatives and projects in 2019

In October 2019 Subsea 7 held its inaugural Global Integrity Day to raise awareness and encourage discussion about how much our approach to compliance is based on ethics and integrity. Events were held at our worksites around the world, centred around a video message from the General Counsel (*Integrity is in Your Hands*) and local senior managers speaking about what Integrity means to them on a personal level.

The Subsea 7 Code of Conduct was refreshed and relaunched. It summarises the different areas of compliance and ethics risk that Subsea 7 is committed to addressing and includes new or expanded pages to address topics that have emerged or grown in prominence over the last six years. It explains in an engaging and relevant way how and why employees and others who work for Subsea 7 should comply. The refreshed Code of Conduct was the subject of the annual compliance and ethics e-learning. During 2019, 4,791 people completed this training which represents 100% of our target population.

We host compliance and ethics meetings and events with our suppliers to ensure we have a shared understanding of how to apply our Code of Conduct for Suppliers, and to help them uphold the commitments set out therein.

Our whistleblowing policy was also refreshed and rebranded as our Speak Up policy, in an effort to encourage more people to speak up if they have concerns about possible unethical conduct, and to make clear what happens if such concerns are raised.

GoodCorporation™ revisited our businesses in Brazil and Egypt and reported very favourably on the implementation of their recommended compliance and ethics programme improvements.



As part of our Global Integrity Day, Subsea 7 and its Nigerian joint venture Nigerstar 7 hosted a compliance and integrity forum for suppliers in Lagos. Approximately 60 suppliers attended and participated in an active discussion about some of the ethical issues faced by them and the importance of integrity to our organisation and theirs.

Measuring our progress

4,791

Number of employees who have completed compliance and ethics e-learning (100% of target)

3.03

Speak Up and other compliance and ethics cases logged per 1,000 employees

Operational eco-efficiency

Improving the environmental efficiency of our operations and our solutions in terms of greenhouse gas emissions and energy use.

Why it is important

Subsea 7 recognises the impacts of climate change and its potential effect on our business, our end markets and on society. We are actively engaged in this by seeking ways to be more efficient in the way that we work and by investing in solutions that lower our greenhouse gas emissions and those of our clients. Over 90% of our emissions come from our vessels such that our carbon dioxide emissions correlate strongly with our activity levels in the year.

The International Maritime Organisation (IMO) is the United Nations specialist agency with responsibility for the safety and security of shipping and the prevention of marine and atmospheric pollution by ships. In 2018, the IMO launched its strategy for the reduction of greenhouse gas emissions from ships. This included limiting sulphur oxide (SOx) and nitrogen oxide (NOx) emissions and setting a target to reduce total annual greenhouse gas emissions from shipping by at least 50% by 2050 compared with 2008. As a result, from January 2020 a new low-sulphur limit for fuel came into effect worldwide. All of Subsea 7's vessels are designed to run on low-sulphur fuel, and as such no additional investment or action was required as a consequence of the change in limit.

Four Subsea 7 vessels are listed with the Environmental Ship Index (ESI) in the World Port Sustainability Program: *Seven Viking*, *Seven Kestrel*, *Seven Falcon* and *Seven Arctic*. The ESI identifies seagoing ships that perform better in reducing air emissions than required by the current emission standards of the IMO.

Subsea 7's owned vessels are enlisted in the Norwegian NOx fund, which supports the shipping industry in cutting NOx emissions by granting financial support to the industry to implement green technology. This is financed by fees paid to the fund by its members, including Subsea 7. Subsea 7's new build vessels have NOx-reducing selective catalytic reduction (SCR) technology that reduces NOx emissions by approximately 75%.

We have one of the youngest fleets in the offshore energy construction market with an average age of just 11 years. We have invested over \$3.5 billion in new vessels since 2010, commissioning 12 new build vessels in that period. We aim to operate a vessel for its entire useful life, investing in new equipment and enhancements to extend the life where possible. When a vessel is at the end of its life we are committed to recycling it responsibly. All of our redundant vessel tonnage is recycled under the Hong Kong Convention and the EU Ship Recycling Regulation.

We have a comprehensive risk management system with procedures and tools that identify, analyse, report and manage business risks, including those related to environmental risks and the effects of climate change. We measure key environmental data against internal targets including fuel and energy consumption, carbon emissions, waste segregation, spills and other incidents. Environmental hazard severity is measured through a points system that reflects the potential impact on the environment should an incident occur. We participate in the Carbon Disclosure Project, publishing detailed information that allows all our stakeholders to review our progress.

Subsea 7 is globally certified to the Environmental Management Standard ISO 14001:2015. This Standard applies to the management of our environmental responsibilities in a systematic manner including the enhancement of environmental performance as well as the achievement of our environmental obligations and objectives.

In addition to minimising our own emissions we are committed to providing our clients with improved technology and engineering solutions that enable them to reduce the environmental impact of their offshore energy developments. For example, our Pipeline Bundle Solutions are constructed onshore and towed into position,



UN Global Compact

We recognise the importance of being actively engaged in tackling the challenges facing our environment. We support the UN Global Compact's principles on the environment and we are undertaking initiatives to promote greater environmental responsibility throughout our Company (Principle 8).

Our ambitions

Investing in technology to improve the lifecycle carbon footprint of energy infrastructure that we offer our clients

Improving our operational efficiency to support reduced-carbon emissions

Enhancing our fleet to reduce operational GHG emissions to achieve a 50% reduction by 2050

Key sustainable development goals



significantly reducing the number of vessel days required for installation and hence lowering emissions arising from the project. We have also signed our first three contracts for the use of Electrically Heat Traced Flowlines. These will be ready for installation in 2020, and will enable long-distance tie-backs with reduced need for new topside processing capacity and reduced power requirements.

Our initiatives and projects in 2019

Subsea 7 installed three onshore Remotely Operated Vehicle (ROV) control centres in 2019, two in our offices in Stavanger and one in Aberdeen. These facilities enable us to operate a ROV with a significantly reduced level of offshore manning. We use 4G communication to link to the ROV, which has been programmed to operate autonomously. This technology is being tested and used in the field today as we work with our clients to progress it to a commercial reality.

In 2019, our Life of Field vessel, *Seven Viking*, was our first vessel to have hybrid power installed (see case study). The initial results have been positive with a fuel saving of approximately 19%, corresponding to 2,400 tonnes of CO₂ saved and NOx savings of 25%. The cost of the upgrade was shared with its joint owner, Eidesvik, and a grant was provided by the Norwegian Government to cover part of the expense. We are evaluating our fleet to assess the potential for suitability and cost of converting other vessels to a similar hybrid system.

Approximately 3,500 clean operations were recorded on our vessels in the year reducing our carbon dioxide emissions by nearly 20,000 tonnes. A clean operation is considered an activity where a vessel's carbon footprint is reduced through activities which save energy without compromising safety or execution.



The conversion of *Seven Viking* to hybrid power was achieved by installing a 1300 kWh battery system, which allows the vessel to optimise the operation of its diesel generators. In particular, the battery serves as a spinning reserve during operations, which reduces the number of generators operating, whilst running the remaining generators at a more energy-efficient load. Additional saving is achieved by peak shaving, where short-term variations of engine load are balanced by the battery.

Measuring our progress

361,164

Tonnes of scope 1 CO₂ emissions from our owned and managed vessels

3,494

Number of clean operations performed with our owned and managed vessels

Ecological impacts

Minimising the impact of our operational activities on marine and land-based ecosystems and biodiversity.

Why it is important

Subsea 7's fabrication and construction activities, offshore and onshore, have an impact on the environments that surround them. We conduct our business in a way that considers the environment and which aims to keep any negative impact to a minimum and put in place procedures to protect biodiversity and the ecosystems we work in. We have a Group Health, Safety, Environment and Security policy which gives close attention to achieving regulatory compliance and continually improving our environmental performance through careful selection of consumables and working practices designed to reduce waste, energy consumption and emissions.

Awareness of the impact that our activities may have on the environment and the management of measures to control such impacts is encouraged through our environmental principles:

- Work according to applicable environmental laws, conventions, protocols and regulations
- Promote and maintain a positive environmental culture
- Manage our activities to eliminate or reduce any potential negative environmental impact
- Consider environmental sustainability an important element in the way we do business
- Use planning, design and risk assessment to avoid and reduce environmental risk.

Some ecological disruption is unavoidable when putting in place new subsea infrastructure. The seabed is disturbed by trenching and rock dumping required to install our flow lines and our presence offshore can be noisy and disruptive for marine life. Our Bundle Pipeline solutions eliminate the need for trenching and rock dumping and are a preferred solution for many clients in the North Sea.

We also rely on some single-use plastic items, such as cable ties to secure loads safely and packaging of items received from our suppliers. We are looking at ways to reduce our dependence on single-use plastics on our sites and vessels and within our supply chain.

We are a member of the Circular Cleanup programme in Norway. Circular Cleanup is a project initiated by the Norwegian Shipowners' Association bringing together forces from both the ocean and waste industries to create new initiatives for cleaner oceans. Subsea 7 is the project manager for the Plastic Chain Pilot Project that the programme is supporting to collect waste offshore and sort it for recycling in Germany.

Many of our vessels transit from one ocean to another in the course of the year. We are sensitive to the risk of contamination of ecosystems that can result in disruption to biodiversity through the introduction of non-indigenous marine life to a new area. We follow all local requirements and legislation to ensure that any risk of contamination through the release of ballast water or from organisms attached to the hulls of our vessels is minimised through vigorous cleaning and decontamination.

Subsea 7 provides decommissioning services to the offshore oil and gas market, helping our clients to safely and responsibly remove and dispose of obsolete offshore infrastructure at the end of its useful life. We also take responsibility for our own end-of-life assets, with all vessels recycled in accordance with the Hong Kong Accord when they are no longer operable. In 2019 there were no vessels removed from the fleet, but in 2018 five vessels, with an average age of 35 years, were sold for recycling.



UN Global Compact

The UN Global Compact's Environmental principles recognise the need for businesses to encourage the development of environmentally friendly technologies. We are aware of the impact our activities may have on the environment and we are striving for ways to improve through a range of initiatives (Principles 7, 8, 9).

Our ambitions

Designing energy infrastructure for recovery and reuse

Making a positive global impact on marine life in each country where we operate

Zero single use plastics onshore and offshore

Key sustainable development goals



Onshore yards and offices usually have a lower environmental impact, with sites remaining stable over time and typically co-existing unintrusively with the local environment. There are occasions when additional measures need to be taken. We conduct environmental risk assessments on all our facilities and use them to form an action plan to minimise this impact.

Our Pipeline Bundle facility in Wick has constructed bird-nesting areas adjacent to our site, encouraging seabirds to nest safely nearby and reducing the incidence of birds nesting in the fabrication and construction zones.

Our initiatives and projects in 2019

Subsea 7 is a founding partner of the SERPENT (Scientific and Environmental ROV Partnership using Existing industrial Technology) Programme, making ROV technology and data more accessible to the world's science community, to share knowledge and progress deep-sea research. To date, nearly 10 drilling installations using Subsea 7 ROVs and 10 support vessels have contributed to SERPENT from a range of locations including West Africa, West of Shetland and the Gulf of Mexico.

Many of our sites are located in coastal areas and we are proud to regularly be involved in beach-cleaning events. In 2019 we took part in beach-clean activities in the UK, Norway, Brazil and Australia, filling hundreds of bags with waste plastic and other litter washed up from the sea. Plastic waste at sea can cause significant damage to marine life and birds so, regardless of the source of the litter, we consider it part of our social responsibility to take part in its removal and safe disposal.

In 2019 we have continued our drive to reduce single-use plastic with the promotion of reusable alternatives where feasible. We have introduced reusable cups in our offices and have provided offshore crews with refillable water bottles to reduce dependency on individual bottles of water offshore.



When installing the Borkum windfarm project offshore Germany in 2018 and 2019 we used a curtain of bubbles around the site while hammering in the foundation piles. This approach was required to lower subsea noise pollution, which can impact sealife. The sound waves are reflected by the bubbles, reducing the leakage of sound from the construction site. Further we also use vibration hammers, which are a quieter alternative to other foundation installation methods.

Measuring our progress

15

Local environmental initiatives undertaken in 10 countries on 4 continents

0.82

Environmental incident frequency rate per 200,000 hours worked

Additional sustainability topics

Continued commitment to supporting additional material topics that are important to our people, our business and the society we are part of.

Human capital development



Why it is important

Our people are at the heart of everything we do and supporting all individuals to achieve their full potential is key to Subsea 7's success.

Subsea 7 has a well-established range of learning and development tools to help our people grow their knowledge and abilities in different areas of the business. Development schemes, behavioural models, webinars and a variety of learning content are easily accessible via our digital platforms, designed to promote inclusive and equal learning opportunities amongst our employees.

Our employees are encouraged to take charge of their careers and, through one-to-one meetings supported by their direct managers, career development plans are created and reviewed on a regular basis. Areas for development are identified and can be supported by our learning and development tools. The process is driven by the individuals and supported by their functional managers.

Our initiatives and projects

Inclusive learning

In 2019 we launched HORIZON, our digital HR platform for our onshore population and a pilot group offshore. The learning tool was launched within the Festival of Learning, an annual event which takes place in October and focuses on learning and personal development around the world. Through HORIZON our people can access eBooks, podcasts, webinars and other digital learning content both at work and via their mobiles. At a local level, the learning culture is further supported by face-to-face training and engagement sessions.



Targeted development

Annually we have an intake of graduates around the world who join our Graduate Engineering Development Scheme. The programme is a blend of local delivery, global webinars, team projects and a one-week session in the UK. The programme aims to both upskill the graduates and to ensure that they connect as a group, to encourage working together collaboratively on projects in the future. In addition in 2019 we had our second intake of participants into the Career Connect Programme. Career Connect is a two year programme that arms participants with a range of tools to support them in their career and leadership skills development. This programme supports Subsea 7's focus on wider talent and succession planning, to gain earlier visibility of the talent pipeline.

Diversity and inclusion



Why it is important

We believe that everyone has the right to be treated fairly, with dignity and respect, and to have equal opportunities in a supportive, friendly and inclusive environment, free from all forms of discrimination, harassment or bullying. Fair employment practices, fair treatment for all individuals and equal opportunity on the basis of merit are the foundation of our development programmes.

We value and promote diversity and regard it as a key to our success. An inclusive and diverse environment fosters creativity and innovation and improves decision-making by introducing new ways of thinking. We are committed to providing a workplace where everyone can thrive. These principles are well-established and form part of Subsea 7's Human Rights Policy (as published on the Company website).

To support our ambition to provide equal opportunities to everyone in the organisation, a Diversity and Inclusion Steering Committee was established in 2019. Chaired by a member of the Executive Management Team and with representatives of different regions, the Committee's aim is to role model diverse and inclusive behaviours, influence others and spearhead the agenda, as well as set Subsea 7's framework for success, ensuring the topic remains a Company priority and evolve the focus as the Company matures.

In 2019 Elisabeth Proust joined our Board of Directors as an Independent Director and our Executive Management Team has welcomed Kate Lyne as an Executive VP. We see this as a step forward towards a more gender-balanced senior management which will contribute to increasing the representation of women at all levels in the Company.



Our initiatives and projects

In 2019 the number of initiatives related to diversity and inclusion have increased significantly across the organisation. Local discussion groups were formed to identify gaps and areas for improvement where actions could help to engage more people, supporting their development in a more diverse environment.

To address gender balance, specific programmes and seminars were developed and introduced in different regions to support our female employees to achieve their full potential. We also support a number of local initiatives to introduce and encourage young girls to Science, Technology, Engineering & Mathematics (STEM) subjects and our industry.

Areas for improvement are identified through feedback loops, with learning and development support available and tools provided.

Women in engineering, inspiring the new generation

In Brazil, our team is committed to inspiring young women to adopt engineering as a career by holding regular events with students from the local communities to promote STEM subjects and the Subsea 7 workplace. Similar initiatives are also promoted in other offices including Aberdeen, London, Paris and Norway. Our HR teams have participated in several recruitment events in an effort to attract more women to our graduate schemes.

Community impact and relationships



Why it is important

Subsea 7 operates on a global basis and a core principle of our operating approach is to optimise local content and engage closely with local communities on all levels. We have found that this is essential for the success of our projects and for the long-term growth in the regions where we operate. Key elements of this include commitments to education and skills transfer.

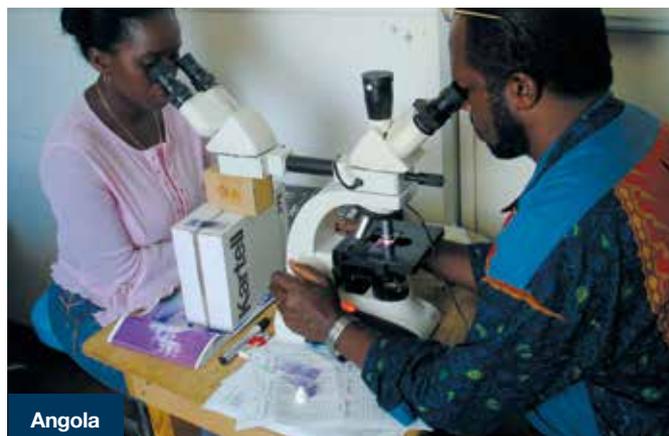
We are committed to promoting initiatives that improve the life of the people in the communities around us wherever we work. Those initiatives vary from country to country and can be directly related to the places where our projects are executed or the office from where they are managed.

The following are just a few examples of how we work with local communities, illustrating the breadth of engagement as well as geographical reach. We will build on these initiatives through 2020.

Our initiatives and projects

Malaria Control Programme

Subsea 7, through its joint venture Sonamet and in conjunction with the Angolan authorities, has developed a Malaria Control Programme (MCP) in the Lobito and Balombo areas. As part of the project, a parasitology laboratory was set up within our medical facilities to obtain fast and reliable data in order to diagnose cases of malaria and initiate treatment immediately. To promote prevention in the local community, a team of agents was organised and together with external consultants they started work on malaria control. One of the initiatives was to use GPS technology to identify the houses of all company employees and analyse the data using a geographical information system (GIS). Each case of malaria was geo-referenced and computer maps helped our team to develop specific measures to tackle the areas and households where the cases were more frequent. The programme has been running since 2002 and it is a unique partnership between Subsea 7 and local authorities to tackle the causes of malaria, directly improving the local community's health and wellbeing.



Angola

Casa da Arvore (Tree House) Brazil

This project offers daily mental health assistance for pregnant women and for children up to nine years old and their parents, as well as supporting actions in the local community, such as training for social care workers. Inspired by Maison Verte, an initiative of the French psychoanalyst Françoise Dolto, it is a space for exchanging experiences, promoting autonomy and supporting children vulnerable to the effects of violence and crime. Since 2004, when the project started, 1,096 children have directly benefited from the programme.



Need to Feed the Need

Subsea 7's Kuala Lumpur office collaborated with Need to Feed the Need (NFN), a non-governmental organisation that runs a soup kitchen for the homeless and urban poor in Kuala Lumpur. The NFN organisation, which was established in 2013, operates solely on voluntary efforts and serves around 400 patrons, including 100 children, on average each week. Subsea 7 donated over 100 bags consisting of stationery, books, food and other items for children.



Legacy in Egypt – Supporting the Fishing Community

During the Giza-Fayoum and Raven (GFR) project in Egypt, Subsea 7 supported an NGO which managed a micro-financing project to provide loans to the Idku and Rashid fishing communities. The project was selected as part of our local development initiative to give something back to the two communities within the area where we executed the GFR landfall operations. We provided funds that were used to offer interest-free loans to fishing communities to enable them to buy fishing equipment, new marine engines, nets, and other such equipment.



Supporting local community through sport

Since 2011 Subsea 7 has promoted a project that provides swimming classes twice a week for the local community in Rio da Ostras, Brazil. In addition to swimming, environmental education is part of the programme. Aimed at transforming people's lives through sports and environmental awareness, the initiative included 265 participants in 2019. People from all ages benefit from this project that aims to improve their quality of life, health and wellbeing.



Responsible supply chain management



Why it is important

A significant part of our work is executed by our supply chain. In EPIC projects outsourced scopes can represent up to 50% of Subsea 7's revenue. We recognise that our supply chain plays an important part in our ambition to deliver our sustainability targets. Our aim is to co-operate closely with our suppliers to achieve a working relationship that benefits both parties. We expect our suppliers to have an approach to sustainability aligned with ours and to respect our values and working culture.

Our initiatives and projects

Subsea 7 has a Supplier Management System to assist and control the process of approving a new supplier and to monitor their progress. As part of the approval process any potential supplier is required to provide satisfactory information on a number of sustainability issues including business ethics, human rights and labour practices, health, safety and environment. The pre-qualification process can also include screening for legal and human slavery issues. The level of scrutiny to which suppliers are submitted may vary according to the region where the supplier operates.

To ensure a fair bidding process, Subsea 7 promotes open competition among approved suppliers. Bidders are treated fairly and evaluated according to their technical and commercial proposals. During the tender process our suppliers are requested to familiarise themselves with our Code of Conduct for Suppliers which are part of our contractual terms and conditions. Our Code of Conduct for Suppliers outlines our expectations regarding business ethics, human rights, health and safety among other topics. By signing a contract with us, they agree to work according to the principles described in this document.



Waste management and effluents



Why it is important

Subsea 7 is committed to minimising any impact it may cause on the environment. The waste produced in our offices and worksites is managed according to local or international regulations and internal policies and procedures are used to manage waste produced in our vessels.

Our initiatives and projects

Many of our offices have been built or upgraded to have better management systems that achieve superior environmental performance. Our corporate office in Sutton has light pollution mitigation with automated window blinds which limit disruption to the local bat population. It also has a rain water collection system which reduces our processed water use.



Data summary

The summary table below represents a range of key metrics associated with our sustainability topics.

Sustainability Priority	Definition	Measurement			
		Coverage	Unit	2018	2019
Health, safety and wellbeing	Total incident-free days	Group	days	336	337
	Total recordable incidents	Group	number	30	26
	Recordable incidents frequency rate per 200,000 hours worked	Group	rate	0.22	0.20
	Total lost time incidents	Group	number	6	3
	Lost time incident frequency rate per 200,000 hours worked	Group	rate	0.05	0.02
	Total fatal accidents	Group	number	0	0
	Fatal accidents frequency rate per 200,000 hours worked	Group	rate	0	0
	Total number of near miss reports	Group	number	305	231
	Total number of internal safety audits	Group	number	305	259
	Total number of supply chain audits	Group	number	101	137
	Proportion of our people said that Subsea 7 demonstrates care and concern for employees in the 2019 bi-annual Employee Opinion Survey	Group	%	*	81
Total days of health, safety and wellbeing training	Group	days	3,819	10,963	
Energy transition	Renewables business revenue	Group	million USD	**	198
	Cumulative number of offshore wind farm monopile foundations installed at year end	Group	number	498	518
	Cumulative number of offshore wind farm jacket foundations installed at year end	Group	number	140	140
	Cumulative number of wind turbine submarine array cables installed at year end	Group	number	457	510
	Cumulative length of wind turbine submarine array cables installed at year end	Group	km	1,264	1,495
	Cumulative number of offshore substations installed at year end	Group	number	30	32
Labour practices and human rights	Proportion of our people responded positively to being treated with respect as an individual in the 2019 bi-annual Employee Opinion Survey	Group	%	*	80
	Speak Up and other compliance and ethics cases logged relating to human rights	Group	number	0	0
	Speak Up and other compliance and ethics cases logged relating to labour concerns	Group	number	23	19
Business ethics	Number of employees who have completed compliance and ethics e-learning	Group	number	3,989	4,791
	Proportion of our people required to complete compliance and ethics e-learning	Group	%	36	40
	Speak Up and other compliance and ethics cases logged	Group	number	47	36
	Speak Up and other compliance and ethics cases logged per 1,000 employees	Group	rate	4.41	3.03

* Data obtained from Subsea 7 bi-annual survey – not available for 2018

** No data available

Sustainability Priority	Definition	Coverage	Measurement		
			Unit	2018	2019
Operational eco-efficiency	Scope 1 CO ₂ e emissions from Subsea 7 owned and managed vessels	Group	tonnes	384,542	366,671
	Scope 1 CO ₂ emissions from Subsea 7 owned and managed vessels	Group	tonnes	378,877	361,164
	NOx emissions from Subsea 7 owned and managed vessels	Group	tonnes	5,333	5,034
	SOx emissions from Subsea 7 owned and managed vessels	Group	tonnes	745	564
	Scope 3 CO ₂ e emitted from air miles travelled by our people for work	Group	tonnes	22,698	26,870
	Number of clean operations performed from Subsea 7 owned and managed vessels	Group	number	3,647	3,494
	Reduction in CO ₂ emissions by clean operations from Subsea 7 owned and managed vessels	Group	tonnes	15,089	19,560
	Operational cost savings due to clean operations from Subsea 7 owned and managed vessels	Group	million USD	3.1	4.1
	Fuel saved due to clean operations from Subsea 7 owned and managed vessels	Group	m ³	5,547	7,190
	Number of hybrid vessels within our fleet	Group	number	0	1
	Reduction in fuel consumption by hybrid vessels (estimated)	Group	%	0	19
Ecological impacts	Environmental incident frequency rate per 200,000 hours worked	Group	rate	0.64	0.82
	Environmental incident frequency rate per 200,000 hours worked for owned and managed vessels only	Group	rate	0.59	0.55
	Number of environmental spills	Group	number	90	105
	Amount of litres spilled per 200,000 hours worked	Group	rate	10.56	11.76
	Number of environmental spills for owned and managed vessels only	Group	number	35	33
	Amount of litres spilled per 200,000 hours worked for owned and managed vessels only	Group	rate	11.89	4.16
	Tonnes of hazardous waste from offshore operations for Subsea 7 owned and managed vessels	Group	tonnes	419	97
	Tonnes of non-hazardous waste from offshore operations for Subsea 7 owned and managed vessels	Group	tonnes	1037	791
	Local environmental initiatives undertaken	Group	number	**	15
Diversity and inclusion	Total number of Employees (as per 31st December)	Group	number	11,142	11,869
	Onshore Headcount	Group	number	5,201	6,422
	Offshore Headcount	Group	number	5,941	5,447
	% of male and female Company-wide, both onshore and offshore	Group	%	87 / 13	84 / 16
	% gender mix of male and female Company-wide	Group	%	M / F	M / F
	Onshore			33 / 12	38 / 15
	Offshore			54 / 1	46 / 1
	% of male and female onshore at leadership level:	Group	%	M / F	M / F
	Leadership (L+)			89 / 11	89 / 11
	Executive Team			83 / 17	75 / 25
	Board of Directors			100 / 0	88 / 12
	% nationality mix of people by region:	Group	%		
	Europe			46	56
	Asia/Pacific			17	17
Americas			23	23	
Other			14	4	
% of full-time and part-time	Group	%	97 / 3	96 / 4	

Report abbreviations

Term	Description
ABMS	Anti Bribery Management System
CO₂	Carbon Dioxide
EAP	Employee Assistance Programme
EPCI	Engineer, Procure, Construct, Install
EPIC	Engineer, Procure, Install, Commission
ESI	Environmental Ship Index
EU	European Union
GFR	Giza-Fayoum and Raven
GIS	Geographical Information System
GPS	Global Positioning System
GW	Gigawatts
HSEQ	Health, Safety, Environmental, Quality
IMO	International Maritime Organisation
km	Kilometres
kWh	Kilowatt hours
MCP	Malaria Control Programme
MW	Megawatts
NFN	Need to Feed the Need
NGO	Non-Governmental Organisation
NOx	Nitrogen Oxide
R&D	Research & Development
ROV	Remotely Operated Vehicle
SCM	Supply Chain Management
SCR	Selective Catalytic Reduction
SDGs	Sustainable Development Goals
SERPENT	Scientific and Environmental ROV Partnership using Existing Industrial Technology
SMS	Short Message Service
SOx	Sulphur Oxide
STEM	Science, Technology, Engineering, Mathematics
SVP	Senior Vice President
T&I	Transport and Install
UK	United Kingdom
UN	United Nations
US	United States

Subsea 7 is a global leader in the delivery of offshore projects and services for the evolving energy industry, creating sustainable value by being the industry's partner and employer of choice in delivering the efficient offshore solutions the world needs.

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