



## OUR COMMITMENT

McDermott's *Human Rights and Social Responsibility Policy* reflects our commitment to respect human rights and provide quality work conditions in compliance with applicable labour laws and the International Labour Organization's core conventions and Declaration on Fundamental Principles and Rights at Work. These include freedom of association, non-discrimination, and prohibition of forced labour, human trafficking, and child labour. McDermott's *Code of Business Conduct* provides further guidance conducting our business responsibly. We are committed to human rights due diligence in collaboration with our business' partners, suppliers and subcontractors.

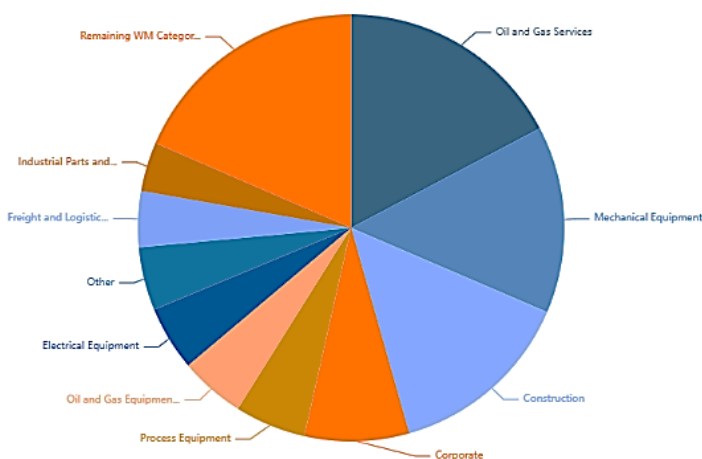
McDermott International, Ltd. and its affiliates are covered by this statement. The statement discusses our actions in the last financial year (2023) and our protocols to address the potential risk of modern slavery in our supply chains.

## OUR BUSINESS AND SUPPLY CHAIN AT A GLANCE

McDermott is a premier, fully integrated provider of engineering and construction solutions to the energy industry. Our customers trust our technology-driven approach engineered to responsibly harness and transform global energy resources into the products the world needs. From concept to commissioning, McDermott's innovative expertise and capabilities advance the next generation of global energy infrastructure—empowering a brighter, more sustainable future for us all. McDermott's locally focused and globally integrated resources include more than 31,000 employees, a diversified fleet of specialty marine construction vessels and fabrication facilities around the world. To learn more, visit [www.mcdermott.com](http://www.mcdermott.com).

In 2023, McDermott's tier 1 supply chain included approximately 7,300 suppliers and subcontractors globally, mostly in the construction, mechanical equipment and oil and gas services sectors.

Key categories include (by order of spend):





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## MODERN SLAVERY RISKS

### RISK ASSESSMENT

We have identified the following material risks based on common trends in the sector and our own due diligence:

- Potential for forced and/or child labor in certain high-risk countries.
- Potential for forced labor issues in subcontractor marine crews.
- Potential for forced labor issues related to subcontractor migrant workers, such as recruitment fees.

## HUMAN RIGHTS DUE DILIGENCE

### STEPS TO ADDRESS RISK

McDermott's Sustainability & Governance function guides our management of human rights risks through the following steps:



McDermott does not charge candidates any fees or costs associated with employment and does not allow our recruiting and placement agencies to charge candidates fees or costs of any kind. We have processes in place to vet new employees, confirm identities and ages, and, where possible, pay employees directly into a personal bank account. We promote access to identity documents, written employment contracts, decent worker living conditions, and access to culturally appropriate grievance mechanisms. We extend these expectations to our suppliers and sub-contractors.



### MCDERMOTT'S POLICIES/COMMITMENT

Our values, principles and policies guide how McDermott conducts business. Our management system includes the following protocols:

- [Code of Business Conduct](#)
- [Human Rights and Social Responsibility Policy](#)
- Speak Up Program
- Human Rights in the Workplace Guideline
- Human Rights Due Diligence Guideline
- [Ethics Helpline for reporting concerns \(phone or web\)](#)
- QHSES Policy

### ISSUE PREVENTION - TRAINING AND AWARENESS

In 2023, our work included:

1. Induction training, inclusive of human rights awareness, for fabrication yard employees and subcontractor workers.
2. Prevention from forced labor training provided to more than 7,000 employees globally.
3. Toolbox Talks for workers addressing human rights.
4. One Team for Integrity Campaign (to mark November Compliance Month) promoting awareness amongst all employees on ethical topics, including how to speak up to voice a concern, treating each other with respect, and psychological safety in the workplace.



### ISSUE IDENTIFICATION - REPORTING CONCERNS

McDermott's Speak Up Program requires employees and other stakeholders (business partners, suppliers/subcontractors and community members) to report concerns, with the option of reporting anonymously. We have a dedicated, experienced team to investigate grievances, take remedial action as appropriate, uphold accountabilities, and ensure appropriate resolution. We also proactively engage in worker interviews at certain sites to identify potential issues.

Sustainability & Governance monitors and regularly reports to our executive management and Board of Directors on relevant human rights risks and issues, including any that relate to modern slavery risks.



## SUPPLY CHAIN DUE DILIGENCE

We expect our suppliers to demonstrate [respect for human rights](#). To help ensure compliance, our due diligence system includes:

- ✓ As a condition of vendor registration, agreement to comply with McDermott's Code of Business Conduct and Human Rights and Social Responsibility Policy.
- ✓ Contractual provisions requiring compliance with human rights obligations.
- ✓ Internal human rights audits and self-assessments that include subcontractor evaluation.

In 2023, we performed human rights audits in our fabrication yard in Indonesia and at our project site in Uganda, and three human rights self-assessments in Mexico, China and Mozambique, focusing on subcontractor personnel and other vulnerable workers. The audits included due diligence on subcontractors on site.

We also set up a Worker Welfare Management Committee at our fabrication yard in Indonesia, with a focus on subcontractor monitoring and improving worker welfare. The Committee is a cross-functional forum to discuss prevention, mitigation, and/or remediation of issues. We hold worker interviews and site inspections every month, inclusive of subcontractors.

Topics covered within the worker interviews	
<b>Child Labor</b> <ul style="list-style-type: none"><li>• Minimum age</li><li>• Young workers</li></ul>	<b>Freedom of association</b> <ul style="list-style-type: none"><li>• Union participation</li></ul>
<b>Modern Slavery/Forced Labor</b> <ul style="list-style-type: none"><li>• Ethical Recruitment</li><li>• Employment Terms</li><li>• Withholding wages</li><li>• Notice periods</li><li>• Freedom of movement</li></ul>	<b>Working conditions</b> <ul style="list-style-type: none"><li>• Improvement suggestion</li><li>• Working hours/overtime/ rest</li></ul>
<b>Nondiscrimination</b> <ul style="list-style-type: none"><li>• Treatment by company</li><li>• Treatment by security</li><li>• Treatment by other workers</li></ul>	<b>Grievance Mechanisms</b> <ul style="list-style-type: none"><li>• Understanding of grievance mechanism</li><li>• Non-retaliation</li><li>• Anonymous Complaints</li></ul>



### ASSESSING THE EFFECTIVENESS OF ACTIONS

We assess the effectiveness of our actions by reviewing trends in complaints or concerns raised through the Speak Up program, worker interviews, and the results of self-assessments and internal audits, among other things.

### PROCESS OF CONSULTATION

We established our Code of Business Conduct and our Human Rights and Social Responsibility Policy in consultation with leaders and experts. This statement has been prepared in consultation with key teams. McDermott consulted with our primary operating Canada, U.K. and Australia legal entities, including:

- McDermott Australia Pty Limited, WA
- McDermott Marine Construction Limited, U.K.
- J.Ray McDermott (Aust.) Holding Pty Limited, WA
- CB&I UK Limited, U.K.
- CB&I Australia Pty Limited, WA
- CB&I Constructors Pty Limited, New South Wales
- Horton CBI, Limited



### FUTURE COMMITMENTS

McDermott will continue to enhance our processes, improve identification of potential risk areas, and track the effectiveness of measures. In 2024, we plan to:

- Continue internal human rights audits and self-assessments and ensure tracking and close out of issues from previous assessments.
- Extend Worker Welfare Committees to additional fabrication yards and sites/projects.
- Extend human rights toolbox talks to additional fabrication yards and sites/projects, including vessels.
- Publish a Supplier Code of Conduct in line with evolving human rights considerations.
- Continue to promote awareness of our Speak up Program, including to subcontractor workforces.
- Conduct regular worker interviews including to subcontractors and other vulnerable workers.

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This statement relates to the financial year which ended on December 31, 2023. It is applicable to McDermott International Ltd and its subsidiaries. This statement addresses McDermott's obligations under the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018 and similar applicable international laws.

On Behalf of the Board of Directors,

Michael McKelvy  
President and Chief Executive Officer  
McDermott International, Ltd  
June 2024



### Cautionary Statement Regarding Forward-Looking Statements

This modern slavery statement contains what are considered “forward-looking statements” within the meaning of the U.S. federal securities laws — that is, any statements that are not historical facts.

Such statements may contain words such as “aim,” “estimate,” “intend,” “commit,” “goal,” “expect,” “may,” “believe,” “predict,” “plan,” “potential,” “projected,” “projections,” “forecast,” “pledge,” “target,” “anticipate,” “think,” “should,” “would,” “could,” “will,” “see,” “likely,” and other similar words.

Forward-looking statements address situations that are, to varying degrees, uncertain, exposed to risks that McDermott cannot control and dependent on different circumstances to materialize.

Taking this into account, actual outcomes may vary materially from those reflected in our forward-looking statements.

Forward-looking statements are aspirational and not guarantees or promises that intended actions, goals or targets will be met.

The forward-looking statements in this modern slavery statement are considered current as of June 2024, and McDermott disclaims any intention or obligation to update publicly or revise such statements, whether as a result of new information, future events, or otherwise.