

MODERN SLAVERY STATEMENT FOR THE YEAR ENDED 30TH JUNE 2023

Subsea7 Australia Contracting's (Subsea7) Modern Slavery Statement sets out the steps Subsea7 has taken to address the risk of slavery and human trafficking taking place within its own operations and supply chain.

Modern Slavery describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Practices that can constitute modern slavery can include:

- Human trafficking
- Slavery
- Servitude
- Forced labour
- Debt bondage
- Forced marriage, and
- The worst forms of child labour.

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 expertise across three operational business units: SURF and Conventional; Life of Field and Renewables. Through these business units we are able to provide full energy lifecycle services.

More details about our business can be found at:

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

Geographies

Subsea7 performs services and operates all over the world. More details can be found at:

<https://www.subsea7.com/en/our-business/where-we-operate.html>

Subsea7's Australia and New Zealand operations are headquartered in Perth, Western Australia.

Employees and Other Staff

Subsea7 has employed an average of 68 permanent employees and indirectly employed an average of 40 contractors in Australia for the period 1 July 2022 to 30 June 2023.

Employees and contractors are engaged under individual common law contracts of employment in accordance with the Fair Work Act and National Employment Standards. Wages and conditions exceed the provisions of relevant Modern Awards.

Supply Chain

Subsea7 has a very large and complex global supply chain, comprising nearly 8,200 direct suppliers based in over 84 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.

EXISTING POLICIES AND PROCEDURES IN RELATION TO MODERN SLAVERY

Human Rights Policy Statement

As part of our global response to the Modern Slavery Act, we developed a Human Rights policy, to pull together our existing policies, procedures and commitments under one coherent human rights policy and program and ensure that modern slavery and human trafficking risks are more explicitly addressed. In 2018 this policy statement was launched across Subsea7. This 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.

There is an online training module on the Human Rights Policy Statements which is a mandatory training module for all employees.

In Q4 2022 Subsea7's Global Chief Ethics Compliance Officer ran several Human Rights Workshops for supply chain, human resources and management and leadership teams. These workshops went through UN Guiding Principles on Business and Human Rights, OECD Due Diligence Guidance for Responsible Business Conduct, Responsible Worker Welfare Principles and Corporate Human Rights Benchmarks. 500 people in our global organization attended these workshops.

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. It was refreshed in 2019. Enhancements to the Code of Conduct 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. There is an online training module on the Code of Conduct which is a mandatory training module for all employees.

Code of Conduct for Suppliers

The Subsea7 Code of Conduct for Suppliers is incorporated into our standard terms and conditions for suppliers and was refreshed in 2019. 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 Subsea7 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.

Supply Chain Management Procedures

We have robust pre-qualification procedures for our direct suppliers, and for suppliers from high-risk countries this includes a risk screening and due diligence process. They 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.

If we became aware of slavery or human trafficking concerns within our supply chain, we would seek to work with the relevant suppliers to improve conditions for their workforce. We would reserve the right to deselect suppliers if they were to fail to make the required improvements within a reasonable timeframe.

Speak Up Policy

Subsea7 staff and suppliers are encouraged to raise concerns about behaviour inconsistent with the above commitments. We have a whistle-blowing policy, which was revised in 2019 to provide more information about the whole process, including how to raise a concern, how the case will be handled, and how the person speaking up will be protected. We renamed it as the Speak Up Policy, to make it more engaging and help avoid any stigma associated with the term "whistle-blowing", which might discourage people from coming forward. We have an externally managed Safecall confidential reporting line, as well as other channels for raising concerns, all of which are widely communicated. We also have procedures for investigating concerns reported via these channels.

To date, Subsea7 has received no reports of concerns regarding slavery or human trafficking in our operations (including our supply chain). If any such issues were reported to us, we would undertake an urgent, thorough investigation into the concerns raised under the supervision of the Executive Ethics Committee. If the investigation confirmed the concerns, we would put in place robust action plans to address the issue and protect the victims.

In 2022 Subsea7's global Compliance and Ethics mandatory training module was focused on our Speak Up Policy and provided insightful examples for how to speak up in different situations. 100% of the global workforce completed this training module.

RESPONDING TO THE MODERN SLAVERY ACT

At the direction of the Global Executive Ethics Committee, Subsea7 established a cross-functional working group, under the sponsorship of the Executive Director of Human Resources and the General Counsel, to assess and respond to the requirements of the Modern Slavery Act 2018, as well as other global Modern Slavery legislation.

In 2017 we engaged GoodCorporation to provide independent, expert advice, and to help us deliver training and design and perform a risk assessment. GoodCorporation is a firm that specialises in helping organisations to assess and manage corporate responsibility and business ethics risks, including human rights and corruption risks.

We:

- Developed a human rights and modern slavery compliance clause for insertion in contracts with suppliers.
- Developed human rights and modern slavery questions for insertion in our supplier due diligence questionnaire.
- Included human rights and adverse media alerts in the tool that we use to screen medium- and high-risk suppliers.
- With help from GoodCorporation and input from key stakeholders across our business and most of our key geographies, conducted a risk assessment to help us identify categories of staff and supplier that might constitute a higher modern slavery risk. This risk assessment included direct suppliers to Subsea7, and it also considered where risks might exist further down the supply-chain.

In 2019 Subsea7 became signatories of the UN Global Compact in which the United Nations set out principles covering human rights, labour, environment and anti-corruption. This marked our commitment to fair and lawful employment practices across our Company and throughout our supply chain.

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

The modern slavery risks within our own workforce are generally perceived to be low, but the risks cannot be ignored, and we need to do more work to be sure that we have assessed the risks correctly and have taken the right steps to mitigate or guard against them.

An Internal Human Rights Risk Assessment for the Australian business is conducted annually, with the most recent assessment being completed in November 2022. This assessment covered the following areas:

- Migrant workers;
- Child labour;
- Terms and conditions;
- Recruitment and induction; and
- Labour suppliers.

This was performed by the Legal Director, Vice President Australia & New Zealand and the Australian business unit management team. This risk assessment did not identify any risks that were a red category in the Australian business.

Despite the above, staff sourced from external agencies to work in our offshore operations may represent a risk, especially where those agencies are based in, or source people from high-risk countries. Suppliers that manage staff working on Subsea7 sites to provide certain services, such as catering, security, cleaning etc. may be relatively high risk, even in countries considered low risk.

As our approach to identifying and managing modern slavery risk matures, we will take a more granular approach, including identifying countries and supplier categories that present a lower corruption risk but a higher modern slavery risk and may thus warrant special treatment.

Although we cannot ignore risks further down our supply chain, in the short term we continue to prioritise our direct suppliers, and suppliers and categories of supply that represent significant areas of expenditure.

ASSESSING THE EFFECTIVENESS OF OUR ACTIONS TO MANAGE MODERN SLAVERY RISKS

Our Human Rights Programme will be effective if it is well implemented. That's why, first, we will monitor the effective implementation of our programme through a dashboard that is designed to identify the progress made in implementing the programme, required actions and ways of improvement that are, are being or need to be implemented. This is a company-wide objective for 2023.

We also follow the progress of our actions related to human rights through a set of key performance indicators that are updated annually and published in the Subsea7 Group Sustainability Report, for instance:

- o proportion of our workforce covered by a human rights risk assessment
- o number of high-risk suppliers undergoing human rights risk assessment
- o percentage of relevant employees trained on human rights.

Finally, and more specifically, we assess the effectiveness of our actions using indicators such as (these are given as examples):

- o the number of cases raised via Subsea7's confidential reporting line (Safecall) which relate to human rights;
- o the number of disqualified suppliers for non-compliance with our human rights requirements following the assessment of their responses to our due diligence questionnaire on human rights (low score, red flag questions responded 'wrongly', lack of justification or clarification).
- o the number of remedial action plans performed by suppliers following the assessment of their responses to our due diligence questionnaire on human rights (this is done to help our suppliers get a better score to the questionnaire and ultimately improve their position towards human rights).

This statement will be revised annually. This statement was approved by the Board of Subsea7 Australia Contracting on 02/06/2023.



Christopher Ratajczak
Public Officer
Vice President, Australia & New Zealand
02/06/2023

