



Heerema Marine Contractors Nederland SE

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Registered in Leiden no. 58180362

Norwegian Transparency Act statement

Heerema Marine Contractors Nederland SE (“HMC”) complies with the Norwegian Transparency Act (‘Åpenhetsloven’) (“Act”). The Act shall promote enterprises' respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services and ensure the general public's access to information regarding how enterprises address adverse impacts on fundamental human rights and decent working conditions.

The obligations of the Act apply to HMC as a larger foreign enterprise that offers goods and services in Norway, and that is liable to pay tax to Norway pursuant to internal Norwegian legislation.

Pursuant to Section 5 of the Act we hereby present our 2024 report that has been developed to comply with the legal requirements as stated in the Act.

About HMC

HMC is a world leading marine contractor in the international offshore oil and gas and renewables industry. HMC excels at transporting, installing and removing offshore facilities.

HMC's activities encompass business development, engineering, procurement, transport, installation, removal, commissioning, decommissioning and recycling of offshore and inshore structures, including management of projects around the world. Additionally, HMC manages a fleet of heavy lift vessels, anchor handling tugs and transport barges.

HMC is headquartered in Leiden, the Netherlands. Project offices can be located worldwide as required to support project preparation or execution. Permanent (foreign) offices are located in London (UK), Houston (USA) and Singapore.

Respecting and promoting human rights and working conditions

At HMC, we endorse internal and external rules that safeguard a responsible way of working. As such, we are fully committed to respecting internationally recognized human rights and decent working conditions. It is important for us to pay close attention to the health, well-being and rights of everyone our business touches.

**Why is this important for us?**

We acknowledge that HMC, through our business activities, may be connected to adverse human rights impacts in our own workforce, the local communities we operate in or through our suppliers and business partners. We therefore have an active role in respecting and promoting human rights and a responsibility to each other, our customers and society.

Our commitment to respecting human rights

We are committed to respecting internationally recognized human rights as set out in the International Bill of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. We support, conduct our business and perform risk-based human rights due diligence consistently with the Act and the United Nations Guiding Principles on Business and Human Rights, which constitute the basis for the human rights chapter of the OECD Guidelines for Multinational Enterprises. In addition, we are committed to ensuring compliance with the International Labour Organization's Maritime Labour Convention for ensuring appropriate work and living conditions on all our vessels.

We are committed to respecting the internationally recognized human rights within our own operations, our activities assigned to and carried out with business partners and our relationships with stakeholders. Minimum legal compliance is not always enough to meet international standards. We recognize this and are committed to respecting the internationally recognized human rights throughout our entire value chain in all countries we operate.

Compliance and integrity – guidelines and procedures

To meet our commitments to respecting human rights and working conditions, HMC has embedded human rights monitoring in a global compliance program managed by our Ethics & Compliance Department. Our global compliance program is risk-based and designed to prevent, detect and respond to compliance and integrity risks — including human rights risks and impacts arising from HMC's activities and business relationships with suppliers and partners. The fundamental human rights principles have been embedded in HMC's [Code of Conduct](#) and [Human Rights Policy](#). These form part of our [suite of compliance policies](#) that help us adhere to standards of loyalty, honesty, integrity, and the avoidance of conflicting interests. They also create awareness and understanding about laws and regulations on a wide variety of topics.

**Supply chain and business partners**

HMC clearly communicates the HMC Code of Conduct to all its suppliers and business partners. This code outlines our fundamental principles regarding human rights (such as the prohibition of forced and child labor, non-discrimination), working conditions (such as a safe working environment, fair wages, respect for freedom of association), and ethical business conduct (such as anti-corruption). When selecting new partners, a thorough due diligence process is carried out to ensure they commit to our code and implement it within their own operations and supply chain. To verify compliance, audits may be executed.

SpeakUp

A transparent way of working is vital for fighting human rights violations. To facilitate open communication, we maintain specific reporting channels. Furthermore, our internal and external whistleblower lines are always available to our stakeholders via our intranet and the HMC website, respectively. By utilizing the SpeakUp misconduct reporting system, we strengthen our commitment to protecting each other and ensure that our morals and culture remain integral to everything we do. Anyone can file a report in their own language, any time of day, by leaving a message on SpeakUp by phone, online or through the app. Reporting is strictly anonymous.



Actual adverse impacts and significant risks of adverse impacts

Following due diligence, we have identified the following (significant risks of) adverse impacts on human rights and working conditions:

Item	Description	Mitigation	
Expected results			
SOCIAL			
Noise and Vibration Exposure	Long-term crew exposure to noise and hand-arm vibrations on vessels.	Noise assessments, PPE, ergonomic tools, HAVs monitoring, crew rotation.	Limiting crew exposure, resulting in less work-related health issues.
Air Emissions from Engine Operations	Exposure to exhaust gasses on vessels may cause unsafe working conditions for crew Emissions from vessel operations contribute to climate change. Gaseous emissions (CO ₂ , NO _x , SO _x) from LNG/MGO engines onboard vessels.	Stop the work mechanism. Implementation of the Net-Zero Roadmap aiming for net-zero emissions by 2050, including optimizing fuel use, replacing fuels with alternatives like LNG and biofuels, and offsetting through carbon capture and storage initiatives.	Limiting crew exposure to incidents only. Significant reduction of emissions.
Confined Space Work	Hazards include oxygen deficiency, toxic atmosphere, entrapment, and rescue difficulties.	Gas detection, ventilation, confined space entry procedures, rescue plans, training.	Limiting crew exposure, resulting in less work-related health issues.
Line of Fire / Dropped Objects	Includes collision risks, snap-back zones, falling tools or equipment, especially on vessels.	Barrier management, competent operators, dropped object prevention plans, voyage planning.	Limiting crew exposure, resulting in less work-related health issues.
Psychosocial Risks (Fatigue, Stress, Wellbeing)	Risks related to employee health, safety, and mental well-being due to long shifts, isolation, high workload, and offshore conditions.	Implementation of the 'Caring for People' ambition encompassing health and well-being programs and organizational support structures including fatigue management programs, mental health support, fair rostering, LMRA, (leadership) training.	Limiting employee exposure, resulting in less work-related health issues.

GOVERNANCE			
Human Rights Violations (Company & Supply Chain)	Potential human rights violations within the company and its supply chain. Related to unfair labor practices, discrimination, forced labor, or lack of decent work conditions.	Enforcement of comprehensive policies for employees, subcontractors, and suppliers to ensure responsible operations, among which clear codes of conduct and compliance mechanisms. Including supplier audits, grievance mechanisms, Code of Conduct awareness training, and due diligence processes.	Reducing the number of human rights violations.
Inadequate consultation and grievance mechanism	Lack of accessible grievance mechanisms and fear of retaliation.	Availability of grievance mechanisms that are confidential, accessible to all workers, and provide protection against retaliation for raising concerns.	Maintaining a safe and transparent working environment for all stakeholders.


Right to information

Upon written request, any person has the right to information from an enterprise regarding how the enterprise addresses actual and potential adverse impacts on human rights and decent working conditions. More information about this right is described in sections 6 and 7 of the Act.

Should you have an enquiry related to how HMC addresses actual and potential adverse impacts on fundamental human rights and decent working conditions, please use the [Contact us](#) form on our website.

Leiden, The Netherlands,

On behalf of the Board of Directors

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19 juni 2025
 Robbert Sloos
 CFO

Signed by:

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19 June 2025
 Jeroen van Oosten
 Chief Commercial Officer