Norwegian Transparency Act statement 2025
Heerema Marine Contractors Nederland SE ("HMC") has prepared this statement pursuant to art. 5 of the Norwegian Transparency Act (Åpenhetsloven) (the "Act"). The Act aims to promote enterprises' respect for fundamental human rights and decent working conditions and to ensure public access to information on how enterprises address actual and potential adverse impacts.

HMC qualifies as a larger foreign enterprise under the Act, offering services in Norway and subject to Norwegian tax obligations. This describes how HMC works to identify, prevent, mitigate, and account for adverse impacts on human rights and decent working conditions.

About HMC
HMC is a world-leading marine contractor in the offshore energy sector, delivering engineering, transport, installation, and decommissioning solutions for offshore infrastructure. Activities include project management, procurement, offshore installation, and fleet operations. HMC operates globally, with headquarters in Leiden (the Netherlands) and offices in London, Houston, and Singapore.

Our supply chain includes offshore subcontractors, fabrication yards, vessel service providers, equipment suppliers, and specialized contractors operating across Europe, Asia, the Middle East, and the Americas. The level of human rights risk varies depending on the nature of services and local labor conditions.

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 of Fundamental Principles and Rights at Work. We support, conduct our business, and perform risk-based human rights due diligence consistent 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 (MLC) for ensuring appropriate work and living conditions on all our vessels.

Why is this important for us?
We recognize that we may be linked to adverse human rights impacts through our own operations, our workforce, local communities, and our business relationships. We therefore have a responsibility to actively identify, prevent, and address such risks across our value chain.

Compliance and integrity – guidelines and procedures
Human rights are embedded in HMC's global compliance program, managed by the Ethics & Compliance Department. This program is designed to prevent, detect, and respond to compliance and integrity risks, including human rights risks.

Our framework includes:
- Code of Conduct
- Human Rights Policy

- Supplier standards and contractual requirements

These policies establish expectations relating to labor rights, working conditions, non-discrimination, and ethical business conduct, and are communicated to employees, suppliers, and business partners.

Human Rights Due Diligence Approach
HMC clearly communicates its 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 labor, child labour and non-discrimination), working conditions (such as a safe working environment, fair wages and 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.

HMC continues to enhance its human rights due diligence approach by moving beyond a primarily compliance-based gap analysis toward a structured, risk-based methodology with saliency-based prioritization using severity and likelihood criteria, and integration into procurement and due diligence processes.

In 2026, HMC is further strengthening this approach, including refinement to risk identification, prioritization, and integration into business processes. Through this methodology, HMC more explicitly identifies and prioritizes its most significant human rights risks, enabling targeted mitigation and ongoing monitoring. The outcomes and effectiveness of these enhancements are currently being implemented and will be assessed and reported in our next annual statement.

Salient Human Rights Risks and Mitigation
Based on the human rights due diligence activities conducted during the reporting period, HMC did not identify any substantiated actual adverse impacts in its own operations requiring remediation. In line with a risk-based approach, HMC's risk identification process also considers widely recognized human rights risk factors associated with the offshore energy sector and related global supply chains.

Through this process, several significant risks of adverse impacts have been identified, particularly relating to contractor labor practices, exposure to migrant labor risks in extended supply chains, offshore working environments, and supplier environments in certain higher-risk jurisdictions. These risks have been prioritized and form the basis for the mitigation measures described below.

Risk topic	Risk description	Mitigation	Results
Contractor labor practices	Risk screening, supplier questionnaires, escalation procedures	Risk screening, supplier questionnaires, escalation, and grievance procedures.	No material breaches identified, supported by consistent documentation practices.

Forced labor and migrant worker risks	Risk of exploitation in extended supply chains or higher-risk jurisdictions.	Risk screening, supplier questionnaires, escalation procedures	No substantiated cases identified through due diligence or Speak Up channels, with ongoing enhancements implemented to further strengthen control effectiveness.
Offshore working environment	Heightened vulnerability due to isolation, long rotations, and dependency on employer.	Compliance with MLC standards, welfare measures, rotation schedules, access to grievance mechanisms	Continued alignment with MLC requirements and stable workforce welfare indicators, availability, and awareness of grievance channels accessible onboard with no systemic issues reported.
Freedom of association	Potential limitations in certain jurisdictions or supplier environments.	Supplier requirements, awareness, access to grievance mechanisms	No reported violations within own operations; risk remains primarily external (supplier/jurisdictional), addressed through contractual expectations and escalation mechanisms.
Community impacts	Potential adverse effects on local communities related to offshore and onshore operations.	Impacts are mitigated through adherence to local regulatory requirements and responsible operational practices.	Community risks assessed at project level with no adverse impacts reported.

Grievance Mechanisms and Remediation

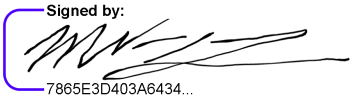
HMC maintains accessible confidential (confidential counselors) and anonymous (SpeakUp) support and reporting channels for employees, suppliers, and external stakeholders. Reported concerns are assessed and, where relevant, lead to corrective actions and follow-up measures. HMC is committed to:

- Protecting individuals from retaliation
- Ensuring appropriate remediation where adverse impacts are identified

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.

On behalf of the Board of Directors

Signed by:

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Marcel de Nooijer
Chief Executive Officer