

What we value, how we behave

Our Code of Conduct for Suppliers

What makes us who we are



Safety



Integrity



Sustainability



Performance



Collaboration



Innovation

How we work together

Our Code of Conduct for Suppliers sets out the key principles of ethical conduct that you (as our supplier) agree must be upheld when working with us (Subsea 7). It has been written in a way that we believe is most relevant to you and the interactions between our two organisations. It complements the full Subsea 7 Code of Conduct (available at www.subsea7.com/conduct-and-ethics), where you can find more guidance, should you need it.

When an organisation asks you to comply with its Code of Conduct, it can seem like an imposition. You may well have your own Code of Conduct, which you and your employees are committed to upholding. Also, such requests don't take into account the fact that an organisation's behaviours are, ultimately, driven by its values and culture, not just by contractual undertakings – even though honouring such commitments is extremely important.

We trust you to uphold your contractual commitments with us, and we get assurance from your ability to demonstrate that you have your own Code of Conduct that sets out equivalent standards and which is embedded within your organisation.

Our Values of Safety, Integrity, Sustainability, Performance, Collaboration and Innovation underpin everything we do, including whom we choose to do business with and how our two organisations work together. We don't ask you to share our Values, just to respect them.

That being said, just as we won't compromise on safety when we work with you, we consider that honesty, fairness and integrity are universal values, and we wish them to characterise the way in which our two organisations do business together.

We require these standards of you, but you can also expect them of us, and we ask that you tell us if anyone is failing to uphold them.

Please ensure that all your staff and subcontractors who are involved in your supply of goods or services to Subsea 7 operate to standards at least as high as those set out in this Code of Conduct for Suppliers.

Thank you.

John Evans
Chief Executive Officer,
Subsea 7

Joseph Leroy
VP Operational Functions,
Subsea 7



ETHICAL BUSINESS CONDUCT AND COMPLIANCE WITH THE LAW

We are committed to doing business with honesty and integrity and to comply with all applicable laws in all jurisdictions in which we operate - including laws against corruption and tax evasion.

We require our suppliers to do likewise.

Bribery and Corruption

Subsea 7 is committed to the prevention of corruption and will not tolerate bribery. Our policy is straightforward. We will not offer, request or accept bribes, nor will we use or permit others to do such things for us or when working on our projects. This includes offering any improper payment or benefit to any person, including any public official, to obtain new business, retain existing business, or secure any improper advantage.

We make no exception for so-called facilitation payments - typically small-value payments to public officials to secure or expedite the performance of a routine or necessary action to which the payer is already entitled.

We require the same of you.

Gifts and Hospitality, and Conflicts of Interest

Reasonable gifts and hospitality that are not intended to influence the recipient improperly can play a legitimate role in business relationships. But we do not allow gifts and hospitality or conflicts of interest to influence the work that our organisations do together.

We require the same of you.

Competition and Anti-Trust

Our established policy is to compete fairly and ethically in full compliance with the competition and anti-trust laws in all jurisdictions in which Subsea 7 operates.

We require you to do the same. This means, among other things, that you should:

- Respect our right to choose which suppliers we invite to pre-qualify or tender
- Be careful not to provide us with information about our competitors' bids or pricing.

HEALTH, SAFETY, SECURITY, ENVIRONMENT AND QUALITY (HSSEQ)

Safety and Sustainability are two of our core Values. Subsea 7 is committed to an incident-free workplace. Our performance depends on our ability to continually improve the quality of the services we provide to our clients, while protecting people, minimising the impact on the environment and the communities where we operate, and damage to assets.

Subsea 7 requires an active commitment to HSSEQ from all our personnel and suppliers in all our work activities.

Safety is one of our core values, and we believe that by working together with integrity, we will create an incident-free Subsea 7 workplace every day, everywhere.

If you work on one of our sites, we require that you ensure you comply with our Supplier Health, Safety, Security and Environment Requirements.

We believe that by working together with integrity, we will create an incident-free Subsea 7 workplace every day, everywhere.

HUMAN RIGHTS AND EMPLOYMENT PRACTICES

We are committed to fulfilling our responsibility to respect and protect human rights. We strive to protect the dignity of all individuals working in or impacted by our operations, including people who work for our suppliers. This includes a commitment to help prevent modern slavery and human trafficking anywhere in our business or supply chain.

We are committed to fair and lawful employment practices across the company and throughout our supply chain. These include, as a minimum, complying with national legal requirements regarding wages and working hours. We also support the International Labour Organisation's standards regarding child labour and minimum age.

We require you to uphold the same standards when dealing with your employees, contract staff and subcontractors.

FAIRNESS AND RESPECT BETWEEN CUSTOMER AND SUPPLIER

We endeavour to honour our contractual obligations, including prompt payments of sums due in accordance with the terms of our agreements with our suppliers.

In return, we also require that all invoices, applications for payment, variations or extensions of time, financial records and reports will accurately reflect our contractual agreements and the business transactions between us.



“TOGETHER WE ALWAYS DO WHAT IS RIGHT”

WHAT IF THERE IS A FAILURE TO UPHOLD THESE STANDARDS?

If you have a serious concern about behaviour that is inconsistent with this Code of Conduct for Suppliers, there are a number of options available to you:

- In general, first seek to address your concerns with the senior manager at Subsea 7 responsible for your relationship.
- Alternatively, you can contact our VP Operational Functions or our Group Head of Compliance and Ethics.
- If you do not feel comfortable raising your question or concern via any of these channels, you can contact our confidential reporting line (see details opposite).

We prohibit retaliation against anyone raising a concern in good faith or on the basis of a reasonable belief, and such concerns can be reported in a confidential and, where local laws permit, anonymous way.

Note: Throughout this document, “we”, “our” and “us” refers to Subsea 7, and “you” and “your” refers to your organisation, as our supplier.

Our externally administered confidential reporting line is available 24 hours a day, 7 days a week via www.safecall.co.uk or the telephone numbers below:

Angola	+44 191 516 7767
Australia	1 800 052 971
Brazil	0800 891 7813
Egypt	0800 000 0059
France	0800 00 99 20
Germany	00 800 72332255
Ghana	+44 191 516 7764
India	000 800 440 1256
KSA	800 8442067
Malaysia	1 800 220 054
Mexico	01800 123 1758
Netherlands	0800 020 1196
Nigeria	+44 191 516 7764
Norway	800 19821
Singapore	800 448 1542
UAE	8000 4413376
UK	0800 055 6712
USA	877 224 3830
Other	+44 207 696 5952



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