

# TRANSPARENCY ACT STATEMENT 2022

in accordance with the Norwegian Transparency Act 18.06.2021  
Saipem Drilling Norway AS



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## Saipem Drilling Norway AS

### 1. Our operations, guidelines, and procedures

#### *1.1 Enterprise structure and area of operations*

Saipem Drilling Norway AS (“**the Company**”) is a limited liability company with its headquarters in Sola, Norway. The company was established 13th April 2012, and its business activities is the ownership, chartering and operation of offshore vessels, and therewith related activities for the execution of offshore drilling operations. The company has an average of approximately 200 employees working offshore on board of the Semi-Submersible Drilling Rig Scarabeo 8.

The Company is a fully owned subsidiary of Saipem S.p.A, a leading international player in energy transition and infrastructures. Saipem S.p.A and its subsidiaries (“**the Group**” or “**Saipem**”) are operating in more than 70 countries with over 30,000 employees representing about 130 nationalities.

The Company owns and operates the Scarabeo 8 rig, a semisubmersible drilling unit which has operated for many of the major Energy Companies active in Norway such as AkerBP, Vår Energi, Shell, Wintershall, TotalEnergies, Repsol. The rig holds the PSA issued Acknowledgment of Compliance AOC and complies with applicable standards for offshore drilling operations in Norway.

The Company also provides bareboat lease services to Saipem Group Affiliate Companies for the utilization of Drillship Santorini outside of Norway.

Compliance with laws, regulations, statutory provisions, Corporate Governance codes, ethical integrity and fairness, is a constant commitment and duty of all Saipem people, and characterizes the conduct of Saipem’s entire organisation. Saipem’s business and company activities shall be carried out in a transparent, honest and fair way, in good faith, and in full compliance with competition rules.

In conducting its activities as an international company and in cooperating with its partners, Saipem stands up for the protection and promotion of human rights, inalienable and fundamental prerogatives of human beings and basis for the establishment of societies founded on principles of equality, solidarity, repudiation of war, and for the protection of civil and political rights, of social, economic and cultural rights and the so-called third generation rights (self-determination right, right to peace, right to development and to the protection of the environment).

Saipem believes that its conduct must not in any way favour or tolerate violations of human rights, and other illegal activities, such as money laundering and any form of terrorist financing and undertakes to guarantee, through its conduct, the full compliance with and effectiveness of the restrictions and limits set by national and international legislation on the matter.

Saipem does not tolerate any form of discrimination, corruption, forced or child labour. Particular attention is paid to the acknowledgement and safeguarding of the dignity, freedom and equality of human beings, to

protection of labour and of the freedom of trade union association, of health, safety, the environment and biodiversity, as well as the set of values and principles concerning transparency, energy efficiency and sustainable development, in accordance with International Institutions and Conventions.

Promoting the respect for fundamental human rights and decent working conditions is emphasized throughout the group, and compliance with the obligations under the Transparency Act has been supported by Company's Board of Directors.

### ***1.2 Saipem commitment, policies and compliance with international guidelines***

Saipem is dedicated to protecting and promoting human rights. Saipem commitment is based on international standards and conventions, United Nations' (UN) Universal Declaration of Human Rights, the International Labour Organisation's (ILO) Fundamental Conventions, the Organisation for Economic Co-operation and Development's (OECD) Principles, and the UN Global Compact principles, and includes the following:

- the Convention on the protection of the European Communities' financial interests (Brussels, 26 July 1995) and relevant first Protocol (Dublin, 27 September 1996);
- the Convention on the fight against corruption involving officials of the European communities or officials of Member States of the European Union (Brussels, 26 May 1997);
- the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (Paris, 17 December 1997);
- the fundamental Conventions of ILO-International Labour Organization
  - o Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87);
  - o Right to Organise and Collective Bargaining Convention, 1949 (No. 98);
  - o Forced Labour Convention, 1930 (No. 29) (and its 2014 Protocol );
  - o Abolition of Forced Labour Convention, 1957 (No. 105);
  - o Minimum Age Convention, 1973 (No. 138);
  - o Worst Forms of Child Labour Convention, 1999 (No. 182);
  - o Equal Remuneration Convention, 1951 (No. 100);
  - o Discrimination (Employment and Occupation) Convention, 1958 (No. 111);
- the "OECD Due Diligence Guidance for Responsible Business Conduct;
- "Guidelines of the Organization for Economic Co-operation and Development (OECD) for multinational companies.

Saipem became a UN Global Compact (UNGC) Signatory in 2016, incorporating their principles of respect for human and labour rights, environmental protection and the fight against corruption into our strategies, policies and procedures. Renewing Saipem commitment to support the UNGC every year is a concrete proof of our willingness to always run business making this initiative and its principles part of business strategy, day-to-day operations, and organisational culture.

These principles are essential for conducting sustainable business operations and maintaining respectful and ethical relationships throughout Saipem 's value chain.

Saipem is committed to promote and maintain a suitable Internal Control System and Risk Management which is the set of company tools, organisational structures, rules and regulations to ensure the safeguarding of our company assets, the efficiency and effectiveness of company processes, the reliability of financial reporting, and compliance with laws and regulations, as well as with the Saipem's Articles of Association and internal regulatory documents. The structure of Saipem's Internal Control System, which is an integral part of its

organisational and management model, involves, with different specific roles, its governance and corporate control bodies, the Compliance Committees, Saipem management and all its personnel.

Saipem embeds human rights and decent working conditions in its policies, procedures and management systems applicable to all its operations.

**Saipem Code of Ethics** states the rejection of any form of discrimination, corruption, forced or child labour. The Code promotes human rights and safeguards the dignity, freedom and equality of human beings including the protection of labour rights and the freedom of trade union association and health and safety, the environment and biodiversity, as well as values and principles relating to transparency, energy efficiency and sustainable development, in accordance with international organizations and conventions. Saipem's Code of Ethics strictly demands that there shall be no harassment in the workplace and protects against any form of discrimination, based on gender, ethnicity, religious beliefs, age, marital status or any other aspect. The Code of Ethics applies to the entire Saipem population, as well as to third parties with whom Saipem collaborates.

The principles and contents of Code of Ethics are disclosed to all with whom Saipem has contractual relations. All agreements concluded by Saipem with third parties shall include a clause requiring such third parties to comply with the law and the reference principles of Code of Ethics; such clause must be accepted by the relevant third parties.

Saipem personnel, directors, statutory auditors, members of the control and supervisory bodies, management and third parties with whom Saipem collaborates with have the obligation to report any violations of the Code of Ethics for what concerns also human rights.

The **Sustainable Saipem Policy** enforces Saipem commitment to promoting and respecting Human and Labour Rights together with the protection of health, safety and personal security which are non-negotiable values for the company and that suppliers, clients and subcontractors must endorse to partner with us.

Saipem's commitment to diversity, equality and inclusion is illustrated by the adoption of measures aimed at creating a work environment that recognises and values uniqueness. In 2022, Saipem issued the **Diversity, Equality & Inclusion Policy**.

**Saipem HSES policy** details the management commitment to fulfilling legal and other HSE requirements, and to guarantee a safe and environmentally friendly workplace for all people, contract workers and the communities where the company operates, implementing measures to prevent safety injuries and health impacts on people, asset damage, and environmental and biodiversity negative impacts.

### ***Vendor Code of Conduct***

In 2022, Saipem issued its Vendor Code of Conduct that all vendors are required to respect. It defines Saipem's expectations regarding business ethics, including the protection of human rights, the assurance that decent work conditions are consistent with local laws and principles defined by the ILO, and the prohibition of any form of child labour and forced or compulsory labour, human trafficking, slavery, discrimination and harassment.

The Vendor Code of Conduct is a public document that communicates Saipem expectations towards its Vendors in terms of:

- Ethics and Compliance

- Human Rights and Modern Slavery
- Health, Safety, Security and Environment
- Local communities
- Information and Data Protection
- Whistleblowing Process.

All Vendors must comply with the Vendor Code of Conduct. During the qualification phase, they are required to sign the “Vendor declaration” form which includes the compliance with the Saipem Code of Ethics and the Vendor Code of Conduct.

## 2. Saipem commitment to protection and promotion of human rights and against Modern Slavery

Since 2016 Saipem publishes an annual “Modern Slavery Statement” which describes the measures adopted to ensure that there are no forms of modern slavery, penal labour or human trafficking within its operations or in its supply chain.

Given the relevance of protection and promotion of human and labour rights in the new international legislation, Saipem issued, as a group, the “*2022 Human Rights and Modern Slavery statement*” report in compliance with “OECD Due Diligence Guidance for Responsible Business Conduct”, describing the commitment, the human and labour rights due diligence process, and the actions implemented to mitigate the risks. The 2022 Human Rights and Modern Slavery statement report has been approved by Saipem Spa BoD the 27th of June 2023 and published on Saipem website.

## 3. Information regarding identified actual adverse impacts and significant risks of adverse impacts

### *3.1 Country Human rights risk assessment*

For each Country in which Saipem operates, an in-depth analysis of the current legislation in force is examined for each of these areas: child labour, forced labour, non-discrimination in employment and occupation, freedom of association and collective bargaining. Information and reports provided by international organisations, NGOs and trade union associations covering labour rights and human trafficking are also considered. Countries are divided into four distinct risk categories: high, medium, moderate, and low.

The country human rights risk analysis results are used in other processes aimed at identifying the human rights risks in the Company operations. In particular, during the qualification phase, the vendors located in countries classified as high risk are subject to more in-depth investigations including specific HSE and human rights assessment.

### *3.2 Assessing human and labour rights risks in Saipem operations*

In 2021, Saipem introduced the Human and Labour Rights (HLRs) Risk Register to identify, assess, and mitigate human and labour rights risks that might be generated by the company business operations and its business relations. The risk register includes the project and country-specific assessment of the potential human and labour rights risks on labour and employment, local communities, supply chain and the risks that might be

generated by the security services. In 2022 the Human and labour rights risk register was implemented mainly in the countries at high risk for human rights.

For the assessment under the Norwegian Transparency Act, the Company used the HLR Risk Register to analyse risks of adverse impacts and mitigating measures.

In the due diligence under the Transparency Act, the Company prioritized the assessment of risks connected to ownership and operation of the Scarabeo 8 rig concerning safety on board, working conditions and suppliers in high-risk areas.

The risk level concerning potential accidents during the execution of work offshore is considered medium level before consideration of mitigating action, due to the potential severity of accidents. However, likelihood of accidents accruing is low, as the Company has a strong focus on HSE, and we have several measures in place to avoid accidents and reduce HSE risks. Taking into account implemented measures, the Company considers the risk to be low.

Considering the operational, technical and organizational barriers and controls in place, the residual risks associated with human and labour rights for the company employees, and suppliers are considered low. The Company have in place measures to monitor, assess, and mitigate risks, as outlined below.

#### **4. Measures implemented to cease actual adverse impacts or mitigate significant risks of adverse impacts**

##### ***4.1 HSE measures and working conditions***

Saipem is committed to maintaining an HSE (Health, Safety, and Environment) management system that is in accordance with both local and international regulations. We adhere to Norwegian laws including the Working Environment Act and the Internal Control Regulations, as well as the guidelines enforced by the Petroleum Safety Authority Norway and those outlined in the Activities Regulations for the petroleum sector. Additionally, we comply with international standards such as ISO 45001, which pertains to health and safety in the workplace. This commitment is demonstrated by the certification the Saipem Group has achieved for these standards throughout our entire organization.

The health and safety of people is constantly monitored, assessed and guaranteed through a management system that integrates aspects of health, safety, security and the environment and covers all employees and subcontractors working on Saipem's sites.

Company has in place a mandatory training system for all personnel to ensure work is performed correctly. The Company provides HSE training for all personnel, including subcontractors to ensure adequate knowledge on HSE risks and prevent the risk of accidents. In the course of 2022, more than 7,000 HSE training hours were delivered in connection with Scarabeo 8 activities for Saipem and subcontractor personnel.

Saipem has further launched various HSE campaigns to make the workers aware on the importance of respect health and safety rules to ultimately preventing the risk of accidents.

All workers on board are provided with safety and protective equipment and appropriate clothes to protect them from health and safety risks.

A dedicated Safety Supervisor is deployed onboard the unit who, together with the elected safety delegates and the rig management ensures a safe working environment.

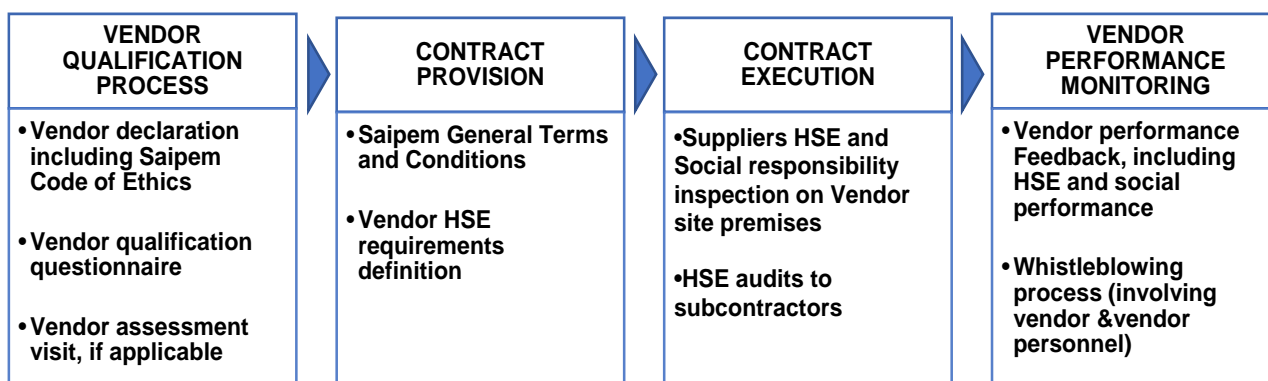
#### 4.2 Supply chain

Saipem undertakes to seek suppliers and external collaborators with suitable professionalism and committed to sharing the principles and contents of the Code of Ethics and promote the establishment of long-lasting relations for the progressive improvement of performances while protecting and promoting the principles and contents of the Code of Ethics. Furthermore, Saipem provides for a detailed supplier assessment system, which provides for the adoption of measures (monitoring, authorization, suspension, withdrawal) against the latter in the event that it becomes aware of conduct contrary to the principles contained in the Model 231 since qualification phase.

Saipem supply chain management system is structured to guarantee that vendors have proven technical and operational skills, but also that they share Saipem’s values and policies and principles related to human and labour rights. The management system includes some sustainable business elements such as ethical behaviour, respect for human and labour rights, including the protection of the health and safety of workers, and environmental protection. These sustainability risks associated to the supply chain management are specifically defined into the Saipem procedures, at each phase being implemented specific analysis and verification tools (audits, questionnaire) to guarantee vendor compliance with Saipem principles, procedures and policies.

Saipem’s vendors are bound by contractual clauses to comply with the principles of the Code of Ethics and respect human rights in conformity with Saipem’s policies and the Vendor Code of Conduct. Saipem also demands that they require respect for the same principles and standards from their own suppliers, thus guaranteeing safe and fair work conditions and the responsible management of environmental and social aspects throughout the supply chain. Failure to comply may result in the suspension of the vendor’s qualification and/or termination of the contract.

#### Management of the Human and labour rights including the HSE aspects in the Supply chain



#### Contract provisions

Saipem has, as part of their general terms and conditions, provisions containing obligations on ethical business standards.

As part of promoting decent working conditions, the Saipem's general terms and condition contain section dedicated to Sustainability and health, safety and environmental (“HSE”) issues. The HSE requirements to Vendors vary depending on the complexity of the contract and the associated risk to the requested service. In general, the provisions require suppliers to take precautions and measures to safeguard the health of the people that may be affected by the contract and to ensure high safety and security levels when conducting operations. The provisions require suppliers to comply with applicable laws, and for the suppliers to provide protective equipment and necessary training for their personnel. To ensure that suppliers comply with the HSE requirements, Saipem reserves the right to inspect suppliers' facilities to assess compliance with requirements and specifications.

#### ***4.3 Saipem Norway Vendor Human Rights Assessment Questionnaires***

As part of the due diligence under the Transparency Act, the Company sent questionnaires to a selected group of suppliers concerning human rights and working conditions. The questionnaires serve a two-fold purpose, as they both inform Company due diligence risk mapping, as well as it is expected to influence the suppliers to respect and promote human rights and decent working conditions. 13 of the Company most significant vendors located in various geographical areas were involved in the process. The results of the assessment indicated that the Vendors have in place policies and procedures related to protection of human rights and promotion of decent work conditions.

#### ***4.4 Training Programme***

All Saipem personnel are informed of the principles and contents of Code of Ethics also through specific mandatory training courses. In 2016, Saipem also implemented a training programme on Human Rights and the Supply Chain to train all Saipem procurement functions involved, mainly Vendor Management and the Post Order Functions. The training includes a focus on international standards and Saipem policies, the actions that can be implemented and the role of employees on these critical issues. Training aims to instruct employees who interact directly with vendors on the importance of reporting serious situations they may observe during visits to vendors premises. The training is delivered mainly via an e-learning platform to reach all Saipem sites worldwide.

## **5. Access to remedy**

### ***5.1 Whistleblowing***

The Saipem whistleblowing system is described in the “Whistleblowing Reports Received (Including Anonymously) by Saipem SpA and by its Subsidiaries in Italy and Abroad” Standard Procedure (Doc. no. STD\_GR-GROUP-ANC-002-E) and is also applicable to Vendors and Vendor personnel who may report any violations, a behaviour and practice, that do not conform with the Saipem Code of Ethics and its principles. Any report received via whistleblowing system is analysed and assessed according with the above standard.

Whistleblowers are guaranteed against any form, direct or indirect, of retaliation, discrimination or penalization, for reasons connected directly or indirectly to the report, without prejudice to the legal obligations and the protection of the rights of the Saipem or of the people accused by wilful misconduct or gross negligence, as well as the provision of disciplinary measures to be applied to those who make, with wilful misconduct or gross negligence, reports that prove to be groundless. In any case, the confidentiality of the whistleblower's identity is assured.



## 5.2 Complain procedure for Seafarers

In addition to Whistleblowing system, Saipem adhered to principles and rights recognized to Seafarers promoted under the ILO Maritime Labour Convention of 2006 (MLC 2006). All personnel on board Scarabeo 8 have the right to submit grievances in accordance with a structured process if a violation of their rights arises. Personnel is made aware of their rights and provided access to all procedures and forms necessary to submit complaints. Complaints are examined by the Captain and/or the Company and are managed in compliance with the applicable Saipem's procedures.

## 6. Transparency of reporting

For further information on how Saipem handles the risks of adverse impacts on human rights and working conditions at Group level, the latest reports 2022 Human rights and Modern Slavery Statement, 2022 Sustainability Report and 2022 Saipem Annual Report (including Consolidated Non-financial Statement) are available in Saipem website.

Any information requests pursuant to the Transparency Act Section 6 may be sent to [luca.giommi@saipem.com](mailto:luca.giommi@saipem.com) and [aase.flatjord@saipem.com](mailto:aase.flatjord@saipem.com)

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