



OFFSHORE

ENERGY. COMMITTED.

SBM Offshore
SPEAK UP POLICY

October 2021

SBM OFFSHORE

SPEAK UP POLICY

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1. INTRODUCTION

At SBM Offshore, we are committed to conducting our business responsibly, ethically and in compliance with the law, our Code of Conduct and our policies and values. Our organization refuses to be complacent about wrongdoing of any kind. We are determined to address any potential deviation from what we believe to be the right standard of doing business.

We therefore promote an open culture, which fosters trust and honest communication. We strive to create an inclusive environment where people feel encouraged and safe to speak up and raise their concerns internally, about any actual or suspected violation of applicable laws, of our Code of Conduct and of our policies (collectively: '*Suspected Misconduct*').

This Speak Up Policy ('*Policy*') explains how and where you can speak up and raise concerns about Suspected Misconduct in confidence and without fear of retaliation. It also informs you about what you may expect from SBM Offshore when you speak up.

We encourage you to read this Policy carefully, and speak up to raise your concerns in relation to Suspected Misconduct, using one of the internal reporting channels as described in this Policy. This will enable all of us to conduct our business responsibly and to sustain our business success, trust and ability to operate in the years to come.

2. WHO CAN REPORT?

Our reporting channels as described in this Policy are available to everyone who has a concern in relation to Suspected Misconduct in our work-related context. This includes, for instance:

- Persons having the status of worker, whether they are employed directly by us, engaged through a staffing agency, or self-employed;
- Shareholders and persons belonging to the administrative, management or supervisory body of SBM Offshore, including non-executive members, as well as volunteers and paid or unpaid trainees;
- Any person working under the supervision and direction of our contractors, subcontractors and suppliers;
- Any person who acquired information on Suspected Misconduct in a work-based relationship which has since ended, or who acquired the information during the recruitment process or other pre-contractual negotiations.

3. WHEN AND WHAT TO REPORT?

3.1 WHEN TO REPORT?

As soon as possible after you become aware of, or are concerned about Suspected Misconduct, we expect you to speak up and raise your concern using one of the internal reporting channels described below. A prompt reporting enables us to address your concern more quickly and effectively.

Importantly, we expect you to use our reporting channels for reporting in **good faith**. That means that when making the report, you at least have a reasonable ground to believe the reported Suspected Misconduct is true.

3.2 WHAT TO REPORT?

We encourage you to speak up and to report any Suspected Misconduct, that is, any actual or suspected violation of applicable laws, our Code of Conduct, our policies, and values. In the text box below, we provide examples of Suspected Misconduct we expect you to report.



- Violation of our Health and Safety procedures;
- Harassment, including intimidation, discrimination or abuse, sexual, racial or otherwise;
- Acts or threats of physical violence;
- Actions which endanger the health or safety of employees or the public;
- Financial and accounting concerns;
- Suspected fraud, bribery or other financial criminal offences;
- Actions which may adversely affect the vital interests or reputation of SBM Offshore;
- Actions which violate human rights or constitute modern slavery;
- Actions which cause serious damage to the environment;

4. WHERE TO REPORT?

4.1. IF YOU ARE AN SBM OFFSHORE EMPLOYEE

To report your concern freely, we refer you to the following reporting channels:

- i. Your **Line Manager**;
- ii. Your contact person at the **Compliance, Human Resources or Legal Department**, locally or at Group level;
- iii. The **SBM Offshore Speak Up Line** (also known as “*Integrity Line*”), which includes both a secured website and a telephone reporting channel (together referred to as ‘*Speak Up Line*’).

We encourage you to first speak up and report to your Line Manager, or otherwise to the Compliance, Human Resources or Legal Department, locally or at group level. However, when reporting through those channels is for whatever reason not possible or does not feel right, we encourage you to share your concerns through our Speak Up Line. See further details in Section 5 below.

When you are concerned that your report may not be addressed effectively internally, or when you are concerned about retaliation, we encourage you to contact our Group Compliance Director before considering reporting externally to competent authorities. Our Group Compliance Director will ensure that your concern is handled with the required care. Local policy guidance may give more detail about alternative external bodies to whom reports of Suspected Misconduct may be made in line with local legislation. Your Compliance Officer can also provide more details about these external bodies.

General HR Related Grievances

When you have concerns relating to general HR grievances, including performance-related issues, discussions on terms of employment and/or personal disputes, we recommend that you share those with your Line Manager and when relevant with Human Resources. When such reports are made through the reporting channels, they are normally redirected to Human Resources for handling. By approaching Human Resources directly, you expedite the handling of your concern.

4.2. NON SBM OFFSHORE EMPLOYEES

If you are not an SBM Offshore employee (i.e. client, supplier etc.) please reach out to your SBM contact person to speak up and report your concern. If this is not possible, or you feel uncomfortable doing so, you can also use the Speak Up Line.

5. HOW TO USE THE SPEAK UP LINE

5.1 THE SPEAK UP LINE

Our Speak Up Line is independently operated by a third party (People Intouch) and is available 24 hours a day, 7 days a week, 365 days a year to receive your report. The Speak Up Line allows you to share your report in your own language.

Your report will be registered by People Intouch and shared with our Integrity Panel for further handling, as explained in Section 6 below.

5.2 ANONYMOUS REPORTING

We strive to create a safe and open environment, and therefore encourage you to identify yourself (by sharing your name, position, and contact details) when making a report. This will allow for fast communication and better handling of your report.

That said, when you are uncomfortable identifying yourself when making a report, you may share your report anonymously. Our Speak Up Line allows anonymous reporting.

5.3 SPEAK UP LINE REPORTING OPTIONS

Our Speak Up Line includes a secured website and a free telephone number per country (where possible) and supports a great variety of languages (see Annex A):

5.3.1. Secured website. You may log in to the Speak Up Line secured website through the following link: <https://www.speakupfeedback.eu/web/sbmoffshore>, by entering your country access code (see list in Annex A). Once you are logged in, you will be able to choose whether to share your identity and then provide your report. Our secured website also allows you to upload supporting documentation.

5.3.2. Report via telephone. You may share your report also by dialling in a local telephone number (see list in Annex A). In most countries, provided that this is possible, our Speak Up Line phone number is a free-of-charge number. The reporting process via telephone is simple and straightforward. You will be guided through the system on how to provide your report.

5.4 WHAT INFORMATION SHOULD I PROVIDE?

To facilitate the assessment of your report by our Integrity Panel, we encourage you to provide, as much as known to you, a full picture of the Suspected Misconduct. Please share any detail you consider relevant and refer or attach any documents, photos or other evidence that may support your report.

Among others, consider addressing the following topics when making a report: the nature of the issue, where and when it occurred (or about to occur), who has been involved, who has been aware of the issue, for how long has the Suspected Misconduct lasted, when did it stop (if stopped at all), what evidence exists to support this information, and who may shed more light on the Suspected Misconduct.

Do's and don'ts

Do's

- Do raise your concern on Suspected Misconduct as soon as possible using one of our internal reporting channels;
- Do share a detailed report and support with documentation, when available;
- Do identify yourself when making a report, and be part of our open-dialogue culture;
- Do respect others who raise concerns to you and inform our Compliance Department when relevant.

Don'ts

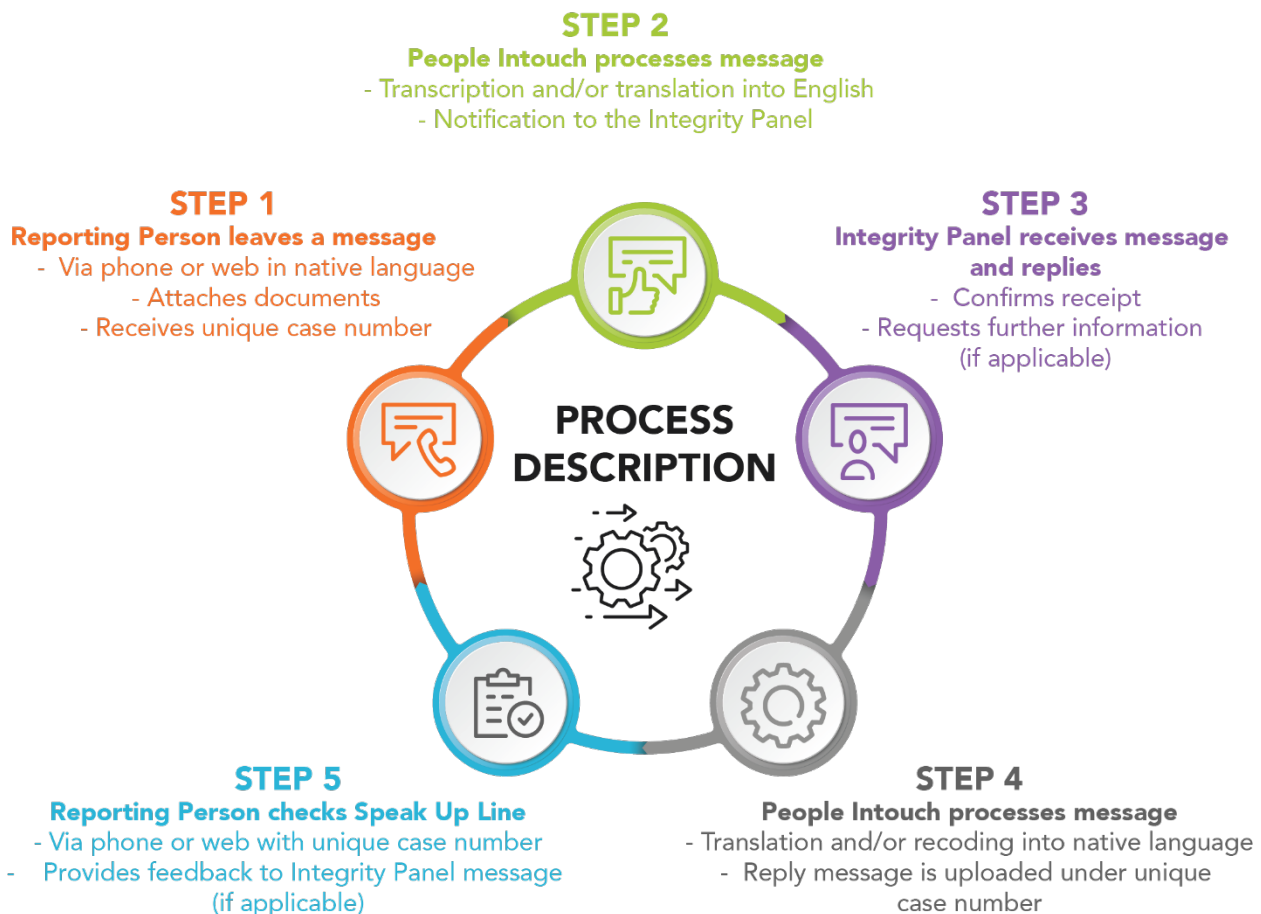
- Don't turn a blind eye. Don't undermine the importance of addressing Suspected Misconduct;
- Don't delay reporting of concerns. Time may be of the essence;
- Don't retaliate and don't allow others to retaliate against reporting persons who report concerns in good faith.

6. WHAT HAPPENS WITH REPORTS MADE THROUGH OUR SPEAK UP LINE?

We are committed to handling reports made through our Speak Up Line with the required care and professionalism. Once a report is made through our Speak Up Line, the following actions will be taken:

- When making the report, you will be provided with a unique case number. With this case number, you will be able to log in to our Speak Up Line and further communicate with the Integrity Panel and obtain their feedback;
- Within 24 hours, our Speak Up Line service provider will share your report with our Integrity Panel (when needed, in a translated form);
- Our Speak Up Line secured website: <https://www.speakupfeedback.eu/web/sbmoftshore> will confirm the receipt of your report within seven (7) working days;
- Upon receipt of your report, the Integrity Panel will conduct a preliminary assessment of the report and decide upon next steps, according to the Integrity Panel Charter. For instance:
 - When the report refers to a Suspected Misconduct, the Integrity Panel is likely to instruct further inquiry to be conducted in relation to your report. The Integrity Panel may determine the scope of the inquiry, and the relevant team who will be handling the matter.
 - In some cases, the Integrity Panel may determine it is not eligible and transfer the report to the relevant Line Manager and/or HR function for further handling. That would be the case, for instance, with respect to performance-related reports;
 - When the Integrity Panel decides that there is no justification for further investigation of the report (for instance, because the report does not indicate any Suspected Misconduct), the Integrity Panel may decide to close the matter.
- When you identified yourself when making the report, our Integrity Panel may share with you directly and confidentially additional inquiries or feedback on your report.
- When you choose to report anonymously, our Integrity Panel may share with you additional inquiries or feedback on your report through the Speak Up Line secured website or free telephone number. Using the case number you obtained when making the report, you will be able to log in via web or via phone and review the confirmation of your report and other feedback provided by the Integrity Panel.

- The Integrity Panel will monitor the progress of handling the report in accordance with the Integrity Panel Charter and will provide you with feedback and updates, to the extent allowed by law, and when sharing such feedback does not jeopardise the inquiry of the report, personal rights of individuals involved or others protected by SBM Offshore’s values and interests. The Integrity Panel will provide feedback within a reasonable timeframe, not exceeding three months after receiving the report.
- The Integrity Panel shall handle your report confidentially, in accordance with Section 7.2.
- Once the matter is closed by the Integrity Panel, the Integrity Panel will, to the extent possible, inform you (directly if identified or anonymously through the Speak Up Line) of the closure of the matter. The information relating to the report will be removed within seven (7) working days after the Integrity Panel’s notification of the closure of the matter.



7. PROTECTION AND RIGHTS OF THE REPORTING PERSON

7.1 NON-RETALIATION

7.1.1 When is a reporting person protected against retaliation?

SBM Offshore will not tolerate any form of retaliation, including the threat of retaliation, against reporting persons who made their reports in good faith. Good faith means that when making the report you at least had a reasonable ground to believe that the reported Suspected Misconduct was true.

7.1.2 Who is protected?

Firstly, all reporting persons (as mentioned in Section 2) are protected against retaliation. Moreover, this Policy does not tolerate any form of retaliation against any third person connected with the reporting person (such as colleagues and relatives) who could suffer retaliation in a work-related context. This Policy also prohibits retaliation against anyone who assisted a reporting person in the reporting process, and against any legal entity that the reporting person owns, works for, or is otherwise connected with in a work-related context.

People who gain protection against retaliation in accordance with this Policy shall not be considered to have breached any restriction on disclosure of information, and they shall not incur any liability in this regard. This is under the condition that they had at least reasonable grounds to believe that the reporting or public disclosure of such information was necessary for revealing a Suspected Misconduct.

7.1.3 What does prohibition against retaliation mean?

Our prohibition against retaliation covers any direct or indirect act or omission, which can harm a reporting person as a result of his / her reporting of a Suspected Misconduct.

SBM Offshore will for example not take any of the following actions against reporting persons due to their reporting of Suspected Misconduct:

- Suspension, lay-off, dismissal or equivalent measures;
- Demotion or withholding of promotion;
- Transfer of duties, change of location of place of work, reduction in wages, change in working hours;
- A negative performance assessment or employment reference;
- Imposition or administering of any disciplinary measure, reprimand or other penalty, including a financial penalty;
- Coercion, intimidation, harassment or ostracism;
- Discrimination, disadvantageous or unfair treatment;
- Failure to renew, or early termination of, a temporary employment contract;

- Harm, including to the person's reputation, particularly in social media, or financial loss, including loss of business and loss of income;
- Early termination or cancellation of a contract for goods or services;
- Cancellation of a licence or permit.

7.1.4 Prohibition against retaliation in case of external reports and public disclosures

The protection against retaliation is also applicable to persons who report Suspected Misconduct externally to the competent authorities.

Moreover, the protection against retaliation is applicable to reporting persons who publicly disclosed their concerns by making information on Suspected Misconduct available in the public domain, but only when:

- the report was first reported internally and then externally to competent authorities, or externally directly, but no appropriate action was taken within the applicable timeframes; or
- the person has reasonable grounds to believe that:
 - the Suspected Misconduct may constitute an imminent or manifest danger to the public interest, such as where there is an emergency situation or a risk of irreversible damage; or
 - there is a great risk of retaliation or a low prospect of the Suspected Misconduct being addressed effectively.

7.1.5 Our response to retaliation

We take claims of retaliation very seriously. Allegations of retaliation will be treated similarly to report on Suspected Misconduct. When reported, they will be investigated, actions will be taken to cease any retaliation and further actions may be taken against those responsible for the retaliation.

7.2 CONFIDENTIALITY AND PROTECTION OF IDENTITY

Your identity (if shared when making the report) and other non-public information you shared in relation to the report will be treated confidentially. Accordingly, our Speak Up Line is operated in a secure manner to ensure the confidentiality of the identity of the reporting person and other related information.

Information in relation to your report will only be shared on a need-to-know basis, with our authorised internal team who is empowered to handle the report, or with external advisors and counsel, who are also committed to handle the information confidentially. Non-authorised staff members will not have access to this information.

In some cases, we may also need to share the information relating to the report with competent authorities. When legally allowed and also feasible in the circumstances, we will inform you about our intention to share information with capable authorities before doing so.

8. DATA PROTECTION AND PRIVACY

SBM Offshore is committed to complying with applicable data protection and privacy legislation. These standards apply to all reports made in accordance with this Policy.

8.1 DATA PROTECTION

In handling reports made in accordance with this policy, we collect personal data and information when the report is made and throughout the handling of the report. This can include (but is not limited to) your name and contact details (unless you report anonymously) and a description of the Suspected Misconduct and the individuals involved.

We will, at all times, only process personal data that is strictly necessary for the purpose of the investigation.

In addition to ensuring that your personal data is treated in accordance with applicable law, we will take all reasonably necessary steps to ensure that your personal data is treated securely at all times.

8.2 RECORD KEEPING

SBM Offshore will keep records of every report received. These records will be kept confidentially. The records will be stored no longer than necessary and proportionate in order to comply with any legal requirements.

9. ENTRY INTO FORCE AND AMENDMENTS

This Policy enters into force on October 1st, 2021 and shall as of this date replace the 2015 SBM Integrity Reporting Policy.

10. ANNEX A

SPEAK UP LINE CONTACT DETAILS

1. People Intouch Secure website:
<https://www.speakupfeedback.eu/web/sbmoftshore>
2. SBM Connect: All Apps / Speak Up Line
3. SBM Offshore external website (www.sbmoftshore.com)

TIPS FOR USING THE SPEAK UP LINE

1. Dial the number exactly as stated below.
2. If you are located in a country that has an AT&T code; first dial the AT&T code and wait for the tone/instructions, before you dial the free phone number.
3. Copy the Access Code for your country.
4. Prepare your message and decide if you wish to identify yourself or remain anonymous.
5. Save your unique case number for future reference.

Country	Phone Instruction	Website	Access code
ANGOLA	226 434 281		58558
BRAZIL	08008919678		88117
CANADA	1-866-8181239		44514
CHINA	4009901434 If you are calling with provider Unicom: 108007440179 If you are calling with provider Telecom (landline only): 108004400179	www.speakupfeedback.eu/web/sbmoftshore/	62481
EQUATORIAL GUINEA	N/A		93412
FRANCE	0800-908810		09568
GUYANA	N/A		01816
INDIA	0008004401221		93412

IRELAND	1800-552136	93412
MALAYSIA	1-800-88-4307	03290
MONACO	0800-908810	15012
MYANMAR	MPT: 0800 800 8025	50281
NETHERLANDS	0800 0222931	56470
NIGERIA	07080601488	24682
NORWAY	800-18333	34659
PORTUGAL	800-831528	93412
SINGAPORE	1800-8232206	72399
SWITZERLAND	0800-561422	28416
UNITED ARAB EMIRATES	80004412727	31678
UNITED KINGDOM	0800-1693502	93412
UNITED STATES	1-866-2506706	27870

Country	Language Options
ANGOLA	Portuguese, English
BRAZIL	Brazilian Portuguese, English
CANADA	English
CHINA	Mandarin Simplified, Cantonese Simplified, English
EQUATORIAL GUINEA	French, English
FRANCE	French, English
GUYANA	English, French
INDIA	English, Hindi
IRELAND	English
MALAYSIA	Malay, English
MONACO	French, English
MYANMAR	Burmese, English
NETHERLANDS	Dutch, English
NIGERIA	English
NORWAY	Norwegian, English
PORTUGAL	Portuguese, English
SINGAPORE	Malay, English, Mandarin Traditional, Urdu, Hindi
SWITZERLAND	Swiss German, French, English

UNITED ARAB EMIRATES	Arabic, English, Hindi, Mandarin Traditional, Urdu
UNITED KINGDOM	English
UNITED STATES	English