

Human Rights Policy

SUST-GEN-PL-00100.00 - Version 7.00

VERSION	DATE	HISTORY
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Number	Version	Human Rights Policy	
SUST-GEN-PL-00100.00	7.00		

Table of Contents

PURPOSE 3

POLICY 3

01 - OUR WORKFORCE 3

02 - HUMAN RIGHTS DUE DILIGENCE 4

03 - EMPLOYEES IN THE VALUE CHAIN 4

04 - AFFECTED COMMUNITIES 4

05 - REMEDIATION 4

06 - SA8000 CERTIFIED SITES.....5

RESPONSIBILITIES 5

EXTERNAL LINKS.....6

REFERENCES 6

TERMS & ABBREVIATIONS.....6

APPENDICES 7

Number	Version	Human Rights Policy	
SUST-GEN-PL-00100.00	7.00		

PURPOSE

McDermott International, Ltd (together with its subsidiaries and affiliates, the “Company”) is committed to respecting and promoting internationally recognized human and labor rights standards across our operations, projects, and value chain. This Policy establishes the principles that guide responsible business conduct, ethical working conditions, and respect for human rights, and supports the identification, prevention, mitigation, and management of actual and potential human rights impacts.

These principles apply to McDermott's workforce and guides our expectations of suppliers, subcontractors, agents, and other third parties conducting business on our behalf. Our approach is informed by current applicable laws and internationally recognized standards, including the United Nations Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights, the International Labor Organization (ILO) Core Conventions, and for certified sites, applies the SA8000 Social Accountability Standard.

McDermott maintains a Code of Business Conduct (ref. to [EC-GEN-PL-00601.00 Code of Business Conduct](#)), publishes an annual Modern Slavery Statement, and implements a Human Rights Due Diligence guideline (ref. to [SG-SUS-GL-00200.03 Human Rights Due Diligence](#)), which outlines our process for identifying, preventing, mitigating, and accounting for human rights risks and impacts across our operations, projects, and supply chain.

This Policy applies to the Company's operations. The Company encourages alignment by joint ventures, consortium partners and labor providers.

Where local law conflicts with internationally recognized human rights standards, McDermott aims to honor the principles of internationally recognized human rights to the greatest extent reasonably possible while complying with applicable law.

POLICY

01 - Our Workforce

- A. McDermott is committed to treating all workers with respect and dignity. Our commitment to people focuses on:
 - I. Protection of the health and safety of our workers.
 - II. Prohibition of Child Labor, Forced Labor, bonded labor, and human trafficking.
 - III. Prohibition of discrimination, harassment, abuse, or inhumane treatment.
 - IV. Prohibition of Worker paid recruitment fees and retention of workers' identity or immigration documents.
 - V. Prohibition of corporal punishment, mental or physical coercion, verbal abuse, or disciplinary practice that undermines Worker dignity.
 - VI. Respect for Freedom of Association and Collective Bargaining.
 - VII. Promotion of fair treatment of vulnerable groups.
 - VIII. Promotion of training and development opportunities.
 - IX. Cooperation in appropriate remediation for adverse human rights impacts caused or contributed to by McDermott.
- B. Engaging workers under clear and lawful terms of employment with wages and benefits in accordance with applicable legal and contractual requirements.
- C. Providing safe and healthy working and living conditions, including appropriate workplace protections, adequate accommodation provided, and access to essential welfare facilities, in line with applicable laws and standards.

Number	Version	Human Rights Policy	
SUST-GEN-PL-00100.00	7.00		

- D. Identifying and protecting vulnerable workers including migrant workers, women, expectant workers, and young workers, by implementing targeted controls.
- E. Fostering a safe and secure environment at our facilities and sites to protect people and assets. Our engagement with the public and private security forces is consistent with the spirit of the Voluntary Principles on Security and Human Rights.
- F. Managing working hours, including overtime, in accordance with applicable laws and regulations.
- G. Providing appropriate breaks and leave and, at a minimum, one (1) day of rest in every seven-day period, or two (2) days of rest in every fourteen-day period, in accordance with applicable laws and regulations.
- H. McDermott's Human Rights in the Workplace Guideline (ref. to [SG-SUS-GL-00200.01 Human Rights in the Workplace Guideline](#)) defines minimum standards for all workers including sub-contracted labor, McDermott-managed sites and facilities.

02 - Human Rights Due Diligence

- A. McDermott implements a risk-based human rights due diligence process into its Supply Chain onboarding and review process to identify, prevent, mitigate, and address actual and potential adverse human rights impacts across its operations, projects, and value chain. For further details please refer to [SG-SUS-GL-00200.03 Human Rights Due Diligence](#) guideline.

03 - Employees in the Value Chain

- A. McDermott expects suppliers and subcontractors to:
 - I. Comply with and flow down contractual human rights requirements across the value chain through the existing provisions within [SCM-PR-FM-01100.29 Corporate Indirect Procurement General Terms and Conditions of Purchase](#) and the Supplier Code of Business Conduct for all.
 - II. Uphold human rights and labor standards consistent with this policy and applicable legal requirements.
 - III. Cooperate with [SG-SUS-GL-00200.03 Human Rights Due Diligence](#) activities and implement corrective actions where required.
 - IV. Prohibit Child Labor, Forced Labor, human trafficking, discrimination, and other human rights abuses.

04 - Affected Communities

- A. McDermott respects communities where we live and work through:
 - I. Assessment and management of social risks and impacts.
 - II. Culturally appropriate and inclusive stakeholder engagement, including access to feedback mechanisms such as local Community Liaison Officers and the [McDermott Ethics Helpline](#).
 - III. Opportunities for local social and economic development.
- B. Where potential impacts to Indigenous Peoples exist, McDermott works to respect the rights of Indigenous Peoples through site-specific strategies that address:
 - I. Consultation and meaningful engagement.
 - II. Opportunities for training, employment, and supply chain participation.
 - III. Cultural awareness training and cultural heritage management processes.

05 - Remediation

- A. McDermott provides workers with access to confidential, and where legally permitted, anonymous Grievance Mechanism, supports Worker representation or alternative engagement structures, and promotes open dialogue.

Number	Version	Human Rights Policy	
SUST-GEN-PL-00100.00	7.00		

- B. The [McDermott Ethics Helpline](#), Speak Up, provides global access to employees and third parties for any concerns or issues (refer to External Links for listing of local Helpline numbers).
- C. McDermott's Global Speak Up and Non-Retaliation Policy details the company's process for investigating and addressing concerns in a timely manner (ref. [SG-EC-PL-00700.00 Global Speak Up and Non-Retaliation Policy](#)).
- D. Where McDermott identifies it has caused or contributed to an adverse human rights impact, it will provide for or cooperate in appropriate remediation, consistent with the UN Guiding Principles.

06 - SA8000 Certified Sites

- A. For SA8000-certified sites, McDermott maintains a social accountability management system aligned with SA8000 requirements, including Worker engagement and representation, Grievance Mechanisms, monitoring, management review, corrective actions, remuneration oversight, and continual improvement.
- B. McDermott is committed to ensuring workers receive a living wage and benefits that comply with applicable legal requirements and contractual obligations and are paid regularly and transparently, sufficient to meet basic needs where required by applicable legal or certification obligations and SA8000 requirements at certified sites.
- C. McDermott maintains clear roles and responsibilities across functions, provides ongoing human rights training and awareness programs, conducts internal audits to assess system effectiveness, and promotes transparency through public reporting.

RESPONSIBILITIES

- The Executive Vice President, Chief Legal Officer is accountable for this Policy, with oversight by the Executive Committee and Board of Directors. Sustainability coordinates the policy implementation, supported by Human Resources, Supply Chain, Legal, Ethics and Compliance, QHSES and Projects within their respective areas of responsibility.
- Employees and contractors are expected to comply with this Policy. Leaders are responsible for implementation within their areas of accountability.

Number	Version	Human Rights Policy	
SUST-GEN-PL-00100.00	7.00		

EXTERNAL LINKS

Name/Link

[Modern Slavery Statement](#)

[McDermott Supplier Code of Business Conduct](#)

[McDermott Ethics Helpline](#)

REFERENCES

Reference Number

HR-IBE-PL-00400.00

HR-ERC-PL-00500.00

EC-GEN-PL-00601.00

SG-SUS-GL-00200.03

SG-SUS-GL-00200.01

SCM-PR-FM-01100.29

SG-EC-PL-00700.00

HR-IBE-PL-00100.00

SCM-PR-FM-01100.29

Reference Title

Global - McDermott Equal Employment Opportunity Policy

Global - Prohibition of Unlawful Discrimination Including Harassment

Code of Business Conduct

Human Rights Due Diligence

Human Rights in the Workplace Guideline

Corporate Indirect Procurement General Terms and Conditions of Purchase

Global Speak Up and Non-Retaliation Policy

Global - Inclusion and Belonging Policy

Corporate Indirect Procurement General Terms and Conditions of Purchase

TERMS & ABBREVIATIONS

Term/Abbreviation

Human Rights

Human Rights Due Diligence

Worker

Child Labor

Discrimination

Forced Labor

Freedom of Association

Description

Human rights are the fundamental and inalienable freedoms and entitlements belonging to every person. They apply universally, regardless of race, sex, nationality, ethnicity, language, religion, or any other status, and are grounded in the inherent dignity and equality of every individual.

The identification, prevention, and mitigation of potential and actual adverse human rights impacts.

An individual who performs work for McDermott, regardless of whether a formal contractual relationship exists.

Any work performed by children under the age of 18 that is mentally, physically, socially or morally dangerous or that interferes with their schooling.

Treating a person or group less favorably than others on the basis of a protected characteristic such as nationality, gender, ethnicity, social and legal status, race, religion, or any other protected status.

Work or service exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily.

The fundamental right of employees and employers to freely form, join,

Number	Version	Human Rights Policy	
SUST-GEN-PL-00100.00	7.00		

	and run their own organizations (such as trade unions or worker associations) to defend their work interests without interference from McDermott.
Grievance	A substantiated and material violation of law or written policy.
Grievance Mechanism	A process through which workers and stakeholders can raise concerns (including anonymously), have them assessed, investigated and responded to without retribution, and seek remedy.
Harassment	A situation where unwanted conduct related to a protected ground of discrimination occurs with the purpose or effect of violating the dignity of a person, and of creating an intimidating, hostile, degrading, humiliating or offensive environment.
Living wage	The remuneration received for a standard work week by a employee in a particular place sufficient to afford a decent standard of living for the employee and her or his family. Elements of a decent standard of living include food, water, housing, education, health care, transport, clothing, and other essential needs including provision for unexpected events.
Cultural Heritage	Both tangible and intangible heritage valued at local, regional, national, or global levels.
Local	What constitutes local may be defined in various ways: By specified project impact areas; specific communities, states, regions, countries, or other geopolitical definition; population – indigenous groups, nomadic groups, or other sociopolitical definition; citizenship, residence, or membership in a group; purchase order address, registration, or ownership structure for businesses.
Collective Bargaining	A voluntary negotiation process between McDermott and workers' organizations (trade unions) aimed at setting working conditions, terms of employment, and regulating labor relations.

APPENDICES

<u>Number</u>	<u>Description</u>
None	