



Report under the  
Norwegian Transparency Act

TIDEWATER NORWAY  
2023

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## 1. Introduction

This report on human rights due diligence is made by Tidewater Norge AS, and its subsidiaries Tidewater Marine AS and Tidewater Rederi AS (hereinafter collectively "Tidewater Norway") in accordance with Section 5 of the Norwegian Transparency Act (Nw: "Åpenhetsloven").

## 2. Structure and operations

Tidewater Norway provides offshore marine support and services to customers mainly in Norway, on the Norwegian continental shelf, and the North Sea, working its vessels out of mainly Norwegian and to some extent UK ports. Tidewater Norway is a wholly owned subsidiary of Tidewater Marine UK Ltd, and a part of the Tidewater group headed by Tidewater Inc. (US). Tidewater Inc. is the owner and operator of the world's largest offshore support vessel fleet.

As of May 2023, the operated fleet of Tidewater Norway consists of eight vessels. Further, Tidewater Inc. is in the process of acquiring the PSV fleet of Solstad Offshore.

Tidewater Rederi AS is the company owning the vessels, whilst Tidewater Marine AS operates the vessels. The crew on the vessels are employed in Tidewater Marine AS, whilst onshore administration is employed in Tidewater Norge AS. Tidewater Rederi AS has no employees.

Tidewater Norway is headquartered in Sandnes, and has a total of approximately 250 employees, of which the majority are crew, and approximately 12 are part of the onshore administration. Tidewater's ship crew consists mainly of own employees, and the use of hired personnel is limited. The employees are mainly of Norwegian or Nordic nationality.

Being a service provider, Tidewater Norway has a relatively limited number of suppliers and a good overview of its suppliers, which mainly consist of Norwegian companies. Our routines for assessing, following up and placing requirements on suppliers are further described below.

## 3. Policies and routines on human rights

The international Tidewater group, which Tidewater Norway is a part of, has a strong focus on human rights, ESG, safe operations, and good governance. Tidewater is committed to safeguarding human rights throughout its business operations, has a zero-tolerance approach to any form of modern slavery, and actively monitors and evaluates adverse impacts in its supply chain.

Tidewater is a signatory to the UN Global Compact, and committed to the Ten Principles, as well as the UN Guiding Principles on Business and Human Rights (UNGPs) and the ILO's core conventions on fundamental principles and rights at work.

Tidewater is subject to similar laws as the Transparency Act in other countries, such as the UK Modern Slavery Act and the Australian Modern Slavery Act. Tidewater Inc. has published a Modern Slavery Act Statement, and publishes an annual Sustainability Report, which both are available on Tidewater's web page.



The Tidewater group operates a number of internal procedures to ensure that it is conducting business in an ethical and transparent manner, and which are relevant in terms of the Transparency Act:

- **Human Rights Policy:** Summarizes Tidewater's commitment towards safeguarding human rights and fighting modern slavery, and steps taken to achieve this.
- **Code of Business Conduct Ethics:** Summarizes the legal and ethical business considerations that govern the conduct of Tidewater's employees and key third-party relationships.
- **Code of Conduct for Suppliers:** Sets out minimum requirements and guidelines for suppliers on e.g. human and labour rights. In addition, we ensure that contracts contains appropriate compliance language, where applicable.
- **Compliance Helpline:** Tidewater operates a Compliance Helpline so that all employees and contractors know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
- **Due Diligence Procedure:** Tidewater has due diligence routines in order to conduct risk analysis of vendor and suppliers, including manning providers, before accepting them as suppliers.
- **Training:** We require e.g. all employees to complete annual online compliance training, as well as other training in relation to HSE and safety.
- **MLC certifications:** We maintain certification of our vessels to MLC (Maritime Labour Convention) requirements, e.g. on seafarer living and working conditions aboard ship, and we comply with other MLC requirements.

In addition to being subject to the abovementioned group procedures, Tidewater Norway also operates various relevant policies locally, such as an employee handbook, vendor intake routines, HSE routines, and whistleblowing routines in accordance with the Norwegian Ship Labour Act and the Working Environment Act. We operate a quality assurance system for our activities, which concerns e.g. MLC certifications on vessels, reporting and whistleblowing procedure, and supply chain management.

Further to being subject to legal requirements on working conditions and human rights, both in Norway and internationally, we are subject to strict contractual requirements and audits from our customers within the offshore industry on working conditions and human rights.

The ultimate responsibility for Tidewater Norway's compliance with the Transparency Act lies with the Board of Directors of the companies, who has adopted a procedure for ensuring compliance with the requirements of the Act. The day-to-day responsibility for implementing the requirements and ensuring compliance is designated to the General Manager and the top management. Other employees are included in the work as relevant, such as within HSEQ, HR, procurement, vessels' management, etc.

#### **4. Situation, assessment and measures in own business**

We pay close attention to the impact we have on our surrounding communities and how we ensure the welfare of our most valuable asset: our people. We are dedicated to the highest standards of safety in our operations and continuously improve our health and safety initiatives to ensure that our employees and third-party personnel are taken care of. We follow all Norwegian and other applicable laws and regulations in relation to working conditions and working environment, and we strive to provide our employees with the necessary tools and training to protect them from potential risk.

HSE is well integrated into Tidewater Norway's quality assurance system, and we have set out HSE objectives, strategies and targets, which includes an objective to have zero injuries to employees or third-party personnel. All our vessels are as mentioned MLC certified, and this forms part of our quality assurance system. We regularly conduct surveys, meetings and evaluations in relation to working conditions, e.g. monthly HSE Committee and Safety Meetings on all vessels.

Our procedures imply that if any incidents or risks relating to working conditions, HSE, etc. are revealed, these will be handled accordingly, and investigated to conclude root causes, gain learnings and implements actions to correct and prevent reoccurrence. Going forward some of our main HSE targets are to improve safety focus during routine jobs on board vessels, and highlight expectations, compliance and safety barriers by initiating more safety campaigns regularly.

Tidewater Norway promotes equality at the workplace, and do not tolerate any discrimination based on sex or any other factors, such as ethnicity, origin, religion or sexual orientation. We are committed to fostering a culture of diversity and inclusion throughout our organization.

Our surveys and assessments imply that the working environment of Tidewater Norway in general is considered to be good. There have been no incidents or reported incidents of actual or potential adverse impacts on human rights or decent working conditions in our own business. We had two recordable injury/illness cases in 2022. Additionally, ten incidents resulted in first aid treatment. In general, sickness absence is carefully monitored.

#### **5. Situation, assessment and measures in the supply chain**

Our quality assurance system includes processes to keep overview and monitor the performance of suppliers and business partners, including in terms of human rights and working conditions. We obtain information from our suppliers through our vendor intake routines, and we place requirements on them through e.g. the supplier code of conduct.

In addition to assessments made prior to a potential supplier relationship, we regularly assess our suppliers and business partners to map and evaluate actual and potentially negative consequences for fundamental human rights and decent working conditions in the supply chain. The assessment is based on the OECD guidelines for



multinational enterprises and is risk-based, emphasizing e.g. general knowledge of industry risk, product risk and geographical risk, information obtained from the supplier/business partner, own experiences and evaluations, the size and significance of the agreement, our connection with the risk and leverage towards the supplier/business partner, and external information obtained through e.g. open sources, other suppliers/business partners, customers or our connected associations. The latter includes the purchase association Incentra, of which we are member and use for a wide range of our procurements (provided that the relevant products / supply need, are included in their database). Incentra performs prequalification and audits of all suppliers in their database to secure that their quality standards and code of conduct are met, including on human and labour rights.

Our latest overall assessment of suppliers/business partners was conducted in the spring of 2023. Tidewater Norway had approximately 250 suppliers in 2022 (minor / ad hoc purchases and retail excluded). In general, we have a good overview of our suppliers, and a good and regular dialogue with our main suppliers. Our suppliers are mainly related to the following: spare parts, equipment and supplies for vessels, shipyard / repair, fuel, travel, manning companies, and technical support, consultancy services, etc. Our suppliers are mainly Norwegian; some are from other Scandinavian countries, the EU or the UK. In general, our suppliers consist of renowned companies with own policies and routines relating to human rights and due diligence, and most of our main/largest supplies are subject to the Transparency Act themselves.

Our assessments have not revealed any actual adverse impacts or significant risks of adverse impacts that requires specific measures, besides the general measures implemented towards our supply chain and business partners. Two focus areas, also going forward, are related to shipyards / repairs and manning companies, since such suppliers are not obtained through Incentra and since these industries in general are associated with a higher risk. To address these risks, we use renowned suppliers within these industries, chosen through careful considerations. Going forward we plan to further strengthen our audit process towards e.g. these industries and suppliers. As for vessels, Tidewater Norway has not built or acquired any new vessels in recent years and has no plans for doing so (apart from the planned acquisition of the existing vessel fleet of Solstad Offshore). Thus, although being fully aware of the industry risk associated with shipbuilding and ship disposal, our exposure towards this risk is currently limited.

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This report is for the period 1 July 2022 to 30 May 2023. However, we emphasise that due diligence and the work on human rights and working conditions are a continuous effort. The report is signed by the Board of Directors and the General Manager of Tidewater Marine AS, Tidewater Norge AS and Tidewater Rederi AS.

  
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Chairman of the Board  
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