

## SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR SUBSEA7 FOR THE YEAR ENDED 31 DECEMBER 2024

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

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

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

### 1. RELEVANT INFORMATION ABOUT OUR ORGANISATION

#### *Our business and sector*

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

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

#### *Geographies*

Our people, onshore and offshore, can deliver solutions around the world. We have an established regional and local presence in all the major offshore energy regions worldwide, working across 36 countries. More details can be found at:

<https://www.subsea7.com/en/about-us/where-we-operate.html>

#### *Employees and Other Staff*

As of 31<sup>st</sup> December 2024, the number of personnel, including direct employees, agency and contract staff working for Subsea7 was:

Headcount	Onshore	Offshore	Grand Total
Direct Employee	6,971	2,593	9,564
Contractor/Third Party	2,234	3,274	5,508
<b>Grand Total</b>	<b>9,205</b>	<b>5,867</b>	<b>15,072</b>

### Supply Chain

Subsea7 has a very large and complex supply chain, comprising over 8,000 direct suppliers globally based in over 71 countries and many sub-suppliers. These suppliers provide a broad range of materials and services, ranging from non-operational, office- and site-based services such as cleaning and security, through the provision of agency staff for offshore work, to pipeline and fabrication, vessel fabrication, logistics, and a whole range of construction and fabrication services and material supplies.

## 2. RESPONDING TO THE MODERN SLAVERY ACT

In order to respond to the UK Modern Slavery Act, as well as to evolving regulatory and stakeholder requirements and expectations (including the Norwegian Transparency Act), over the last 9-10 years Subsea7 has developed and implemented a Human Rights Programme. This programme is designed to identify and manage the risks of modern slavery and human trafficking.

Our programme is summarised in this graphic:



More details about how our Human Rights Programme manages modern slavery and human trafficking risks, as well as other human rights risks, we have identified, are set out in section 4 below.

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

Modern slavery risks, and Human Rights risks in general can be significant, due to the type of work Subsea7's workforce and suppliers perform and the potential involvement of vulnerable, migrant workers from countries with lower human rights protections. Subsea7's objective is to ensure it has identified and assessed the risks and taken the correct steps to mitigate and guard against them.

#### *Risk Context*

Subsea7 works across the world in a range of countries and regions with varying risk levels. We also work with a wide range of suppliers of services and materials all with their own potential risks and challenges. For example, in 2024 30% of our suppliers by number and 24% by spend were based in countries considered medium-high or high-risk from a human rights and modern slavery perspective. In addition, in our own workforce, around a third of personnel are non-permanent employees, either as consultants or employed through labour agencies with their own terms and conditions and pay arrangements.

This means that our risk landscape is very dynamic and complex. However, there are themes that we have identified as areas where potential impacts could occur and so warrant closer consideration:

Human Rights and Labour Practices Salient Issues	Potential impact	Potentially impacted population
Use of labour agencies for our offshore operations	Poor labour practices by external labour agencies leading to delay in salary payments, identification documents being withheld, or improper management of work visas.	Non-permanent low-skilled workers
Support services at our offices, sites and vessels considered higher risk such as cleaning, catering, security etc.	Third party service providers having poor recruitment and/or employment practices leading to conditions akin to modern slavery	Low-paid / low-skilled workers, often migrant workers from higher-risk countries.
Supply of manufactured equipment containing raw materials with complex and/or opaque supply chains	Potentially severe modern slavery risks in the supply chain, such as forced labour, child labour and human trafficking during the extraction and processing of raw materials	Workers in high-risk material extraction and processing industries such as mining, scrap processing and smelting.
Vessel fabrication or dry-	Modern slavery risks in third	Largely migrant workers in

docking services for vessel maintenance	party dry dock or fabrication sites such as retention of identification documents, high recruitment fees and associated debt bondage, poor accommodation and lack of freedom to leave employment	heavy industry doing relatively low-skilled work
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#### 4. THE SUBSEA7 HUMAN RIGHTS PROGRAMME

The Subsea7 Group human rights programme is designed to:

- embed our Human Rights Policy Statement and the relevant aspects of our Code of Conduct; and
- identify and manage human rights risks across our own operations and within our supply chain, with a particular emphasis on the risks of the most egregious impacts, namely child labour, slavery and trafficking, and other forms of forced or involuntary labour; and thereby
- give effect to our commitments under the UN Global Compact and the ILO Standards in relation to child labour; and
- address existing and emerging stakeholder and regulatory expectations and requirements, such as the UK Modern Slavery Act, the Norwegian Transparency Act and applicable, forthcoming EU corporate sustainability due diligence laws.

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

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

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

##### **a) Top Level Commitment**

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

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

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

Managing slavery and trafficking and other human rights risks is a management accountability, but Human Resources and Supply Chain Management are two functions with key roles to play.

Our efforts are led by the CECO, who has overall responsibility for the design of the programme. In addition, during 2024 we continued to build a network of human rights “champions”, whose role it is to help local and regional management understand and fulfil their accountability, and to provide subject matter expertise and guidance.

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

## **b) Risk Assessment and Due Diligence**

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

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

Suppliers deemed to be high-risk must complete a human rights due diligence questionnaire; whereas those considered medium-risk complete a short-form risk assessment questionnaire, designed to validate whether they need to complete the full questionnaire. These questionnaires were enhanced and rolled out in 2022 and have continued in development during the last 2 years. All medium- and high-risk suppliers also undergo due diligence screening (via our third-party risk assessment and due diligence platform).

Significant progress was made during 2024, with over 1,584 suppliers assessed, including 112 high-risk suppliers from a Human Rights perspective. Two suppliers were prohibited from use because of our Human Rights risk assessment and due diligence process. In addition, we updated our process to require certain suppliers to provide an annual human rights certification. These suppliers include labour agencies and other suppliers that are likely to utilise vulnerable migrant workers from high-risk countries.

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

To this end, during 2024, we conducted a risk mapping exercise in conjunction with GoodCorporation™, looking at risks in 5 of our biggest and most important supply chain categories: Fabrication, Umbilicals and flexibles, Linepipe, Valves and forged products, and Vessel dry-docking. We spoke with category managers for each of the categories, suppliers, on-site inspectors and other experts with knowledge of the products and services in each category. The risk-mapping exercise was a preliminary exploration of some of the potential issues, but it confirmed a number of assumptions:

- Modern slavery risks are increasingly likely the farther down the supply chain you go, with raw material extraction, material processing and subcontracted labour agencies potentially being of high risk.
- High-risk activities in the supply chain can exist even under low-risk direct suppliers.
- Common supply chains support many of our critical categories, such as scrap steel processing, and so warrant further investigation.

A number of recommendations were made following the completion of the project which have been included in our 3-year road map.

### **c) Human Rights Policy Statement and Other Policies**

Our Human Rights Programme is underpinned by our Human Rights Policy Statement and Code of Conduct. Both documents have been adopted by the Board of Directors of Subsea 7 S.A. and are regularly reviewed and updated. The Human Rights Policy Statement, which was updated in 2023, is one of our three highest level policy statements. It sits alongside our Ethics Policy Statement and HSEQ Policy Statement, and all three statements are displayed prominently at our offices and sites.

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

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

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

#### *Code of Conduct*

The Subsea7 Code of Conduct (the Code) is applicable to all personnel working for and on behalf of Subsea7 globally, including direct employees and agency and contract staff. The Code sets out our commitment to conducting business fairly and ethically, including by treating our employees, clients, contractors and suppliers fairly and with respect. It also provides guidance on how to ensure we uphold our commitments. Enhancements to the Code when it was refreshed in 2019 included more prominent and engaging sections on human trafficking, forced labour and other human rights abuses.

All Subsea7 direct employees are required to sign up to the Code of Conduct on joining the business. They also take an e-learning module on the Code of Conduct.

### *Code of Conduct for Suppliers*

The Subsea7 Code of Conduct for Suppliers is incorporated into our standard terms and conditions for suppliers and was revised in 2020. It includes mutual commitments to:

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

### **d) Communication, Education and Training**

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

We continue to train and raise awareness among those in key leadership and functional roles who need to be able to help identify and manage human rights risks. During 2024 around 80 additional managers participated in formal human rights training, and many more have attended team-specific training, which varied from short summary presentations at team meetings to 90 minute, deep-dive sessions into managing labour agencies.

Our network of Human Rights Champions is maturing, and they have become focal points for project tenders, requests for information and supporting local actions in the offices. An example is a short series of podcasts produced by a region, where they interviewed the Group's Human Rights Manager and discussed how everyone can play their role.

The combination of the above training and the risk assessment work referred to in section 4b above also helped inform our Ethics Committee-approved strategy for managing human rights risks, which it was agreed would prioritise child labour, slavery, trafficking and other forms of forced or involuntary labour. It was agreed that these would be red lines, such that we would not tolerate breaches within our own operations or our supply chain, nor work with suppliers that cannot demonstrate that they are complying with the relevant International Labour Organisation or local law standards.

### **e) Speak Up Channels and Culture, and Grievance Procedures**



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

If individuals working for us (whether as employees or contract staff) have a grievance about unfair labour practices, they are encouraged to use local grievance procedures, which are widely communicated and available to all our staff. In 2023 we launched a Global Grievance Procedure, which was designed to help ensure alignment of local grievance procedures, to the extent appropriate.

#### **f) Procedures and Controls**

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

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

When engaging with our suppliers, typically through a competitive tender process, we emphasise Subsea7's zero tolerance for the most egregious human rights risks, namely: child labour, modern slavery and trafficking and other forms of forced or involuntary labour. These standards are outlined in our Code of Conduct for Suppliers and are incorporated into our standard contract terms and conditions with suppliers. Any breach of these human rights commitments, as specified in our terms and conditions, is considered a material breach of contract, granting Subsea7 the right to terminate the contract for default. During 2024, no supplier contracts were terminated due to breaches of human rights commitments

#### **g) Investigations, Remediation and Enforcement**

All allegations received via SafeCall, or internal channels are reported to the CECO, who logs them on a case management system and oversees their investigation by appropriately independent managers, in accordance with the Group Compliance and Ethics Investigations Principles and Procedure. The table below shows the cases investigated and substantiated during the year ended 31 December 2024;

Case Type	Total Cases	Substantiated Cases
Human Rights	1	0
Discrimination	4	0
Sexual harassment	4	2
Other bullying or harassment	11	2
Equal opportunities and diversity	2	0
<b>Total</b>	<b>22</b>	<b>4</b>

None of the above cases presented a severe human rights impact. Of the 4 cases that were substantiated, the sanctions and remedial steps that were applied included: 1 dismissal, 1 written warning and 2 oral warnings.

If Subsea7 received reports of concerns regarding slavery or human trafficking in our operations or our supply chain, we would undertake an urgent, thorough investigation into the concerns raised under the supervision of the CECO and, potentially, the Ethics Committee. If the investigation confirmed the concerns, we would put in place robust action plans to address the issue and protect the victims.

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

Grievances are handled in accordance with the Global grievance procedure, as mentioned in section 4e above.

## h) Monitoring, Auditing and Assurance

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

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

As our programme matures, our human rights programme will be included within the scope of our Internal Audit function's work. We will also aim to develop efficient, cost-effective methods of obtaining a greater degree of assurance from high-risk suppliers that they have implemented the prescribed procedures to manage the potential human rights risks we have identified. Such

methods would include monitoring, virtual and in-person audits, as well as evidence that the = supplier has been audited by a credible, independent assurance provider.

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

[2024 Annual Report](#)

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

- Maintaining our target of 100% of relevant employees trained on human rights, including new relevant joiners to the company.
- 90% of our high-risk suppliers undergoing enhanced human rights risk assessments by end 2025.
- 100% of our workforce covered by a human rights risk assessment within the last three years.

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

## 5. SPECIFIC STEPS TAKEN DURING THE YEAR ENDED 31 DECEMBER 2024

For ease of reference, specific steps taken by Subsea7 during the year ended 31 December 2024 to address the risk of slavery and human trafficking taking place within our own operations and supply chains, as already mentioned above, include:

- Continuing to assess our high-risk suppliers with full Human Rights due diligence questionnaires, completing 112 in 2024.
- The continued implementation of the enhanced risk assessments of our own operations and of our suppliers mentioned in section 4b above.
- The continued roll-out of the human rights training workshop for a targeted audience, mentioned in section 4d above.
- The addition of a Human Rights scenario into our annual Global Code of Conduct e-learning.
- Continuing to develop our internal Human Rights Champions network through calls, awareness and collaborative working.
- Completion of a supply chain risk mapping project on 5 of our most important procurement categories with GoodCorporation™.
- Presenting EU Corporate Sustainability Reporting Directive (CSRD) disclosures on labour practices and human rights in our annual report.

We will provide annual updates to this statement.

**Signed by**

**John Evans**  
**Chief Executive Officer, Subsea7**  
**12<sup>th</sup> May 2025**

## APPENDIX

Members of the Subsea7 Group<sup>1</sup> that carry on business or part of a business in the UK and had an annual turnover for the financial year ended 31 December 2024 of £36 million or more:

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

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<sup>1</sup> The entities marked with an asterisk were, in 2024, wholly-owned subsidiaries of Seaway7 ASA, which is wholly-owned by Subsea7.