

Sustainability Report 2023

**MAKE
SUSTAINABLE DELIVERY
POSSIBLE**

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→ Find more sustainability information online
www.subsea7.com

Delivering sustainable value for our stakeholders

Group revenue
\$6.0bn
 Renewables \$1.0bn

Workforce
14,000+
 From over 100 nationalities

Suppliers
8,000+
 Based in nearly 80 countries

Projects supported in 2023
84
 13 renewable projects

Clients supported in 2023
100



2023 at a glance

0.03

Lost-time injury frequency per 200,000 hours worked

Completed a double materiality assessment

New Board appointments strengthen oversight of key topics



\$1.0bn

in revenue from the Renewables business unit

2

Delivery of two industry-leading offshore wind construction vessels



Largest construction vessel *Seven Arctic* to be hybridised in 2024

98%

medium- & high-risk suppliers assessed for corruption risks

244

new graduates hires, 41% of whom were female

BORA Blue Ocean Research Alliance® programme endorsed by United Nations Decade of Science

2

Granted funding for two offshore green hydrogen studies



Our vision, values and strategy

Our vision

To make possible the global delivery of offshore energy for today and tomorrow.

Our strategy

We create sustainable value by delivering the offshore energy transition solutions the world needs.

Our values

-  Safety
-  Performance
-  Integrity
-  Collaboration
-  Sustainability
-  Innovation

Chief Executive Officer's Letter

Delivering offshore energy for today and tomorrow



John Evans
Chief Executive Officer

“The world continues to seek a balance in delivering affordable, secure and lower-carbon sources of energy. Subsea7 is well positioned across the offshore energy landscape to support our stakeholders and the world achieve these goals.”

Whilst ongoing geopolitical pressures persist, society is demanding energy that is both accessible and secure to meet and sustain present needs. Simultaneously, the world is facing the challenge of responding to the impacts of climate change and the need for cleaner ways to produce energy with lower emissions.

We know that each of these dimensions requires a balanced effort to address and support a stable energy system capable of meeting the needs of today and tomorrow.

To meet this challenge, the world will need experienced and innovative companies to deliver solutions. Subsea7 is well positioned across the offshore energy landscape from oil and gas, fixed offshore wind and carbon capture to emerging offshore energy sources such as floating wind and hydrogen. We are playing a key role in supporting our stakeholders, and the world, in achieving these energy transition goals.

When I reflect on 2023, it has been a busy and productive year for us. Subsea7 acquired all remaining shares in Seaway7, our fixed

offshore wind business, and we have seen greater focus and positive signs of a rebalance of risk and reward in the offshore renewables sector. Additionally, the creation of OneSubsea, a uniquely positioned joint venture between SLB, Aker Solutions and Subsea7, will play a significant role in subsea production economics, lowering development costs and achieving decarbonisation goals. With the anticipated growth in the subsea market, we consider this relationship to be fundamental in supporting the world's energy needs more sustainably.

We have remained focused on the areas that have the most material impact. Fundamental aspects of our business such as health and safety, business ethics and labour practices and human rights will always require a level of continued focus to ensure we uphold our duty of care and integrity. I'm pleased to report our positive position in these areas in this report. In climate, emissions and other environmental impacts, we have grown our fixed offshore wind business, and we continue to implement measures to decarbonise our operations and manage our impact on the environment. Collaboration and innovation will

be required to unlock some of the challenges in these areas, and I am pleased to see positive momentum and discussions. Finally, to support greater strength in governance across key areas, we established Board-level expertise and a focal point to address climate-related matters, IT cyber security, labour practices and human rights and biodiversity.

During the year, Subsea7 has been preparing itself in several areas for the impending EU Corporate Sustainability Reporting Directive, which we expect to apply to Subsea7 from 2024. We carried out a refresh of our material topics using a double materiality assessment approach. This approach ensures that we consider the impacts, risks and opportunities of relevant topics from an outside-in (financial) and an inside-out (societal/environmental) perspective. This allowed us to validate whether our current material topics continue to be appropriate and to identify emerging issues, which will inform our reporting. We see a high level of convergence to the sustainability areas that we have been focusing on since 2019. The learning from the double materiality assessment also ensures that as we evolve and mature our sustainability



WE SUPPORT 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 are making our best efforts to 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.

strategy over the coming years we do so in a way that is consistent with the values of our key stakeholders and of society more broadly.

Looking forward, it is expected that next year will be an important year for Subsea7 from a sustainability reporting perspective. Moving from voluntary to mandatory reporting will be a significant undertaking but one that should improve the comparability of Subsea7 against our peers and allow us to demonstrate our progress in the coming years. We remain focused on delivering long-term value across the offshore energy sector to support a long-term future.

Q&A With EVP Strategy and Sustainability

A conversation with Marcelo Xavier



Marcelo Xavier
Executive Vice President Strategy and Sustainability

“Subsea7 makes offshore energy transition possible through the continuous evolution of lower-carbon oil and gas and by enabling the growth of renewables and emerging energy.”

Q As a global player in the offshore energy sector, how are you managing the challenges in the industry, and has this impacted your strategy?

Whilst the global offshore energy sector is challenged in many ways, managing geopolitical risks, changing market dynamics, supply chain constraints and evolving regulations, we are also in a very exciting cycle of growing energy demand combined with a need to decarbonise our industry. Our strategy is to create sustainable value by delivering the offshore energy transition solutions the world needs, and we remain focused on the delivery of offshore energy across lower-carbon oil and gas, offshore wind and emerging energy projects.

Q How important is sustainability to your clients and how is this driving decisions today?

Whilst economics continue to play a central role, we recognise there are broader elements at play influencing decisions. Particular aspects will continue to be fundamental to meet minimum standards of compliance, such as safety, ethical business conduct, human rights and environmental criteria. We see that climate change considerations are driving a range of strategic directions for our clients. We are actively supporting their development in lower carbon intensity oil and gas, carbon capture and storage and offshore wind projects while we continue to make progress in the decarbonisation of our own operations.

Q As you reflect on your sustainability goals, how would you describe performance and where are your key challenges?

We know that creating sustainable value is a long-term agenda. It requires constant effort in material areas. I am pleased with the progress we have made not just this year but over the last few years. I'm happy to see our teams reaching the targets we set for 2023 and the progress made towards the long-term ones. I believe this is due to the strength in governance and continued effort and diligence of our people throughout our business. You can read about key highlights of our progress in pages 10 to 21 of this report.

The reduction of our emissions is a key and challenging target. We continue to make progress to decarbonise our operations by hybridising power of some of our vessels, using green power from shore when possible and digitalising our fleet fuel consumption monitoring system. However, the largest emissions reduction impact will come from alternative clean fuel, that today is not available at scale and cost to be widely used.

Q What is your primary objective for the year to come? How do you see the future?

2024 will be an important year for us. With the corporate reporting landscape evolving, Subsea7 will be focused on mandatory disclosures to support greater transparency around how we manage material topics. This will involve reviewing current governance structures to ensure sustainability matters will have the right level of support including a review of appropriate management practices, policies and controls to mature our disclosures.

In parallel to this, we remain focused on the long-term agenda, supporting business resilience and creating value through our continued attention in areas that are materially important to us and our stakeholders in preparing the business for the future.

Our approach

Sustainability governance

Subsea7 recognises the importance of having a solid governance framework around sustainability to ensure we have the correct agenda and it is driven by effective leadership.

The Board of Directors of Subsea 7 S.A. (the 'Board') is responsible for guiding the Group's strategy in relation to sustainability and climate-related matters, and when defining the objectives, strategies and risk profiles for the Group's business activities, sustainability risks and opportunities are considered. Sustainability represents a permanent feature at every Board agenda, and this is in line with the Board's aim to carry out business in a manner that is sustainable for the Group's shareholders, having regard to financial, social and environmental considerations.

Over recent years, governance of particular areas has been strengthened by the appointment of Board members with expertise on climate-related matters and risk, which includes IT cyber security. In 2023, this was further strengthened by the appointment of a director with expertise in labour practices and human rights. In order to further develop knowledge

in key areas, the Board has been working with Management to enhance the understanding of matters relating to biodiversity.

At Management level, our Sustainability Committee, composed of the Executive Management Team, promotes and fosters a culture that supports and drives the implementation of our sustainability ambitions and objectives. This committee enables a clear communication channel to the Board and meets quarterly to review performance against our ambitions. Reporting to our CEO, our Executive Vice President Strategy and Sustainability has the responsibility to drive our sustainability agenda and further embed the integrated link between strategy and sustainability within the business. The work of the Sustainability Committee is supported by the work of our Risk Committee and Ethics Committee, to align their approaches to the management of our material topics.

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 management

and key business function leaders. The sponsor ensures the alignment of the sustainability strategy with business priorities and the long-term direction of Subsea7. The focused workgroups are responsible for implementing the sustainability ambitions, managing relevant risks and performance across the organisation as well as considering their implication for the business. Quarterly updates on progress across the sustainability priorities are provided to the sponsors to facilitate oversight and support strategic direction of key sustainability matters.

A Corporate Sustainability Team, led by a Director of Sustainability, facilitates the Group's sustainability efforts including tracking stakeholders' expectations, communicating and reporting on our sustainability performance, and working with our focused workgroups to ensure successful implementation of our sustainability strategy.

To ensure regional focus, our global business functions work with our regional management to support the Group's efforts by integrating sustainability ambitions and actions into their operations.



Our approach

Materiality

Subsea7’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 could have a material impact on our business and the world around us.

As part of our preparations for our enhanced reporting obligations under the EU Corporate Sustainability Reporting Directive (CSRD), which we expect to apply to Subsea7 from 2024, we undertook a double materiality assessment to validate whether our current material topics continue to be appropriate and to identify emerging issues.

The assessment follows a double materiality approach, guided by the CSRD, to ensure that we consider the impacts, risks and opportunities of relevant topics from an outside-in (financial) and an inside-out (societal/environmental) perspective. This approach enables us to identify topics that may pose material risks and opportunities

for our business and where Subsea7’s activities may contribute a significant impact on broader society or the environment.

Our assessment in collaboration with an independent sustainability consultant, which involved desk research, impact workshops and multiple stakeholder engagement, including interviews, demonstrated a high level of convergence to the sustainability areas we have been focusing on since 2019. The findings of the assessment showed a total of 10 material topics, which represent Subsea7’s most important sustainability impact and focus areas. For further details on the double materiality assessment process and our materiality matrix, see pages 27 to 28.

2019-2023 material topics

Sustainability priorities

Health, safety and wellbeing

Energy transition

Labour practices and human rights

Business ethics

Operational eco-efficiency

Ecological impacts

Additional focus areas

Diversity and inclusion

Human capital development

Responsible supply chain management

Community impact and relationships

Our updated material topics

Material topics

- | | |
|-------------------------------------|--|
| ● Health and safety | ● Talent attraction, development and retention |
| ● Climate strategy | ● Diversity and inclusion |
| ● Labour practices and human rights | ● Responsible supply chain |
| ● Business ethics | ● Collaboration and partnerships |
| ● Greenhouse gas emissions | ● Cyber security and privacy |

● ● ● ● aligned to existing priorities ● aligned to existing additional focus areas ● emerging topics

Our approach

Stakeholder engagement

Engaging and responding to our stakeholders is important to Subsea7's business development and long-term success.

This involves continuing and building upon a foundation of trust and maintaining a long-term relationship with our stakeholders. Understanding our stakeholders' interest and priorities helps us to better align with their expectations of us and around sustainability matters.

Our key stakeholder groups are our clients, our people, our shareholders and the society in which we operate.

We engage with our stakeholders in a range of ways including but not limited to in-person or virtual meetings, responding to environmental, social and governance (ESG) criteria in tender processes, investor and client engagement events, Supplier Integrity days, press releases, Group reporting, employee town halls and employee surveys.

This year during our formal materiality assessment process, we gathered a wide range of views from our internal and external key stakeholders which influences the sustainability issues we focus on and the material topics. For further details on how we engage with our stakeholders during the materiality assessment, see page 27.

2023 Stakeholder engagement in numbers

>7,000
attendees at our annual Festival of Learning

>200
meetings with investment firms

>400
delegates attended Supplier Integrity events

Stakeholder expectations

Our clients

Expect us to operate safely, efficiently, 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.

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.

Creating better outcomes for our stakeholders

We work collaboratively with our clients to make possible the energy transition. We offer cost effective solutions and explore carbon reduction opportunities through our technology, assets and strategic partnerships. We insist on high standards in safe and responsible operations.

Our people are the foundation of our business and their health, safety and wellbeing are our top priority. We invest in our people, giving them opportunities to learn and grow. Creating, maintaining and promoting an inclusive work environment is vital for our employees to thrive.

Our strategy aims to create resilient value for shareholders. We are committed to strong capital stewardship and corporate governance. Transparent reporting enables our shareholders to measure our performance, and through investor events we aim to communicate our strategy and listen to feedback.

With a well-established international presence, we take care to understand and respect local customs and sensitivities. Through close relationships with local stakeholders, we create opportunities that foster sustainable energy development for all. We aim to minimise the impact of our operations on ecosystems.

Our approach

Our Net Zero target

Our target is to achieve Net Zero Scope 1 and 2 greenhouse gas (GHG) emissions by 2050 and reduce our Scope 1 and Scope 2 emissions by 50% by 2035¹.

Whilst we are implementing changes and solutions available today, there are several factors that could affect Subsea7's ability to meet these targets and could cause our plans to differ materially from those currently reported, including but not limited to the availability and deployment of cleaner technologies at scale commercially.

→ For information on our forward looking statements, please refer to our **2023 Subsea7 Annual Report page 170**

KPI	2018 Baseline	2023 Performance
Scope 1 GHG emissions	631,630^{**} CO ₂ -e tonnes	656,624 CO ₂ -e tonnes
GHG emissions intensity	153 Scope 1 GHG emissions/ mil. USD revenue	110 Scope 1 GHG emissions/ mil. USD revenue
Scope 2 GHG emissions	6,951 CO ₂ -e tonnes	2,317 CO ₂ -e tonnes

These targets are based upon plans to decarbonise Subsea7's operations by implementing changes and solutions. Our efforts will be focused around three core areas:

Hybridisation and shore power

We aim to reduce our emissions from 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).

Alternative fuels and energy sources

We aim to reduce our emissions by using fuels with reduced carbon footprint (e.g. biofuels, synthetic fuels). 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 aim to reduce our emissions by managing the performance of our vessels through the use of digital tools.



* Our targets are based on a percentage reduction in absolute GHG emissions compared to an adjusted 2018 base year inventory.
 ** 2018 base year inventory recalculated in 2023 to account for the material structural change in the Group resulting from the combination with OHT ASA in the fourth quarter of 2021.

Our approach

Our sustainability priorities

Our priorities reflect the sustainability risks and opportunities that are of greatest importance to our business and our stakeholders.

Health, safety and wellbeing

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

0.03

Lost-time injury frequency rate per 200,000 hours worked (2022: 0.01)

Business ethics

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

100%

proportion of the business covered by an independent anti-corruption compliance programme assessment (2022: 86%)

Operational eco-efficiency

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

81%

of owned fleet with digital fuel flowmeters installed

Labour practices and human rights

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

98%

relevant employees trained on human rights (2022: 83%)

Energy transition

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

1,127

cumulative offshore wind turbine generator foundations installed (2022: 1,028)

Ecological impacts

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

Zero

significant (>10m³) hydrocarbon spills recorded (2022: zero)

For this report, we disclose our progress against the six sustainability priorities, as they were identified as material topics from our sustainability materiality assessment conducted in 2019.

Building on our previous assessment, in 2023, we completed an independent double materiality assessment, guided by the principles of the EU Corporate Sustainability Reporting Directive and the underlying European Sustainability Reporting Standards. Our assessment reviewed our existing material topics for continued relevance and identified emerging sustainability topics that are material to our business and our stakeholders. To read more about our double materiality assessment, see pages 27 to 28.

Sustainability priorities



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

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

Our commitments



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

Why it is important

Our workplaces are potentially hazardous, particularly when we are working offshore in harsh and remote environments. The safety of our people is our first priority. We aim for an incident-and injury-free workplace every day, everywhere and our policies are reviewed to seek to improve our safety performance. We believe that all people working on our sites anywhere in the world are entitled to the same level of protection.

Subsea7's Business Management System underpins the way in which we conduct training, reporting, procedures and assessments linked to safety. Subsea7's line managers are responsible for implementation and compliance with the system and ensuring that all employees and contractors are aware of their responsibilities. We record all incidents and near misses in detail and investigate every event. Subsea7 checks activities against our internal standards and processes as well as regulatory and legislative requirements.

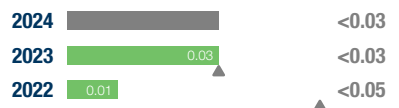
Supporting the wellbeing of our people both for their own health as well as for Subsea7 as a whole is very important. All our employees have access to a confidential Employee Assistance Programme that provides support for coping with life's challenges including health and wellbeing, financial problems, stress or anxiety and family issues.



Achieving high safety standards

The reporting and investigation of recordable injuries are prioritised in order to further advance our learning and safety performance. In 2023, there were 37 recordable injuries from over 30 million hours worked across our vessels, sites and offices. This translates to one recordable injury per 814,802 hours worked. This is a significant achievement and a testament to our strong safety leadership and culture.

Lost-time injury frequency per 200,000 hours worked (rate)



Serious injury frequency per 200,000 hours worked (rate)



Employee satisfaction score¹ on health and wellbeing at Subsea7



1. Score out of 10.

▲ Target ■ Actual

Sustainability priorities continued

Our progress in 2023

We continue the focus on health, safety and wellbeing as a priority for Subsea7 and our commitments in this area have remained strong.

Health and safety: Our safety performance continued to be positive in 2023, supported by our teams across the business who remained focused on upholding our ‘work safe, home safe’ commitment. This long-standing commitment captures our responsibility to everyone working on or connected to a Subsea7 site where we as a priority ensure a safe environment for those involved or affected by

our activities, where everyone participates and is empowered to stop the job if they feel it is unsafe.

In 2023, feedback from our Offshore Management Teams was that the skills being learnt at the Leading Safety Refresh programme were having a favourable impact on the application and use of our safety tools such as toolbox talks and pre-task briefings. This encouraged us to maintain and deliver our safety leadership training to all relevant employees and contractors to underpin our safety culture and performance. The training focused on developing and inspiring leaders to encourage a positive

safety environment where human and organisational performance (HOP) principles develop.

Subsea7 continued to deploy the vessel sponsor programme across 100% of our vessels and work sites. This involves a two-way communication between operations and senior management, to enable a focussed level of support and discussion around safety-related performance, incidents or potential issues.

Human and organisational performance (HOP):

HOP embraces the reality that people can make mistakes but if we create an environment where we collaborate with people to listen, understand and learn from mistakes, this will allow us to improve our operations, safety and predictability.

In 2023, Subsea7 developed four HOP principles to guide our thinking and embed this philosophy within the way we work. These are:

- we seek to understand each other and our work,
- we recognise how we really do things,
- we make space for the unexpected, and
- we learn from everything we do.

In 2023, our colleagues in Norway held dedicated health and wellbeing days focused on mindfulness, stress management and CPR training. They also provided mental health awareness training to key leaders to be able to address concerns and support teams, and encourage people to have ‘the necessary conversation’.

Assurance and verification:

We increased the level of assessment across some of our suppliers to support improved performance. This included close collaboration with multiple suppliers via several face-to-face safety meetings to better understand the common challenges our suppliers are facing. By engaging with our suppliers, we were able to identify potential areas of improvement to support the overall quality of delivery to better achieve predictable performance.

Wellbeing: We recognise the importance of providing health and wellbeing support across work, life and home and in 2023 as part of the relaunch of our employer value proposition ‘Being7’, this was emphasised to all our people, with clear and visible leadership commitment.

Our teams have embraced the importance of wellbeing across our business and continue to

bring it to life through various activities including workshops, training, questionnaires, conversations, group sessions and sessions dedicated to key wellbeing topics. As an example, our offshore management teams and medics were provided with access to training in mental health to support greater awareness of this topic.

Looking forward

We are committed to high levels of safety performance across our operations by remaining focused on what we believe are the key fundamentals.

The principles of human and organisational performance will be further instilled in our ways of working and leaders across the business will remain committed to supporting the wellbeing of our people.



Safety award presented by North Oil Company

Subsea7 was recognised as one of the safest contractors by North Oil Company during a ceremony in Qatar, as we contributed to their achievement of 40 million hours worked without an lost-time injury (LTI).

Sustainability priorities continued

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 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).

Why it is important

As global demand for energy continues to grow so too does the drive to address climate change and deliver lower-carbon sources of energy. Operators are seeking cost effective and reliable solutions to overcome the complexities facing today's industry in order to better serve the needs of tomorrow. Subsea7 plays a leading role in the construction of sustainable offshore energy developments around the world and the offshore fixed wind farm market is becoming a significant part of our business. In 2023, this business unit generated 16% of Subsea7's revenue.

Floating wind offers the possibility to further support the 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. Although time frames remain uncertain, floating wind farms are expected to become a significant contributor to the energy transition over time. Subsea7 continues to grow our

technical capability and expertise in this area to develop cost-effective innovative solutions.

Lower-carbon oil and gas from subsea greenfield and tieback projects has an important role in the transition. Our proprietary technology and engineering capability support our clients in developing these fields cost-effectively and efficiently. Subsea7 has extensive expertise and experience in large offshore gas field developments.

Subsea7 commissioned an expert energy consultancy to perform a study to analyse the relative carbon intensity levels of extracting oil and gas, specifically mapping emissions from exploration, drilling, field development, production and transportation. The study was carried out to interrogate several industry research claims that deepwater developments have, on average, the lowest carbon-intensive means of extracting oil and gas. The findings of the study support the observation that offshore hydrocarbons, particularly deepwater, has the potential to be the lowest carbon-intensive source per barrel of oil.

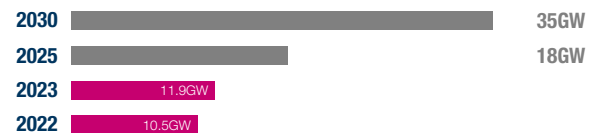
→ For more information please contact [Subsea7.com](https://www.subsea7.com)



Delivery of two new-build vessels to support growth of renewables

Seaway7 took delivery of two new-build vessels, *Seaway Alfa Lift* in 2023 and *Seaway Ventus* in early 2024. *Seaway Alfa Lift* is a large monohull heavy lift crane vessel capable of transporting and installing offshore structures including wind turbine generator (WTG) foundations, jackets, transition pieces, topsides and monopiles. The *Seaway Ventus* is a self-propelled jack-up vessel designed to install both WTG and monopile foundations to the relative environmental standards with particular focus on energy and heat recovery, battery hybrid solutions and a sophisticated electrical and control system, reducing CO₂ emissions by 20% compared to similar units.

Cumulative power capacity of renewables projects supported



Our targets*

35GW
by 2030

18GW
by 2025

* Target revised upwards from previous year.

▲ Target ■ Actual

Sustainability priorities continued

Our progress in 2023

Growth in offshore renewables:

The offshore wind sector was turbulent in 2023. A number of our clients struggled in the two major markets of the UK and US, whilst some turbine manufacturers continued to suffer heavy financial losses. However, the long-term fundamentals remain strong and we continue to advance our position.

Fixed wind: Despite the market continuing to experience volatility impacted by economic and policy conditions, we delivered significant progress to support the continued growth of renewable power. Subsea7 acquired all remaining shares in Seaway7 and the focus was on steering towards a more sustainable risk/reward balance between client and contractor.

Activity was high in the UK where *Seaway Strashnov* completed the installation of monopiles for Dogger Bank A project, the first phase of the world's largest offshore wind farm project to date, which once complete will produce 3.6GW of renewable power capacity. *Seaway Phoenix* and the *Maersk Connector* continued cable lay in Taiwan, and *Seaway7* secured its first contract award in Poland from Equinor and Polenergia for the inner-array cables of the MFW Baltyk II and MFW Baltyk III bottom fixed offshore wind projects.

Throughout 2023, our ongoing projects, representing a broad geographical coverage, contributed significant volume by successfully installing 142 cables and 99 wind turbine foundations (jackets and monopiles). Combined, these projects will support approximately

1.4GW of renewable power capacity. Given the now secured work in hand through to 2025, we revised our previous gigawatts contribution target upwards to reflect this impact. A further significant development in 2023 was the successful delivery of two new construction vessels.

Floating wind: Whilst floating wind holds potential, the project economics remain a key barrier to the pace of development. In 2023, our focus was on maturing technologies and solutions to support lower-cost offshore floating wind developments through several studies.

Transition to lower-carbon solutions: With the positive market momentum anticipated in subsea oil and gas, there is a greater need to support lower-carbon solutions whilst meeting current and future energy needs. Subsea7's share in OneSubsea, a global joint venture between SLB, Aker Solutions and Subsea7, will strengthen and accelerate the solutions needed to reduce emissions in subsea operations through a focus on innovation and efficiencies in its integrated project offering.

We continue to invest in technologies enabling lower-carbon solutions such as Electrically Heat-Traced Flowline (EHTF®), power buoys and riser monitoring.

2023 was also an active year for offshore green hydrogen. We were granted funding for two studies by the Scottish Emerging Energy Technologies Fund. We have progressed internal technology to address some of the challenges related to offshore hydrogen production, storage and transportation and enhanced our competence and capability in offshore green hydrogen development.

Emerging energies – new markets and opportunities:

The pace of emerging energies remains challenged by macroeconomic uncertainties, the complex regulatory frameworks and challenging economics for development projects resulting in a reduced level of activity in these emerging areas. During 2023, our focus has been primarily on two market opportunities: Carbon Capture and Storage (CCS) and green hydrogen production, storage and transportation. We delivered six concept and pre-Front-End Engineering Design studies for offshore CCS developments.

In 2023, we completed the first phase of our pipelay scope for the world's first open source CO₂ transport and storage project, Northern Lights. We also actively participated in a number of joint industry projects to enhance the industry's understanding of CO₂ flow assurance, corrosion, material compatibility and pre-commissioning. Our value proposition for integrated CCS project delivery with our Subsea

Integration Alliance (SIA) partner, OneSubsea, was also well received by several clients and resulted in the award of several studies.

Advocacy of energy transition:

In 2023 we exchanged views on UK renewables and emerging energies markets with the UK's Minister for Energy Security and Net Zero. This was an opportunity to talk about how we grow these markets in the UK to secure long-term energy supply and support its commitment to 50GW of offshore wind by 2030.

Looking forward

In fixed offshore wind, we will continue to focus on predictable project delivery and sustainable financial performance. In lower-carbon oil and gas, we will leverage on our new OneSubsea joint venture and capitalise on the opportunities this uniquely positioned collaboration will bring. For emerging energies we will continue to develop capabilities to make energy transition possible and support our stakeholders toward a lower-carbon future.

Fair contracting principles for offshore wind

In 2023, IMCA (the International Marine Contractors Association) published the industry's first standard contract for transport and installation works in offshore wind projects, building on a campaign for an industry-wide discussion to ensure a more distributed allocation of risk across the supply chain. Subsea7's General Counsel and Chair of IMCA's Legal Committee Nathalie Louys said:

"With this document reflecting the fair allocation of risks, IMCA aims to set the tone so that the industry can move forward productively and collaboratively as we gear up to help meet global ambitions for offshore wind."

Sustainability priorities continued



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 Subsea7 and actively monitoring compliance

Ensuring broad understanding of Subsea7 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 commitments



We are a signatory to the UN Global Compact and aligned with its commitment to respect and protect human rights (Principles 1 and 2) and to fair and lawful employment practices across the Company and throughout our supply chain (Principles 3, 4, 5 and 6). We also support the International Labour Organization's standards regarding child labour and minimum working age.

Why it is important

Human rights risks in our sector can be significant, due to the type of work our people and our suppliers perform and the potential involvement of vulnerable, migrant workers from countries with lower human rights protections.

We want to ensure we have properly assessed the risks and taken the correct steps to mitigate and guard against them. In accordance with our risk-based approach, we have identified child labour, slavery and trafficking, and other forms of forced or involuntary labour as the human rights risks that could have the most egregious impact. These are the labour-related human rights risks we are focused on managing as a clear priority. We also recognise that corruption, safety and security risks, and environmental impacts are also key aspects of our human rights obligations.

Respecting human rights and managing the human rights impacts of our operations is how we live our Values and is fundamental to how

we conduct business. Putting in place fair and lawful employment practices and providing a working environment in which no-one is abused, or exploited by us or anyone we work with, makes us a stronger and more reliable company capable of attracting and retaining talented people, and with which our clients and suppliers want to partner, around the world.

To meet our commitments to human rights, we maintain a human rights programme, underpinned by our Human Rights Policy Statement and Code of Conduct.

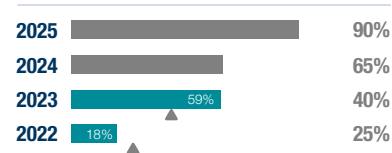
Strengthening our governance

The Board of Directors and the Ethics Committee play a critical role in overseeing our approach to human rights and ensuring our processes are consistent with international stakeholder and regulatory expectations and standards. During 2023, a Board member with expertise on labour practices and human rights was appointed, strengthening the Board's oversight.

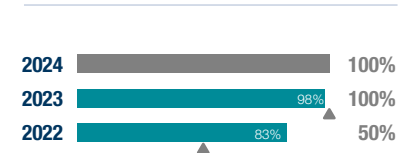
Proportion of our workforce covered by a human rights risk assessment within the last three years¹



High-risk suppliers undergoing enhanced human rights risk assessment



Relevant employees trained on human rights



1. Having reached 100%, the aim is to refresh this risk assessment at least every three years.

▲ Target ■ Actual

Sustainability priorities continued

Our progress in 2023

We continued to enhance our human rights programme, with a focus on the risks of child labour, slavery and trafficking, and other forms of forced or involuntary labour in our own operations and our supply chain.

We published an overview of our human rights programme on our website. It is designed in accordance with regulatory and stakeholder requirements and expectations to help ensure we identify and manage human rights risk arising from our own activities and across our supply chain.

We also published our seventh Slavery and Human Trafficking Statement, which describes our efforts to respond to the UK Modern Slavery Act, as well as our first Norwegian Transparency Act report.

Human rights risks within our own operations: During 2023, we continued to work towards effective implementation of our human rights programme. We launched a human rights dashboard to support the regions and business units in evaluating how they are doing in implementing Group requirements and elements of the programme.

Our human rights risk assessment is conducted for every country in which we operate, and on entry

into a new, high-risk country. During the year, we reached 100% completion of the human rights risk assessment across our own workforce, using the tool we rolled out at the end of 2021. The assessment enables us to identify where we may face risks; and where we may have gaps in our own policies and procedures.

Following on from the assessments referred to above, we published our Group Human Rights Procedure which underpins our Human Rights Policy Statement. The procedure provides guidance on how to address any policy and procedure gaps identified and thus better manage the most egregious, potential human rights impacts.

We also participated in a client human rights programme audit, which resulted in a positive overall outcome, with several areas of good practice observed and no non-conformities identified.

Human rights risks within our supply chain: We updated our processes to integrate an enhanced risk assessment matrix for identifying suppliers that might present a medium or high human rights risk. This is based on a combination of the country risk (using proprietary country risk data to which we subscribe) and

the type of material or services supplied. We also enhanced our human rights due diligence questionnaires, sharpened their focus on the human rights risks that could have the biggest impact (namely child labour, modern slavery, human trafficking and other forms of forced or involuntary labour), and included prescribed remedial actions, depending on our suppliers' responses and the resulting risk scores. These updates help to embed supplier human rights risk assessment and due diligence procedures, to ensure they are consistently applied and are as practical and effective as possible.

By the end of 2023, 59% of our high-risk suppliers had been through the process, with over 600 suppliers responding to our due diligence questionnaires. We developed and launched a supplier human rights risk assessment register and dashboard to help the regions monitor progress in risk assessing our suppliers, as well as the close-out of any remedial or improvement actions undertaken by our suppliers. These tools assist in providing more granular data with regard to our higher-risk suppliers which puts us in good stead to make continued improvements to our risk management procedures.

Training and awareness:

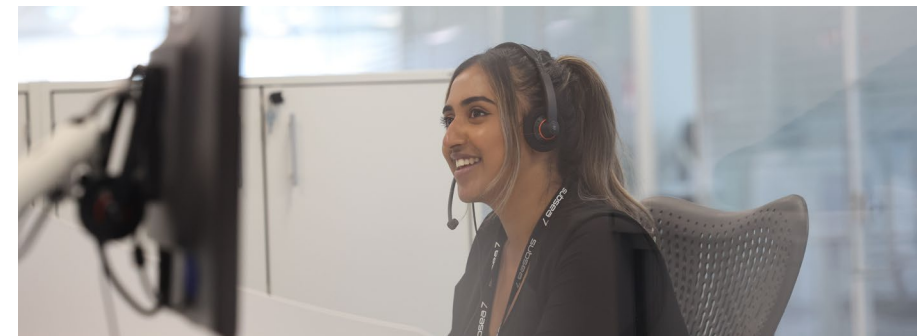
As in previous years, we held a number of Supplier Integrity events, at which human rights featured prominently on the agenda. We want to raise awareness of the risks across our sector and work with our supply chain to develop common ways of managing the risks.

Looking forward

We will continue to embed our human rights programme across both our operations and our supply

chain to ensure we manage our highest-impact human rights risks. Some of the key areas that we will focus on are:

- Continue to enhance and embed our supplier risk assessment procedures.
- Improve the use of digital tools and platforms to improve efficiency and decision-making.
- Continue to raise awareness of our human rights commitments within the organisation and with our suppliers.



Speak Up and grievance

We have a well-established Speak Up Policy and confidential channel for people to report serious breaches of our Code of Conduct. In addition, we have local grievance policies and mechanisms, in line with the Global Grievance Procedure and local legislation, that provide a fair and effective procedure for resolving individual grievances on matters such as working practices, health and safety, fair treatment, or terms and conditions of employment. Any grievance relating to labour practices can be raised according to these procedures.

Sustainability priorities continued



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 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, and policy and process enhancements we have continued to strengthen our approach to maintaining ethical business conduct.

Why it is important

Integrity is one of our core Values, and Subsea7 is committed to acting honestly, fairly and with integrity at all times, to comply with the law, and to conduct business ethically in accordance with our Code of Conduct. By so acting, we believe we earn the trust of our clients, employees, business partners, suppliers and other stakeholders.

Our sector can present significant corruption risks, as can many of the countries in which we operate. As with safety, we take a management system approach to embedding a culture of ethics and integrity and managing legal and reputational risks across our operations.

In recent years, regulatory, stakeholder and societal focus on, and expectations in relation to, anti-bribery/anti-corruption have remained strong, as does focus on these areas. During 2023, international sanctions also continued to be a prominent compliance risk area.

The Subsea7 compliance and ethics programme is designed to embed our Code of Conduct and help manage compliance and ethics risks. To help manage risks in our supply chain, our programme also includes our Code of Conduct for Suppliers, which sets out the key principles of ethical conduct that our suppliers are required to uphold, and a range of supply chain risk assessment and due diligence procedures.

→ Read more on [Subsea7 compliance and ethics programme](#)



Independent programme assurance

We completed the independent assessment of our compliance and ethics programme across the whole of Subsea7, and successfully completed an ISO 37001 Anti-Bribery Management System certification audit of Subsea7 in the United Kingdom.

Proportion of the business covered by an independent anti-corruption compliance programme assessment¹



Medium- and high-risk suppliers assessed for corruption risk



1. Having achieved 100%, our focus is now on a rolling programme of independent audits to ensure and maintain an ISO 37001 certification. ▲ Target ■ Actual

Sustainability priorities continued

Our progress in 2023

Subsea7 has a well-established compliance and ethics programme which we have continued to embed and follow.

Embedding a culture of ethics, compliance and integrity:

We continue to hold our annual Global Integrity Day, which aims to encourage, empower and embed a culture of integrity. This year's sixth event focused on encouraging our people to be as comfortable talking about integrity as they are talking about safety. Everyone was encouraged to share their thoughts on Integrity and what it means to them with their clients and suppliers, and to post these 'Integrity Moments' on our internal social media platform. The campaign was underpinned by messages shared by various members of our Executive Management Team. There was also a dedicated session on Integrity Moments delivered by our Chief Ethics and Compliance Officer as part of our Festival of Learning.

Safecall is our independently administered, confidential reporting line. This year, we refreshed the posters used to promote Safecall and our Speak Up Policy. Also, as with most years, our 2023 compliance and ethics

e-learning included an overarching message about speaking up with any concerns about possible unethical conduct.

Ensuring transparent governance around compliance and ethics, we disclose our Code of Conduct, elements of our Anti-Corruption Programme and relevant performance indicators publicly. Based on our disclosure, Subsea7 achieved top percentile (score date of December 2023) in the sector assessed by S&P Global ESG Rating.

Ensuring all who work for us uphold our commitment to business ethics:

In 2023, we carried out further independent assurance across our compliance and ethics programme to ensure it is well embedded across Subsea7. The independent assurance assessments were completed for Senegal, Türkiye and Brazil, as well as a re-assessment of Seaway7. This now means that the whole of Subsea7 (including Seaway7) has been covered by such assessments conducted by an independent, expert firm.

We also engaged Det Norske Veritas (DNV) to perform a certification audit of Subsea7 against ISO 37001-2016, the International Anti-Bribery

Management System Standard, and we received the accredited ISO 37001 certification for our programme in the UK. This triggered a three-year certification, which will be maintained by means of ongoing assessments.

We continued to embed our procedure for managing suppliers that are appointed without a purchase order. This procedure was revised in 2022 to reiterate that such suppliers nonetheless have to be assessed for compliance and ethics risks. In 2023, we engaged an estimated 1,400 such suppliers. Any such suppliers assessed to be medium or high risk are subject to our risk assessment, due diligence and/or compliance officer approval process.

Making a positive impact on business ethics in our sector, including the supply chain:

We supported UN International Anti-Corruption Day, which highlights the rights and responsibilities of everyone in tackling corruption. This year's event celebrated the 20th anniversary of the UN Anti-Corruption Convention.

During the year, we continued our efforts to encourage our sector to coalesce around a common anti-bribery standard and a common

approach to providing assurance, including working with industry groups such as the International Marine Contractors Association. We conducted a pilot project in collaboration with an independent expert assurance provider to develop an anti-bribery/anti-corruption self-assessment portal. The suppliers that participated in the pilot were generally positive in their responses, and they acknowledged the benefits of a common standard.

Throughout 2023, a total of seven Supplier Integrity days were organised across our regions, attended by over 260 supplier companies with over 400 individual attendees.

Looking forward

We recognise that ongoing training and education are necessary so our employees have the awareness and skills to understand and uphold our Values and Code of Conduct.

Therefore, we continually look at ways to improve and make our training more engaging and thus more effective for our people. As part of this we will continue to do more to promote our Speak Up Policy and culture.

We will continue to ensure that suppliers and other third parties undergo our risk-based risk assessment and due diligence process.

In undergoing certification against ISO 37001-2016, we aim to be in a position to encourage many of our suppliers to get themselves certified, with a goal to make assurance-gathering efforts more consistent and efficient. We will continue to support the efforts to gain traction on this initiative.

We also continue to support and oversee other business-led integrity initiatives, including Global Integrity Day, International Anti-Corruption Day and Supplier Integrity events.

Brazil 6th Supplier Market & Integrity Conference

Subsea7 Brazil hosted a Supplier Market & Integrity Conference. The event brought together representatives from several suppliers important to the sustainability of our business and included the participation of leaders from Subsea7 Brazil and IBP (Brazilian Petroleum Institute) to talk about our Integrity value, essential throughout the supply chain.

Sustainability priorities continued



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 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).

Why it is important

Subsea7 recognises the risks and opportunities of climate change and its potential effect on our business and stakeholders. Identifying and managing the impacts of climate change, including our approach to emissions, is important as we evolve our strategy and support a lower-carbon future economy. Guided by the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD), in 2022, Subsea7 published its first climate-related financial impacts, risks and opportunities disclosures.

We seek to be more efficient in the way that we work and invest in solutions that lower our greenhouse gas emissions within our operations and throughout our supply chain. Over 90% of our emissions come from our vessels such that our CO₂ emissions correlate strongly with our offshore activity levels and we must seek to reduce these in line with our

targets. The emissions arising from our supply chain are fundamental to address together with our clients if we are to collectively target a lower-carbon industry.

To be able to effectively manage our performance, it is important we measure key climate and emissions data against internal targets including fuel and energy consumption. We have a comprehensive risk management system with procedures and tools that identify, analyse, report and manage business risks that are related to environmental exposure and the effects of climate change.

Powering vessels from shore

Subsea7 changed over the power supply during vessel port calls in Frederikshavn, Denmark for the *Seven Navica* from diesel generators to shore renewable electricity connections for a period of time (during inactivity and project mobilisations) which resulted in around 1,100m³ of fuel savings and 3,000 tonnes of CO₂ prevented.

Scope 1 GHG emissions (CO₂-e tonnes)



GHG emissions intensity (Scope 1 GHG emissions per \$m revenue)



Our targets*

50%

by 2035

Reduction in Scope 1 and 2 GHG emissions

Net Zero

by 2050

Scope 1 and 2 GHG emissions

* Largest emissions reductions expected to come from alternative clean fuel that today is not available at scale and cost to be widely used.



Sustainability priorities continued

Our progress in 2023

In 2023 we continued to implement digital technology to measure and ultimately allow us to improve the efficiency of our vessels. We prepared for the next hybridisation of one of our vessels and advanced the focus on our supply chain and Scope 3. However, a significant factor in achieving our goals relies on the development of suitable alternative fuels being commercially available at scale in the market for the shipping industry globally.

We continue to have discussions with key suppliers and see progress being made in the volumes available, however progress remains slow which could subsequently affect progress to achieve targets outlined on page 8.

Improving the environmental performance of our fleet:

Alternative fuels: Following on from our successful alternative fuel trial on *Seven Oceanic*, we continue to monitor the development of alternative fuels and consider this area to have a significant potential impact in reducing emissions from our operations when mature.

Today, there is a mix of alternative fuels being discussed. Limitations exist concerning readiness, availability, scalability and cost which are hindering progress. Based on our

research and evaluation, paraffinic, co-processed marine gas oil (MGO) and fatty acid methyl esters (FAME) could offer near-term viable solutions.

We are researching opportunities to utilise alternative fuels with bunker suppliers and fuel processors, and following an internal assessment, established that 50% of our vessels can take the various drop-in fuel blends when they are economically available.

Hybridisation: Throughout 2023, work continued to equip *Seven Arctic* with an energy-saving and storage system that will lower fuel consumption, reduce Scope 1 emissions, and improve operational efficiencies. An Energy Storage System (ESS) will provide up to 3.75 MW of engine support and 1.4 MWh of energy, with a 3.5MW connection to receive power from shore. The installation of this system is planned to start in early 2024 and upon completion, we expect to reduce emissions by up to 5,000 tonnes per annum. Similarly, our two new-build renewables vessels will operate with hybrid power, with the *Seaway Ventus* already prepared and *Seaway Alfa Lift* awaiting delivery of the batteries in 2024.

Digital efficiency: Following the successful installation of our digital data analytics system, *Voyage*, across our fleet of vessels, we have updated key tools and processes to manage and measure our power management and fuel consumption. We have taken a significant step forward in the way we operate our vessels through a directive to operate all vessels at economic speed during long transits as the tendered default position. This change has been reflected in one of our business management processes and is expected to result in a reduction in fuel consumption and subsequent emissions. We conducted a case study to measure the potential emissions savings from our vessels as a result of digital efficiency. Annual savings of 3% CO₂ would be realised if vessels followed the new default slower speed.

Engaging with clients to reduce environmental impact of our services:

We continue to mature the use of our Carbon Estimator tool and it forms part of our business processes within early engagement and tendering to ensure we have an estimate of the carbon emissions for every study and all tenders over \$20 million revenue. We see the long-term importance

of building up emissions data across studies and tenders to support decision-making for when this becomes instrumental.

Collaborating with our supply chain to reduce environmental impact:

Throughout the year we have advanced the focus on Scope 3 by engaging in more detail with key suppliers to better understand their plans around how they intend to decarbonise their operations. We developed questionnaires and held one-to-one meetings with more than 15 key suppliers to understand their progress so far and to also learn about the challenges and complexities they face. This level of engagement has been critical in our future plans to develop emission requirements in our tender documents and how that may influence our procurement decisions. We also joined the IMCA Supply Chain Work Group in 2023 to participate in developing offshore contracting industry guidance on Scope 3 reductions.

Eco-speed transits

Leveraging data from our fuel metering programme, the performance of our fleet is regularly monitored to verify the vessel's most efficient transit speed. By operating our fleet of vessels at eco-speed for transits, this can offer a reduction in emissions associated with completing a vessel's transit.

Looking forward

We intend to further investigate the possibility of accessing and utilising additional drop-in clean fuels dependent on appropriate quantities to allow for economic use.

We continue driving optimal ways to increase efficiencies through our hybrid fuelled vessels and capitalising on our digital tools to better inform our decision-making.

We plan to continue regular engagement sessions with our key suppliers, leading to a planned dedicated supplier engagement day on emissions.

Sustainability priorities continued

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

* Non-essential single-use plastic.

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 and 9).

Why it is important

Conducting our operations in a way that minimises impact on the environment is important to Subsea7. It is recognised that Subsea7's fabrication and construction activities, offshore and onshore, can have an impact on the environments that surround them.

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 the potential impact. Subsea7 acknowledges the significance of safeguarding and conserving biodiversity. Through our Environmental Management System and in line with regulatory compliance, we strive to control the impact of our operations on a region's biodiversity. With the reinforcement of transparent and steadfast government policies and by fostering collaboration with our clients, Subsea7 aims to prevent, reduce or mitigate impact on biodiversity within our operations.

Our HSEQ policy and Code of Conduct focus on ensuring regulatory compliance and improving our environmental performance through working practices designed to reduce waste, energy consumption and emissions. Our projects are complex and are sometimes performed in unfamiliar environments in varied conditions, so we use planning, design and environmental risk assessment to avoid and reduce environmental risks as well as ensure compliance with relevant laws and regulations.

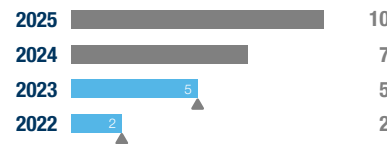


BORA Blue Ocean Research Alliance® achievements

BORA Blue Ocean Research Alliance® has been endorsed by the UN Decade of Ocean Science for Sustainable Development, recognising the valuable work we are doing to understand the world's oceans for a sustainable future, whilst also improving access and collaboration between scientific institutions and the offshore industry. BORA Blue Ocean Research Alliance® is one of the first Industry and Science Alliances to be endorsed by the UN Ocean Decade.

BORA Blue Ocean Research Alliance® is an initiative between the National Oceanography Centre (NOC) and Subsea7 enabling greater access to the oceans for scientists to build knowledge and understanding of the world's oceans.

BORAbox® units available for science¹



Waste recycled onshore



Waste segregated offshore for recycling



1. BORAbox® is a suite of sensors fitted to our ROVs or other offshore infrastructure to collect ocean data.

▲ Target ■ Actual

Sustainability priorities continued

Our progress in 2023

We continued to deliver meaningful ecological value this year.

Recycling our waste: Waste contractor health checks have been continuing throughout 2023 in many regions where we operate. They aim to give us a deeper understanding of the waste disposal methods available in particular regions and assurance our waste is being managed responsibly. Internal environmental site and vessel visits have also been undertaken to focus on waste segregation across the different waste streams. In 2023 we recycled 91% of total onshore waste generated and segregated 71% of total offshore waste generated for recycling.

Promoting circular economy: We continue to promote a culture of circular economy within our projects, utilising our share and reuse model Inventory7 across our sites. Inventory7 has been proving successful globally: building awareness in engineering

Reuse model Inventory7

Inventory7 is a database that captures information on owned equipment stored globally across Subsea7 sites. It provides access to over 46,000 minor items that are available for re-use in our projects, promoting circular economy in our business.

across our Africa, Middle East and Caspian regions by embedding Inventory7 in their induction process; and equipment being frequently reused resulting in environmental and cost savings for projects in Brazil.

Supporting BORA initiatives through our projects: Throughout 2023, we continued to raise the awareness and impact of BORA Blue Ocean Research Alliance® on a number of fronts. The BORAbOX®, developed in 2021 to measure essential ocean variables including ocean acidification from global warming, was installed on some of our vessels as part of projects in the UK, Brazil and Norway.

In addition, we completed a habitat mapping project in Brazil to better understand what is impacting the distribution of adult Gray Triggerfish, an International Union for Conservation of Nature (IUCN) red-listed endangered species.

In the UK, we also looked at what marine sediment can tell us about the Earth's history during our core sediment sampling initiative. The mud that settles on the seabed is an archive that preserves information about the evolution of the climate and oceans over time.

To raise awareness of our relationship with the National Oceanography Centre, we presented Subsea7's first environmental paper at the Offshore Technology Conference in Houston to highlight the benefits of BORA Blue Ocean Research Alliance®.

Eliminating single-use plastics: Across our regions we continued to use our single-use plastic database to help track and monitor the essential and non-essential single-use plastic items identified and replaced in our sites. In 2023 we phased out a further two types of single-use plastics. We trialed a single-use plastic observation card in three locations offshore and onshore and this will be progressing in the coming year to identify incoming single-use plastics from suppliers.

The UN World Environment Day enabled us to focus on 'Solutions to Plastic Pollution', #BeatPlasticPollution and to raise awareness of the different activities we are doing to help solve this issue. We produced an interactive world plastic map, which enabled our teams to view what we are currently doing and could do to reduce single-use plastics.

Looking forward

We will continue our efforts to raise awareness on waste including opportunities to reuse equipment by promoting a culture of circular economy within our projects.

We will further develop our approach to biodiversity and continue to work collaboratively with our clients to support the BORA Blue Ocean Research Alliance® initiatives.

Single-use plastic guidelines will become part of our Environmental Management System documents and processes as we will assess how we can further reduce our dependence on non-essential single-use plastics across our value chain.



Use of Environmentally Acceptable Lubricants (EAL)

EALs are a lubricant including any oil or grease that is biodegradable, minimally toxic and not bio-accumulative as defined by US Vessel General Permit (VGP) 2013. Subsea7 has used a number of EALs across the fleet in 2023 including on back deck equipment, remotely operated vehicle (ROV), subsea junction boxes and thrusters to reduce our impact when working in the ocean.

Gulf of Mexico relationship with Ballyhoo Plastics

As part of World Environment Day, our Gulf of Mexico office showcased their relationship with Ballyhoo Plastics who specialise in commodity and engineering grade plastic resin sales and recycling. Ballyhoo Plastics collect certain types of plastic from our sites for recycling and turn it into raw material for reuse.

Additional focus areas



Diversity and inclusion

Why it is important

We employ onshore and offshore employees from more than 100 nationalities and view individual differences as a strength. Embracing diversity in the workplace helps maintain access to and supports a diverse pipeline of talent. An inclusive and diverse environment not only fosters creativity and innovation but also improves decision-making through new ways of thinking.

As the energy industry continues to evolve, we need to build new skills and develop global perspectives to make the energy transition possible and help us remain competitive on an international scale. Creating, maintaining and promoting an inclusive work environment where all our differences are embraced, and everyone is treated equitably

is vital for our employees to thrive and be motivated to support the sustainable delivery of offshore energy transition solutions the world needs.

Our initiatives in 2023

Following the launch of the Subsea7 Diversity & Inclusion framework in 2022, we continued to focus on our four pillars:

- inclusive culture
- gender balance
- nationality balance
- recruitment pipeline

In 2023 we launched our onshore Women in Business Programme and held three Offshore-Women's Forums. Through these engagements we aimed to increase our understanding of what it feels like

to work at Subsea7, whilst in parallel providing skills and insights that support career development.

We also enhanced our approach to talent management to ensure clearer visibility of our onshore top talent and launched our offshore talent review. Recognising that women's representation within our offshore workforce remains low, we continue to place focused effort on attracting and hiring women to join our offshore crews, resulting in a 27% increase in female hires during the 2022/23 recruitment period compared with 2021/22. In addition, to support increasing our diversity in gender, nationality and leadership offshore, we launched Remotely Operated Vehicle Pilot and Shift Supervisor Conversion Programmes for both internal and external candidates to apply.

Focusing on inclusion, our Australia business delivered '7Ally' training, a programme designed to provide tools to help our people to think more clearly and make measured decisions when confronted with inappropriate workplace behaviour.

Through 2023, we continued to build diversity and inclusion awareness through our Festival of Learning

World Day for Cultural Diversity

Our colleagues from around the world celebrated the World Day for Cultural Diversity for Dialogue and Development by organising networking events and creating content that makes us reflect on how to break our biases and better understand local cultures. As part of our global campaign, we created posters that can be used in different locations to make our people reflect on unconscious bias and how much diversity we can find in the company we all work in.



Gender Equality Award

Subsea7 in France attained the Gender Equality Award from the City of Suresnes, in recognition of the strong commitment to gender diversity through actions such as Conversion and Women in Business Programmes, and the partnership with 'Elles Bougent' association where Subsea7 female engineers are mentoring external female students in scientific and technical professions.

events and worldwide celebrations, including International Women's Day, World Day for Cultural Diversity and International Day of the Seafarer. We also continued and expanded our diversity and inclusions focused partnership with external groups:

- We signed up to the UK Armed Forces Covenant which supports service leavers' transition from military life to civilian employment in a way that recognises their compatible and transferable skills to Subsea7.

- POWERful Women, a professional initiative to create a gender-balanced, diverse and inclusive UK energy sector.
- WISTA International, an networking organisation whose mission is to attract and support women, at the management level, in the maritime, trading and logistics sectors.

Looking forward

Moving forward into 2024 we will continue activity across all four of our pillars, with an increased focus on inclusion.

We aim to engage with our majority population, whilst continuing a spotlight on the minority both onshore and offshore.

Additional focus areas continued



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 Subsea7's success. As society continues to drive the transition of energy, our focus is on ensuring our people have the skills they need to make sustainable delivery possible.

Subsea7 has a well-established range of learning and development tools and programmes to help our people grow their knowledge and abilities in different areas of the business, including business and functional skills capability frameworks, development programmes, and a variety of learning content, designed to promote inclusive and equal learning opportunities amongst our employees.

Our initiatives in 2023

We continued to promote a culture of learning through regular communications and our annual Festival of Learning event. This year's event was themed 'Incredible Journey', consisting of live webinars, panel discussions and interactive workshops on topics that are

enabling the energy transition and supporting our people. Over 7,000 people took part across 90 sessions offered globally.

Throughout the year, we continued to communicate and encourage the use of our Business Skills Framework, providing clarity for our people to transition their skills to support Subsea7's strategy. We continued to invest in our people through a global suite of leadership and targeted programmes:

- Two-year Graduate Programme to provide a baseline of technical, commercial and interpersonal skills and on-the-job learning. The class of 2023 includes 176 graduates.
- Safety Leadership Programme as well as a Refresher Programme to upskill our offshore management teams and supervisors with the fundamental leadership skills applied in the context of safety offshore. A total of 280 people attended.
- Core Career Skills Programme to teach our people how to master the core career skills in our framework. The refreshed six-part programme lasting six weeks was attended by over 500 people.

- Project Manager Diploma Programme to provide technical and professional skills to enhance project management knowledge and help build a strong project management network. A total of 40 project managers attended.
- Two-year 'Leading 7' Leadership Programme, with senior talents upskilling on the 'Leader' skills in the framework, whilst building a network of future leaders. A total of 20 senior talents joined the 2023 cohort.
- Introduced a new Offshore Line Manager Programme with 40 offshore line managers and continued the Onshore Line Manager Programme, delivered to 100 onshore line managers. Both programmes focus on upskilling the 'People Manager' skills in the framework.
- Launched a nine-month onshore Global Women in Business Programme designed to provide women with the skills to support them achieving the careers they aspire to and connecting them with senior leaders as mentors. A total of 40 women have been invited to join the inaugural programme.



Future talents

Our 2023 onshore engineering and non-engineering graduates' class was our largest to date being 176, with 40 nationalities and 39% female. In addition, we on-boarded 30 graduate surveyors (10% female) and 13 UK Marine cadets (23% female) made up of deck officers, electro-technical officers and engineering officer cadets.

- Launched a Commercial Awareness Programme to increase commercial knowledge through training, e-learning and discussion forums.
- Launched the 'RISE' Programme targeted at emerging leaders with 40 talents joining our first cohort. The programme aims to empower, inspire, and uplift our emerging leaders by providing them with the resources, network, and opportunities necessary for personal growth and professional development.
- Launched a pilot Project Success Programme in our Global Project Centre, targeted

at upskilling Project Functional Leads with commercial and people management skills. This programme will become part of the global programmes in 2024.

Looking forward

We will continue to embed and review our offerings, always linking back to our Business Skills Framework. We will also launch a suite of offshore focused programmes. This includes the Marine Conversion, Assistant Deck Foreman and Women in Business programmes.

➔ See our website to explore **our current vacancies**

Additional focus areas continued



Responsible supply chain management

Why it is important

Supply chain procurement represents a significant proportion of the work we perform. Constraints within our supply chain are increasingly a key factor in the delivery of projects on time and on budget for our clients, making them central to our business activities.

With an established local presence in many countries, working with over 8,000 suppliers, our supply chain is an essential part of our strategy to be a strong, safe, socially and environmentally responsible business. Managing the associated risks within our supply chain and continually leveraging opportunities to create long-term value creation, are central to our goal to make sustainable delivery possible.

Our Code of Conduct for Suppliers sets out the key principles of ethical conduct that our suppliers are required to uphold when working with Subsea7. This includes principles related to ethical business conduct and compliance with the law, safety, human rights, employment practices and environment.

Our initiatives in 2023

We measure risks related to compliance and ethics and human rights in our supply chain on an ongoing basis. We continued to use Exiger, the cloud-based portal, to perform compliance risk assessments and due diligence of our suppliers and third parties.

During the year, we updated our compliance process with the enhanced human rights risk-tiering matrix, as well as fine-tuned our human rights due diligence questionnaires, introducing remedial action plans for suppliers as required. We took these actions as part of our risk-based approach to sourcing and procurement which is central to our responsible supply chain management ethos.

Using Exiger, we modified our risk sensitivity parameters, taking into account feedback from our screening managers, as well as renewed our relationship with a progressive uplift in our screening requirements in line with our projected future needs. With our screening managers, refresher

Exiger training was conducted and best practices and learning were shared. We also initiated the creation of a centralised screening resource, to increase efficiency and add robustness to our compliance programme. We programmed and launched monitoring dashboards to better keep track of screening activities in each region.

Alongside the focus on lowering the carbon impact from our operations, we continued to work with our key strategic suppliers to better understand how they intend to decarbonise their operations. Through engagement with more than 15 of our key suppliers, we exchanged progress plans, as well as discussed decarbonisation complexities and challenges faced by the various industries.

Throughout 2023, we also engaged with our key suppliers through Supplier Integrity events held virtually as well as in-person. We raised awareness around material sustainability issues, shared initiatives on tackling common challenges and highlighted opportunities where we could collaborate.



Participating in IMCA's Supply Chain Work Group

Subsea7 has been an active member of the International Marine Contractors Association (IMCA) for a number of years and in 2023, we also joined the IMCA Supply Chain Work Group to participate in developing offshore contracting industry guidance on Scope 3 reduction.

Looking forward

We will continue to review our sustainability priority matters involving our supply chain. Some key areas that we will focus on are:

- Key suppliers which represent higher impact areas and greater risks.
- Upskilling our key people to maintain a risk-based focus.
- Utilising digital tools to allow us to make better-informed decisions.
- Providing more clarity to our suppliers as to our expectations and how these may influence our procurement decisions.
- Engaging with our key suppliers and clients on raising awareness of the sustainability challenges we all face.
- Promoting collaborative ways in which we can develop industry-accepted sustainable procurement strategies.

Additional focus areas continued

Community impact and relationships

Why is it important

Subsea7 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.

Our initiatives

In 2023 employees across Subsea7 offices proactively engaged with our communities through charitable events and business activities.

Community outreach programme:

In Angola, our donation to SOS Children's Villages has helped the purchase of essential daily items and fund maintenance work in some of the family houses. Our support has impacted 2,760 children and caregivers across villages. In Houston, together with a local partner we prepared essential school supplies for students in under-served communities.

Texas MS 150 Team: A Subsea7 team of 27 cyclists took part in a two-day, 180-mile fundraising cycling ride organised by the National Multiple Sclerosis Society and raised over \$21,000 locally to help fund research and support people with multiple sclerosis.

Promote learning opportunities:

We partnered with the NGO Junior Achievement and IBP (Brazilian Petroleum Institute) to provide mentoring services to High School students from the Rio de Janeiro public school system. Topics such as time management and leadership were covered as part of the programme.

Circularity for social good:

Our team in Singapore collected preowned items to donate to local charity, Willing Hearts, to support their work by providing essential items to the underprivileged individuals in their community while maximising value from reused items.

Inspiring young futures: Seaway7 partnered with OffshoreWind4Kids to inspire children about engineering through hands-on learning experiences, whilst showcasing the possibilities of careers in offshore wind.

Bringing academia and industry together:

We sponsored a computer laboratory in a vocational school, Offshore Technologies Centre in Türkiye. These facilities will enrich the classroom experience for students and researchers and facilitate professional development through Subsea7 internship opportunities.

Blood donation drive: We collaborated with local organisations and health institutes to organise blood donation campaigns at our office premises in Kuala Lumpur and Lisbon.

Developing an appreciation for diversity:

Employees from Subsea7 Australia took part in the 'Brant Garvey's Resilience Rumble', five-week Wheelchair Basketball Challenge, designed to promote disability awareness and empathy along with immersing colleagues in real-life diversity and inclusion training.

Beach clean-up: In support of the #BeatPlasticPollution campaign, our employees across the organisation took part in beach clean ups to remove plastic waste from local beaches and coastlines.

Food donations: Subsea7 Norway donated surplus long-life food items from the demobilisation of *Seven Oceanic* to Varmestuens Venner, a charity supporting individuals struggling with addiction in Stavanger and its surroundings.

Supporting community resilience:

We are working with a local partner in Senegal to plant seedlings and propagules to regenerate the mangrove of the Saloum river delta that will help stabilise the zone and support the livelihood of local communities. In Saudi Arabia, we collaborated with Saudi Aramco to plant 25,000 trees as part of the in-country sustainability plan.



USA



Norway



Australia



Saudi Arabia

Additional focus areas continued

Collaboration and partnerships

Subsea7 specialises in forming collaborative partnerships to enable mutually beneficial and more efficient ways of working – including strategic alliances where partners jointly cooperate to successfully deliver projects and overcome challenges.



In October 2023, the transaction to create the new OneSubsea joint venture between Subsea7, SLB and Aker Solutions completed. OneSubsea's ambition is to drive the future of energy from the seabed through the use of subsea technologies to deliver the sustainable energy future that the world needs.

This new business will drive innovation and efficiency in subsea production by helping customers unlock reserves and reduce cycle time. Bringing together the complementary skills and portfolios of the three companies, a comprehensive suite of life-of-field solutions can be provided to customers globally. The combination brings several opportunities through joint technology development, procurement, stronger engineering, service and manufacturing capabilities.

In navigating the ever-challenging landscape of the energy transition, this joint venture will enable us to collaborate to accelerate innovation, reduce emissions in subsea operations and deliver a unique value proposition across the industry.



The International Marine Contractors Association (IMCA) is a leading trade association representing the vast majority of contractors and the associated supply chain in the offshore marine construction industry worldwide.

Subsea7 is a founding member of IMCA, which was formed in 1995. In 2023 an executive member of management was appointed as Chairperson of the IMCA Board. In being an IMCA member, Subsea7 has the opportunity to engage with experts in all facets of international marine contracting and collaborate both with their fellow members and IMCA to support the energy transition and a lower-carbon future.

Subsea7 is also part of the Supply Chain Work Group of IMCA's Environmental Sustainability committee.

PETROFUND

Petrofund is a Namibian Sovereign Wealth fund responsible for the development of local competencies and social progress of the Namibian economy through scholarships and supporting education institution building.

Subsea7 has signed a Capacity Building Memorandum of Understanding with Petrofund which is preparing the ground for multiple focused capacity building initiatives and is a significant step towards the development and growth of the country's energy sector.

The collaborative efforts of government bodies, industry leaders and educational institutions will aid the establishment of a robust knowledge network hub, strengthening the Namibian energy sector preparedness and competitiveness as well as ensuring sustainability in the face of evolving global energy dynamics.



➔ For further details on our collaborations and partnerships, **please visit our website.**

Additional information

Double materiality assessment

During 2023, we have further aligned our materiality approach with the framework proposed by the EU Corporate Sustainability Reporting Directive (CSRD) by conducting a double materiality assessment. Our assessment supported by an independent sustainability consultant, adopts the concept of double materiality from the European Sustainability Reporting Standards (ESRS) and incorporates insights from within the business and our relevant external stakeholders. This is to ensure we consider the impacts, risks and opportunities of relevant topics from a two-dimensional perspective.

- **Outside-in perspective** – The potential financial impacts, risks and opportunities for Subsea7 arising from ESG factors
- **Inside-out perspective** – The impacts of Subsea7’s business activities on broader society and the environment

A brief overview of some of the work undertaken is outlined below:

Identification of relevant topics	Gathering stakeholders’ views	Validation of material topics
We performed desk research on existing and emerging topics by looking at stakeholders’ areas of interest and the materiality assessment undertaken by our peers. We also observed the wider industry and scientific reports, sustainability standards and frameworks, as well as ESG ratings to ensure relevance with industry advancements and stakeholder interest.	We engaged with our internal and external stakeholders through interviews, desk research and internal workshops, to understand our impact on them and find out the relative importance of the various sustainability-related topics to them. Our stakeholders included our clients, shareholders, investors, employees, key suppliers and value chain partners, and public organisations.	Where interest was expressed, we shared the list of topics with participating stakeholders. Business impact workshops, which included a risk and opportunities assessment, were held with key functions and leaders to determine the materiality of the shortlisted topics. The material topics were presented to the Sustainability Committee for review and sign-off.
150 potential topics that are relevant to Subsea7 were identified	19 conceptual topics shortlisted in line with the ESRS	10 material topics identified for review



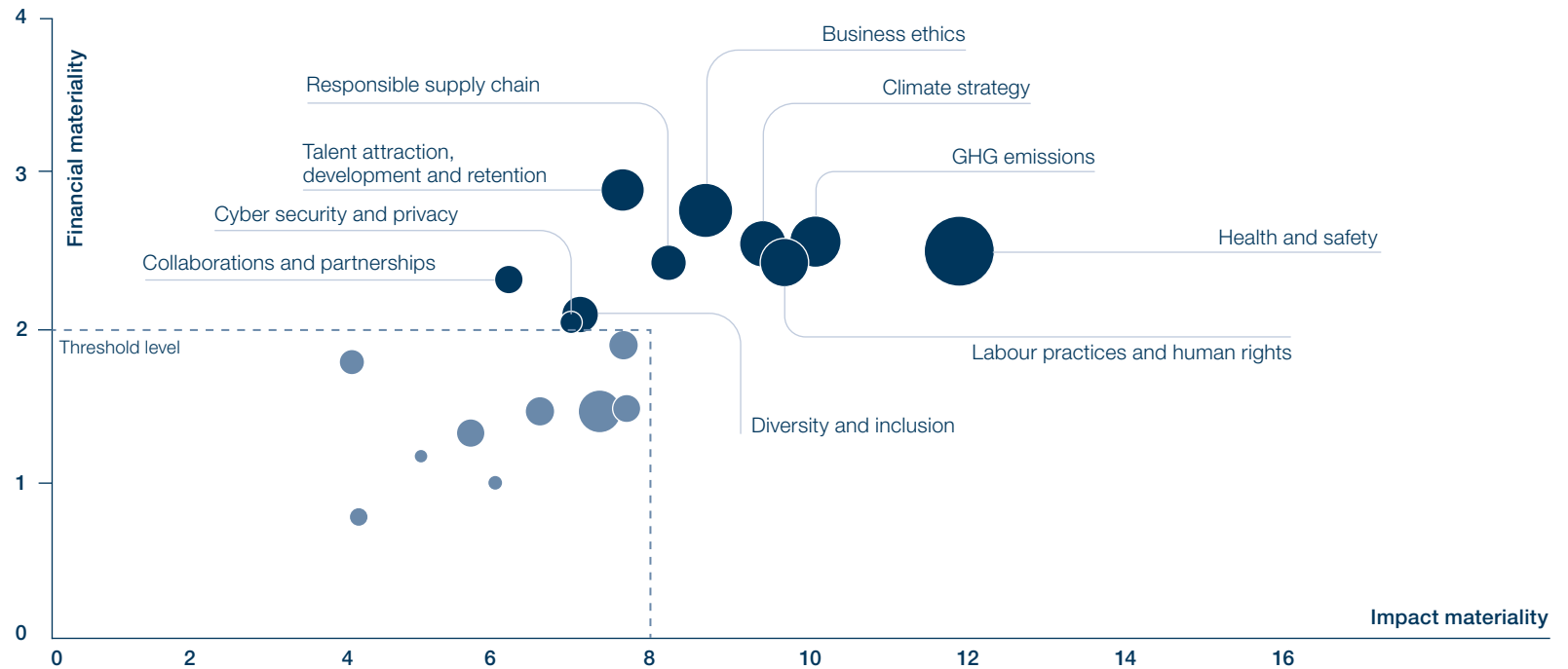
Additional information continued

Double materiality assessment

Through the 2023 double materiality assessment, 10 sustainability issues, illustrated in the materiality matrix, were identified as most material to our business and our stakeholders. The resulting material topics demonstrated a high level of convergence to the sustainability areas we have been focusing on since 2019. Our assessment also yielded results in relation to issues that are currently of lower materiality to our business. These are important to us, but our approach focuses on those that apply to a wide range of stakeholders and have the greatest long-term impact on our performance and development as well as future opportunities.

In order to remain focused on the most material topics going forward, we intend to carry out a refresh of our materiality assessment every three years.

Subsea7 2023 double materiality matrix



● Material topics
○ Importance for stakeholders

● Topics with lower materiality for Subsea7

- Affordability of energy
- Pollution management
- Biodiversity
- Spills management
- Water and marine resources
- Waste management
- Local communities and development
- Resource management
- R&D and innovation

Additional information continued

Reporting principles

Reporting period

The information presented in this report covers the period from 1 January to 31 December 2023.

Scope of reporting

In this report, we refer to Subsea 7 S.A. and its subsidiaries as “Subsea7”, the “Group” or “we”. This report covers the entirety of the Group, unless otherwise noted. It features performance indicators and progress against our six sustainability priorities, and the additional focus areas.

The reporting scope used for Scope 1 and 2 GHG emissions and energy consumption data follows the financial control approach. This includes data relating to:

- owned and operated assets (vessels, offices and work site)
- leased-in third-party vessels for 12 months or longer
- leased-in offices and work site with more than 25 employees

The Scope 3 data currently only includes emissions from business flights taken by our employees. Data and calculations are based on analysis by an external provider.

Unless otherwise noted, the scope of health, safety and environmental metrics includes all Subsea7 controlled work site, within our operational boundary, and third-party work site as defined by the Subsea7’s mode

of control, in line with the guidance from the International Association of Oil & Gas Producers guidance (Report 423). This includes activities carried out by employees and contractors whose work or workplace is controlled by Subsea7. We track and report safety figures (i.e. lost-time injury frequency, serious incident frequency) on a consolidated basis, without distinguishing between employees, contractors, subcontractors or supplier employees working on behalf of Subsea7.

Whilst we have used an operational boundary for environmental reporting, consolidation of NOx and SOx emissions follows the same boundary as Scope 1 GHG emissions.

Human-resources-related data is reported on a permanent and non-permanent basis using an end of period headcount (as at 31 December). This includes people working in Group subsidiaries, people seconded to consolidated joint ventures and the direct hires of the consolidated joint ventures. Other social data (employee training and survey) includes only those employees with access to our Human Resources training and survey platform.

The Subsea7 Code of Conduct applies to everyone who works for Subsea7 onshore, offshore, both permanent and non-permanent, across all sites, in all locations and in every country.

Exceptions to the reporting scope for certain performance indicators are specified in the notes to the data tables.

Emissions calculation

Our accounting and reporting of GHG emissions is guided by the GHG Protocol methodologies and principles, including recalculation of emissions in the base year to reflect material changes in the structure of the Group, or material change in the emissions accounting methodology used, if any.

Scope 1 and 2 GHG emissions are calculated based on energy consumption and using suitable emissions factors and the relevant GHG Global Warming Potentials of the Intergovernmental Panel on Climate Change. GHG emissions intensity is calculated based on absolute Scope 1 GHG emissions and revenue (in \$ millions) for the Group.

Controls

As part of the wider Group Business Management System, Subsea7 implements an integrated Health, Safety, Security, Environmental and Quality (HSSEQ) Management System to manage, monitor and report its global HSSEQ performance. Our HSSEQ system is certified to ISO 9001, ISO 14001, ISO 45001 and complies with all applicable laws and regulations in the countries where we operate.

Subsea7 established a centralised approach for the preparation of this report. The Group Corporate Sustainability Team interacts with identified data owners to collect the necessary data disclosed in the report. The relevant business functions are responsible for the completeness



and accuracy of information, and are required to provide explanation sheets on significant data development. Data was extracted from Subsea7 systems or approved third-party systems. The data relating to our workforce and diversity (age, gender and nationalities) is taken from our Human Resources database. Data regarding incidents and injuries (including for third parties), energy consumption, waste and spills is reported through our consolidated reporting tools based on submitted data from Subsea7 reporting entities. Our tools are auditable, with manuals and online training in place.

As part of our ongoing monitoring of our sustainability performance, our Sustainability Committee reviews progress towards our sustainability targets on a quarterly basis and input to reporting matters throughout the year.

Note regarding forward-looking statements

Certain statements made in this report may include ‘forward-looking statements’ including any information regarding our future business expectations and objectives and sustainability goals, which involve risks and uncertainties. Actual and future results could differ materially from those set forth in such statements due to various factors, and we are (wholly or in part) reliant on information provided by third-party sources, our suppliers and business partners.

→ All such forward-looking statements made in this report are qualified by the cautionary note found in the **2023 Subsea7 Annual Report page 170.**

Additional information continued

Summary of climate-related financial disclosures

Subsea7 supports the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD) which aims to improve the reporting of climate-related risks and opportunities.

In 2022, Subsea7 published its first climate-related disclosures guided by the recommendations of the TCFD. It sets out how the Group incorporates climate-related risks and opportunities into governance, strategy, risk management and metrics and targets. This page aims to summarise the response against these core recommendations as well as provide additional information relating to progress made during 2023.

We also disclose additional TCFD-aligned information in our annual voluntary response to the CDP.

→ Subsea7's TCFD-aligned disclosures can be found in full on our **website**.

Governance

The Board has a duty to embed sustainability and climate-related matters into the Group's business processes, and is responsible for guiding the Group's strategy. This includes ensuring climate considerations are reviewed and incorporated into our strategy.

Our Executive Management Team provides leadership to enable the Group to develop and implement its commitment towards sustainability, including the impacts of climate change.



Our progress in 2023

Climate-related issues are directly or indirectly an agenda item at all routine Board meetings. As part of the regular briefings to the Board, two detailed sessions focusing on climate-related matters including regulatory requirements were delivered to the Board.

Strategy

Subsea7 recognises the need to assess how the landscape within the energy sector may change to ensure the viability, resilience and profitability of its business.

Subsea7 identified climate-related risks and opportunities that may have a strategic or financial impact over the short, medium and long term.



Subsea7 carried out its annual business planning exercise to support the development of regional future scenarios which include considerations to climate-related matters.

Subsea7 concluded its double materiality assessment and identified climate strategy and greenhouse gas emissions to be material topics important to our business, our stakeholders, and wider society.

Risk Management

Subsea7's Sustainability Committee, comprising members of the Executive Management Team, manages the Group's sustainability-related risks. The Sustainability Committee meets regularly to discuss pertinent issues relating to its material topics including those that relate to the impacts of climate.

Working closely with the Group's Risk Committee, these risks are integrated as part of the Group's overall risk management.



Subsea7 engaged a third party to assess its current approach to risk management and to provide recommendations and a framework to support greater alignment and integration of sustainability-related risks as part of this process.

Metrics & Targets

Subsea7 reports several metrics and targets to assess and manage climate-related risks and opportunities.

We have set targets to reduce our Scope 1 and 2 absolute GHG emissions by 50% by 2035 against an adjusted 2018 base year inventory and to be Net Zero (Scope 1 and 2) by 2050.



Subsea7 has begun tracking and reporting carbon emissions intensity to provide greater context to absolute emissions as our operations expand.

Subsea7 continues to develop inventory of our material Scope 3 emission sources.

Additional information continued

ESG performance and ratings

We report on a range of key ESG performance indicators associated with our sustainability priorities and focus areas as a measure of progress.

Subsea7 is regularly assessed based on our disclosures by rating agencies and our ESG performance across various areas continues to be recognised. Detailed below is how we performed in key ESG ratings.

Our ESG performance data on pages 32 to 36 provides an update to reflect our performance over the last three fiscal years.

ESG ratings 2023

Rating agency	Scale (high low)	Sector average	Score	Trend vs 2022 score
Sustainalytics	0 > 100	27.1	17.3 Low risk	↑
S&P Global ESG	100 > 1	25	52 (91 st percentile)	=
ISS ESG	A+ > D-	C-	C	=
MSCI ESG	AAA > CCC	AA	AA	=
CDP (Climate)	A > D	C	C	=

1. Data as at 31st December 2023.

↑ = Trend vs 2022 score



Additional information continued

Climate and greenhouse gas emissions

Performance indicator	Unit	Measurement		
		2021	2022	2023
Greenhouse gas (GHG) emissions				
Scope 1 GHG emissions ^{1,2}	CO ₂ -e tonnes	657,987*	617,309	656,624
Scope 2 GHG emissions ^{1,3}	CO ₂ -e tonnes	2,168	1,794	2,317
Scope 3 GHG emissions ⁴ (GHG Protocol scope 3 Category 6 – business air travel emissions)	CO ₂ -e tonnes	29,469	47,886	49,552
GHG emissions intensity ^{5,**}	CO ₂ -e tonnes/ mil. USD	131	120	110
Carbon dioxide (CO₂) emissions				
CO ₂ emissions ²	CO ₂ tonnes	*	608,824	627,745
Energy consumption				
Fuel consumption ^{2,6}	tonnes	*	185,008	195,929
Purchased onshore electricity from renewable energy tariffs	% of total	66	73	69
CO₂ emissions and energy saving initiatives⁷				
CO ₂ emissions reduced from energy efficiency initiatives	CO ₂ tonnes	77,317	98,744	113,934
Fuel saved from energy efficiency initiatives	m ³	29,080	37,536	43,499
Operational cost savings from energy efficiency initiatives	million USD	16.4	31.0	35.7
Renewable capacity				
Renewables business unit revenue ⁸	million USD	1,260	1,117	955
Cumulative offshore wind farm monopile foundations installed	number	639	769	847
Cumulative offshore wind farm jacket foundations installed	number	152	259	280
Cumulative offshore wind turbine generator foundations installed	number	791	1,028	1,127
Cumulative renewable cables installed	number	726	944	1,086
Cumulative length of renewable cables installed	kilometre	1,281	1,968	2,569
Cumulative offshore substations installed	number	35	35	35
Cumulative power capacity of renewable projects supported	gigawatts	7.5	10.5	11.9
EU Taxonomy key performance indicators⁸				
Total revenue	million USD	5,010	5,136	5,974
EU Taxonomy-eligible revenue	million USD	1,239	1,106	876
EU Taxonomy-eligible OPEX	million USD	31	18	21
EU Taxonomy-eligible CAPEX	million USD	403	122	424
EU Taxonomy-aligned revenue	million USD	-	1,061	860
EU Taxonomy-aligned OPEX	million USD	-	17	20
EU Taxonomy-aligned CAPEX	million USD	-	122	424

Notes

1. Our reporting on GHG emissions is based on carbon dioxide equivalent (CO₂-e), a standard unit used to compare and account for emissions from various GHGs based on their global warming potential. The emissions conversion factors to calculate CO₂-e are IEA for electricity and Defra for fuel/gas.
2. Scope 1 reporting covers direct GHG emissions in CO₂-e, CO₂ emissions and fuel consumption from all owned vessels and leased-in vessel that Subsea7 uses for a period of 12 months or over.
3. Scope 2 reporting covers indirect emissions from purchased electricity (non-renewable sources) for our onshore facilities. Emissions are reported using the 'location-based' methodology.
4. Scope 3 reporting covers only emissions associated with business travel – air miles travelled by our people for work. Emissions data is pre-calculated and provided by external provider.
5. GHG emissions intensity is calculated by dividing Scope 1 GHG emissions in CO₂-e by the total revenue.
6. Fuel consumption data does not include power from shore while vessels are in port.
7. CO₂ emissions reduced from using hybrid vessels and through energy saving measures.
8. Financial data taken from audited 2023 Subsea 7 S.A. Annual Report.

* 2021 Scope 1 GHG emissions restated to reflect the adjusted 2018 base year inventory. The adjustment to historical absolute CO₂-e GHG emissions metrics follows Subsea7's GHG emissions recalculation method developed in 2023 and aligned with the GHG Protocol. This method applies adjustments to the CO₂-e based on annual average CO₂-e GHG emissions inventory norms and is not applied to other metrics which have been left blank for the avoidance of doubt.

** The indicator was first introduced in our sustainability reporting in 2023.

Additional information continued

Environmental

Performance indicator	Unit	Measurement		
		2021	2022	2023
Emissions to air¹				
Nitrogen oxides (NOx) emissions	tonnes	7,088	9,450	10,031
Sulphur oxides (SOx) emissions	tonnes	381	575	610
Environmental incidents²				
Environmental incident frequency per 200,000 hours worked	rate	1.18	1.06	1.18
Spills				
Number of environmental spills ³	number	106	101	120
Volume of environmental spills ³	litres	1,752	2,041	3,344
Environmental spills ³ frequency in litres per 200,000 hours worked	rate	16	16	23
Number of significant hydrocarbon spills ⁴ (>10m ³)	number	*	0	0
Volume of significant hydrocarbon spills ⁴ (>10m ³)	m ³	*	0	0
Waste generation and disposal				
Hazardous waste generated from:	tonnes			
Offshore ¹		2,938	3,202	3,124
Onshore ⁵		108	251	987
Non-hazardous waste generated from:	tonnes			
Offshore ¹		3,057	4,265	4,131
Onshore ⁵		3,194	3,852	3,921
Total hazardous and non-hazardous waste directed to disposal from onshore ⁵ sites	tonnes	761	618	439
Total hazardous and non-hazardous waste recycled from onshore ⁵ sites	tonnes	2,541	3,485	4,468
	%	77	85	91
Non-hazardous waste generated from offshore segregated ⁶ for recycling	%	69	66	71
Environmental fees				
Significant fines or non-monetary sanctions in excess of \$100K USD for non-compliance with environmental laws/regulations	USD	0	0	0

* The indicator was first introduced in our sustainability reporting in 2022.

Notes

1. We report emissions (NOx and SOx), waste and spills generated from Subsea7 owned vessels and leased-in vessels that Subsea7 uses for a period of 12 months or over.
2. 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.
3. An environmental spill is a spill reaching gravel, soil, water, sewer systems or absorbing floors, even if only a small portion of the spill is not contained. Spills fully contained by drip trays, overflow tanks etc. are not considered environmental spills.
4. For Subsea7, significant spill is defined as the number of uncontained hydrocarbon liquids spills greater than 10m³.
5. Onshore waste data is limited to owned work site. We are working on consolidation of data to cover both owned and leased work site.
6. Excludes an element of non-hazardous waste which cannot be recycled.

Additional information continued

Social

Performance indicator	Unit	Measurement		
		2021	2022	2023
Safety^{1,*}				
Total recordable injury	number	39	28	37
Lost-time injury	number	14	1	5
Fatality	number	0	0	0
Total recordable injury frequency per 200,000 hours worked	rate	0.33	0.21	0.25
Lost-time injury frequency per 200,000 hours worked	rate	0.12	0.01	0.03
Serious injury frequency ² per 200,000 hours worked	rate	**	0	0
Total near miss reports ³	number	248	265	262
Training on health, safety, and wellbeing[*]				
Total days of health, safety and wellbeing training	days	4,022	4,699	4,372
Safety courses taken per person by employee category:	average number			
Offshore		2.66	3.30	2.43
Onshore		1.45	1.52	1.42
Health and wellbeing courses taken per person ⁴	average number	0.28	0.16	0.23
Emergency Response exercises conducted onshore ⁵	number	137	128	135
Human rights programme				
Proportion of our workforce ⁶ covered by a human rights risk assessment within the last three years	%	**	92	100
Relevant employees trained on human rights ⁷	%	**	83	98
High-risk suppliers undergoing enhanced human rights risk assessment	%	**	18	59
Suppliers with a contract that included human rights clauses	number	6,164	6,521	6,822
	%	86	81	83
Employee training and education[*]				
Courses taken per person by employee category:	average number			
Offshore		3.02	4.05	3.22
Onshore		7.81	11.12	10.71
Hours of training undertaken per person by employee category:	average hours			
Offshore		3.34	4.64	4.93
Onshore		8.51	8.44	14.47
Employee survey results				
Satisfaction score for following statement:	score out of 10			
"At Subsea7, people of all backgrounds are accepted for who they are"		8.3	8.4	8.6
"Employee health and wellbeing is a priority at Subsea7"		7.4	7.6	7.9

* Excludes Xodus, 4Subsea and consolidated joint ventures.

** The indicator was first introduced in our sustainability reporting in 2022.

Notes

1. Safety data includes employees (permanent and non-permanent), subcontractor or supplier employees working on Subsea7 controlled work site.
2. For Subsea7, serious injury frequency is actual injuries that result in the injured person having a permanent impairment per 200,000 hours worked.
3. A near miss is an incident that has no actual consequences but does have potential negative consequences.
4. Health and wellbeing courses apply only to those with access to our Human Resources training platform.
5. Emergency Response exercises are based on simulated scenarios developed to reflect potential offshore or onshore operational issues and conducted by the onshore support team.
6. The proportion of the Group's permanent and non-permanent workforce headcount who work across all our offices, sites and vessels.
7. Relevant employees refer to those employees who need to have a good level of understanding of human rights because their roles mean they can and should help identify and manage human rights risks.

Additional information continued

Social continued

Performance indicator	Unit	Measurement		
		2021	2022	2023
Employment, new hires and turnover¹ (as at 31 December)				
Total number of employees:	headcount	12,502	13,437	14,814
Onshore		6,592	7,885	9,258
Offshore		5,910	5,552	5,556
Employee by gender mix of male or female:	%	M/F	M/F	M/F
Onshore		39/14	43/16	41/18
Offshore		46/1	40/1	40/1
Employee by nationality mix:	%			
Europe		53	52	53
Asia Pacific		20	21	21
Americas		19	20	23
Africa		8	7	3
Employee by age group of onshore population:	%			
under 30		12	15	17
30-50		69	67	64
over 50		19	18	19
Employee by age group of offshore population:	%			
under 30		8	8	9
30-50		67	67	64
over 50		25	25	27
Permanent employee by employment type (full time and part time) ²	%	FT/PT	FT/PT	FT/PT
		97/3	97/3	96/4
New permanent employee hires by gender mix of male or female ³	%	M/F	M/F	M/F
		75/25	69/31	69/31
New permanent employee hires by age group ³ :	%			
under 30		31	31	35
30-50		62	62	58
over 50		7	7	7
Permanent employee voluntary turnover rate ⁴	%	7.0	8.2	7.9
Leadership diversity				
Onshore leadership by gender mix of male or female ² :	%	M/F	M/F	M/F
Leadership group		87/13	85/15	84/16
Executive Management Team of Subsea 7 S.A.		67/33	71/29	75/25
Board of Directors of Subsea 7 S.A.		86/14	86/14	71/29

Notes

1. Data includes all types of employees (permanent and non-permanent), unless otherwise stated.
2. Permanent onshore population only. Excludes 4Subsea, Xodus, and consolidated joint ventures.
3. Permanent onshore population only. Excludes consolidated joint ventures.
4. Annual turnover is calculated by number of permanent employee voluntary leavers (rolling 12-month total) per number of permanent headcount (rolling 12-month average).

Additional information continued

Governance

Performance indicator	Unit	Measurement		
		2021	2022	2023
Compliance and ethics programme				
Proportion of the business covered by an independent anti-corruption compliance programme assessment* (see page 17 for further details)	%	80	86	100
Speak Up channel and culture				
Speak Up and other compliance and ethics cases ¹	number	31	47	53
Speak Up and other compliance and ethics cases ¹ frequency per 1,000 employees	rate	2.62	3.50	4.16
Compliance and ethics cases ¹ relating to:				
Human rights	number	1	2	0
Labour practice (including grievance)	number	13	18	31
Discrimination	number	2	0	7
Human rights impact on local communities	number	0	0	0
Conflict of interest	number	**	**	2
Money laundering	number	**	**	0
Data privacy	number	**	**	0
Communication, education and training²				
Governance body members ³ that have received compliance and ethics training and have had the Subsea7 anti-corruption policy communicated to them	number	156	141	170
	%	81	95	97
Employees ⁴ that have received compliance and ethics training and have had the Subsea7 anti-corruption policy communicated to them	number	5,067	6,691	7,912
	% of total employees	46	55	62
Other categories that have had the Subsea7 anti-corruption policy communicated to them:				
Incorporated joint venture partners ⁵	number	22	21	18
	%	100	100	100
Unincorporated joint venture, consortium, and alliance partners ⁶	number	6	6	6
	%	100	100	100
Suppliers	number	6,164	6,521	6,822
	%	86	81	83
Suppliers attending a compliance, ethics and integrity session	number	527	319	265
Supply chain management				
Medium- and high-risk suppliers assessed for corruption risk ⁷	%	40	91	98
Other				
Monetary value of financial/in-kind political contributions made by Subsea7	USD	0	0	0

* Excludes Xodus, 4Subsea and consolidated joint ventures.

** The indicator was first introduced in our sustainability reporting in 2023.

Notes

- At Subsea7 whistle-blowing is referred to as 'Speaking Up'. Compliance and ethics cases include all alleged or suspected breaches of the Code of Conduct, whether raised via Safecall or reported via other channels, whether or not substantiated (i.e. proven) and excluding any duplicate concerns.
- Training on compliance and ethics including anti-corruption. Training is conducted through e-learning, general and targeted workshops.
- Governance body members include directors of Subsea 7 S.A., Seaway 7 AS and every wholly-owned subsidiary in the Group.
- Employees required to complete compliance and ethics training include all onshore and designated offshore employees in certain decision-making or budget-holding roles, on the basis that they need to be in such a role to represent a bribery risk.
- An unincorporated joint venture is a contractual arrangement between the partners, whereas in an incorporated joint venture, the partners hold shares in a company.
- As part of Subsea7's standard anti-corruption compliance process, all unincorporated joint venture, consortium and alliance partners would have had Subsea7 anti-corruption policies communicated to them, however the total number in this category is not known.
- Subsea7 considers any supplier in a high-risk country as medium risk or, if it interacts with public officials on our behalf, high risk.

Additional information continued

Reporting standards and frameworks

EU Non-Financial Reporting Directive (NFRD)

We include non-financial statements about our business models, outcomes, risks and risk management and key performance indicators as an integral part of our annual corporate reporting. In line with the Directive, we set out below where the relevant information and key performance indicators can be found.

EU NFRD reference table

	Annual Report	Sustainability Report
Business Model	Pages 6-7, 10-19, 48	Pages 5-7
Anti-Corruption	Pages 20, 22, 26, 37, 47, 62	Pages 9, 16-17, 24, 36
Diversity	Pages 23, 36, 48, 55	Pages 22, 35
Environment	Pages 20, 22, 25-27, 35, 43, 47	Pages 9, 20-21, 32-33
Human Rights	Pages 20-21, 26, 36, 41	Pages 9, 14-15, 24, 34, 36
Social	Pages 20, 23, 36, 41-43, 47	Pages 9-11, 22-25, 34-35

EU Taxonomy

We disclose our taxonomy-eligible and aligned economic activities (revenue, OPEX and CAPEX) in line with the EU Taxonomy Regulation requirements in the Subsea7 2023 Annual Report.

United Nations Global Compact



As part of our ongoing commitment to the United Nations Global Compact, we report our annual disclosure to stakeholders on progress made in implementing the Ten Principles of the UN Global Compact in relation to human rights, labour, environment and anti-corruption. View our letter of commitment to the UN Global Compact.

Sustainable Development Goals

We have mapped our six sustainability priorities against the United Nations' 17 Sustainable Development Goals (SDGs), eight of which are highly relevant to our stated ambitions and where we are able to create sustainable value.



Task Force on Climate-related Financial Disclosures

We refer to recommendations from the Task Force on Climate-related Financial Disclosures to improve our reporting of climate-related matters. Our climate-related disclosure can be found on our website.

The Norwegian Transparency Act (Åpenhetsloven)

Subsea 7 Norway AS is subject to the Norwegian Transparency Act and is committed to fulfilling its responsibility to respect and uphold human rights. Further information can be found in our Norway Transparency Act Report 2023.

Other ESG frameworks

We are currently working towards compliance with the new European Sustainability Reporting Standards as part of our preparations for our enhanced reporting obligations under the Corporate Sustainability Reporting Directive, which we expect to apply to Subsea7 from 2024.

→ Find more information on our policies, statements and reports online www.subsea7.com

Additional information continued

Glossary

Abbreviation	Description
CAPEX	Capital expenditure
CCS	Carbon capture and storage
CO ₂	Carbon dioxide
CO ₂ -e	Carbon dioxide equivalent
CSRD	Corporate Sustainability Reporting Directive
D&I	Diversity & Inclusion
Defra	Department for Environment, Food and Rural Affairs
EAL	Environmentally Acceptable Lubricants
ESG	Environmental, social and governance
ESRS	European Sustainability Reporting Standards
ESS	Energy Storage System
EU	European Union
FAME	Fatty acid methyl esters
GHG	Greenhouse gases
GW	Gigawatts
HOP	Human and organisational performance
HSEQ	Health, safety, environment and quality
HSSEQ	Health, safety, security, environment and quality

Abbreviation	Description
IBP	Brazilian Petroleum Institute
IEA	International Energy Agency
ISO	International Organization for Standardization
IUCN	International Union for Conservation of Nature
km	Kilometres
KPI	Key performance indicator
LTI	Lost-time injury
MGO	Marine gas oil
MW	Megawatts
NOC	National Oceanography Centre
NOx	Nitrogen oxides
OPEX	Operational expenditure
R&D	Research and development
ROV	Remotely operated vehicle
WTG	Wind turbine generator
SDGs	The United Nations' Sustainable Development Goals
SOx	Sulphur oxides
TCFD	Task Force on Climate-related Financial Disclosures
UN	United Nations
VGP	Vessel General Permit

Term	Description
BORA Blue Ocean Research Alliance®	BORA Blue Ocean Research Alliance® is one of the first Industry and Science Alliances to be endorsed by the UN Ocean Decade.
BORAbox®	BORAbox® is a suite of sensors fitted to our ROVs or other offshore infrastructure to collect ocean data.
Company	Subsea 7 S.A.
DNV	Det Norske Veritas (DNV) is a leading classification society for the maritime industry.
OneSubsea®	A joint venture between SLB, Aker Solutions and Subsea7.
Seaway7	Subsea7's Renewables business unit.
Subsea Integration Alliance	A Subsea Integration Alliance (SIA) is a strategic global alliance between OneSubsea® and Subsea7, bringing together field development planning, project delivery, innovative contracting models and total lifecycle solutions under the world's leading subsea technology and services portfolio.

Subsea7 is a global leader in the delivery of offshore projects and services for the energy industry. Subsea7 makes offshore energy transition possible through the continuous evolution of lower-carbon oil and gas and by enabling the growth of renewables and emerging energies.

Subsea 7 S.A. is listed on the Oslo Stock Exchange (SUBC),
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