



# Sustainability Report 2019

Creating a tomorrow  
better than today.



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# Introduction

## Message from the Managing Director



### Welcome to Attollo Offshore's 2019 Sustainability Report.

As a leading offshore marine operator, with unrivalled expertise in the demands and challenges of marine assets required for offshore operations, we strive towards continual improvement and maintain the challenging of convention in order to achieve smarter

operations and better results offshore. We strongly believe that optimising our resources and minimising our energy usage is fundamental to our operations and, thus, have placed much focus this past year on taking action towards responsible and effective methods for energy use while providing a service that further lowers our carbon footprint.

Furthermore, we are committed to sustainability and involvement in leading the business to achieve the company's vision and strategy.

In my five years as Managing Director, I have continually worked towards the aim of being one of the leading, most admired companies in our industry. Going forward, we aim to lead the agenda on the future of marine operations in a zero-carbon future.

We have supported offshore energy projects across the world and we are proud to have contributed to the successful completion of major offshore wind projects that are tackling climate change. We inspire to create an environment where individuals and companies collaborate to deliver extraordinary cost-effective solutions to our clients, to reduce the cost of offshore services and increase return on investment. Regarding sustainability, we are committed to running a safe, fair and resourceful business to ensure that Attollo continually maintains a constructive and fair contribution to local communities and wider society, whilst maintaining continual improvement and support towards the UN Global Compact initiatives and principles.

We continue to support local communities through engagement, with a clear vision of contributing towards local community development and initiatives.

Within our 2019 Sustainability Report, we will detail the actions we have taken and are continuing to take in order to operate safely, reduce our environmental footprint and work closely and fairly with the community and our stakeholders. In an industry that is continually developing and changing, we recognise that maintaining sustainability as the constant foundation of our approach to doing business is paramount to Attollo Offshore's success and adequate contribution.



**Ben Moore**  
Managing Director

## What We Aim to Achieve

Our Sustainability Report sets out our objectives and achievements towards playing a positive role in communities and, as UN Global Compact participants, we have incorporated the UNGC Principles into our strategies, policies and procedures, while establishing an integrity culture upholding our basic responsibilities to people and the planet, setting the stage for long-term success.

Attollo Offshore is committed to achieving the highest level of HSEQ, operational and corporate sustainability initiatives and standards, ensuring that we operate responsibly, support local and wider societal rights and contribute towards fighting corruption, labour discrimination, climate change and the strengthening of society and protection of human rights.

## Our Contributions

Our contributions are detailed within this report and include how Attollo Offshore participates in achieving corporate sustainability and playing a constructive part in society. We continually work towards ensuring that our operations focus on working with local communities, in a safe and fair manner and that our environmental footprint is reduced.

During 2019, it became clear to everyone at Attollo Offshore that we wanted to make an even greater contribution towards the lowering of carbon emissions from our operations, which led to us creating a long-term goal of achieving net zero. We believe that, with the hard work of our teams and with collaboration with different industries, we can achieve this goal, having a positive impact on the offshore environment while still bringing low costs and efficient services to our clients.



# Smarter Operations. Better Results.





# ABOUT ATTOLLO OFFSHORE

## Attollo Offshore’s Main Functions and Goals

By embracing advancement, innovation and modern technology, Attollo Offshore believes that it can bring a real and long-lasting impact to the economic viability of offshore energy whilst operating safely and without harm to people, assets and the environment. Safety is a priority within Attollo Offshore’s operations whereby we maintain a “Goal Zero” approach and strive towards ensuring maintenance of our principled approach to doing business in accordance with the UN Global Compact initiatives.

During 2019, Attollo Offshore further developed its Business Management System in such a way that it is now region-specific and has always been aligned, compatible and certified under ISO and OHSAS standards, including 9001, 14001 & 45001. This new region-specific Business Management structure was put in place to facilitate our continued international growth and allows for the

application of documentation, legislation and standards to comply with the specific regional requirements where operations are being conducted. The Business Management System’s overarching Policies, Standards and Objectives furthermore reflect our company values, which are applied throughout the organisation and in alliance with the UN Global Compact Principles and our Code of Business.

The Business Management System’s framework comprises of four fundamentals and 10 elements which incorporate processes for continual improvement, risk assessment, compliance with legal and regulatory requirements, training and performance, and the objectives are implemented in all that we do and are proven through our HSEQ and Operational Performance, which will be detailed further in this report.

The 4 fundamentals consist of: **Implementation, Leadership, Risk Management and Continual Improvement:**

- 1 **Implementation:** Effective implementation is essential to the success of Attollo Offshore and our Business Management System. Effective implementation requires a shared commitment to carry out work safely, responsibly and in conformance with plans and procedures. It is reliant upon all 4 fundamentals to ensure that the elements and expectations of the Business Management system are delivered effectively.
- 2 **Leadership:** The effective leadership of Attollo Offshore demonstrates integrity, open communication and the fostering of an environment where people can provide feedback. Everyone at Attollo is responsible for ensuring that the system is effective and recognises opportunities to demonstrate leadership at whatever level of the organisation.
- 3 **Risk Management:** Risk management is about eliminating the negatives and enhancing the positives. Attollo Offshore’s business has hazards and risk inherent in its activities; however, by using a standardised approach to risk management, on which is applied consistently across all our business, this allows us to reduce risk to as low as reasonably practicable (ALARP) and realise new opportunities. Risk management is an integral part of our processes and is central to decision-making at Attollo Offshore, explicitly addressing uncertainty to protect the firm, our people and create value. At Attollo Offshore, it is recognised that it is not possible to eliminate or avoid risk entirely, but it is expected that reasonable measures be taken to reduce and/or mitigate risk to a reasonable level.

- 4 **Continual Improvement:** The concept of achieving continual improvement through a logical sequence of repeated steps is fundamental to our business. We utilise the ‘Plan-Do-Check-Act’ cycle (PDCA) which starts with careful planning, followed by controlled execution, which is monitored for effectiveness, leading to the inclusion of improvement actions with further planning in a continual cycle. The PDCA cycle guards against complacency and the success of this cycle relies on the commitment of the team at Attollo Offshore to integrate the PDCA cycle into their routines to manage business activities.

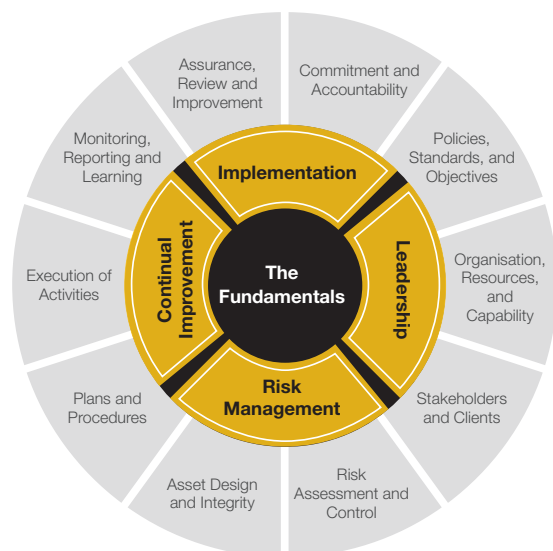


Figure 1 Attollo Fundamentals and Key Elements

The 10 elements consist of: **Commitment and Accountability; Policies, Standards, and Objectives; Organisation, Resources and Capability; Stakeholders and Clients; Risk Assessment and Control; Asset Design and Integrity; Plans and Procedures; Execution of Activities; Monitoring, Reporting and Learning; Assurance, Review and Improvement.**



# Attollo Offshore takes being a responsible marine operator seriously.





# ABOUT OUR SUSTAINABILITY VISION AND STRATEGY

Attollo Offshore's sustainability starts with our organisation's core values and a principled approach to doing business. By operating in this way, we meet our fundamental responsibilities in the areas of human rights, labour, environment and anti-corruption. With our values and principles, we know that good practices in one area must not offset harm in another.

Under The UN Global Compact Ten Principles which include Human Rights, Labour, Environment and Anti-Corruption, businesses should:











	<b>Principle 1</b>	<i>support and respect the protection of internationally proclaimed human rights;</i>
	<b>Principle 2</b>	<i>make sure that they are not complicit in human rights abuses.</i>
	<b>Principle 3</b>	<i>uphold the freedom of association and the effective recognition of the right to collective bargaining;</i>
	<b>Principle 4</b>	<i>ensure the elimination of all forms of forced and compulsory labour;</i>
	<b>Principle 5</b>	<i>ensure the effective abolition of child labour;</i>
	<b>Principle 6</b>	<i>ensure the elimination of discrimination in respect of employment and occupation.</i>
	<b>Principle 7</b>	<i>support a precautionary approach to environmental challenges;</i>
	<b>Principle 8</b>	<i>undertake initiatives to promote greater environmental responsibility;</i>
	<b>Principle 9</b>	<i>encourage the development and diffusion of environmentally friendly technologies.</i>
	<b>Principle 10</b>	<i>work against corruption in all its forms, including extortion and bribery.</i>

Figure 2 UNGC Ten Principles

Our responsibilities towards looking after the ten principles under the UN Global Compact Human Rights, Labour, Environment and Anti-Corruption fundamentals are incorporated into our strategies, policies and procedures and we realise our responsibility towards playing a part in tackling some of the world's biggest sustainability challenges.





The 17 Sustainable Development Goals as implemented by the UN Global Compact are incorporated into our management system; however, we have selected the below goals where we concluded that we can make the most contribution:



### Good Health and Well Being

Attollo Offshore recognises that the success of everything we do relies on the health, safety and wellbeing of our workplace and our people. Our processes and procedures are implemented to ensure that personnel work in a safe and healthy environment that does not exhaust our personnel resources and we are committed to a work environment that is free of discrimination, harassment, bullying and planning towards a healthy workforce and working environment which will create lasting and continuous improvement in health management.



### Gender Equality

Here at Attollo Offshore, we recognise that gender equality is a fundamental human right. Our procedures and processes identify our requirement to treat people fairly, and that we will not discriminate on the grounds of gender, and we furthermore ensure that we provide adequate training in equal opportunities to people likely to be involved in recruitment or other decision-making where equal opportunities issues are likely to arise.



### Decent Work and Economic Growth

Attollo Offshore dedicates itself to upholding adequate labour standards across its operations and assets. We recognise that all personnel have the right to work in decent working conditions and, as such, we plan our work activities to ensure that hazardous working environments are adequately assessed, the risks are mitigated, the health, safety and welfare of our people are not compromised, equal opportunities remain constant and individuals have the freedom to express any concerns within the workplace.

We embrace diversity and ensure that our processes and strategies focus on the achievement of non-discrimination and, furthermore, strive to ensure that we continually improve our work practices to ensure continuous job satisfaction, economic growth and the ever-growing birth of innovation.



### Climate Action

We are committed to ensuring that our operations are planned in such a way that maintains the highest standards of environmental preservation and protection and the highest level in reduction of emissions. We strive to achieve this through our core business strategies and by pro-actively working with all our employees, clients, contractors, public, government authorities and interested parties and by through the implementation of our policy and procedural commitments to improve performance and demonstration of conformity with the ISO 14001 Environmental Management System standard to which we are certified.

During 2019, Attollo Offshore began to further explore low carbon sources of energy offshore as a key objective for the forthcoming years, which will include the execution of emission reduction initiatives.



Figure 3 UNGC Sustainable Development Goals

Our sustainability strategy is reviewed each year at our management review, referencing the UN Global Compact’s Ten Principles. These are derived from: The Universal Declaration of Human Rights, the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention Against Corruption.

Our sustainability strategy, policies and procedures support good business and industry practice and ensure that we meet or exceed the applicable laws and external requirements.



## STRATEGY AND VISION

Sustainability is a key element to Attollo Offshore’s values and forms an integral part of our business strategy. Sustainable Development is an approach adopted by Attollo Offshore and sustainability is deemed to be a significant contributor to the company’s success, future development and creating long-term value.

Attollo Offshore recognises the UN’s Sustainable Development goals and seeks to align its operations to meet these universally accepted principles whether our supplier are signatories or not.

Attollo Offshore’s visions are captured within its Code of Business which defines the company’s responsibilities to our Clients, Colleagues and Communities and outlines the principles expected of our people to achieve our vision.

We aim to tackle the most pressing issues and escalating costs currently facing the offshore energy industry in mature areas whilst ensuring our principles and those of the UNGC are never compromised and always maintained. If successful, we could contribute to the viability and prosperity of mature energy basins being extended well beyond what is possible through current practices and enabling offshore wind projects to be commissioned for the benefit of us all.



# Operations and HSEQ

## OPERATIONAL ACTIVITIES

### Operating Safely

The success of everything we do relies on the safety of our workplace and our people. Attollo Offshore is committed to achieving the highest standards of health and safety within all its business activities and to maintain its continual improvement. We, as an organisation, have developed our Business Management System to implement and maintain our health and safety management commitments to safeguard our people, assets and the environment, to effectively manage risks and hazards for all operations and, furthermore, to adhere to the applicable rules, laws, regulations, codes and standards relevant to our operations.

## TARGETS AND PERFORMANCE

### During 2019

Attollo Offshore strives to eliminate any incidents or accidents across all our activities and operations. Our HSEQ and operational targets are reviewed and monitored on a continual basis. Our main Corporate Objectives for 2019 are as below:




	<b>Safety Objectives</b>	Maintain an LTI Rate Below 1.0	✓
		Maintain a TRI Rate Below 1.0	✓
	<b>Health Objectives</b>	Have Zero Occupational Health Diseases	✓
	<b>Environmental Objectives</b>	Have Zero Pollution Incidents	✓
		Monitor our Asset Emissions	✓
	<b>Quality Objectives</b>	Achieve certification and migration to the new Occupational Health International Management System Standard (45001)	✓
	<b>Operational Objectives</b>	Maintain Operational Utilisation above 98%	✓
	<b>Social Performance Objectives</b>	Support local projects in areas we operate through our Foundation	✓

Table 1 Objectives

# HEALTH AND SAFETY MANAGEMENT

Attollo offshore continues to ensure safety is a priority. Our 'Goal Zero' commitment was made when operations commenced, and this remains the commitment moving forward. Continual improvement and challenging what would be the norm in the industry where need be is the foundation of Attollo Offshore. We maintain the belief that advances in workplace health and safety should be an ongoing goal.

Attollo Offshore achieved its 2019 objective of maintaining its LTI and TRI Rates below 1.0:

LTI Rate			
2016	2017	2018	2019
0.0	0.0	0.0	0.0

Table 2 LTI Rate

Operational Utilisation			
2016	2017	2018	2019
100%	100%	100%	100%

Table 4 Operational Utilisation Percentages

TRI Rate			
2016	2017	2018	2019
0.0	0.0	0.0	0.0

Table 3 TRI Rate

FAT Rate			
2016	2017	2018	2019
0.0	0.0	0.0	0.0

Table 5 FAT Rate

Occupational Diseases			
2016	2017	2018	2019
0.0	0.0	0.0	0.0

Table 6 Occupational Diseases Rate

## Workforce Health

Our commitment to safety, the environment and workforce health is pinnacle in the planning, design and operation within our projects. Under our Risk Assessment process requirements, we ensure that health impact assessments are carried out for personnel as required and shall identify, assess and control risks to health.

## Workforce Involvement

Attollo recognises within its Code of Business Principles that our people are essential to our success. Without the best people, we cannot be the best business. We select people who believe what we believe so as to sustain the vision and success of Attollo Offshore. We work to maintain a productive and healthy organisation by employing and developing talented people, continually strengthening our leadership and enhancing employee performance by fostering strong engagement. Individual excellence is always encouraged; however, the best results are produced by our team. We accomplish more together than we will ever do apart.

## Workforce Protection

Attollo Offshore aims for the very highest standards of Risk Management through adequate assessment, evaluation, planning, control and monitoring of activities to ensure risks are controlled to As Low As Reasonably Practicable (ALARP). We recognise that the effective management of risk is a fundamental component for safe operations and in order to safeguard the health and safety of our employees and any others who may be affected by our activities, assets and the environment we are committed to the implementation of an organisational philosophy that ensures risk management is an integral part of our corporate objectives, plans and business management system.

Attollo Offshore continues to maintain robust risk management policies and processes whereby the paramount initiative includes the protection of our people, the environment and assets and, with regard to our Safety Culture, our Policy also defines our core values and behaviours resulting from a collective commitment by leaders and individuals to emphasise safety over competing goals to ensure the protection of people and the environment. Attollo Offshore expects all personnel to be accountable for their own safety and the safety of others and we encourage our teams to intervene and stop any unsafe acts and conditions that they may witness.



## RISK MANAGEMENT AND ASSURANCE

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Attollo Offshore is committed to the prevention and management of major accident hazards, to minimise injuries and incidents, and to operate safely and efficiently. We strive to reduce risks as far as is technically and financially feasible and to minimise the potential impact of any incident. Our commitment to the reduction of the risk of major accident hazards is incorporated into everything we do.

Attollo Offshore has a risk management framework for use across our asset portfolio; this framework establishes processes for the identification, assessment, control and mitigation of risk. We manage risk proactively to create and protect value, manage major accident hazards, maintain continual improvement and support business decision-making. We have a standardised, formal approach to the identification, mitigation and management of major accident hazards at all our assets. This is delivering real progress in developing a real-time risk management platform across our portfolio.

Each year, our team conducts thorough reviews of our Risk Management processes, Corporate Risk Registers and entire Business Management System, as part of our Management Reviews, which is driven through the ISO management system standards.

During 2019, a Management Review Meeting was held every quarter, which allowed us to ensure our systems were thoroughly and regularly reviewed by the business as a whole.





# ENVIRONMENTAL MANAGEMENT

## Environmental Impacts and Management

Attollo Offshore is committed to ensuring that all its activities are conducted with due consideration to the protection of the environment with a view to eliminating or minimising pollution. The success of these objectives relies on the commitment and participation from every level of the organisation, as well as our contractors, to comply with our Policies and Procedures. We continually strive to ensure that objectives and processes are identified and implemented to achieve the policy commitments, improve performance and demonstrate conformity to ISO 14001 to which we are certified.

Attollo Offshore continues to monitor emissions from our operating assets in accordance with industry guidelines. This is to baseline our environmental impact; a key objective over the coming years will be to execute emission reduction initiatives.

Our environmental objectives for 2019 included the minimisation of impact to the environment through the monitoring of asset emissions and maintaining our “Goal Zero” to environmental incidents, including spills, to which end we were successful:

One major KPI that we track is our carbon footprint. As an international company, our work involves business travel and we feel that we should be tracking our carbon footprint with the aim to always decrease this as much as possible. Below are our year on year trends in regards to our carbon footprint for the business (CO2) and the km travelled throughout the year.

### CO2 Usage

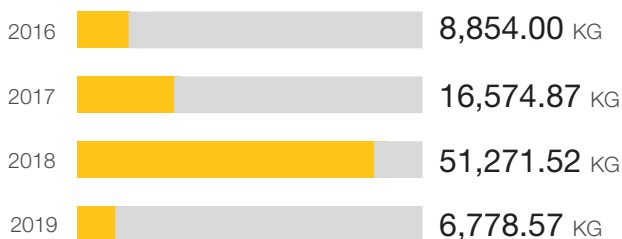


Table 7 CO2 Usage

### km Travelled



Table 8 km Travelled



## QUALITY MANAGEMENT

Attollo Offshore is accredited to the most recent International Quality Management System Standard (ISO 9001) to ensure that our work continually complies with such quality standards. We ensure through our management review and both internal and external risk-based audit processes that areas of improvement are always identified and managed through our Corrective Actions, Risks and Opportunities procedure by which their effectiveness is verified at Attollo Offshore. Application of this procedure will provide uniformity of corrective actions, risks and opportunities across the business.

# Working in Partnership

## ENGAGING WITH SOCIETY AND LOCAL COMMUNITY

### United Nations Global Compact

Since Attollo Offshore became participants to the United Nations Global Compact (UNGC), we have continued to show alignment of our strategies and operations with the UNGC Principles, which cover human rights, labour, environment and anti-corruption. The UNGC also encourages participants to support the UN Sustainable Development Goals (SDGs), with an emphasis on collaboration and innovation.

### Attollo Foundation



*Pupils from North East Lincolnshire School*

Attollo Offshore continues to maintain its commitment to the offshore industry, which goes well beyond providing industry leading assets and operations. The Attollo Charitable Foundation, founded in 2017 with the objective of assisting in the development of maritime education, science technology and maths (STEM), art and culture for the benefit of young people, has been a success thus far.

So far, the Foundation has provided a legacy to the offshore projects we support by investing in development of young people on a multi-year basis long after our assets have left the area.

During 2019, the Attollo Foundation continued to support local school pupils from the Grimsby area, allowing those pupils who form part of the North East Lincolnshire School Sport Partnership's Gifted and Talented programme to take part in some athletic coaching sessions and the provision of a tour of the World Class Performance Environment.

Ben Moore, Attollo Offshore Managing Director explains that, "Fundamental to everything Attollo does, is the aim of providing a positive future, whether that's for the offshore energy industry or the local communities in which we operate. Through engagement with the local Grimsby community, it was clear that there is a particular value in supporting the desire to improve school-age participation and development in sport.

**“ The Attollo Foundation was created to generate a legacy to our offshore campaigns, and we are delighted to support a variety of initiatives, such as this visit to the English Institute of Sport which we return to for the second year. The main lesson of the day was the importance of commitment and positive attitude; fundamental not only in sporting success, but incredibly important life lessons. We're confident that it will provide some real inspiration to the pupils who attend.”**



## TRAINING AND DEVELOPMENT

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Attollo Offshore is committed to the development of its personnel and to continuously improving the levels of competence in all areas of business. Our robust training and competence assurance process is an essential aspect of our Business Management System, in ensuring that personnel have the required level of training and competence, in accordance with pre-defined standards and criteria, necessary to carry out their work activities. The implementation of this process provides the framework for ensuring, monitoring, measuring and improving personnel's technical and interpersonal performance and the improvement of HSEQ performance.

Our training and development falls in line with the Step Change in Safety Competence Management Framework and, during 2019, we ensured personnel maintained involvement with their workshops and campaigns, deployment of their safety videos and information out to assets and teams offshore in order to improve understanding of Major Accident Hazards, risk analyses, bowties and SECEs, barrier maintenance and barrier assurance and verification.

## BUSINESS ETHICS

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Attollo Offshore strives to continually ensure, through the management and governance of our policies, procedures and systems of internal control, that our systems maintain robust standards of business conduct and transparency centrally and in any region in which we operate. Our region-specific Business Management ensures that Attollo maintains a systematic, transparent and continually monitored business.

At Attollo Offshore, we clearly communicate our expectations in our Code of Business and maintain high standards of transparency of the team at Attollo Offshore to perform activities in accordance with company policies, standards and objectives, and in compliance with client and regulatory requirements. Communication and transparency between colleagues and our assets are vital to ensure our success, lessons are learnt and our continual improvement forms part of our culture within the organisation.

## WORKING WITH OUR STAKEHOLDERS

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### Code of Business and Supplier Code of Conduct

Attollo Offshore's visions are captured within its Code of Business which defines the company responsibilities to our Clients, Colleagues and Communities and outlines the principles expected of our people to achieve our vision.

Attollo Offshore expects all its suppliers and subcontractors to share the principles which are expressed in our Supplier Code of Conduct and comprise an important component of supplier selection, evaluation and business relationship. We rely on our people to uphold our integrity, vision and beliefs. Our values demand that we deal fairly with our clients, suppliers, competitors and colleagues. No one at the firm may seek advantage through illegal or unethical business practices. Some of the principles contained within our Supplier Code of Conduct include, but are not limited to:

- *Ethics including Business Integrity/Anti-corruption, Conflict of Interest, Fair Competition, Privacy and Intellectual Property, Identification of Concerns and Conflict Minerals*
- *Human Rights and Labour, including Child Labour Avoidance, Community Relations, Freely Chosen Employment, Diversity and Inclusion, Fair Treatment, Working Hours, Wages and Benefits and Freedom of Association*
- *Health, Safety, Security and Quality requirements, including compliance with all applicable HSEQ regulations, Continual Improvement, Emergency Preparedness, Risk Information and Training and Waste Emissions.*



# Our Principles and Sustainable Goals

## TRANSPARENCY AND OUR APPROACH

Our Business Management System ensures that Attollo Offshore maintains a clear, understandable, factual, systematic, transparent and continually monitored and reviewed structure.

As part of the Management Review process, we ensure that our Management System is reviewed regularly to identify any areas that require improvement, which maintains our continual improvement approach towards our business. The implementation of the new structure within our Business Management System has allowed us to provide region-specific management system documentation, including templates, procedures, policies and legislation linkages to reflect region-specific additional requirements.

As an organisation which conducts operations throughout multiple locations, Attollo Offshore also ensures high level transparency with regard to the collation and accessibility of data throughout the business through the implementation of advanced online technological systems. This allows personnel to work from different geographical locations without making any compromises to their productivity, via access of up-to-date, live and accurate levels of data, for monitoring and reporting in both onshore and offshore working environments and, furthermore, overcomes the boundaries of time and location, thereby helping our teams to work more effectively.

## ANTI-BRIBERY AND CORRUPTION

Attollo Offshore values its reputation and is dedicated to maintaining the highest level of ethical standards in the conduct of its business activities in the UK and overseas. The actions and conduct of the company's staff as well as others acting on its behalf are key to maintaining these standards. Our Anti-Bribery and Corruption Policy and Procedure identifies key risk areas and responsibilities of our people to prevent, detect and report any forms of anti-bribery and corruption.

Our policy and procedure outline the company's position on preventing and prohibiting bribery, in accordance with the Bribery Act 2010. The company will not tolerate any form of bribery by, or of, its employees,

agents or consultants or any person or body acting on its behalf. Senior management is committed to implementing effective measures to prevent, monitor and eliminate bribery.

Furthermore, we have established detailed risk management procedures which include the prevention, detection and prohibition of bribery whereby key business exposure activities are identified, assessed, controlled and recorded within the corporate risk assessment register and, where relevant, identifies personnel within the company and external third parties who are in positions where they may be exposed to bribery in order to undertake extensive due diligence.

## LABOUR

### Workforce Diversity and Inclusion

Attollo Offshore has strict policies and procedures which identify that it is unlawful to discriminate because of age, disability, sex, gender reassignment, pregnancy, maternity, race (which includes colour, nationality and ethnic or national origins), sexual orientation, religion or belief, or because someone is married or in a civil partnership. The company ensures that employment and internal progression is determined solely by personal merit and the application criteria, which are related to the effective performance of the job and the needs of the business - nobody will be treated less favourably than any other on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (which includes colour, nationality and ethnic or national origins), religion or belief, sex or sexual orientation.

We at Attollo Offshore recognise that the issue of diversity has dominated headlines for the past few years, wherein women in the offshore energy industry have been underrepresented. With this in mind, we are dedicated to ensuring gender balance is fairly maintained throughout the business and continue to provide opportunities to people based on their performance, competence and work ethic rather than gender. Gender balance is essential for economies and communities to thrive, and we continually strive to maintain the attitude that the offshore industry should be no different.



## Non-Retaliation and Grievance

### Non-Retaliation

Attollo Offshore maintains stringent Non-Retaliation and Grievance Policies, which highlights the importance regarding any fraud, violations or misconduct and wrongdoing by workers or officers of the company to be reported and properly dealt with and we encourage all individuals to raise any concerns that they may have about the conduct of others in the business or the way in which the business is run. Attollo Offshore is firmly committed to its policy, which encourages timely disclosure of such concerns and prohibits retribution or retaliation against any faculty or staff members who, in good faith, report such concerns.

### Grievance

We recognise that it is in the interest of all parties that any individual and group issues should be dealt with effectively and efficiently, in an atmosphere of mutual trust and confidence. Our grievance process identifies an individual's right to raise a grievance with management concerning their working conditions and employment arrangements, to seek redress and to be treated in a fair and effective manner and identifies the process to be followed when dealing with a grievance matter.

## LOCAL CONTENT

### Expenditure

One of Attollo Offshore's key objectives is to commit to as much variable expenditure to the local area of our offshore projects as is possible, providing jobs for local people and support for the local supply chain. We achieve this by engaging with the local supply chain in the regions the assets are located on all our projects and track and we set KPIs for our local commitments.

## HUMAN RIGHTS

Attollo Offshore's approach to human rights is incorporated within our Business Management System Manual, Policies, Procedures and Supplier Code of Conduct and has been developed in accordance with the UNGC Guiding Principles on Business and Human Rights. We recognise and strive to meet our corporate responsibility to respect human rights along with a duty to protect them. To achieve this, we identify and assess our human rights impacts, and make it as easy as possible for our operational areas to raise concerns, complaints or grievances. We also assess our assets for human rights risks and, where we find such risks, we ensure that mitigating measures are aligned with international best practice.

Furthermore, our policies identify our commitments to human rights and include creating a working environment free of harassment, bullying and discrimination and we will pursue equality of opportunity as a means of achieving this objective.

Our Supplier Code of Conduct identifies our expectations of suppliers to protect the human rights of personnel and to treat them with dignity and respect. We do not tolerate child labour and ensure that operations are consistent with the International Labour Organisation and UNGC principles and requirements.





## EQUALITY AND DIVERSITY

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### Equal Opportunities

Attollo Offshore is dedicated to maximising the effective use of people in the company's and employees' best interests and will pursue equality of opportunity as a means of achieving this objective. Our Equality and Diversity Policy and Procedure outlines that employment and progression is determined solely by personal merit and the application criteria, which are related to the effective performance of the job and the needs of the business and which identify key areas and types of unlawful discrimination.

Nobody will be treated less favourably than any other on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion, belief, sex or sexual orientation.

## SUPPLIERS

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### Supplier Code of Conduct

Sustainability is a key element to Attollo Offshore's values and forms an integral part of our business strategy. Sustainable development is an approach adopted by Attollo Offshore and sustainability is deemed to be a significant contributor to the company's success, future development and creating long-term value.

Attollo Offshore recognises the UN's Sustainable Development goals and seeks to continually align its operations to meet these universally accepted principles whether our supplier are signatories or not.

Attollo Offshore expects all its suppliers and subcontractors to share the principles which are expressed in our Supplier Code of Conduct and which comprise an important component of supplier selection, evaluation and business relationship with a supplier.

### Suppliers and Environmental Management

At Attollo Offshore, we recognise that environmental management not only falls under our direct responsibility, but also that the responsibility cascades through to the suppliers we source from and engage with.

In order to ensure that Attollo Offshore's "net zero" goal in relation to carbon footprint and emission reduction is maintained throughout our own operations and those of the suppliers we approve to conduct operations under our management, we have further developed our Supplier Code of Conduct to ensure the reporting of their own emissions and carbon footprint.

As a company we also aim to embark on further developing our "net zero" goals through the involvement of carbon offsetting.





ATTOLLO  
OFFSHORE



[www.attollo-offshore.com](http://www.attollo-offshore.com)