

SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR SEAWAY 7 FOR THE YEAR ENDED 31 DECEMBER 2021

Seaway 7's Slavery and Human Trafficking Statement sets out the steps Seaway 7 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 Seaway 7 Group, including those members of the Group listed in the Appendix. Seaway 7 is 72% owned by Subsea 7 S.A. and operates under the same policies and procedures as its primary shareholder.

A. RELEVANT INFORMATION ABOUT OUR ORGANISATION

Our business and sector

Seaway 7's offshore experience in the energy sector spans three decades, successfully completing over 30 projects and transferring offshore knowledge gained in the oil and gas industry to support the energy transition and offshore fixed wind market. Seaway 7 has been active in the offshore Renewables Energy industry since 2009, when we installed our first Wind Turbine Generator (WTG) monopile foundation offshore in the UK and has since built an industry-leading track record in installing WTG foundations, substations and inner array cables for many of the key offshore wind developers in Europe, Taiwan and the US. More details about our business can be found at:

<https://www.seaway7.com/our-services/>

Geographies

Our people, onshore and offshore deliver solutions around the world. We have an established regional and local presence in many major offshore energy regions worldwide, working across 13 countries. More details can be found at:

<https://www.seaway7.com/about-us/where-we-operate/>

Employees and Other Staff

As at 31 December 2021, the number of personnel, including direct employees, agency and contract staff working for Seaway 7 was:

Headcount	Onshore	Offshore	Grand Total
Direct Employee	469	0	469
Contractor/Third Party	124	0	124
Grand Total	593	0	593

*offshore workforce are employed indirectly and are not reflected in the numbers above

Supply Chain

Seaway 7 has a very large and complex supply chain, comprising 806 direct suppliers based in 32 countries in 2021, 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.

B. EXISTING POLICIES AND PROCEDURES IN RELATION TO MODERN SLAVERY

Human Rights Policy Statement

As part of our response to the Modern Slavery Act, we developed a Group-wide Human Rights policy, to pull together our existing policies, procedures and commitments under one coherent human rights policy and programme and ensure that modern slavery and human trafficking risks are more explicitly addressed. In 2021 this policy statement was launched across Seaway 7. 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.

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.seaway7.com/labour-practices-and-human-rights/>

<https://www.seaway7.com/about-us/business-ethics/>

Code of Conduct

The Seaway 7 Code of Conduct (the Code) is applicable to all personnel working for and on behalf of Seaway 7 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 adopted in 2021. It includes prominent and engaging sections on human trafficking, forced labour and other human rights abuses.

All Seaway 7 direct employees are required to sign up to the Code of Conduct on joining the business.

Code of Conduct for Suppliers

The Seaway 7 Code of Conduct for Suppliers is incorporated into our standard terms and conditions for suppliers and was adopted in 2021. 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 Seaway 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.

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

Seaway 7 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, Seaway 7 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.

C. RESPONDING TO THE MODERN SLAVERY ACT

In 2019 Subsea 7 became signatories to the UN Global Compact, in which the United Nations set out principles covering human rights, labour, environment and anti-corruption. This marked another milestone in its commitment to fair and lawful employment practices across the company and throughout its supply chain. Subsea 7 also signed and committed to supporting the 10 Worker Welfare Principles set out by the Building Responsibly organisation, a global business-led coalition committed to promoting the rights and welfare of workers across the Engineering and Construction industry.

In 2021 Subsea 7 participated in several of the Building Responsibly working groups to help develop training and due diligence tools. In 2019 Subsea 7 established a new ‘Sustainability’ Value that specifically focuses on environmental and societal behaviours and defines Human Rights & Labour Practices as one of the 6 priorities. Seaway 7 has the same set of values and Sustainability priorities.

Subsea 7 formed a Working Group with senior leaders from functions across the company who set the strategic direction for providing working conditions aligned with international best practice with respect to human rights and labour practices. In 2020, as part of its focus on Human Rights and Labour Practices, Subsea 7 developed a three-year roadmap for embedding the principles of Building Responsibly and the UN Global Compact into the ways in which it already respected and protected human rights of all personnel working for and on behalf of Subsea 7 globally, including direct employees and agency and contract staff of Subsea 7 and of legacy Seaway 7 companies. In addition, Subsea 7 enhanced its risk assessment process to embed these principles and support a review of its global operations to identify any high-risk areas. Further details can be found here: <https://www.subsea7.com/en/sustainability/our-priorities-and-focus-areas/labour-practices-and-human-rights.html> including of relevance to slavery and trafficking the following targets:

- 100% Relevant employees trained on human rights by 2025 (50% by 2022)
- 90% High-risk suppliers undergoing enhanced human rights risk assessments by 2025 (25% by 2022)

- 90% Proportion of our workforce covered by a human rights risk assessment within the last three years by 2022.

Further action in 2021 included implementation of an enhanced third-party risk assessment and due diligence platform, which will help process all high-and medium-risk suppliers and other third parties. It includes business ethics and human rights risk assessment and due diligence screening, automated due diligence questionnaires, and approval workflow.

Also in 2021, Subsea 7 worked with GoodCorporation to develop human rights training materials which were used for a workshop with its Ethics Committee, of which the Seaway 7 CEO is a member, and will be used to train target audiences in 2022. Those target audiences comprise, initially, regional and business unit management teams and other most senior managers, and certain roles within HR and SCM.

The above training also helped inform the Subsea 7 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 the company would not tolerate breaches within its own operations or its supply chain, nor work with suppliers that cannot demonstrate that they are complying with the relevant International Labour Organisation or local law standards.

To support the three-year road map and track progress against the focus on Human Rights and Labour Practices, including Modern Slavery and Human Trafficking, KPI's were developed and are presented in our Sustainability Report on an annual basis and can be found here:

<https://www.seaway7.com/investors/results-reports-publications/>

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. We will add further KPI's as we progress through our three-year road map.

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

Our risk assessment process continues to evolve and mature. In 2021 we reviewed various risk assessment and due diligence tools available in our sector, and we will use the insights gained to help us design a tailored tool, which will be used for risk assessing our own operations in the first half of 2022. Those insights also informed a new human rights due diligence questionnaire for high-risk suppliers, which we started to develop in 2021 and will roll out in 2022.

Our risk assessment process has already confirmed that some of our initial assumptions and areas of focus are appropriate, namely:

- 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.
- 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 and/or when those migrant workers are performing relatively low-skilled/low-paid work.
 - Similarly, suppliers that manage staff working on our sites to provide certain services, such as catering, security, cleaning etc. may be relatively high risk, even in countries considered low risk.

- Suppliers of certain materials tend to be higher risk than many of our suppliers of services, as they may have long, opaque supply chains, which are much harder to assess and gain assurance about.
- Vessel fabrication services is a category that warrants careful assessment and scrutiny, as such services can involve tough working conditions, subcontracting of work and a complex supply chain, and they represent a very significant amount of expenditure by the company.
- The map of countries that are considered medium or high risk from a modern slavery perspective correlate to a significant extent with the Transparency International Corruption Perceptions Index, on the basis of which our supply chain management procedures already categorise suppliers as high- or medium-risk. This substantial correlation has made it easier for us to integrate slavery and human trafficking risk assessment (including due diligence questionnaires and online screening) and risk mitigation steps into what is a mature suite of supply chain management procedures. 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.
- To this end, in 2021 we subscribed to the Verisk Maplecroft human rights risk indices, which we have used to provide a more granular and reliable human rights risk tiering of the countries in which we or our suppliers operate. In 2022, this risk tiering will:
 - be integrated into our supply chain risk assessment and due diligence procedures; and
 - inform our risk assessment of our own sites, vessel and operations.
- Over two thirds of the 71 countries in which our suppliers are based are considered medium-high or high-risk from a human rights and modern slavery perspective.
- 71% of our suppliers by number and 30% by spend are based in countries considered medium-high or high-risk from a human rights and modern slavery perspective.
- Although we cannot ignore risks further down our supply chain, in the short term we continue to prioritise our direct suppliers, and also suppliers and categories of supply that represent significant areas of expenditure.

As our programme develops, we will provide further updates to this statement.



Stuart Fitzgerald
Chief Executive Officer, Seaway 7
6th July 2022

APPENDIX

Members of the Seaway 7 Group that carry on business or part of a business in the UK and had an annual turnover for the financial year ended 31 December 2021 of £36 million or more:

- SHL Offshore Contractors B.V.
- SHL Contracting UK Limited
- Seaway Offshore Cables GmbH