

SUBSEA 7  
SUSTAINABILITY REPORT 2021





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information online  
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## OUR PROGRESS

In 2021 we made good progress on  
our sustainability journey

### CONTINUED TO ENGAGE AND PROGRESS AGAINST OUR SUSTAINABILITY PRIORITIES

- Published our target to achieve net zero GHG emissions by 2050
- Created a market-leading, pure-play renewables company, Seaway 7 ASA, through the combination of our fixed offshore wind business unit with OHT ASA
- Initiated human rights training to relevant employees
- Established BORA Blue Ocean Research Alliance™ to build knowledge and understanding of the world's oceans to create a sustainable marine future
- Launched a Company-wide approach to wellbeing
- Continued to focus and make a positive impact on business ethics amongst our suppliers

### SET SUSTAINABILITY TIME BOUND TARGETS ALIGNED TO OUR PRIORITIES

### ESTABLISHED A WORKGROUP TO ADDRESS THE RECOMMENDATIONS OF THE TASK FORCE FOR CLIMATE-RELATED FINANCIAL DISCLOSURES



## OUR VISION

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

Discover online how we are fulfilling our vision. Visit [www.subsea7.com](http://www.subsea7.com)

## OUR VALUES



Safety



Performance



Integrity



Collaboration



Sustainability

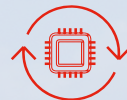


Innovation

Understand how our Values help drive our performance on page 3 of our 2021 Annual Report

## OUR STRATEGY

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



**SUBSEA FIELD OF THE FUTURE – SYSTEMS AND DELIVERY**



**ENERGY TRANSITION – PROACTIVE PARTICIPATION**

Information on our strategic priorities can be found online and on pages 10 to 15 of our 2021 Annual Report

## OUR DIFFERENTIATORS



Culture



Relationships



Solutions



Creativity



Reliability



## UN GLOBAL COMPACT

In 2019 Subsea 7 became a signatory to the United Nations Global Compact. This is a voluntary commitment to adopt sustainable and socially responsible business policies and report on their implementation. We are committed to upholding the 10 principles in the UN Global Compact, which cover human rights, labour, environment and anti-corruption, and to engaging in collaborative projects which advance the broader development goals of the United Nations, including the Sustainable Development Goals. To view our letter of commitment to the UN Global Compact principles, please visit: <https://www.unglobalcompact.org/what-is-gc/participants/135266-Subsea-7-S-A-unglobalcompact.org>



## SUSTAINABLE DEVELOPMENT GOALS

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







**John Evans**  
Chief Executive Officer

## CREATING SUSTAINABLE VALUE



### UN GLOBAL COMPACT

We remain committed to the UN Global Compact and the 10 key principles of that compact. Our approach to respecting and protecting human rights, providing safe and fair labour practices, safeguarding the environment, and working against corruption in all forms is central to our ways of working and our sustainability efforts. By operating from these strong

principles, we ensure we uphold the commitment to supporting these global challenges and driving towards a more sustainable future. We are pleased with the progress we are making in support of these principles and this report serves as our Communication on Progress.

**In this rapidly changing world, we support the delivery of efficient and affordable energy as the world transitions to a lower-carbon economy. I am confident in our ability and preparedness to support this transition in a sustainable and responsible way.**

As a global leader in offshore energy services, Subsea 7 creates sustainable value for our stakeholders by delivering the efficient offshore energy solutions the world needs. Sustainability at Subsea 7 goes beyond the way we work and the behaviours we value to include the business risks and opportunities related to the transition towards lower-carbon sources of energy. Access to affordable energy is a fundamental societal need. In order to meet the global energy demand while reducing the impact of climate change, our industry must seek better and cleaner ways to produce energy and focus capital investment on decarbonising the energy sector.

At the heart of our business lies our Company Values which drive our culture and behaviours and represent how we think and act. Working from these strong foundations we have continued our push for a sustainable future for ourselves and the world we live in.

Subsea 7 recognises that to be truly sustainable, we must consider both the impact that our business has on society and also the risks impacting us and our long-term resilience. Like many, we have faced various challenges over recent times and none less significant than the ongoing effects of Covid-19. However, despite the challenges of the pandemic, wider society has continued its desire to change its energy balance. Together, we must ensure we are moving towards a lower-carbon future whilst ensuring we continue to safeguard and respect the current needs for affordable energy. This is central to our business strategy.

We play an important role in helping supply that energy, from both renewable and non-renewable sources. We have a clear focus on working with our clients to achieve an orderly rebalancing of energy supply in the decades to come.



The challenges of climate change form a key part of our sustainability efforts. We have advanced our approach in this regard to support the goal of the UN Paris Agreement including the publication of our climate roadmap which highlights our target to reduce our emissions by 50% by 2035 (for Scope 1 and 2) and a longer-term aim to be net zero by 2050. Throughout 2021, we also formed a dedicated workgroup to address the recommendations of the Task Force on Climate-related Financial Disclosures. We will continue to apply effort to further align ourselves, not only to support clear and transparent disclosure, but as an additional tool to support business decisions and validate our approach to future strategy.

A mainstay of our efforts is active participation in the global energy transition towards cleaner energy. This is one of our Sustainability Priorities and in 2021, we announced the combination of our fixed offshore wind business unit, Seaway 7 with OHT ASA to create Seaway 7 ASA,

a pure-play renewables company. This combination will enhance both the capabilities and scale required for efficient worldwide operations. In doing so it cements our commitment to grow our renewables business where we already have a well-established track record, and places us well as we head towards a new and challenging future.

We have made significant progress across all areas we consider to be material to us and our stakeholders, and are pleased to include the initiatives, actions and growth being made towards our goals. We have learned the importance of setting clear direction and being transparent about what is important to us, and so we are pleased to include this year, a set of commitments and targets against our six Sustainability Priorities to help guide our efforts. Having clear direction will also provide context to our performance and hold us accountable to our goals and clearly demonstrate how we are supporting the UN Sustainable Development Goals.

Through enhanced disclosures and active participation in independently evaluated ESG rankings, we are pleased with recent progress being made in this area and recognise the value it serves to our investor community. In line with EU legislation around sustainability reporting, we are preparing ourselves to meet these expectations and focusing on improving visibility of appropriate information on our Company website in 2022.

We have set clear targets and plans for the future and through our engaged and determined workforce, we drive forward on our commitments.

We are in no doubt that collective action is needed to drive the progress required for a sustainable future. We recognise the significance we play in this collective approach and we are positive about the progress we can make moving into 2022.

**John Evans**  
Chief Executive Officer

## TARGET NET ZERO

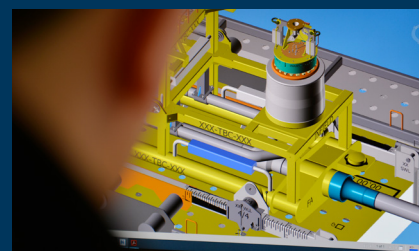
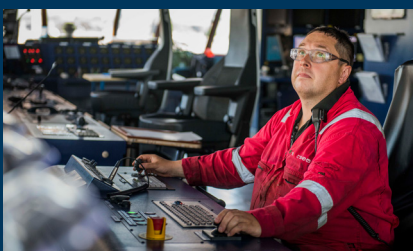
In line with the goals of the UN Paris Agreement on climate change, Subsea 7 announced its target to achieve net zero greenhouse gas (GHG) emissions by 2050 with a nearer-term target of 50% reduction in Scope 1 and Scope 2 emissions by 2035 compared to a 2018 baseline.

These targets are based upon plans to decarbonise Subsea 7's operations, and our efforts will be focused around three core areas:

MORE THAN

**90%**

of our emissions come from our vessels.



### HYBRIDISATION/SHORE POWER

We will reduce our emissions by how we power our vessels in two ways: install battery packs on certain vessels (hybridisation) and use clean electricity from shore to power certain vessels while docked (shore power).



### CLEAN FUELS

We will reduce our emissions by using fuels with reduced carbon footprint (e.g. bio fuels, synthetic fuels). In addition, we will look into implementing changes and solutions available today as well as the deployment of new cleaner technologies as they become commercially available at scale in the market.



### DIGITAL EFFICIENCY

We will reduce our emissions by managing the performance of our vessels through the use of digital tools.



# OUR APPROACH TO SUSTAINABILITY

## GOVERNANCE

**Subsea 7 recognises the importance of embedding solid governance around sustainability to ensure our agenda is supported through effective leadership.**

The Board of Directors is responsible for guiding the Company's sustainability strategy. Sustainability is now an agenda item at each Board meeting. These meetings take place a minimum of once per quarter and include the Executive Management Team.

At the management level, we have an established Sustainability Committee, composed of the Executive Management Team, reporting directly to the CEO. This committee enables a clear communication channel to our CEO for all sustainability matters pertinent to the business and makes recommendations to the Board.

Each Sustainability Priority, defined through a materiality assessment, is sponsored by a member of the Executive Management Team and is supported by a focused workgroup of senior managers and business unit leaders. The focused workgroups are responsible for implementing the Company's

sustainability ambitions, targets and measures across the organisation and integrating sustainability issues into the day-to-day operations.

A Corporate Sustainability Team, led by a newly appointed Director of Sustainability, facilitates the Company's sustainability efforts, managing and reporting on performance, and supporting the focused workgroups on their action plans.

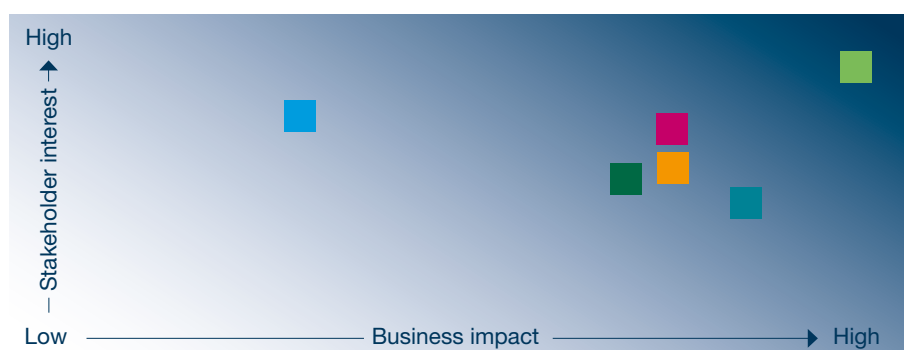
## MATERIALITY

**Subsea 7's sustainability strategy is guided by a materiality assessment to ensure we prioritise the risks and opportunities that are of greatest importance to our stakeholders, as well as those that have a material impact on our business.**

We undertook a review of Company, sector and societal factors to determine which of these should take priority for us. We gathered broad stakeholder feedback from our clients, our shareholders and our people and we observed the wider industry and scientific reports. This information was then analysed in detail to create a longlist of key topics. All the topics we discussed are important to us, but the longlist focused on those that apply to a

wide range of stakeholders and have the greatest long-term impact on our future.

In collaboration with a specialist sustainability consultant, this assessment enabled us to define six Sustainability Priorities that maximise our opportunity for impact. We are committed to carrying out a review of our materiality assessment in 2023 to ensure relevance with industry advancements and changes in stakeholder interest.



## STAKEHOLDERS

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

### OUR SOCIETY

defines what is acceptable and what is expected in terms of corporate behaviour. We have a duty to respect the communities where we operate and the environments, we work in.

### OUR CLIENTS

expect us to operate safely, cleanly and with integrity.

### OUR PEOPLE

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

### OUR SHAREHOLDERS

expect us to be fair, balanced and transparent in our interactions with the market around our approach to environmental, social and governance-related risks and opportunities.



# OUR SUSTAINABILITY PRIORITIES AND TARGETS

Setting targets aligned to our priorities will help guide efforts.

## HEALTH, SAFETY AND WELLBEING

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

Lost-time injury frequency rate

**0.05**

by 2022

Serious injury frequency rate (very high potential)

**0.10**

by 2022

## OPERATIONAL ECO-EFFICIENCY

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

Reduction in Scope 1 & 2 emissions

**50%**

by 2035 (baseline year 2018)

**NET ZERO**

by 2050

## ENERGY TRANSITION

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

Cumulative power capacity of renewables projects supported

**10GW**

by 2025

**25GW**

by 2030

## BUSINESS ETHICS

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

Medium and high-risk suppliers assessed for anti-corruption risk

**100%**

by 2025 (90% by 2022)

Proportion of the business covered by an independent anti-corruption compliance programme assessment

**100%**

by 2025 (85% by 2022)

## LABOUR PRACTICES AND HUMAN RIGHTS

Providing working conditions aligned with international standards with respect to labour practices and human rights.

Relevant employees trained on human rights

**100%**

by 2025 (50% by 2022)

High-risk suppliers undergoing enhanced human rights risk assessments

**90%**

by 2025 (25% by 2022)

Proportion of our workforce covered by a human rights risk assessment within the last three years

**90%**

by 2022

## ECOLOGICAL IMPACTS

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

Waste recycled onshore

**90%**

by 2025 (82% by 2022)

Waste segregated offshore for recycling

**70%**

by 2025 (65% by 2022)

BORAbot™ sensors deployed for science

**15**

by 2025 (2 by 2022)



# HEALTH, SAFETY AND WELLBEING

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

## OUR AMBITIONS

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

Providing a workplace that encourages, supports and enables health and wellbeing choices and lifestyles

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

## OUR TARGETS

**0.05** BY 2022

Lost-time injury frequency rate

**0.10** BY 2022

Serious injury frequency rate (very high potential)

## OUR PERFORMANCE

**0.12**

(2020: 0.07)

Lost-time injury frequency rate

**7.4**

Score out of 10 from our people based on the statement: Employee health and wellbeing is a priority at Subsea 7



## OUR COMMITMENTS

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

### UN SDGs



## WHY IT IS IMPORTANT

The safety of our people is our first priority. Our workplaces are potentially hazardous, particularly when we are working offshore in harsh and remote environments.

We believe that all our people and those working on our sites are entitled to the same level of protection regardless of where in the world they work. To achieve this it is essential that we have the right frameworks in place to enable our people to work safely. Our policies and training programmes are continuously reviewed to make sure that this is achieved.

We capture key lessons from our global operations in order to improve our systems, to reduce and ultimately eliminate activities that have the potential to harm our people, the environment and cause damage to our equipment. We record all incidents and near misses in detail and investigate each event. Near misses can be defined as being an event where something happened, nobody was injured and nothing was damaged; however had circumstances been slightly different it would have been an incident. By collecting this valuable information and tracking our performance in our Business Management System we are able to continually seek to improve our safety performance. We set challenging targets to drive performance improvement with an aim of achieving an incident-free

workplace every day and everywhere we work. We celebrate our safety successes with awards for worksites that achieve superior performance and communicate details of incidents when they do occur to help our people learn to be safer in all they do.

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

Keeping our people safe also includes their security at work. We assess the security risks of countries, areas, hotels, airlines and other means of transportation, to make sure our people are secure and travel safely. Subsea 7 has operations around the world, and some of the places we work in are higher risk with regard to adverse events such as extreme weather, as well as political or civil unrest and the

threat of terrorism. We provide our people with onsite support as required to minimise the risk to personal security. This may include security personnel, Company-arranged transport, travel management plans and travel guides.

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



## WE HAVE BEEN FOCUSING ON

Delivering a focused campaign to reduce dropped objects ●

Self-verification process to 75% of our vessels ◐

Launching and embedding our global wellbeing framework ●

## OUR PROGRESS IN 2021

Our focus on health, safety and wellbeing is a priority for Subsea 7 and our continued efforts in this area have remained strong. However our underlying lost-time injury rate increased in 2021, which is a cause for concern. We believe the cumulative effect on our crews and project teams from disrupted travel, extended quarantine and unfamiliar crew mates has led to a reduced focus on routine tasks resulting in an increase in minor injuries. However our serious injury frequency rate remains low and we have made positive progress through the following initiatives.

**Health and safety:** We believe that best performance is achieved by an enterprise where people are connected and engaged, and in 2021 our senior management representatives maintained strong relationships with our vessels and site management teams through our worksite sponsor programme. This covered 100% of our vessels and worksites to ensure they are being properly supported by the organisation, that high priority health, safety, environment and quality actions are being attended to and that senior management have a first-hand appreciation of the current situation and any critical issues on our worksites.

Throughout 2021, we delivered a focused campaign aimed at reducing the number of dropped objects. This consisted of categorising our dropped objects and

allocating specialist knowledge to be applied to each category. We have adopted changes to existing processes and new ways of working aimed to reduce or avoid repeat occurrences. Our efforts in this area will continue to be monitored over the long-term to ensure effectiveness.

**Assurance and verification:** Our self-verification process ensures our safety practices are being followed at all times. During 2021 we enhanced our approach by introducing additional measures to support our drive to reduce repeat incidents. This will allow us to go beyond simply verifying a process but should enable greater assurance in how we operate safely by exploring why we do certain things. We came close to our target of 75%, having used the first part of the year adding additional steps to the programme and are satisfied with progress to date, and we will continue to implement this initiative throughout 2022.

**Wellbeing:** We recognise the importance of supporting the wellbeing of our people both for their own health as well as for our Company as a whole. In 2021 we launched a Company-wide wellbeing framework that is focused around four pillars contributing to our wellbeing at home and in the workplace: Body, Mind, Connect and Thrive. Our regions embraced this refreshed approach to wellbeing through local events. In addition we included six wellbeing questions within our new Employee Survey which will allow us to understand the impact of our wellbeing tools and initiatives.

**Covid-19:** The effects of Covid-19 continued to impact us all in 2021. To ensure the safety of all our people offshore, we implemented a health screening programme to protect the most vulnerable from the impacts of the virus. Being proactive in this regard enabled us to mitigate potentially damaging impacts both to our people and our operations.



## HEALTH SCREENING PROGRAMME

Since the beginning of the Covid-19 pandemic, we have worked to keep our offshore crews safe and protected through our health screening programme. In 2021 we processed over 30,000 travel and health questionnaires. Our approach to ensuring the safety of our people throughout this pandemic whilst maintaining delivery of the operational demands has been a key example of us living our Company Values.

## WE WILL BE FOCUSING ON

Delivering next phase of safety leadership programme

Predictable outcomes through quality assurance

Wellbeing activities based around employee insights

Linking behavioural safety with performance safety

## OUR PLANS FOR 2022

We are committed to improving our safety performance by focusing on what we believe are the key fundamentals. With improved travel globally and reduced quarantine requirements we are focused on creating stable crews for our vessels and undertaking a focused campaign on routine tasks. We will deliver the next phase of our safety leadership programme. This focused training will further develop and support our leaders for the delivery of a safe working environment both onshore and offshore.

Where possible, we will reinforce face-to-face visits to onshore and offshore work locations to reconnect some of the links that were interrupted due to restrictions in 2021. We believe that focusing on

consistent and predictable outcomes is necessary for delivering good quality.

We will use our quality system to further underpin more predictable outcomes with a strong focus on quality assurance.

Building on the progress we have made with our wellbeing framework, we will use the insights from our Employee Survey to put in place impactful activities to address the feedback and further support our people.

We believe that our human and organisational performance, coupled with our levels of engagement, have a direct impact on our safety performance. Our focus will be on how we can positively support these key factors in our safety performance.



# ENERGY TRANSITION

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

## OUR AMBITIONS

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

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

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

## OUR TARGETS

**10GW**  
BY 2025

**25GW**  
BY 2030  
Cumulative power capacity of renewables projects supported

## OUR PERFORMANCE

**7.5GW**  
(2020: 6.0GW)  
Cumulative power capacity of renewables projects supported

**25%**  
of total research and development spend associated with energy transition



## OUR COMMITMENTS

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

### UN SDGs



## WHY IT IS IMPORTANT

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

Seaway 7, our fixed offshore wind business unit, has an established position in the renewables supply chain, providing our clients with foundation installation, turbine installation, cable lay and transportation services for the construction of offshore wind farms through various contracting models ranging from transport and install (T&I) to integrated T&I and EPCI. With over 10 years of experience, we have built and installed hundreds of foundations and kilometres of inner-array cables for fixed offshore wind farms worldwide.

The levelised cost of electricity (LCOE) from offshore wind has decreased significantly over the last 10 years, driven by increased efficiency in transportation and installation, bigger turbines, and cost improvements in the supply chain.

As a result of these cost reductions, supported by the capability and expertise of contractors such as Subsea 7, offshore wind farms are now economically viable at significantly lower levels of government

subsidy. The global fixed offshore wind farm market has grown rapidly with more than 50GW of capacity anticipated to be installed by the end of 2025 globally. Looking ahead, further significant growth is projected as society looks to increase investment in renewable energy and carbon-neutral alternatives.

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

Floating offshore wind is the next most promising growth area for offshore renewables. Floating wind offers the possibility to further support energy transition by allowing greater quantities of offshore wind to be developed by using areas where the water is too deep to allow

the construction of fixed offshore wind farms. While there are no significant commercial farms anticipated in the short term there are a large number of demonstrators and concepts in operation with a number of smaller projects being progressed to provide clean power to remote offshore oil and gas facilities. We are actively participating in these projects and are growing our technical capability and expertise in this area to be ready to support future large-scale commercial developments. Floating wind farms are expected to become a significant contributor to the energy transition in a five to ten-year time frame.

Gas has an important role in the transition to lower-carbon energy, as it is an energy source that releases lower-carbon emissions to the atmosphere when used to generate power and helps to lessen dependence on coal. Subsea 7 has extensive expertise and experience in large offshore gas field developments. Our proprietary technology and engineering capability support our clients in developing these fields cost effectively and efficiently.



## WE HAVE BEEN FOCUSING ON

- Utilising our carbon estimator tool on tenders and studies
- Growing our renewables business unit and its capabilities
- Establishing an energy transition R&D programme
- Establishing a structured advocacy plan

### OUR PROGRESS IN 2021

We have made significant progress in advancing our plans in the energy transition.

#### Transition to lower-carbon solutions:

We have strengthened our early engagement capabilities with our carbon estimator tool which has been used on over 200 tenders and studies throughout 2021. This has allowed us to determine the largest carbon emission contributions of a development and also enabled key discussions with clients around investigating options for lower-carbon alternatives.

#### Growth of renewables – offshore wind:

We have strengthened our offshore wind and renewables capabilities through a number of advancements. Within fixed offshore wind we announced our combination with OHT ASA to form a new company, Seaway 7 ASA. This pure-play renewables company will be a key player in the industry with an active fleet of 10 vessels and two more under construction. In addition to enabling capabilities and scale for efficient worldwide operations, it will provide us vessel flexibility and optionality to clients. We also invested in the conversion of *Seven Phoenix* to a dedicated cable lay support vessel which has successfully operated in Taiwan.

Within floating offshore wind, we have invested in two key areas: We acquired

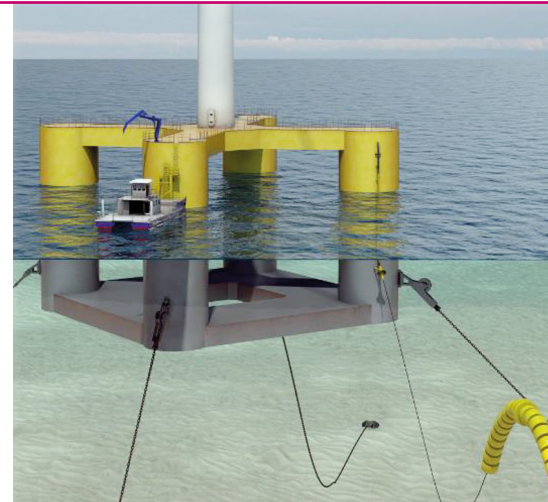
a majority share in Nautilus Floating Solutions, a floating wind technology developer and secondly, we joined forces with Simply Blue Energy to develop Salamander, a floating offshore wind project in the UK. Finally, we established a dedicated offshore wind technology programme as part of our overall energy transition technology programme.

Our subsidiaries Xodus and 4Subsea have demonstrated their offshore renewables growth plans by developing their teams, offices, capabilities and capacity, supporting over 50 projects and studies for a growing list of clients in offshore wind.

#### Emerging energy – new markets and opportunities:

In line with our strategy, we established a new technology programme for energy transition and appointed a dedicated team. In total, 25% of our research and development (R&D) funds were allocated towards energy transition technology areas in 2021, with plans to grow our proportionate spend in these areas year on year towards 2025. We have been active in developing our capabilities for emerging energies including oilfield decarbonisation, carbon capture, hydrogen and offshore wind. This has helped support our clients in their understanding of key growth areas within the energy transition and led us to the successful award of our first carbon capture project, Northern Lights with Equinor.

**Advocacy of energy transition:** Subsea 7 is an active participant advocating the need for transition in the offshore energy sector towards lower-carbon and sustainable solutions. In 2021, to ensure structure and focus, we increased our engagement within energy transition through active participation and a structured advocacy plan to maximise our efforts. We are now represented on more than 20 key industry forums across a wide range of energy transition subjects including representation of our CEO on the Hydrogen Council.



## NAUTILUS FLOATING WIND

Subsea 7 is supporting Nautilus Floating Solutions, S.L. with a goal to maximise energy production of large wind turbines while limiting expensive offshore integration and maintenance procedures. The Nautilus concept is a floating wind foundation based on a semi-submersible steel structure that supports a centrally placed wind turbine. Subsea 7 provides technical expertise, engineering and project management capabilities. It is envisaged that the concept will be included in tenders for demonstrator or pilot projects in 2022 and beyond.

## WE WILL BE FOCUSING ON

- Working with clients to identify carbon reduction solutions
- Capitalising on formation of Seaway 7 ASA
- Identifying opportunities within emerging new markets
- Embedding advocacy plan within our regions

### OUR PLANS FOR 2022

We will continue to develop capabilities, products and services to support clients with lower-carbon oil and gas production and the delivery of decarbonisation solutions.

Building on the formation of Seaway 7 ASA we are committed to translating our combined capabilities into benefits for clients within the fixed offshore wind industry and have set a target of supporting 10GW of cumulative power capacity installed by 2025. Our capabilities will be supported by successful delivery of two new vessels in 2023.

Within emerging new markets such as carbon capture, hydrogen and floating wind, we will identify opportunities and actively participate in early phase energy transition projects. Our growth in investment towards focused technology and R&D will extend into 2022 and beyond.

We will further embed our advocacy plan with all our regions and business units so that our approach is consistent and our efforts are optimised. We will grow our participation in relevant industry forums, conferences and joint industry partnerships related to the energy transition.



# LABOUR PRACTICES AND HUMAN RIGHTS

Providing working conditions aligned with international standards with respect to labour practices and human rights.

## OUR AMBITIONS

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

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

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

## OUR TARGETS

### 90%

**BY 2022**

Proportion of our workforce covered by a human rights risk assessment within the last three years

### 90%

**BY 2025**

High-risk suppliers undergoing enhanced human rights risk assessments (25% by 2022)

### 100% BY 2025

Relevant employees trained on human rights (50% by 2022)

## OUR PERFORMANCE

### 14

(2020: 15)  
number of compliance and ethics cases relating to human rights (1) and labour practices (13)

### 86%

(2020: 82%)  
percentage of suppliers with a contract that included human rights clauses



## OUR COMMITMENTS

We are aligned with the UN Global Compact in supporting the commitment to respect and protect human rights (Principles 1 and 2). We uphold the UN Global Compact's labour principles and commit to fair and lawful employment practices across the Company and throughout our supply chain (Principles 3, 4, 5, 6).

UN SDGs



## WHY IT IS IMPORTANT

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

Respecting human rights and adopting good labour practices helps us live our Values. Having a robust Speak Up procedure and channels for people to raise concerns enables us to deliver on this commitment. Our commitment to labour practices and human rights and our associated policies and procedures also help us to recruit and retain talented people around the world. Maintaining good employee relations makes us a stronger and better company capable of winning market share and performing well for all our stakeholders.

Everyone at Subsea 7 must abide by our Code of Conduct. Fundamentally our Code is all about standing up for human rights in all we do, wherever we work, so no-one is ever mistreated, abused or exploited by us or anyone we work with. Our Human Rights Policy Statement makes it explicitly clear that we will not accept any abuse of human rights, including forced or involuntary labour, and we will not work with suppliers or partners that do.

Subsea 7 is proud to be a signatory to the UN Global Compact, in which the United Nations has set out 10 principles covering human rights, labour, environment and anti-corruption. We have also signed up to support the Worker Welfare Principles set out by the Building Responsibly organisation, of which we became a Board member in 2021.

We are committed to fair and lawful employment practices across the Company and throughout our supply chain. We are an equal opportunities employer and seek to protect our people from discrimination, bullying and harassment. As a minimum we comply with national legal requirements regarding wages and working hours everywhere we

have operations. We also apply the International Labour Organization's standards regarding child labour and the minimum working age. We support the rights of our people to freedom of association and collective bargaining.

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

We are also committed to working with suppliers and partners whose human rights standards are consistent with our own. We require our suppliers to uphold the same standards when dealing with their employees, contract staff and subcontractors. We require them to commit to our Code of Conduct for Suppliers (which includes human rights and labour practices), and we encourage them to expect the same of us and report any behaviour that is inconsistent with this code. If they are not comfortable reporting to Subsea 7 directly, we encourage the use of our externally administered confidential reporting line, Safecall.

## WE HAVE BEEN FOCUSING ON

Aligning global policies and procedures to international standards



Piloting human rights risk assessments with suppliers



Developing human rights training programme



### OUR PROGRESS IN 2021

We have continued to focus on enhancing our understanding of how to identify and manage labour practices and human rights risks, both within our organisation and our supply chain, aligned with international standards.

**Baseline setting:** Inline with our three-year roadmap to embed the principles of Building Responsibly and the UN Global Compact, our focus has been on reviewing our global policies and ways of working to ensure they align with these standards and commitments. Our review indicated that we already had a strong baseline that supports us in respecting and upholding human rights. However, we are conscious that managers and relevant functional staff need a better level of understanding to provide us with an adequate level of assurance. We will revalidate our initial risk mapping and continue to review the corresponding policies and ways of working, following the full roll out of training to relevant employees.

**Risk assessments:** Our initial risk mapping allowed us to determine high-risk areas which will enable us to apply appropriate action plans to address these risks. We have also assessed human rights risks at a project level and put in place human rights plans to address risks identified on two major projects.

We enhanced our approach with respect to human rights risks within our supply chain. Our due diligence questionnaire already included human rights questions for high-risk suppliers but we invested in a digital platform to manage these suppliers in a more systematised way. Throughout 2021, we have been embedding this platform and training users in Supply Chain Management (SCM). We identified and sourced a reliable, responsible sourcing risk index that will enable us to improve our risk-tiering of suppliers. In addition, we engaged an expert, independent firm to conduct human rights and labour practices risk assessments at sample suppliers.

**Communication and engagement:** Communication is key to making progress, both internally and externally. Our roadmap includes an engagement plan to raise awareness across the organisation of labour practices and human rights and our commitments to the Building Responsibly Worker Welfare Principles and the UN Global Compact principles. We worked with an independent expert firm to design and deliver appropriate training for relevant employees, and we have started to provide this training to our most senior leaders.



## HUMAN RIGHTS ASSESSMENT SUPPLIER VISIT

With a view to increasing the level of assurance of our supply chain, in 2021 we engaged an independent expert firm, to conduct some pilot human rights and labour practices risk assessments at three strategic suppliers. Our goal was to gain some insights into the higher risks to prioritise, and some practical understanding of how our high-level commitments can be applied in practice, both internally and with suppliers. The process involved site visits, reviews of policies and procedures, and interviews with managers and staff at suppliers.



Building Responsibly was launched in 2017 as a global business-led coalition committed to promoting the rights and welfare of workers in the engineering and construction sector. It is based on the belief that collaboration is required to deliver better practices across the engineering and construction industry.

## WE WILL BE FOCUSING ON

Risks within our own operations

Enhanced risk assessment of high-risk suppliers

Raising awareness of our human rights commitments and training key people

### OUR PLANS FOR 2022

Continue with implementation of our three-year roadmap across the organisation which will include:

With respect to our own operations, we aim to validate risk assessments across our regions and develop action plans to address the priority risks identified. This will include a focused review of our policies and ways of working.

In relation to our supply chain, we will refine our risk tiering of suppliers based on country and sector of industry to improve our screening and due diligence process.

We will apply the lessons learned from both the human rights assessments conducted in 2021 and from our continued engagement with suppliers on the topic. Improved awareness among the SCM population will enable us to better promote the principles of Building Responsibly and UN Global Compact with all our suppliers. We will also continue to enhance the supplier risk assessment process.

We will continue to raise awareness of our human rights commitments, focusing on training of our targeted populations including SCM and Human Resources.



## BUSINESS ETHICS

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

### OUR AMBITIONS

Embedding a culture of ethics, compliance and integrity

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

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

### OUR TARGETS

**100%**

**BY 2025**

Proportion of the business covered by an independent anti-corruption compliance programme assessment (85% by 2022)

**100%**

**BY 2025**

Medium and high-risk suppliers assessed for anti-corruption risk (90% by 2022)

### OUR PERFORMANCE

**80%**

Proportion of the business covered by an independent anti-corruption compliance programme assessment

**2.62**

(2020: 2.94)

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



### OUR COMMITMENTS

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

UN SDGs



### WHY IT IS IMPORTANT

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

The Subsea 7 Compliance and Ethics Programme is designed and implemented in accordance with international best practice, including the International Anti-Bribery Management System Standard ISO 37001:2016. A more detailed description of our programme and a diagrammatic summary can be found on our website. Most importantly, it is underpinned by our culture and Values. Much of our focus in recent years has been on anti-corruption, as well as competition/anti-trust, sanctions and export controls. Our sector can present significant corruption risks, as can many of the countries in which we operate.

We recognise our duty to manage the human rights impacts of our business on people and communities where we operate – and corruption is one of those potential impacts. We have a zero tolerance approach to corruption, and we want to play our part in combatting it. Our programme also has a broader scope

which is defined by our Ethics Policy Statement and our Code of Conduct (both approved by the Board of Subsea 7 S.A.). In recent years, increased regulatory and stakeholder demands and expectations have continually raised the bar and brought other compliance and ethics risks to prominence, including tax evasion, human trafficking and modern slavery, and other human rights risks. In relation to these few topics, there is a clear overlap with business ethics.

As with safety, we take a management system approach to embedding a culture of ethics and integrity and managing legal and reputational risks. The Subsea 7 Compliance and Ethics Programme has been developed to prevent bribery, corruption, and other legal and business ethics breaches by the Company and all who work for us – including suppliers and other third parties. We have an Ethics Committee comprising all members of the Executive Management Team, which oversees the implementation and continual improvement of the programme and approves the strategy and priorities. In conjunction with the Board, it also oversees our Speak Up Policy, procedures and channels, and any significant compliance and ethics incidents and investigations.

In order to monitor and continually improve our programme, we conduct internal audits of compliance with relevant financial controls, supply chain management procedures, our due diligence and gifts and hospitality policies and procedures, and other aspects of our programme. We have also engaged an external expert firm (GoodCorporation™) to perform independent assessments of our programme, both at a Group level and in selected countries.

A key element of our approach to compliance is to emphasise ethics and integrity. We want people to care about the impacts of corruption and the consequences of different types of compliance breach (which is why we refer to it as compliance and ethics); and we want to inform people about what integrity means to Subsea 7; empower them to bring their personal integrity to work; and educate them on how to use personal and Company integrity to make the right decisions in their work.

## WE HAVE BEEN FOCUSING ON

- Enhancing our delivery of training ●
- Developing our approach to assurance ●
- Holding Supplier Integrity webinars ●

### OUR PROGRESS IN 2021

This year Subsea 7 has continued to follow and improve its very well-established compliance and ethics programme.

**Embedding a culture of ethics, compliance and integrity:** Our annual Compliance and Ethics e-Learning achieved 100% completion for our targeted onshore workforce and so far 81% of our targeted offshore workforce, with 100% completion expected by the end of February 2022. We enhanced our approach to the training this year, to make the experience more engaging and effective, and the feedback was very good. More than 700 people reviewed the training and gave it an average score of 4.7 out of 5.

Raising awareness of our Speak Up Policy is an ongoing action across all of our business units. We track all potential breaches of the Code of Conduct that are reported via our Speak Up channels or reported or detected locally. We compare data and trends year-on-year. In principle, the more cases we see, the more confident we are that there is a positive Speak Up culture; but we are also alert to whether any cases are a signal that the Code of Conduct is not properly understood and embedded.

**Ensuring all who work for us uphold our commitment to business ethics:** We engaged GoodCorporation™ to continue with the independent assessments of our anti-bribery/anti-corruption programme. This year they assessed our programme in France (for which our benchmark included the French Sapin II law) and the Gulf of Mexico. We are working towards being able to say the whole of Subsea 7 has had its programme independently assessed.

We also continued our work to ensure suppliers and other third parties uphold our standards. We continued to embed our new platform for the risk assessment and due diligence screening of third parties.

**Making a positive impact on business ethics in our sector including the supply chain:** We promoted and helped celebrate UN International Anti-Corruption Day, including a message from our CEO.

We held Supplier Integrity webinars across our regions and business units, at which senior managers talked about the importance of integrity. More than 500 suppliers and 1,100 individuals attended, and several clients also participated. Such events help spread best practice across our sector and raise awareness and buy-in. They also help provide us with assurance about our suppliers' alignment with and willingness to help uphold our commitment to ethical business conduct.



## GLOBAL INTEGRITY DAY

We want our people to be as comfortable talking about integrity as they are talking about safety. To help mark our Global Integrity Day, our fourth Integrity Video brought together six employees in different roles for an open conversation about integrity. The aim was to showcase how well the messages about integrity at the most senior level have landed, and how people have picked up the conversation confidently and in a very engaged way and taken ownership of our integrity.

Our integrity is the sum of the personal integrity of everyone who works here. Standing up for what our integrity means to us personally means being confident that our Company means what it says, values integrity above all things and will always stand up for it too.

## WE WILL BE FOCUSING ON

- Further encouraging our Speak Up culture
- Increasing independent assessments of our business
- Continuing to enhance our supply chain risk assessment process
- Working collaboratively to develop common standards

### OUR PLANS FOR 2022

Fostering a culture that encourages employees and others to speak up is an ongoing goal, and it will continue to be one of our focus areas in embedding our Compliance and Ethics Programme. We will also continue the progress we made in enhancing the impact and effectiveness of compliance and ethics training.

In addition, we will continue to develop and implement our approach to assurance across Subsea 7 and third parties through further independent assessments of parts of our business towards our goal of the

whole enterprise having been independently assessed. We will continue our ongoing third-party risk assessment and due diligence and more clearly define expectations of suppliers and other third parties.

Finally, in terms of making a positive impact on business ethics in our sector, we aim to continue to work with clients, peers, suppliers and others to develop common standards. We will support and oversee business-led integrity initiatives, including Global Integrity Day, UN Anti-Corruption Day and supplier integrity events.



# OPERATIONAL ECO-EFFICIENCY

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

## OUR AMBITIONS

Reducing emissions from our fleet

Reducing our Scope 3 emissions to support our clients' targets

Working with our supply chain to offer lower-carbon alternatives to our clients

## OUR TARGETS

**50%**

**BY 2035**

Reduction in Scope 1 and 2 emissions

**NET ZERO**

**BY 2050**

Emissions

## OUR PERFORMANCE

**535,642**

(2020: 410,446)

Tonnes in Scope 1 CO<sub>2</sub> emissions

**74,288**

(2020: 29,264)

Tonnes reduction in CO<sub>2</sub> emissions from Clean Operations



## OUR COMMITMENTS

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

### UN SDGs



## WHY IT IS IMPORTANT

Subsea 7 recognises the risks and opportunities of climate change and its potential effect on our business, our end markets and on society. We are committed to further aligning ourselves to the recommendations of the Task Force on Climate-related Financial Disclosures and have established an internal workgroup to progress this.

We published our plans to target net zero by 2050 and included a nearer-term target of 50% reduction in Scope 1 and 2 greenhouse gas emissions by 2035 from a 2018 baseline. In line with our emissions targets, we are actively engaged in seeking ways to be more efficient in the way that we work and investing in solutions that lower our greenhouse gas emissions and those of our clients. Over 90% of our emissions come from our vessels such that our carbon dioxide emissions correlate strongly with our activity levels in the year. We have established our Scope 3 baseline and are focused on engaging with our stakeholders to work together on reducing the contribution of emissions from our projects and services.

The International Maritime Organization (IMO) launched its strategy for the reduction of greenhouse gas emissions from ships. This included limiting sulphur oxide (SOx) and nitrogen oxide (NOx) emissions and setting a target to reduce total annual greenhouse gas emissions from shipping by at least 50% by 2050

compared with 2008. As a result, from January 2020 a new low-sulphur limit for fuel came into effect worldwide. All of Subsea 7's vessels are designed to run on low-sulphur fuel, and as such no additional investment or action was required.

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

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

We have one of the youngest subsea, umbilicals, risers and flowlines fleets in the offshore energy construction market with an average age of just 10 years. We have invested over \$3.5 billion in new vessels since 2010, commissioning 12 new build vessels in that period. We aim to operate a vessel for its entire useful life, investing

in new equipment and enhancements to extend the life where possible. When a vessel is at the end of its life we are committed to recycling it responsibly.

All of our redundant vessel tonnage is recycled under the Hong Kong Convention and the EU Ship Recycling Regulation. We have a comprehensive risk management system with procedures and tools that identify, analyse, report and manage business risks that are related to environmental exposures and the effects of climate change. We measure key environmental data against internal targets including fuel and energy consumption, carbon emissions, waste segregation, spills and other incidents. Environmental hazard severity is measured through a points system that reflects the potential impact on the environment should an incident occur. In addition, Subsea 7 discloses its climate change impact through CDP.

Subsea 7 is globally certified to the Environmental Management Standard ISO 14001:2015. This standard applies to the management of our environmental responsibilities in a systematic manner including the enhancement of environmental performance as well as the achievement of our environmental obligations and objectives. In 2021, DNV GL performed a surveillance audit of our compliance which confirmed effective fulfilment of requirements and no non-conformities with the requirements of the standard.

## WE HAVE BEEN FOCUSING ON

- Publishing our net zero target ●
- Establishing baselines of our full carbon footprint ●
- Ensuring 100% of sites use renewable energy where available ◐

### OUR PROGRESS IN 2021

Lowering the carbon impact from our operations is critical to limiting climate change and its impacts. Following the announcement of our net zero target, we refined our three ambitions to ensure a focused approach to our efforts and this year concentrated on the following areas.

**Improving the environmental performance of our fleet:** Our overall fuel usage and hence emissions increased this year. This was driven primarily by a close to commensurate increase in active vessels days supporting our projects. In addition, the mix of projects and locations we operated, resulted in nearly double the number of transit days which often burns more fuel. Our focus has been on how we action reductions within this area. Our studies have concluded that we will target three main areas for improvement: digital optimisation of our fleet power management, lower-carbon fuels and use of electric battery hybrid power. We also concluded our study on the design and

analysis of hybrid battery power on a number of different vessels.

We have been deploying digital fuel flowmeters to many of our ships and have also been establishing and trialling digital dashboards to help us optimise fuel use and reduce emissions. Finally, our continued focus on Clean Operations throughout 2021 has resulted in 74,288 reduction of CO<sub>2</sub> emissions.

#### Engaging with clients to reduce environmental impact of our services:

We recognise the importance of tracking and reporting our full carbon footprint as well as supporting our clients with establishing ways to lower the impact of our emissions on their operations too. In 2021 our focus has been around establishing a framework and setting baselines for the total carbon footprint of our projects, services and operations. This extends beyond Scope 1 and 2 to look at how we will track emissions from our supply chain and other elements of our business to provide a full picture including Scope 3.

**Improving environmental efficiencies onshore:** Our commitment to improving the environmental efficiency extends to our onshore operations. Following the circulation of a Company directive to switch to renewable energy sources of power, 66% of our total electricity consumption was generated from renewable energy tariffs. This supports our continued drive to seek ways to reduce our emissions in line with our target.



### DIGITAL SOLUTION ONBOARD VESSELS

Our ships are all diesel-electric powered, which essentially means they are floating power stations that generate electricity, but we do not necessarily need or use all the power all of the time. A number of our vessels have been fitted with digital dashboards which provide visibility, in real time, where we can potentially reduce emissions through saving power and fuel.

## WE WILL BE FOCUSING ON

- Rolling out digital dashboards across our fleet and trialling biofuels
- Extending use of our Carbon Footprint Estimator tool to projects
- Collaborating with key suppliers

### OUR PLANS FOR 2022

We will complete our installation of digital fuel flowmeters and roll out of digital dashboards across our fleet in order to optimise fuel/power management and thus reduce emissions. In addition, we will progress with preparations to hybridise an additional vessel in 2023.

We plan to run a biofuel trial on one of our vessels in 2022 to help support our understanding of this lower-carbon fuel and its technical compatibility with our fleet's existing power systems. We also intend to explore the opportunities and requirements to make use of sustainable electric power from shore to support our vessels whilst in port. These latter two initiatives are dependent on aspects outside our control, namely the breadth of availability of biofuels and the existence of

sustainable electricity supplies adjacent to the port facilities we operate from, but nonetheless we believe both are important elements on our path to net zero.

We will look to establish a platform to track and report our full carbon footprint such that our efforts and action in reducing our emissions will be focused and robustly measured against our revised baselines. We will engage clients through the continued application of our Carbon Footprint Estimator tool and look to deploy further in our projects to identify and deliver emissions savings.

Alongside the focus of how we track emissions from our supply chain, we will continue to engage with key strategic suppliers on their carbon footprint and discuss opportunities to reduce.



# ECOLOGICAL IMPACTS

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

## OUR AMBITIONS

Recycling all of our waste

Zero single-use plastics onshore and offshore

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

## OUR TARGETS

**90%**

**BY 2025**

Waste recycled onshore (82% by 2022)

**70%**

**BY 2025**

Waste segregated offshore for recycling (65% by 2022)

**15 BY 2025**

BORABOX™ sensors deployed for science (2 by 2022)

## OUR PERFORMANCE

**77%**

(2020: 76%)

Waste recycled onshore

**69%\***

(2020: 61%)

Waste segregated offshore for recycling

\* 2021 was a special year with high content of client materials being segregated offshore.



## OUR COMMITMENTS

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

### UN SDGs



## WHY IT IS IMPORTANT

Subsea 7's fabrication and construction activities, offshore and onshore, have an impact on the environments that surround them. We conduct our business in a way that considers the environment and which aims to keep any negative impact to a minimum and put in place procedures to protect biodiversity and the ecosystems we work in. Our HSEQ policy focuses on ensuring regulatory compliance and improving our environmental performance through careful selection of consumables and working practices designed to reduce waste, energy consumption and emissions. Subsea 7's line managers are responsible for implementation and compliance with our policies within our Business Management Systems and for ensuring that all employees and contractors are aware of their responsibilities.

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

- Work according to applicable environmental laws, conventions, protocols and regulations
- Promote and maintain a positive environmental culture

- Manage our activities to eliminate or reduce any potential negative environmental impact
- Consider environmental sustainability an important element in the way we do business
- Use planning, design and risk assessment to avoid and reduce environmental risk.

Our environmental awareness training is mandatory for all new starters and covers environmental compliance, reporting environmental incidents, our impacts and the role of our employees and their actions.

Some ecological disruption is unavoidable when putting in place new subsea infrastructure. We recognise the impacts our operations may have on marine biodiversity above the water, below the water and on the seabed and are focused on minimising and mitigating these impacts through focused effort. Our Pipeline Bundle solutions eliminate the need for trenching and rock dumping and are a preferred solution for many clients in the North Sea.

We also rely on some single-use plastic items, however, we are a signatory to the UK Chamber of Shipping Single-Use Plastic Charter. In line with this agreement, we are looking at ways to reduce our dependence on single-use plastics on our sites and vessels and within our supply chain annually.

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

Subsea 7 provides decommissioning services to the offshore oil and gas market, helping our clients to safely and responsibly remove and dispose of obsolete offshore infrastructure at the end of its useful life. We also take responsibility for our own end-of-life assets, with all vessels recycled in accordance with the Hong Kong Accord when they are no longer operable. In 2021 *Seven Eagle* was decommissioned from the fleet.

Onshore yards and offices remained environmentally stable over time and typically co-existing unobtrusively with the local environment. We conduct environmental risk assessments on all our facilities and use them to form an action plan to minimise this impact from the early engineering design phase through to daily operations.

## WE HAVE BEEN FOCUSING ON

- Recycling waste to meet targets ●
- Launching a research alliance with the UK National Oceanography Centre ●
- Removing four categories of single-use plastic items from our operations ◐

### OUR PROGRESS IN 2021

We have been encouraged by the Company-wide initiatives and progress to deliver meaningful ecological value this year.

**Recycling our waste:** We developed a global initiative to engage with our waste contractors to ensure our waste is being handled responsibly.

We continued to apply focus on achieving our targets for recycling waste through collective collaboration across the business. We connected with our workforce through targeted campaigns to encourage progress in this area. This year we have recycled 77% onshore waste and segregated 69% offshore waste for recycling, which is on track for our 2025 targets.

#### Partnering with an institution to assist in a marine environmental initiative:

Together with the UK National Oceanography Centre, Subsea 7 formed a global partnership called BORA Blue Ocean Research Alliance™. This alliance seeks to bridge the gap between industry and science in support of a sustainable

marine future. It will utilise Subsea 7's ability to reach both geographical areas and water depths that have perhaps been unattainable to science at scale. This not-for-profit alliance will explore many opportunities to add value in understanding the health of our oceans and supporting biodiversity. We have identified four key projects to implement over the medium term.

Our first area of focus is the BORAbbox™ which is a programme to deploy sensors on our underwater Remotely Operated Vehicles (ROVs) and structures to monitor essential ocean variables. During 2021 we successfully trialled the first BORAbbox™ on one of our vessels and we plan to install a further two in 2022.

**Zero single-use plastics:** As a signatory to the UK Chamber of Shipping Single-Use Plastic Charter which seeks to eliminate non-essential single-use plastic, we are making good progress both onshore and offshore with phasing out four categories of commonly used single-use plastic. We are keeping track of progress through an online database at our onshore sites and vessels. A small number of sites and vessels still need to phase out existing single-use stock but going forward we will not purchase single-use items related to the four categories.



## SENSORS TO MAKE SENSE OF THE SEA

BORAbbox™ is a suite of sensors fitted to ROVs or other offshore infrastructure to collect data in otherwise inaccessible areas and enhance the global reach of ocean observations. Data collected is regularly processed for scientists to analyse and make available to the global science community. With a focus on measuring essential ocean variables, the BORAbbox™ measurements will monitor temperature, salinity, depth and the carbonate system, all of which are vital in helping monitor the wellbeing of our oceans.

## WE WILL BE FOCUSING ON

- Enhancing our waste management protocols
- Supporting BORA Blue Ocean Research Alliance™ initiatives through our projects
- Phasing out a further two categories of single-use plastic items

### OUR PLANS FOR 2022

Our efforts to recycle our waste will continue throughout 2022 with targets set to achieve 90% onshore and 70% segregated offshore for recycling by 2025. We will further enhance waste management protocols onshore and offshore.

In support of BORA Blue Ocean Research Alliance™ and our 2025 target to deploy 15 BORAbbox™ sensors subsea, we will install two BORAbbox™ sensors subsea which will collect and transfer key ocean variables to scientists. We will seek client support and funding to ensure we meet our target. In addition, we will begin to advance the partnership's second focus

area which will be around capturing marine life photos and videos in remote locations and water depths through an existing project called SERPENT. We also plan to develop specific BORA Blue Ocean Research Alliance™ projects, of high scientific or environmental value, with our clients across the globe, where we have subsea projects.

Following on from replacing the four single-use plastic categories in 2021, we will continue to phase out our single-use plastic items with a target to extend this to an additional two categories across the business.



# ADDITIONAL SUSTAINABILITY TOPICS

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

## HUMAN CAPITAL DEVELOPMENT



### WHY IT IS IMPORTANT

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

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

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

### Our initiatives and projects

#### VIRTUAL-READY LEARNING AND DEVELOPMENT

Building on the investment made in 2019 in our digital HR platform for our onshore and offshore population, we continue to encourage a culture of learning through regular communications from "Academy 7". These communications build on relevant topics and initiatives to support our people's learning and development. In 2021 we made further investment in our digital learning offering with the launch of "Training Portal" to our wider offshore community, which provides a springboard for greater learning and development opportunities for our offshore population. The 2021 Festival of Learning theme was "Create Connections", with the offerings supporting our people to create connections with other colleagues, with the business and with their own wellbeing. Over 3,000 of our people took part in 40 Academy 7 sessions offered globally, and this does not take into account those who attended the many face-to-face and virtual sessions organised by our regions and offices around the world.

We continued to challenge ourselves to focus on our Value of Performance, and in 2021 we achieved 97% completion of our Performance Management Process known as "Compass", beating our target of 95%. In 2021 we introduced the new "Career Development Conversation" to our onshore people, evolving our offering to support our people to plan for their future and learn new skills that advance their career, as society makes the energy transition.

**"I felt that it was a complete learning experience, even though we never actually physically met each other."**

### TARGETED DEVELOPMENT

In 2021 we continued the development of our managers onshore, with 200 line managers joining our "Academy 7 Virtual Line Managers" programme.

For offshore managers we continue the delivery of the virtual "Safety Leadership Programme" with five cohorts going through the programme in 2021. 94% of the offshore managers who attended said they would recommend the training to a colleague.

In 2022 we will expand our Graduate Programme and launch a Project Management Diploma course and a new Leadership Development Programme.

**"Being able to talk in a group about real challenges we face and get some new ideas on how to solve them has been really useful."**

## DIVERSITY AND INCLUSION



### WHY IT IS IMPORTANT

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

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

Human Rights Policy Statement and are further detailed in our equal opportunities and diversity employment policy.

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

### Our initiatives and projects

In 2021 we set a Company objective for our regional business units to deliver against their D&I action plans to demonstrate our local leadership commitment. The VPs of each business started the year participating in sharing sessions, where they showcased their plans and D&I agendas with the other leaders. Locally around the world D&I networks were set up.

Other examples of activity included Brazil facilitating LGBTQi+ activities to increase knowledge, our Renewables business management team had deep dive awareness sessions and our Gulf of Mexico business held D&I Coffee and Conversation sessions on topics such as women in business, cultural awareness and "men advocating real change".

At the global level we included four D&I questions in our Employee Survey, to allow us to better understand how our people feel about this topic and to measure the impact of our initiatives and activities moving forward. In 2021 we increased our internal advertising of senior roles following internal feedback to ensure all employees have equal opportunities for career advancement. Also in 2021, to remove potential bias, we changed our approach to our talent and succession process, by ensuring that everyone at a certain level is talent assessed in advance of completing succession plans.

Throughout 2021 we maintained communication on this topic, which included celebrating International Women's Day in March, and we launched our "Drawing Strength from our Differences" video on the United Nations World Day for Cultural Diversity in May. As part of the Festival of Learning we held multiple D&I related sessions to support our people to be exposed to someone outside their usual network. We continue our proactive involvement with the POWERful Women Energy Leaders Coalition, with one focus in 2021 being evaluating the effectiveness of STEM outreach.

Moving forward to 2022 we plan to launch our detailed D&I plan to our people, continue a focus on inclusivity and use the Employee Survey results to focus our initiatives and activities.

## RESPONSIBLE SUPPLY CHAIN MANAGEMENT



Image courtesy of Vattenfall



### WHY IT IS IMPORTANT

A significant part of our work is executed by our supply chain. In EPIC projects, outsourced scopes can represent up to 50% of Subsea 7's revenue. We recognise that a responsible supply chain is central to our business activities and important in ensuring a sustainable

future. Our aim is to co-operate closely with our suppliers to achieve a working relationship that benefits both parties. We expect our suppliers to have an approach to sustainability aligned with ours and to respect our Values and working culture.

To ensure a fair bidding process, Subsea 7 promotes open competition among approved suppliers. Bidders are treated fairly and evaluated according to their technical and commercial proposals. Our Code of Conduct for Suppliers sets out the key principles of ethical business conduct that our suppliers are required to uphold. This includes business ethics, labour practices, human rights, health, safety, security, environment and quality. By signing a contract, they agree to work according to these principles.

### Our initiatives and projects

This year we launched a new risk management platform to improve the way we conduct due diligence screening and assess business ethics and human rights with medium and high-risk suppliers and other third parties.

We have also replaced our Supplier Management System with a fully integrated software platform to assist and control the process of approving a new supplier and to monitor their progress. As part of the approval process any potential supplier is required to provide satisfactory information on a number of sustainability issues, and the process can also include screening for legal, business ethics and human rights issues. The level of scrutiny to which suppliers are assessed is based on a risk methodology that takes into account country risk and the type of materials or services supplied.

Throughout 2021, we engaged with our key suppliers through a number of Supplier Integrity events as an opportunity to highlight sustainability issues and opportunities across our supplier base. These sessions provided us with the opportunity to discuss the suppliers' own plans and how they can support Subsea 7 in delivering our ambitions.



## COMMUNITY IMPACT AND RELATIONSHIPS



### WHY IT IS IMPORTANT

Subsea 7 operates on a global basis and a core principle of our operating approach is to optimise local content and engage closely with local communities on all levels.

#### AUSTRALIA COVERALL UPCYCLING

Subsea 7 recovered coveralls from *Seven Oceanic* offshore campaign in Australia and sent them to be upcycled into 'tote bags', to be used as giveaways for the Australian business unit. We have engaged a local non-profit organisation, LOOP, who provide coverall 'upcycling' services, which ultimately results in reduction of landfill waste and employment of people-in-need from the local community.



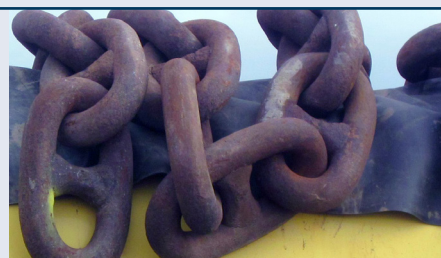
#### BRAZIL AGAINST HUNGER

Subsea 7 worked with Industry Federation of the State of Rio de Janeiro (FIRJAN) to organise the SESI Citizens Against Hunger awareness campaign to raise financial and food donations for those who are in situations of hunger and extreme poverty. We organised a collection of food and essentials into baskets of basic products for those in need.



#### UNITED KINGDOM REPURPOSING CHAINS AT WICK

Chain links are used to provide weight control for pipeline bundles and are cut to lengths to suit project requirements. When the chains are cut, the cut link is no longer of use and is discarded. In 2021 our Wick team worked with local fishermen to reutilise 1,500 chains as weights to secure their fishing pots and creels to the seabed.



#### MALAYSIA THE LIGHTHOUSE

Employees in Kuala Lumpur volunteered and raised funds for The Lighthouse, an orphanage home for children. Donations in the form of personal care items, cleaning supplies and cash aids were given as contribution towards the essential items needed for the children.



#### GLOBAL WORLD CLEAN-UP DAY

Across the organisation, our employees took part in the World Clean-up Day to clean up and remove plastic waste from local beaches and coastlines. In parallel, the team in Kuala Lumpur, Malaysia performed a City Clean-up, which involved removing rubbish from the public areas surrounding the Subsea 7 office building.



## UNITED KINGDOM YOUNG ENTERPRISE

Since 2018, Subsea 7's Sutton office has supported Young Enterprise, a national charity who specialise in enterprise and financial education for young people. This year, Subsea 7 volunteers engaged with local schools in local and regional competitions to judge the participants on their business models for a sustainable and environmentally friendly product.



## EQUATORIAL GUINEA SCHOOL INAUGURATION

In Bata, Subsea 7 contributed to building a school to support the Government initiative to provide new schools. Subsea 7 is committed to working with communities to deliver initiatives that will enhance the areas where we operate and expand access to education in the area.



## FRANCE RED CROSS DONATION

Subsea 7 delivered 30 food and essentials boxes to the Red Cross of Suresnes as an appreciation for the support they have provided to us. The Red Cross unit has worked in various missions organised around social action, first aid and training.



## UNITED KINGDOM CARNIE WOODS BOARDWALK UPGRADE

In partnership with Aberdeen City Council's Countryside Rangers, 24 members of Subsea 7 Aberdeen sponsored and replaced worn-down boardwalks and cut back overgrown vegetation, to improve a local public recreational area.



## AUSTRALIA MEALS FOR SHARING

In Perth, our teams cooked healthy meals for over 100 residents at Ronald McDonald House. This facility provides accommodation to remote families while their children receive treatment at the Perth Children's Hospital.





# DATA SUMMARY

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

PERFORMANCE INDICATOR	COVERAGE	UNIT	MEASUREMENT		
			2019	2020	2021
HEALTH, SAFETY AND WELLBEING <sup>1</sup>					
Total incident free days <sup>2</sup>	Group	days	337	336	286
Total recordable injury	Group	number	26	32	39
Total lost-time injury	Group	number	3	8	14
Total recordable injury frequency	Group	rate*	0.20	0.29	0.33
Lost-time injury frequency	Group	rate*	0.02	0.07	0.12
Total serious injury frequency (very high potential) <sup>3</sup>	Group	rate*	**	**	0.19
Total fatality	Group	number	0	0	0
Total near miss reports <sup>4</sup>	Group	number	231	273	248
Training and education					
Total days of health, safety and wellbeing training	Group	days	10,963	2,738	4,022
Safety courses taken per person	Group	average number			
– Offshore			**	2.17	2.66
– Onshore			**	0.63	1.45
Health & wellbeing courses taken per person <sup>5</sup>	Group	average number	**	0.55	0.28
Emergency Response exercises conducted onshore <sup>6</sup>	Group	number	126	119	137
Employee Survey <sup>7</sup>					
Score given to the statement: “Employee Health and Wellbeing is a priority at Subsea 7”	Group	Score out of 10	**	**	7.4
ENERGY TRANSITION					
Renewables business revenue	Group	million USD	198	631	1,260
Cumulative offshore wind farm monopile foundations installed	Group	number	518	***605	639
Cumulative offshore wind farm jacket foundations installed	Group	number	140	***142	152
Cumulative offshore wind turbine generator foundations installed	Group	number	658	***747	791
Cumulative renewables cables installed	Group	number	546	548	726
Cumulative length of renewables cables installed	Group	number	770	816	1,281
Cumulative offshore substations installed	Group	number	32	35	35
Cumulative power capacity of renewables projects supported	Group	GW	5.1	6.0	7.5

\* Frequency rate calculated per 200,000 hours worked

\*\* Data not available

\*\*\* Following a review of our data tracking, 2020 figures for the relevant indicators restated

1. Data includes both employees and contractors.

2. Total incident free days refer to the number of days without a recordable incident that caused work-related injury or a significant spill.

3. Total serious injury frequency (very high potential) rate refers to the number of work-related recorded incidents and near miss cases where the potential for personal injury was rated as very high (potential fatality), per 200,000 hours worked. The indicator was introduced in our sustainability reporting in 2021.

4. A near miss is an incident that has no actual consequences but does have potential negative consequences.

5. Health and wellbeing courses apply only to those with access to our HR training platform.

6. Emergency Response exercises are based on simulated scenarios developed to reflect potential offshore or onshore operational issues and conducted by onshore support team.

7. A new Employee Survey methodology implemented in 2021.

PERFORMANCE INDICATOR	COVERAGE	UNIT	MEASUREMENT		
			2019	2020	2021
LABOUR PRACTICES & HUMAN RIGHTS					
Compliance and ethics cases <sup>1</sup>					
Compliance and ethics cases relating to:	Group	number			
– Human rights			0	0	1
– Labour practices			19	15	13
Compliance and ethics cases relating to discrimination	Group	number	0	0	2
Compliance and ethics cases relating to human rights impacts on local communities	Group	number	0	0	0
Supply chain					
Suppliers with a contract that included human rights clauses	Group	number %	6,481 77	6,660 82	6,164 86
Employee Survey <sup>2</sup>					
Score given to the statement “At Subsea 7, people of all backgrounds are accepted for who they are”	Group	Score out of 10	**	**	8.3
BUSINESS ETHICS					
Speak Up and other compliance and ethics cases	Group	number	36	32	31
Speak Up and other compliance and ethics cases per 1,000 employees	Group	rate	3.03	2.94	2.62
Proportion of the business covered by an independent anti-corruption compliance programme assessment <sup>3</sup>	Group	%	**	**	80
Medium-and high-risk suppliers assessed for anti-corruption risk <sup>3</sup>	Group	%	**	**	40
Communication and training <sup>4</sup>					
Employees that have received training on compliance and ethics (including anti-corruption)	Group	number	4,791	5,153	5,067
Proportion of our people required to complete compliance and ethics training (including anti-corruption)	Group	%	40	47	46
Governance body members <sup>5</sup> that have received training on compliance and ethics (including anti-corruption)	Group	number %	115 60	122 64	156 81
Categories that have had Subsea 7 anti-corruption policies communicated to them:	Group	number			
– Governance body member <sup>5</sup>			115	122	156
– Incorporated joint venture partners			**	18	22
– Unincorporated joint venture, consortium and alliance partners <sup>6</sup>			**	**	**
– Suppliers			6,481	6,660	6,164
– Employees			4,791	5,153	5,067
Categories that have had Subsea 7 anti-corruption policies communicated to them:	Group	%			
– Governance body member <sup>5</sup>			60	64	81
– Incorporated joint venture partners			**	100	100
– Unincorporated joint venture, consortium and alliance partners			**	100	100
– Suppliers			77	82	86
– Employees			40	47	46
Suppliers attending a Compliance, Ethics and Integrity session	Group	number	**	481	527
Other					
Monetary value of financial/in-kind political contributions made by Subsea 7	Group	USD	**	0	0

\*\* Data not available

1. Compliance and ethics cases include all alleged or suspected breaches of the Code of Conduct, whether raised via Safecall or reported via other channels.

2. A new Employee Survey methodology implemented in 2021.

3. The indicator was introduced in our sustainability reporting in 2021.

4. Training through e-learning, general and targeted workshops.

5. Governance body member includes directors of Subsea 7 S.A Board and every wholly-owned subsidiary in the Group.

6. As part of Subsea 7 standard anti-corruption compliance process, all unincorporated joint venture, consortium and alliance partners would have had Subsea 7 anti-corruption policies communicated to them however the total number of this category is not known.



PERFORMANCE INDICATOR	COVERAGE	UNIT	MEASUREMENT		
			2019	2020	2021
OPERATIONAL ECO-EFFICIENCY					
Greenhouse gas emissions					
Scope 1 CO <sub>2</sub> -e emissions <sup>1,2</sup>	Group	tonnes	439,700	420,564	543,041
Scope 1 CO <sub>2</sub> emissions <sup>2</sup>	Group	tonnes	432,733	410,446	535,642
Scope 2 CO <sub>2</sub> -e emissions <sup>1,3</sup>	Group	tonnes	*3,426	*2,974	2,168
Scope 3 CO <sub>2</sub> -e emissions <sup>1,4</sup>	Group	tonnes	26,870	*27,579	29,469
Non-greenhouse gas emissions					
NO <sub>x</sub> emissions <sup>5</sup>	Group	tonnes	5,034	4,808	7,088
SO <sub>x</sub> emissions <sup>5</sup>	Group	tonnes	564	379	381
Resource use					
Fuel consumption (marine gas oil) <sup>5,6</sup>	Group	tonnes	112,864	111,476	167,090
Onshore electricity from renewable energy tariffs	Group	%	51	45	66
CO <sub>2</sub> and energy saving initiatives – Subsea 7 fleet					
Number of hybrid vessels	Group	number	1	1	1
Number of Clean Operations <sup>7</sup> performed	Group	number	3,494	3,322	5,093
Fuel saved by hybrid vessels (estimated)	Group	%	19	11	6
Fuel saved during Clean Operations <sup>7</sup>	Group	m <sup>3</sup>	7,190	10,759	23,186
CO <sub>2</sub> saved from hybrid vessel	Group	tonnes	3,376	1,645	810
CO <sub>2</sub> -e saved during Clean Operations <sup>1,7</sup>	Group	tonnes	19,863	29,722	75,355
CO <sub>2</sub> saved during Clean Operations <sup>7</sup>	Group	tonnes	19,560	29,264	74,288
Operational cost savings from Clean Operations <sup>7</sup>	Group	million USD	4.1	4.7	14.2

\* Following a review of our data tracking, Scope 2 and Scope 3 CO<sub>2</sub>-e figures restated for the indicated year

1. Our reporting on GHG emissions is based on carbon dioxide-equivalent (CO<sub>2</sub>-e), a standard unit for measuring carbon footprints. The conversion factors to calculate CO<sub>2</sub>-equivalent (CO<sub>2</sub>-e) are IEA for electricity and Defra for fuel/gas.
2. Scope 1 emissions are direct emissions from Subsea 7 owned or controlled vessels.
3. Scope 2 emissions are indirect emissions from purchased electricity (non-renewable sources) for our offices and sites.
4. Scope 3 emissions are emissions from business travel – air miles travelled by our people for work.
5. Our reporting of NO<sub>x</sub> and SO<sub>x</sub> emissions and fuel consumption has from 2021 been adjusted due to a change in scope of reporting with the inclusion of data for charter vessels (12 months or over).
6. Fuel consumption data does not include power from shore while vessels are in port.
7. A Clean Operation is an energy efficiency initiative where a vessel's carbon footprint is reduced through measures which save energy without compromising safety and execution.

PERFORMANCE INDICATOR	COVERAGE	UNIT	MEASUREMENT		
			2019	2020	2021
ECOLOGICAL IMPACTS					
Environmental Incidents <sup>1</sup>					
Environmental incident frequency rate per 200,000 hours worked	Group	rate	0.82	0.86	1.18
Spills <sup>2</sup>					
Number of environmental spills	Group	number	105	94	106
Volume of environmental spills <sup>3</sup>	Group	litres	**	**	1,752
Amount of litres spilled per 200,000 hours worked	Group	rate	11.76	36.00	16.00
Waste generation and disposal <sup>4</sup>					
Hazardous waste generated from	Group	tonnes			
– Offshore			*	1,523	2,938
– Onshore			**	150	108
Non-hazardous waste generated from	Group	tonnes			
– Offshore			*	2,883	3,057
– Onshore			**	3,451	3,194
Total hazardous and non-hazardous waste directed to disposal from Subsea 7 onshore owned sites	Group	tonnes	**	849	761
Total hazardous and non-hazardous waste recycled from Subsea 7 onshore owned sites	Group	tonnes	**	2,752	2,541
		%	**	76	77
Non-hazardous waste segregated for recycling from offshore <sup>5</sup>	Group	%	**	61	69
Other					
External environmental initiatives undertaken locally	Group	number	15	11	22
Significant fines or non-monetary sanctions in excess of \$100k USD for non-compliance with environmental laws/regulations	Group	USD	0	0	0

\* Following a review of our data tracking, we have removed previous years data and elected to reset our baseline as 2020

\*\* Data not available

1. Subsea 7 requires that all environmental incidents that have or could have resulted in environmental impact are reported. An environmental incident is defined as an actual unplanned, uncontrolled or unauthorised release to the environment causing pollution to land, air, water or the seabed.
2. Spills occur from offshore and onshore sources owned or controlled by Subsea 7. Types of spills include oil, fuel, hydrocarbons, chemicals and other substances (water, bilge water, grey water, etc.).
3. The indicator was introduced in our sustainability reporting in 2021.
4. Our reporting of waste has from 2021 been adjusted due to a change in scope of reporting with the inclusion of data for charter vessels (12 months and over). Onshore data is now included and covers waste generated from Subsea 7 onshore owned sites.
5. Excludes an element of non-hazardous waste which cannot be recycled.



PERFORMANCE INDICATOR	COVERAGE	UNIT	MEASUREMENT		
			2019	2020	2021
WORKFORCE					
Employment, New Hires and Turnover <sup>1</sup>					
Total employees headcount (as per 31 <sup>st</sup> December 2021)	Group	number	11,869	10,870	12,502
– Onshore headcount			6,422	5,747	6,592
– Offshore headcount			5,447	5,123	5,910
Total employees by employment type (full time and part time) <sup>2,3</sup>	Group	%	FT/PT 96/4	FT/PT 97/3	FT/PT 97/3
Total new employee hires by gender <sup>2</sup> :	Group	%			
– Female			29	28	25
– Male			71	72	75
Total new employee hires by age group <sup>2</sup> :	Group	%			
– under 30			31	27	31
– 30-50			63	67	62
– over 50			6	6	7
Total voluntary permanent employee turnover <sup>2</sup>	Group	rate*	6.0	4.0	7.0
Diversity					
Gender mix of employee:	Group	%	M/F	M/F	M/F
– Onshore			38/15	39/14	39/14
– Offshore			46/1	46/1	46/1
Onshore leadership level by gender mix of male or female <sup>2,3</sup> :	Group	%	M/F	M/F	M/F
– Leadership			89/11	87/13	87/13
– Executive Management Team			75/25	75/25	67/33
– Board of Directors			88/12	86/14	86/14
Nationality mix of employee:	Group	%			
– Europe			56	57	53
– Asia/Pacific			17	22	20
– Americas			23	17	19
– Other			4	4	8
Individuals by age group onshore:	Group	%			
– under 30			15	14	12
– 30-50			66	67	69
– over 50			19	19	19
Individuals by age group offshore:	Group	%			
– under 30			9	8	8
– 30-50			68	68	67
– over 50			23	24	25
Training and education					
Courses taken per person	Group	average number			
– Offshore			**	3.88	3.02
– Onshore			**	6.00	7.81
Hours of training undertaken per person	Group	average hours			
– Offshore			**	4.44	3.34
– Onshore			**	7.42	8.51

\* Annual turnover rate is calculated by number of permanent voluntary leavers (rolling 12-month total) per number of permanent headcount (rolling 12-month average)

\*\* Data not available

1. Data includes both employees and contractors, unless otherwise stated.

2. Data excludes contractors.

3. Permanent onshore population only. Excludes 4Subsea, Xodus, and direct hires of the joint ventures as data is not available.

The data summary in pages 22 to 26 provides group-consolidated data of Subsea 7 and Seaway 7 excluding OHT ASA. From 2022, Subsea 7 Sustainability Report will present a consolidated dataset for Subsea 7 and Seaway 7 ASA.

# REPORT ABBREVIATIONS

<b>CO<sub>2</sub></b>	Carbon Dioxide
<b>CO<sub>2</sub>-e</b>	Carbon Dioxide Equivalent
<b>D&amp;I</b>	Diversity & Inclusion
<b>EPCI</b>	Engineering, Procurement, Construction and Installation
<b>EPIC</b>	Engineering, Procurement, Installation and Commissioning
<b>ESG</b>	Environmental, Social and Governance
<b>ESI</b>	Environmental Ship Index
<b>EU</b>	European Union
<b>GHG</b>	Greenhouse Gas
<b>HSEQ</b>	Health, Safety, Environment and Quality
<b>HR</b>	Human Resource
<b>IEA</b>	International Energy Agency
<b>IMO</b>	International Maritime Organization
<b>km</b>	Kilometres
<b>kWh</b>	Kilowatt hour
<b>LCOE</b>	Levelised Cost of Electricity
<b>LGBTQI+</b>	Lesbian, Gay, Bisexual, Transgender, Queer and Intersex
<b>MW</b>	Megawatts
<b>NOx</b>	Nitrogen Oxide
<b>R&amp;D</b>	Research & Development
<b>ROV</b>	Remotely Operated Vehicle
<b>SCM</b>	Supply Chain Management
<b>SDGs</b>	Sustainable Development Goals
<b>SOx</b>	Sulphur Oxide
<b>STEM</b>	Science, Technology, Engineering and Mathematics
<b>T&amp;I</b>	Transport and Install
<b>UK</b>	United Kingdom
<b>UN</b>	United Nations



## EU NON-FINANCIAL REPORTING DIRECTIVE

In line with the EU Non-Financial Reporting Directive, we set out below where the relevant information can be found.

	ANNUAL REPORT	SUSTAINABILITY REPORT
Business Model	Pages 6-7, 10-17, 37	Page 4
Anti-Corruption	Pages 18, 20, 30	Pages 12-13, 23
Diversity	Pages 21, 29	Pages 19, 26
Environment	Pages 18, 20, 24, 28, 34, 36	Pages 14-17, 24-25
Human Rights	Pages 18-19, 29	Pages 10-11, 23
Social	Pages 18-19, 29, 33-34	Pages 6-7, 18-21, 22





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