



**moss**maritime |  **SAIPEM**

## Transparency Act Statement 2022

In accordance with the Norwegian Transparency Act of 18.06.2021

Moss Maritime AS



# 1 OUR OPERATIONS, GUIDELINES AND PROCEDURES

## 1.1 Enterprise structure and area of operations

Moss Maritime (“the Company”) is a limited liability company located at Lysaker in Bærum, Norway. The company was established 15<sup>th</sup> of June 2001 and is a company providing leading technology and expertise within design and engineering services to the offshore energy sector as well as other ocean-based sectors. The company has an average of approximately 60 employees.

The Company is a fully owned subsidiary of Saipem International B.V with its registered office in Netherland and with Saipem S.p.A, with head office in Milan, Italia, as the ultimate owner. 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 and is a leading international player in energy transition and infrastructures.

The Company continues to specialize in frontier and technology advanced projects and provide a wide variety of design solutions for innovative floater designs for the energy industry in general, with focus on energy carriers such as LNG and hydrogen, as well as for the renewable energy sector. The Company also engages in non-energy markets with the need of floater competences such as aquaculture, large coastal structures and infrastructure. The Company’s portfolio of services and products is divided into the following business areas: Gas technologies, Clean energy solutions, Ocean technology and infrastructures and ECO drilling floaters

Although the Company specializes in frontier and technology advanced projects, the Company provides a wide variety of design, engineering and technical services to owners, operators, fabricators and other engineering companies.

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 conducted 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 the Company. The Company's 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
  - Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87);
  - Right to Organise and Collective Bargaining Convention, 1949 (No. 98);
  - Forced Labour Convention, 1930 (No. 29) (and its 2014 Protocol );
  - Abolition of Forced Labour Convention, 1957 (No. 105);
  - Minimum Age Convention, 1973 (No. 138);
  - Worst Forms of Child Labour Convention, 1999 (No. 182);
  - Equal Remuneration Convention, 1951 (No. 100);
  - 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 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, and Moss Maritime Code of Ethics*** prepared in line with the Saipem Code of Ethics, state the rejection of any form of discrimination, corruption, forced or child labour. The Code of Ethics 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. The 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 Group/Company population, as well as to third parties with whom Saipem/Moss Maritime collaborates.

The principles and contents of Code of Ethics are disclosed to all with whom the Company has contractual relations. All agreements concluded by the Company 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/Moss Maritime's personnel, directors, statutory auditors, members of the control and supervisory bodies, management and third parties with whom Saipem/Moss Maritime collaborates with, have the obligation to report any violations of the Code of Ethics for what concerns also human rights.

***The Policy Sustainable Saipem*** enforces Saipem commitment to promote and respect 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 recognizes and values uniqueness. In 2022, Saipem issued the ***Diversity, Equality & Inclusion Policy***.



**Saipem HSES policy** details the management commitment to fulfil 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**

All vendors of Saipem are required to respect 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. During the qualification phase, the vendors of Moss Maritime are required to sign the “Vendor declaration” form in which the vendor confirm to comply fully with the principles stated in the Moss Maritime Code of Ethics and the Sustainability Policy of Saipem.

## **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.



## 3.2 Assessing risks related to human and labour rights in Moss Maritime's operations

### 3.2.1 Risk assessment tool

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 within the Group mainly in the countries at high risk for human rights.

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

During the evaluations under the Transparency Act, the Company has concluded that the main areas to prioritize in the assessment of risks are related to working conditions and suppliers.

### 3.2.2 Work Conditions

The results from the Group's Country risk assessment mentioned in chapter 3.2.1 above, show that Norway is a low-risk country with regards to adverse impacts on human rights and decent working conditions. Based on this analysis and taking into consideration both that Moss Maritime's main activities are carried out in Norway, and that the activities performed are engineering services mainly within the company's offices, the Company consider the risks of negative impacts within the company as limited.

Further, considering that the Company has in place measures to monitor, assess and mitigate risk as outline in chapter 4.1 below, the residual risk associated with the lack of decent work conditions for the company's employee are considered low.

### 3.2.3 Supplier Chain

With regards to the Supplier chain, the Company consider that there is a certain risk that within vendors' organization there might be adverse impacts on human rights or decent working conditions. Considering that the Company has in place an overall system and framework where the vendors undertake to comply with the Moss Code of Ethics, it should be expected that the vendors would have their own framework in place in order to avoid negative impacts on human rights and decent work conditions. In order, to uncover whether the vendors actually have such framework, the Company has planned to initiate additional controls in 2024 as described in the chapter 4.2 below.



## 4 MEASURES IMPLEMENTED AND PLANNED TO CEASE ACTUAL ADVERSE IMPACTS OR MITIGATE SIGNIFICANT RISKS OF ADVERSE IMPACTS

### 4.1 Working conditions in the Company

Ethics and integrity are central to everything we do, and all employees are obliged to follow our current policies and guidelines. Our Code of Ethics is available in all Company's channels and new recruits get an introduction to the Code of Ethics upon their startup in the Company and further they must confirm that they have read and will follow the Code of Ethics.

Furthermore, courses related to the Code of Ethics are arranged for employees on a regular basis through Saipem's e-learning portal.

#### ***Diversity and equality***

The 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.

Furthermore, by promoting the Company's value «ONE TEAM», the Company wants to create a culture that shows that everyone's efforts are important for the Company to succeed, and that working together as a team where the team members are respecting and acknowledging each colleague's contribution is important for the Company.

In order, to have a clear channel to report in cases where the employee experiences conflicts, harassment or inappropriate behaviour, the Company has issued a separate procedure informing about the reporting channels and the process for such reporting.

#### ***Development interviews***

The Company arranges annually Development Interviews between the employee and the supervisor. These interviews are part of the follow-up of the individual employee, as well as the planning of the employee's further development and growth. The interview does also give the employees the opportunity to give their feedback on conditions in the company with regards to the work environment.

#### ***Monitoring of workload***

The Company has a timesheet-registration system where all employees shall register working hours and leave on a weekly basis. The Company are constantly monitoring the data to avoid any breaches of the working time regulations in the Working Environment Act. In cases where a heavy workload over a certain period is identified, additional measures are put in place to reduce the future workload for these employees.

#### ***HSE***

The health and safety of people is monitored, assessed and safeguarded through a management system that integrates aspects of health, safety, security and the environment and covers all employees and subcontractors working in Moss Offices. In collaboration with the Working environment committee, Health and safety



representative and the Company health service, the Company provides ongoing evaluation of the HSE work as well as the workload.

## 4.2 Supply chain

Saipem undertakes to seek vendors and external collaborators with suitable professionalism and committed to share 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.

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. The sustainability risks associated to the supply chain management are specifically defined into the Saipem procedures.

Moss Maritime'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. Moss Maritime also demands that the vendors 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.

As part of the due diligence under the Transparency Act, the Company has made an overall analysis of vendors who have delivered services to the company in 2022. Less than 50 vendors have delivered goods/services with a value above NOK 100.000 and all vendors, except for one, are registered in Norway or in another country considered to have a low country risk in accordance with the Saipem Country risk analysis.

Even if the Company has a system where the suppliers are bound to comply with the principles of the Code of Ethics and the respect of human rights in conformity with Saipem's policies, there is a risk that the suppliers are not actually following these principles. In the current evaluation the company has considered the Transparency act reports of 2022 issued by various vendors. The result of the assessment indicated that many of the vendors have in place policies and procedures related to protection of human rights and promotion of decent work conditions.

The Company's plan for next year's work on identifying and assessing possible negative effects on basic human rights and employee rights in the supply chain, is to carry out an audit of a selection of suppliers with a focus on mapping whether the suppliers have their own ethical guidelines implemented.

Further, for suppliers from whom the Company hire in personnel, the company will carry out an audit to ensure that the hired-in personnel are remunerated in accordance with



the regulations in the Working Environment Act§ 14-12 “Equal treatment of pay and working conditions when hiring from staffing companies”.

For potential new suppliers who carry out their work in high-risk countries, the Company will add additional controls prior to ordering work from such companies.

## 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.

Furthermore, a whistleblowing system is described in various of the Company’s procedures.

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.

## 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 related to Company pursuant to the Transparency Act Section 6 may be sent to

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Approved by the Board of Directors Moss Maritime AS

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