



2022 environmental, social and governance report



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A message from our Group Chief Executive





With a long-established and growing business in the global offshore renewable energy sector, we are at the centre of the energy transition. This position gives us the opportunity to lead by example, demonstrating through our actions a commitment to the environment and good governance.

Dr Bernhard Bruggaier, Group Chief Executive




Welcome to our 2022 environmental, social and governance (ESG) report, which gives an overview of our performance over the last year and looks forward to what we want to achieve. We understand that sustainability is critical for the future of our business, and, by publishing this report, we are sharing our progress and holding ourselves accountable for our actions.

Our initial ESG report set out our commitment and approach. Since then, we have conducted a materiality assessment that is now helping us to focus on the areas that matter most to our business and stakeholders. Led by our ESG Executive Committee, we are using this information to inform our ESG strategy and to identify improvement opportunities, manage risk and enhance reporting transparency.

With a long-established and growing business in the global offshore renewable energy sector, we are at the centre of the energy transition. This position gives us the opportunity to lead by example, demonstrating through our actions a commitment to the environment and good governance.

Our promise to provide a safe and inclusive work environment continues to be at the heart of our business. We are working to continuously improve our ESG performance, for example, by developing and deploying innovative technologies that are helping to reduce the number of experts needed at project sites, and by delivering services from smaller, more efficient vessels.

Through our ESG performance, we aim to become an employer of choice

<p>Environmental </p> <p>To help protect the planet for future generations, we are committed to the energy transition and have a strategic renewable energy sector focus.</p>	<p>Social </p> <p>We care for our employees and the communities in which we work. Safety is paramount in everything we do and we promise to provide our employees with a safe and inclusive work environment. Our people have opportunities for professional development and to give back to our communities.</p>	<p>Governance </p> <p>We care about our behaviour and hold ourselves accountable, recognising and complying with the standards, laws and policies in the countries where we work, and acting ethically and with integrity in all our business dealings.</p>
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What we do

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One Acteon to reach our potential

While many people are talking about a more sustainable future, we are building it. For decades, we have been involved in some of the world's most complex offshore energy projects, supporting the application of renewable energy and helping decommission and remediate redundant oil and gas infrastructure. Our offerings help customers across the marine infrastructure industries to operate safely, efficiently and in an environmentally responsible manner.

We integrate specialised products and services from our brands to design and engineer the best solution across the life cycle of the project, from early-stage geo-services to foundations and moorings, integrity management and eventually decommissioning.

As our company travels with developers and large contractors along our collective energy transition journey, our employees are dedicated to embracing leaner processes that help to increase efficiencies and reduce our environmental footprint.

2000+
employees

21
countries

1.39

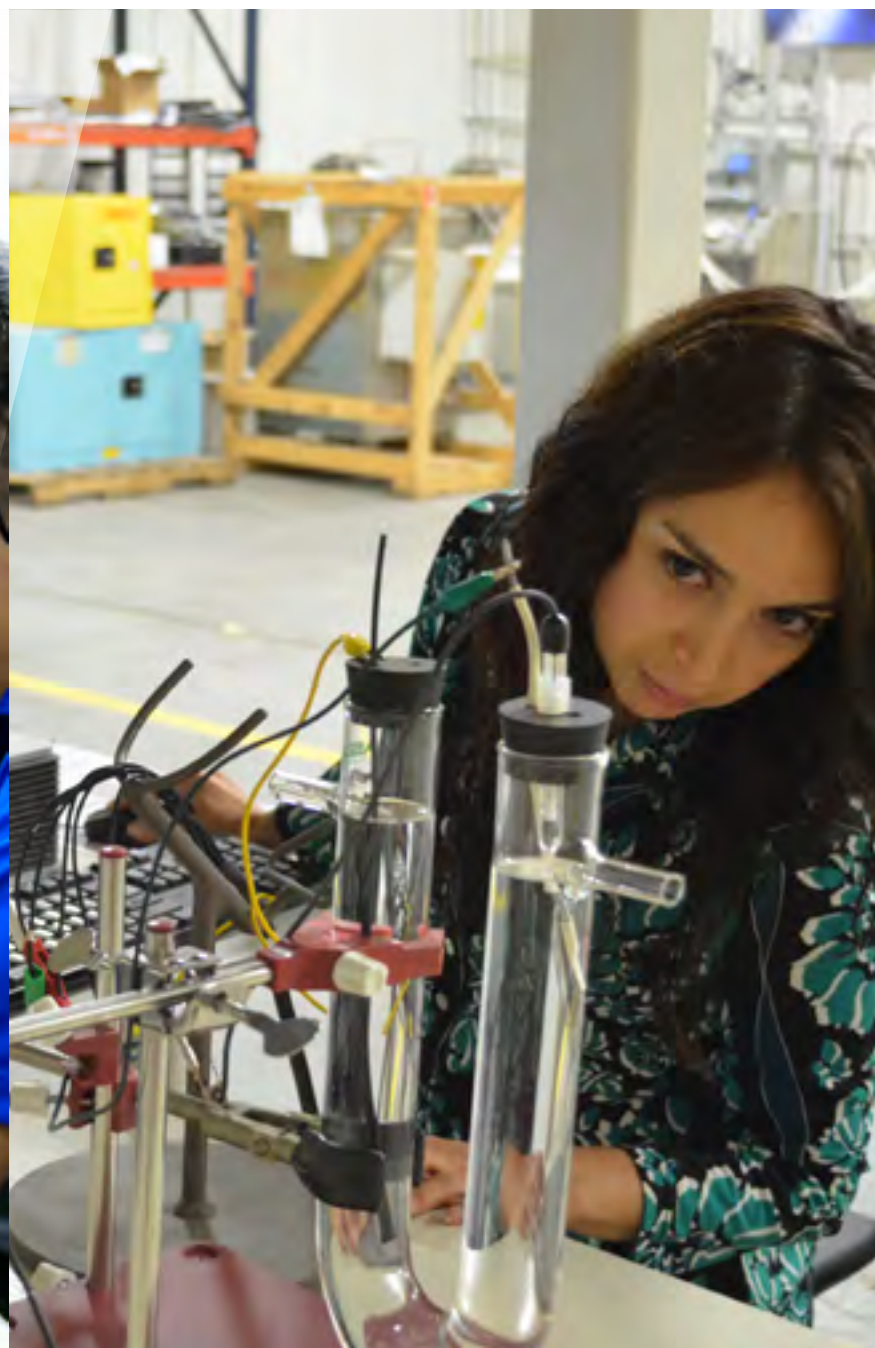
lost time incidents per million
employee hours worked

60

sites including
workshops | offices | quaysides |
yards | storage | laboratory

500

km² facilities footprint



Industries we serve

Acteon supports the offshore renewable energy, nearshore construction, and oil and gas industries by delivering commercial and environmental benefits and helping to enable the energy transition. We have been in offshore renewable energy from the beginning through our hydraulic pile-driving solutions and have expanded to provide comprehensive services ranging from early-stage geo-services, through integrity management to decommissioning.



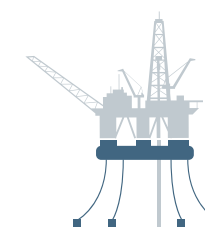
Renewables

Working in partnership with our customers, we provide the best available technologies and services to maximise asset integrity insights and asset life while optimising cost and lowering environmental impact.



Nearshore construction

We provide design, construction, asset integrity planning, structural health monitoring and a range of advanced cathodic protection solutions to look after your assets, even in the harshest environments.

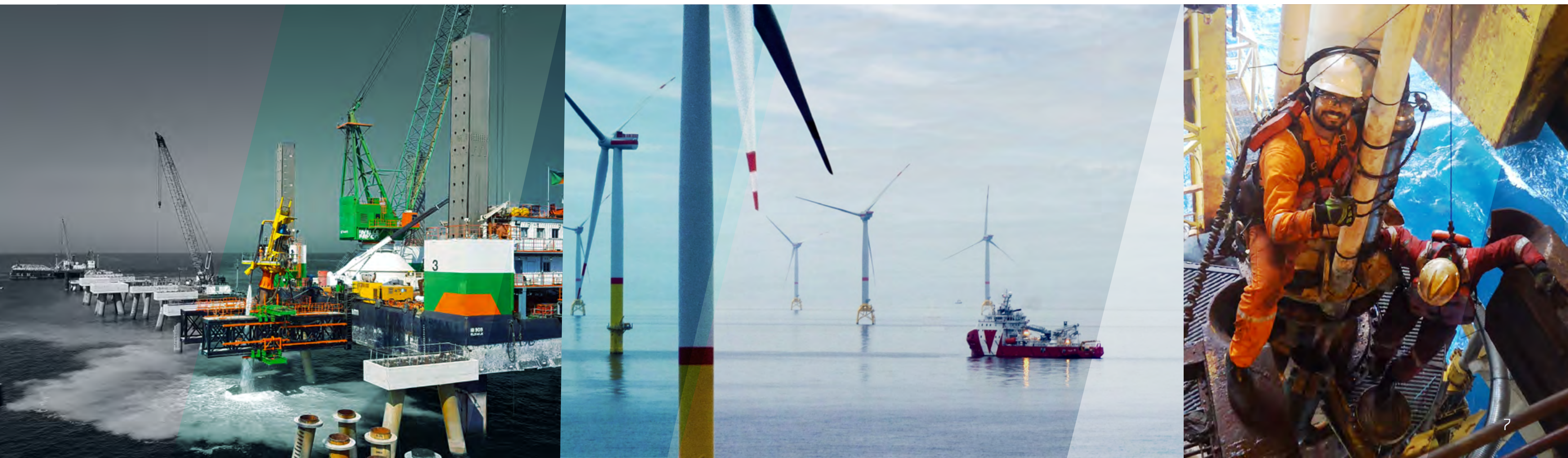


Oil and gas

From conception through operations, life extension and decommissioning, we offer integrated technology and service solutions to determine the condition of your assets, how to safeguard infrastructure, reduce lifetime costs and risks, and return the seabed to its natural state.



Learn more about what we do



Transforming our technologies

We are committed to continuously investing in game-changing innovation. Our data-driven processes and machine learning technologies are delivering smarter solutions across the project life cycle. This enables an increasing number of tasks to be performed remotely, faster and/or moved onshore, and it supports the use of smaller vessels, minimises time at sea, and reduces costs and carbon emissions, measured as tonnes of carbon dioxide equivalent (tCO₂e).

Examples of technologies we are deploying to help reduce the environmental impact of installation, operation and maintenance work include

- **uncrewed surface vehicles (USV)** combined with remote survey control and data processing. These technologies are used during geophysical surveys to significantly reduce personnel on board (POB) and associated travel costs and carbon emissions, and to reduce marine fuel use.
- **our noise reduction technology**, which reduced sound energy emissions by as much as 65% during the pile-driving phase of a wind development project in South East Asia.
- **structural monitoring and response digital twin technologies**. These provide operators with the insight to optimise offshore maintenance interventions for fewer POB, which has positive safety and emissions implications. Our integrated monitoring and digital twin solution is currently being applied to the world's largest operating floating wind farm off the coast of Aberdeen, Scotland.





Structured for innovation

We have built and structured our business to provide a fully integrated offering, including new products and services aligned with customers' needs, and a strong platform for delivering commercial and environmental benefits. Our focus has always been partnering with our customers to solve their challenges by engineering the most efficient solution. A key aspect of our approach is to be asset light, lowering the operational footprint of projects, without compromising on quality, by applying domain expertise and value engineering methods to remove unnecessary equipment or resources.

How we do it

11 Our culture and values

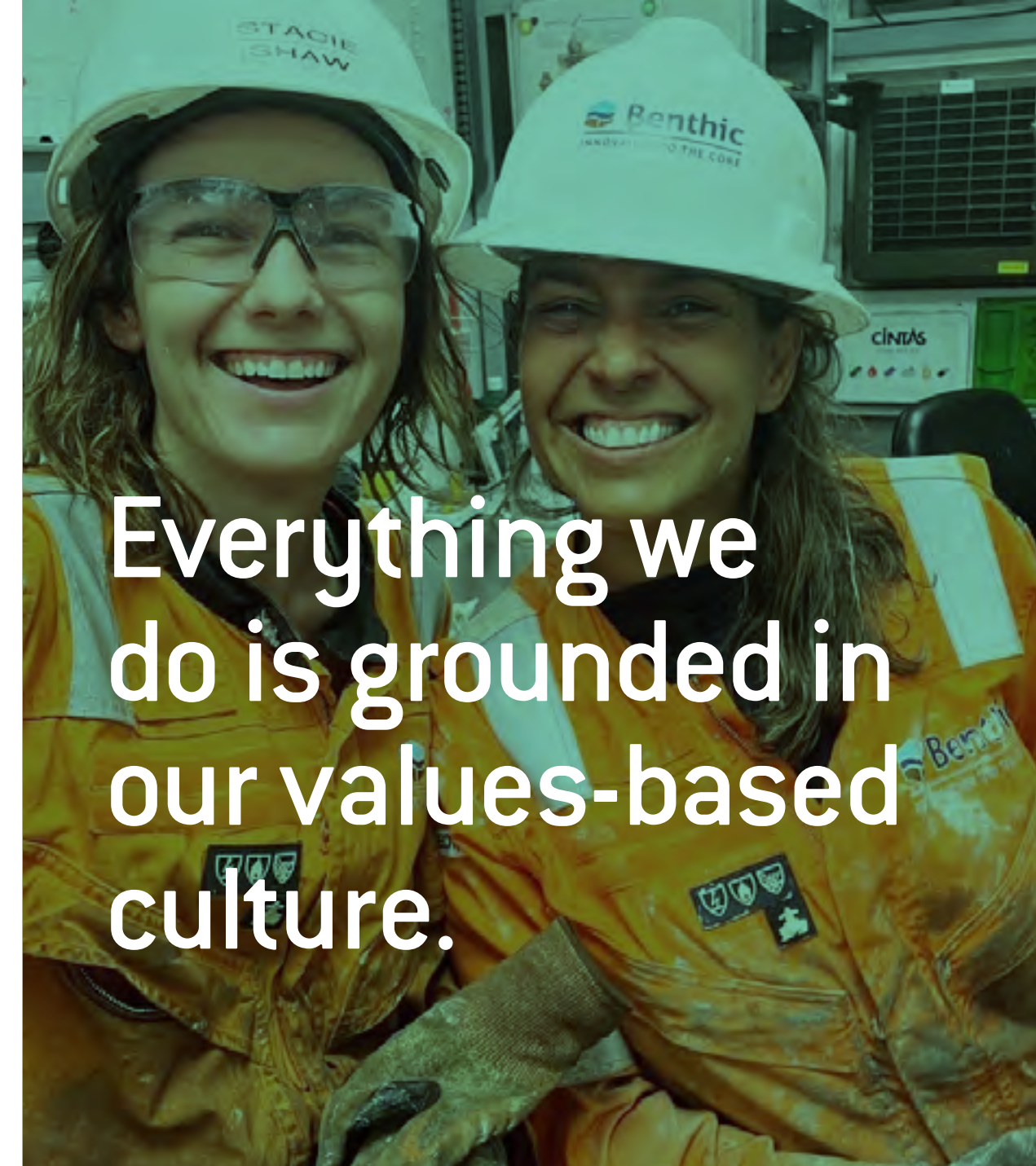
12 Materiality: Listening to our stakeholders



Succeed together

We are accountable to ourselves and each other, and communicate clearly and simply to drive alignment, leverage our operational, technical and industry expertise, and enable action. We make time to support others and ask for help to move forward as a team. We nurture health, safety, environmental and compliance engagement, and share our successes.

Our culture and values



Everything we do is grounded in our values-based culture.



Customer first

We are curious and actively listen to build strong relationships with our customers to help us diversify our perspectives, solve problems and enable ambitions.



Challenge convention

We think big and boldly, and use our resourcefulness to bring optimal solutions to the table. We move quickly and take pride in our work to drive the best outcome for our customers.



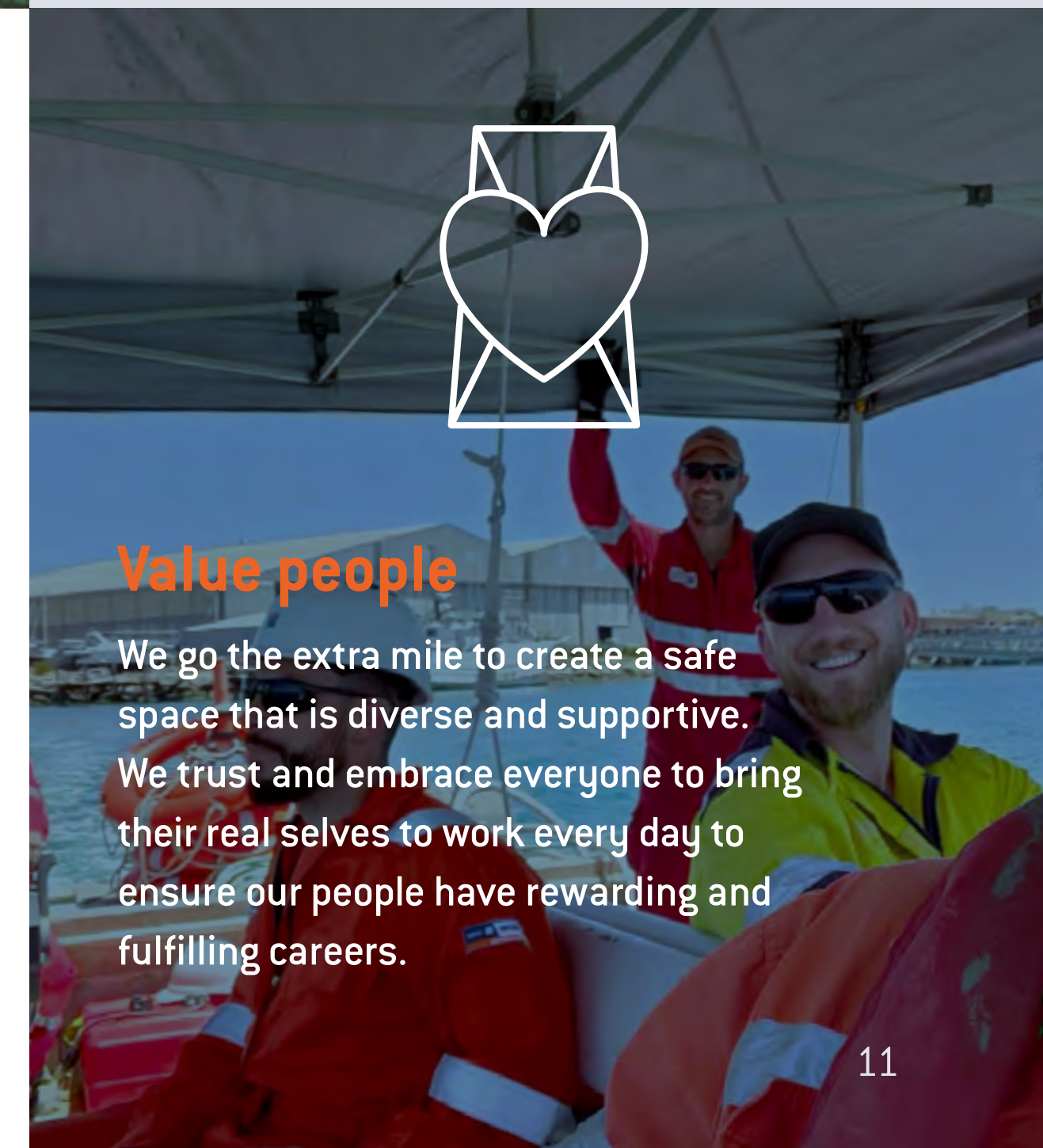
Take responsibility

We take responsibility for the safety of our people, partners and community, and acknowledge ownership of the impacts we and our supply chain have on the environment, including our carbon footprint, and the societies within which we operate.



Commercial focus

We use our resources wisely and practise financial discipline in our decisions. And we respond actively to feedback and proactively share advice with others to gain new insights and accelerate growth.



Value people

We go the extra mile to create a safe space that is diverse and supportive. We trust and embrace everyone to bring their real selves to work every day to ensure our people have rewarding and fulfilling careers.

Materiality: Listening to our stakeholders

In early 2022, Acteon undertook its first ESG materiality assessment. In this, we worked with sustainability consultancy ERM to help shape our ESG priorities. This assessment forms the foundation of our ESG strategy, enables us to engage and align with our stakeholders, and helps us to focus on the topics most important to our business over the next three to five years.

Guided by global standards, we researched the ESG focus areas for our customers, peers and investors, and surveyed our employees. The results identified health and safety, climate change, and ethics and compliance as three key sustainability topics for our business and our stakeholders. The assessment also highlighted the impact we can make through innovation to support the energy transition and reduce our impact on biodiversity when working offshore.

Engagement with our employees demonstrated their eagerness to make a considerable sustainability contribution.

Implementing our ESG strategy

Based on this ESG materiality assessment, we have embarked on a journey to embed these sustainability considerations into our corporate strategy, continuously evaluate our management approaches against these material topics and develop ambitious goals.

We have also expanded the sustainability-related committees at board and executive levels to help us achieve our strategy. And we are now in the process of developing an ESG reporting matrix for greater accountability and to focus our resources where they will make the greatest impact.

The top three priorities by stakeholder group are shown here. The results of our materiality assessment confirm what we believed, and we are working with a sustainability partner to further develop our actions in each of these priority areas.

Employees

- Talent management, including upskilling and job creation
- Community
- Health and safety

+ Customers

- Health and safety
- Ethics and compliance
- Research and development, and digital solutions

+ Investors

- Climate and the energy transition, including carbon emission reporting and climate policies aligned to UN goals
- Waste management
- Talent management



Environment

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Environment – Highlights

We are committed to reaching net zero

In 2022 we committed to a programme of understanding and capturing our global scope 1, 2 and 3 emissions by partnering with an independent ESG advisory consultant. This partnership will enable us to understand our current emissions, implement best practices for carbon reduction and set meaningful science-based targets for our environmental performance.

Reducing air travel and marine vessel emissions

A significant percentage of our emissions come from international air travel and marine fuel use. We are working hard to address this by developing and deploying innovative technologies that help to reduce the number of experts needed at project sites and to deliver services from smaller, more efficient vessels. For example, the use of autonomous surface vehicles (ASV),

and remote survey control and data processing technologies for geophysical surveys is helping us to significantly reduce POB and associated travel costs and carbon emissions, and to reduce marine fuel use and emissions.

Decarbonising our vehicle fleet

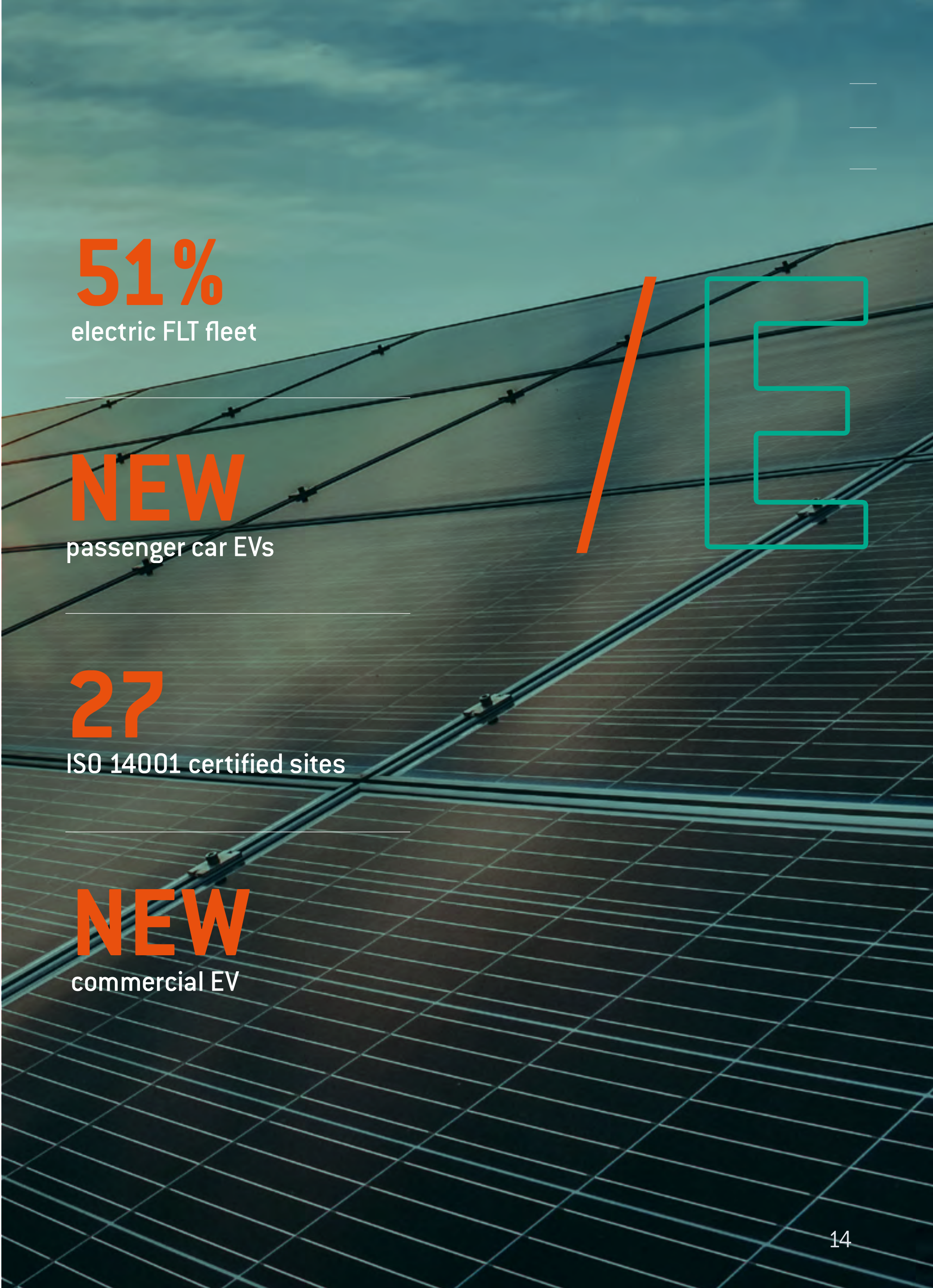
We have evaluated and introduced electric vehicles (EV) into our fleet, including two electric cars used by one of our marine foundation brands and one commercial EV used by one of our moorings and anchors brands. We have also increased the ratio of electric to internal-combustion-powered forklift trucks (FLT) from 35% to 51% (a 68% increase from 2021) and are committed to increasing our electric fleet annually. In the UK, we have installed six EV charging points across three offices so far, and we are looking at introducing an employee EV leasing programme in 2023.

Investing in renewable power at our sites

Each of our sites is evaluating where it is reasonably practicable to install photovoltaic solar systems. To date, we have installed two solar power systems and have other installations proposed for 2023.

Establishing a robust environmental management system

We recognise that having a robust environmental management system is a key enabler for meeting our net-zero ambitions; we have 27 sites that are now ISO 14001 certified. InterMoor, a mooring and anchors brand in our Engineering, Moorings and Foundations division, received a Certificate of Environmental Wellness, awarded by GreenTek Solutions LLC, for recycling 2115 kg of redundant IT equipment in a single year, saving emissions of 2.9 tCO₂e.



Protecting marine life with a 65% reduction in installation noise for a Taiwan wind development

Challenge

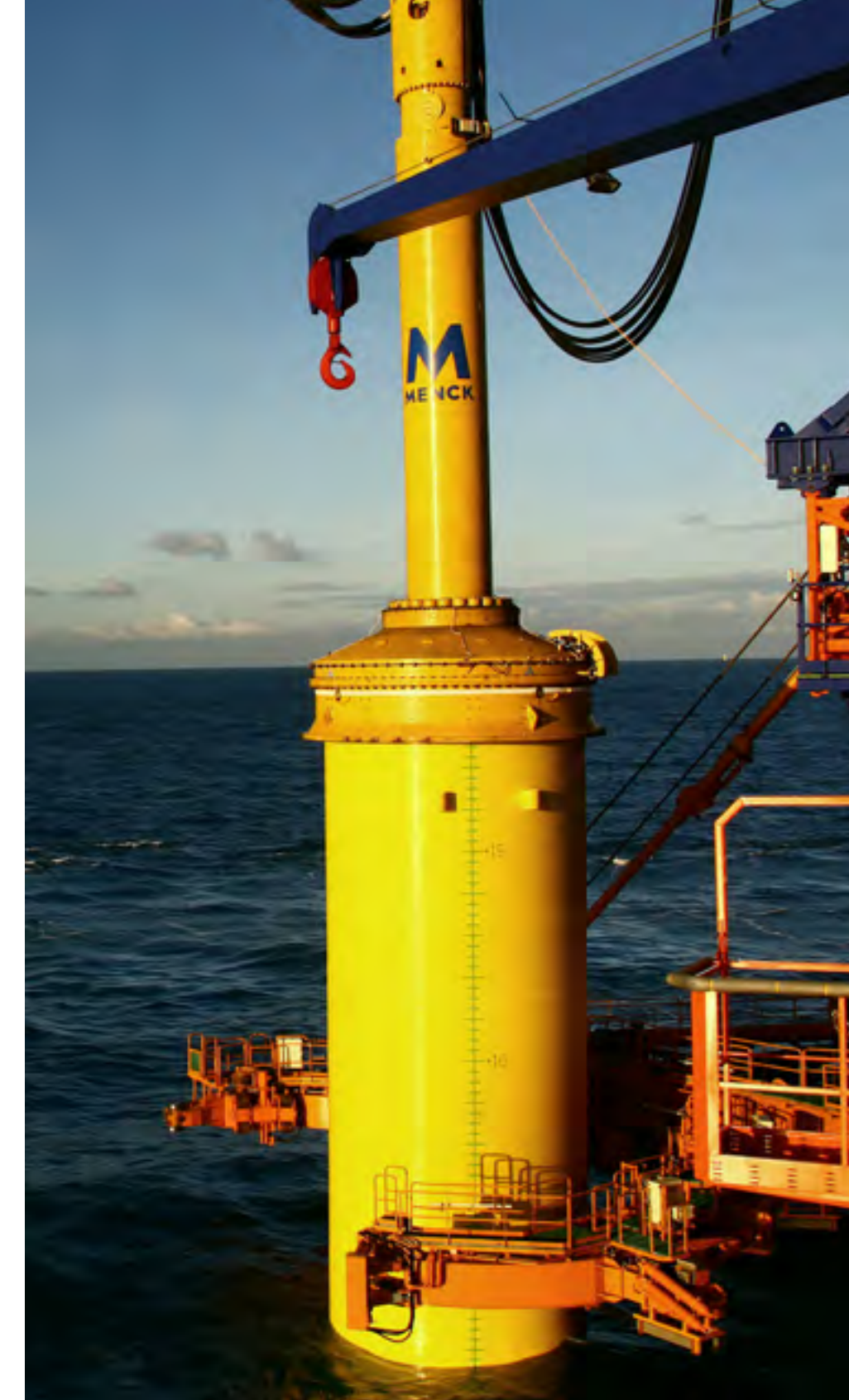
Sound pressure energy from foundation installation using pile-driving hammers has the potential to harm sea life and reduce biodiversity. Although there is no single international agreement on limiting pile-driving sound energy, this is something within our operational control and critical to our and our customers' environmental aspirations.

Solution

MENCK, a marine foundations brand in our Engineering, Moorings and Foundations division, has developed and operates a marine noise reduction unit (MNRU) that is integral to its hammers. Six solid-steel lenses delay energy release using kinetic energy transfer to the jacket, which reduces peak energy.

Benefit

The MNRU has been proven in testing and deployment, most notably in Taiwan, where it **reduced sound emissions by up to 65%** during the installation of **6 monopiles** and piles for **339 jackets**.



339

jacket piles installed using an MNRU in Taiwan



6

monopiles driven using an MNRU in Taiwan

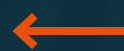


up to
65%

less pile-driving noise

68%

less lighting energy
at our InterMoor
Morgan City facility



750 → 200
59 → 48
35 → 24
wattage reduction

22%

less lighting energy at our
Deepwater Houston facility

8

new sites identified
for similar initiatives



Reducing lighting energy by 68% at our Morgan City, USA, facility

Challenge

Avoiding and reducing carbon emissions is key to meeting our net-zero ambitions. InterMoor, a mooring and anchors brand in our Engineering, Moorings and Foundations division, was lighting its large fabrication and maintenance workshop, offices and related buildings at its Morgan City facility in Louisiana, USA, using metal halide and fluorescent bulbs.

Solution

In 2022, we moved from
750-W metal halide bulbs → 200-W LED lights
59-W fluorescent bulbs → 48-W LED lights
35-W fluorescent bulbs → 24-W LED lights.

Benefit

A 68% energy reduction has been recorded associated with the change to LED lights, which also have a longer lifespan for less maintenance.

A similar initiative at our Deepwater brand’s facility in Texas, USA, has reduced lighting energy consumption by 22%, and eight other sites are scheduled to change their lighting in the coming year.



Returning the seabed to its natural state in the Celtic Sea, Ireland

Challenge

Energy operators have a legal obligation to return the seabed to its natural state when their work has finished. An energy operator needed to cut and recover 14 subsea wellheads from a depleted offshore gas field in the Celtic Sea, 50 km (31 mi) off the south coast of Ireland in a water depth of 100 m. The wellheads had to be cut 3 m below the mudline, and the task was complicated by the age, unknown condition and differing configurations of the wellheads.

Solution

In 2022, Claxton, a cutting and decommissioning brand in our Energy Services division, provided an integrated solution that dynamically assessed each wellhead and ensured the right equipment and services were available to overcome the challenges associated with lack of well data to ensure successful severance.

Benefit

The wells were successfully severed at or below the mudline and the **structures were recovered to return the seabed to its natural state**. The work was **completed on schedule** without the need for additional vessel time.



Social

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Social – Highlights

Early in 2022, we established an Acteon Social Committee that draws members from all areas of our business. Its purpose, set out in a Social Committee Charter, is to champion social principles by

- ensuring our employees are given the opportunity to perform to the best of their ability
- making a positive contribution to the communities within which we operate.

Investing in supporting and rewarding our people

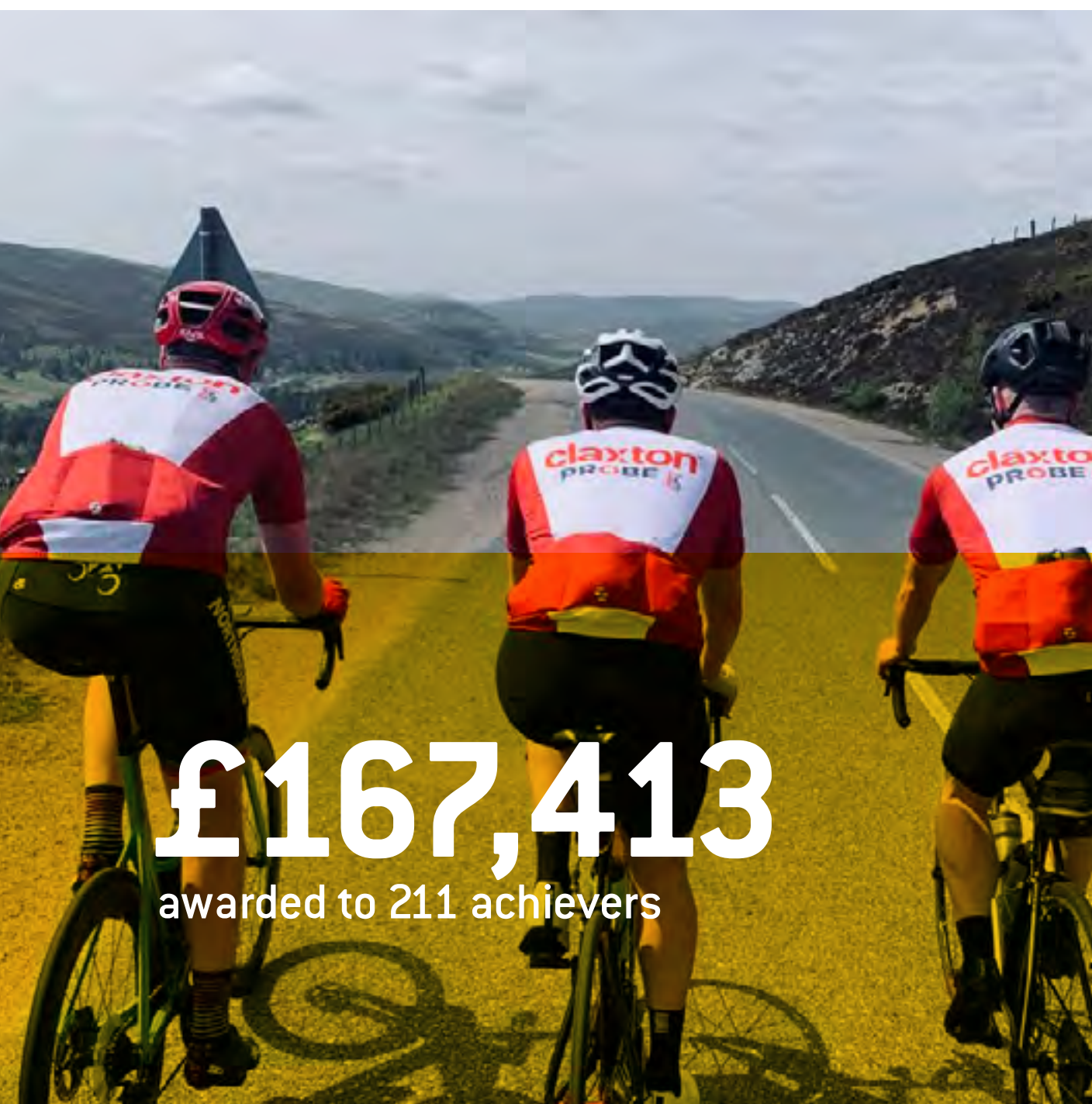
In 2022, we

- **set up** a learning and development calendar
- **delivered** a total of 1016 hours of training on 12 topics to 381 attendees
- **awarded** 57 people with Acteon Lean Six Sigma Yellow Belt certificates (and we have 377 registered on the training programme)
- **launched** a global employee-led Women of Acteon affinity group, which already has 156 members, and we are seeking members for neurodiversity and other affinity groups

- **presented** 211 people with Achievers Awards, from a £167,413 fund, for their successes in categories aligned with our values.

Supporting communities

Over the past year, our employees have been active in numerous community projects. They donated to local food banks, and supported Ukraine relief funds through fundraising and collections of food, toiletries, medical supplies and sleeping bags. Staff raised £3735 for Kayleigh's Wee Stars, a charity supporting families of terminally ill children. Other activities included cleaning beaches, hosting a student field trip to one of our operating sites and sponsoring local sports teams.



£167,413
awarded to 211 achievers

£3735
raised for Kayleigh's Wee Stars

“Creating a Social Committee has been an important step in growing our social initiatives across the Group. It is helping us to get global input to our activities.”



Launch
of employee-led affinity group



Food
time and money donated locally and to support Ukraine



1016
training hours delivered

Delivering learning and development opportunities

Challenge

We want to create varied learning opportunities to help our people reach their full potential and have fulfilling careers.

Solution

In 2022, we launched a learning calendar to provide structured development activities throughout the year. The content was identified and developed to meet the needs of our diverse workforce, based on employee feedback, a twice-yearly performance and development process and the changing requirements of our business. Training covered a variety of topics including an introduction to diversity, equality and inclusion; managing virtual teams; handling constructive conversations; understanding unconscious bias; coaching skills; sales training; and running successful reviews. It was delivered through a combination of trainer-led sessions and an online platform that provides more than 750 expert-designed, video-based micro-learning.

We also rolled out mental health training, with modules in mental health awareness for employees and leading positive mental health for managers. This training scheme aims to provide us with a better understanding of common mental health challenges and improve our skills in opening mental health conversations.

The Acteon Lean Six Sigma Yellow Belt training programme was also offered to help people improve their professional skills.





Benefit

In 2022, 381 people shared in 1016 hours of training provided through 12 virtual and 2 face-to-face programmes. Our aim for the current year is to increase the number of attendees to more than 500 and deliver a multi-module programme of development for new people managers, which will help them to better coach, develop and support their teams.

In addition, 132 people participated in 12 mental health and well-being training sessions. Following this training, a well-being champions community was formed that aims

to share best practice across Acteon, advocate for mental health and well-being in the members’ local businesses, and help shape the Acteon Group mental health and well-being agenda.

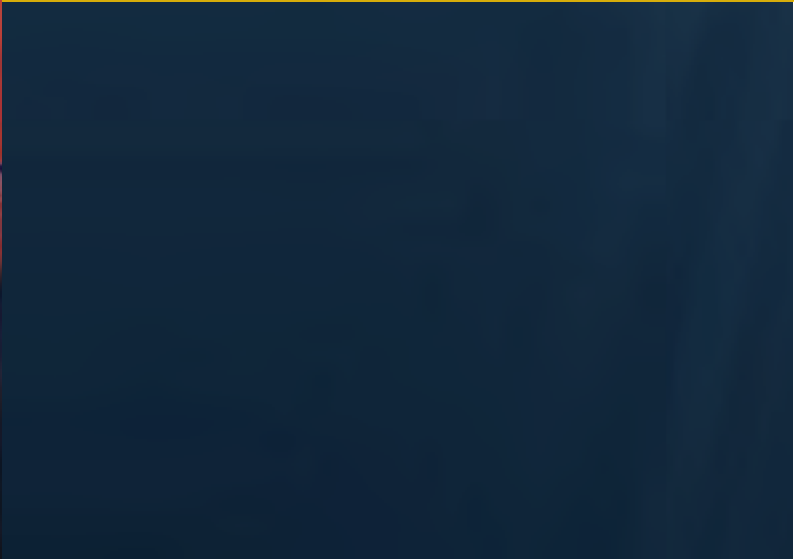
The Acteon Lean Six Sigma Yellow Belt training programme has attracted registrations from 367 people. Of the participants, 57 gained their certificates, each having created two improvement plans for their business, role or area. This year, we are aiming for 10% of the people in each division to become Yellow Belt certified, a total of about 200.



1016
training hours delivered



513
participants



57
yellow belts awarded



Setting up diversity, equality and inclusion affinity groups

Challenge

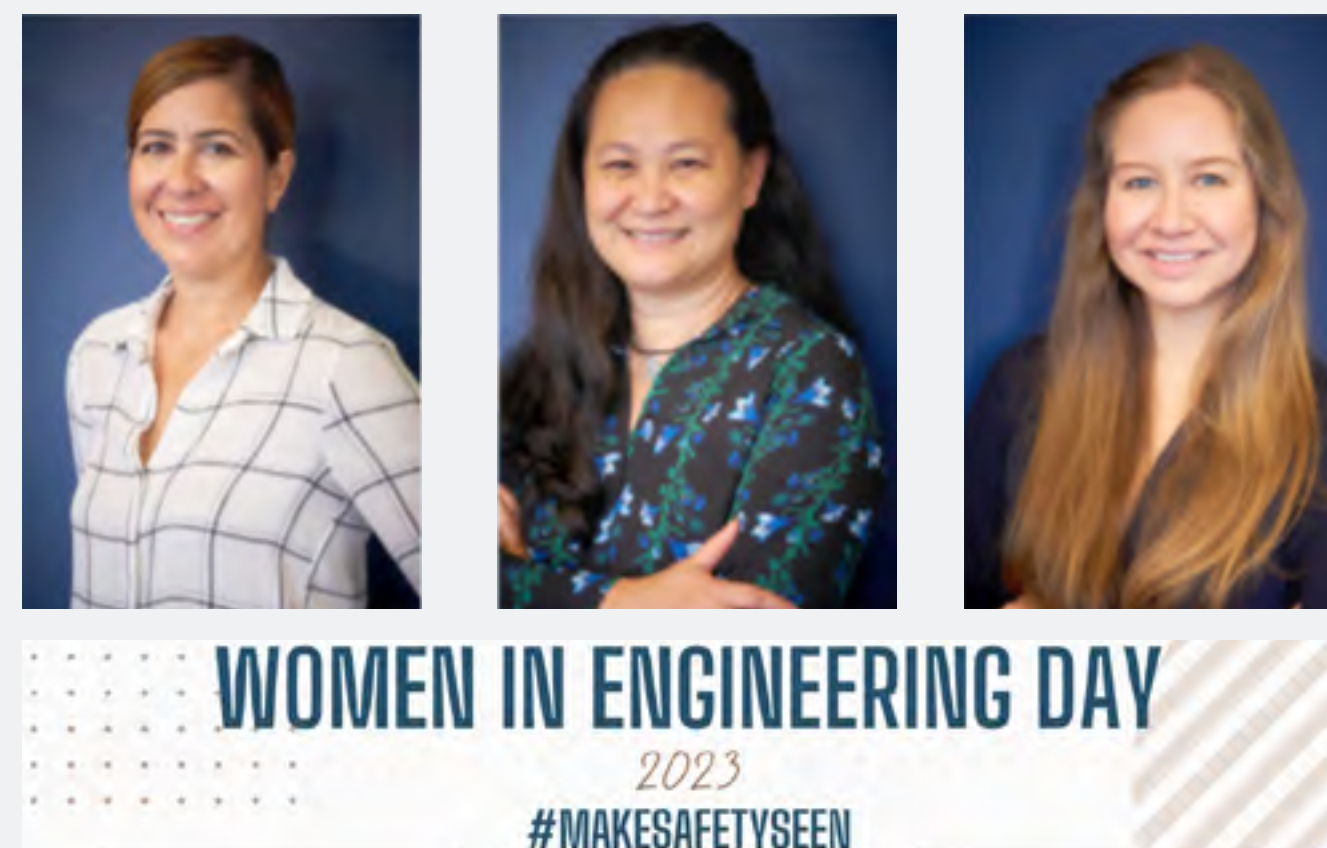
In line with our commitment to “value people”, we want to create a safe work environment that is diverse and supportive, so we can all bring our real selves to work every day. As part of this, we want to create a more diverse, equitable and inclusive workforce by advancing diversity, equality and inclusion (DE&I) across our business through training, celebration and engagement.

Solution

In 2022, we launched DE&I training, including “Introduction to DE&I” and “Understanding unconscious bias”.

Our first affinity group – Women of Acteon (WOA) – was launched. This global network aims to empower all the women in Acteon by connecting, developing, attracting and retaining female talent; creating a culture of inclusion; and making a social impact in local communities. This was demonstrated by WOA participation in the University of East Anglia’s “Women of the Future” event in Norwich, UK. This gave local students the opportunity to engage with the latest generation of female STEM professionals. In 2023, WOA plans to attend this event and the STEM recruitment fairs in London and Glasgow. WOA members will also visit schools in Acteon’s local communities to promote the opportunities available in the industry for young women.

We also celebrated International Women’s Day and International Women in Engineering Day, and had employees profiled in an external “Faces of wind energy” campaign.

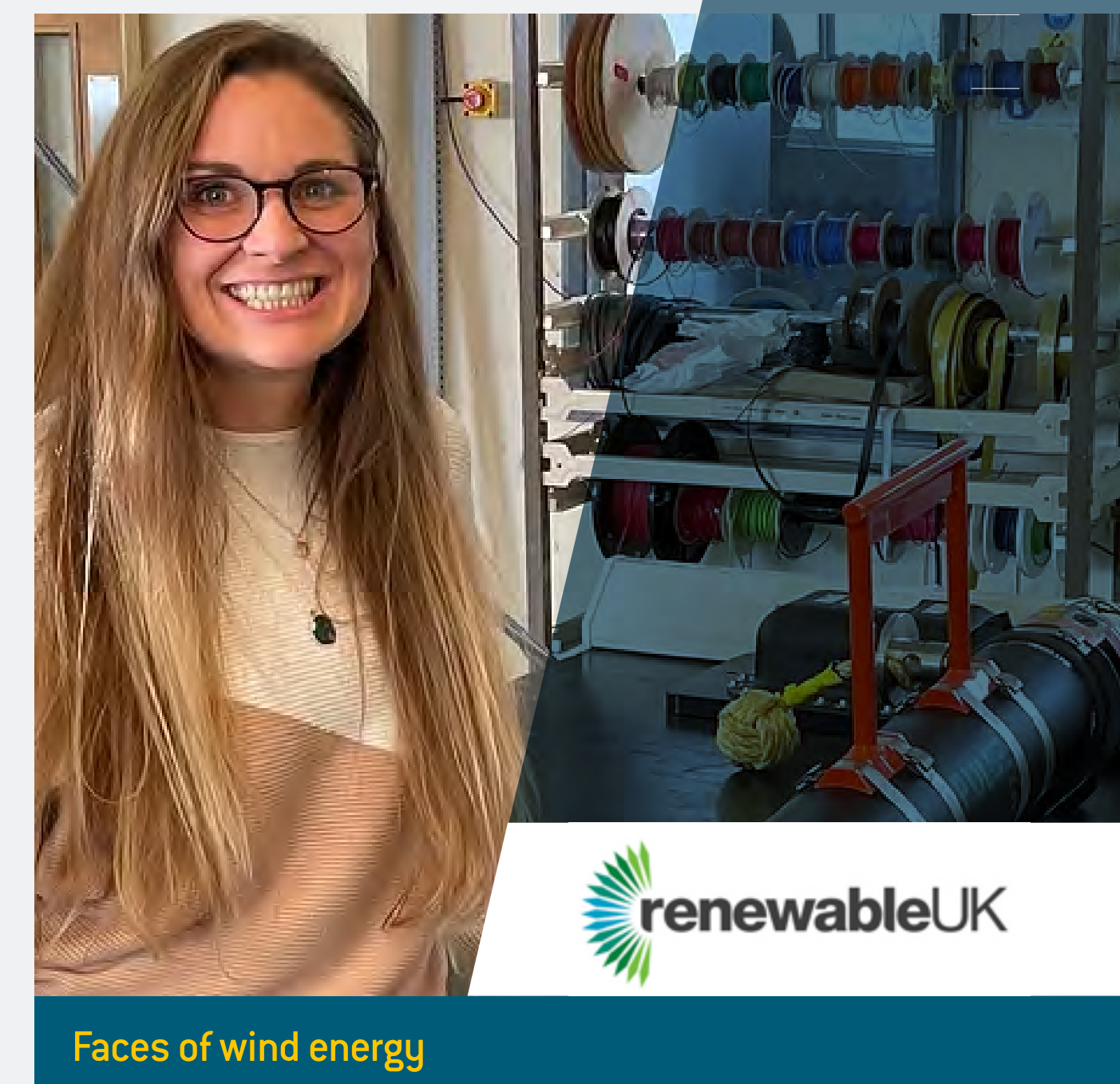


Benefit

Seventy-two people participated in DE&I training, including the “Introduction to DE&I” and “Understanding unconscious bias” modules.

Feedback from this training led to the formation of the **WOA affinity group**, which has provided networking and mentoring opportunities, professional development and a community that can help to open doors for women in Acteon. WOA supports a more diverse Acteon for everyone by focusing on

- **providing our female employees with a network** so they can learn from and support the development of each other
- **building a visible community** that is seen and heard – presenting to our Executive Management Committee twice a year
- **helping shape and deliver** our DE&I organisational strategy and policy
- **celebrating the female talent** we have across our organisation.



156
WOA members



108
diversity learning
hours delivered

Community engagement

Challenge

We want to empower our employees to engage with their local communities, as we believe this enables us to better connect with the communities in which we operate and gives our staff valuable skills and new experiences.

Activities

In 2022, our people were actively involved in a wide range of community projects, including

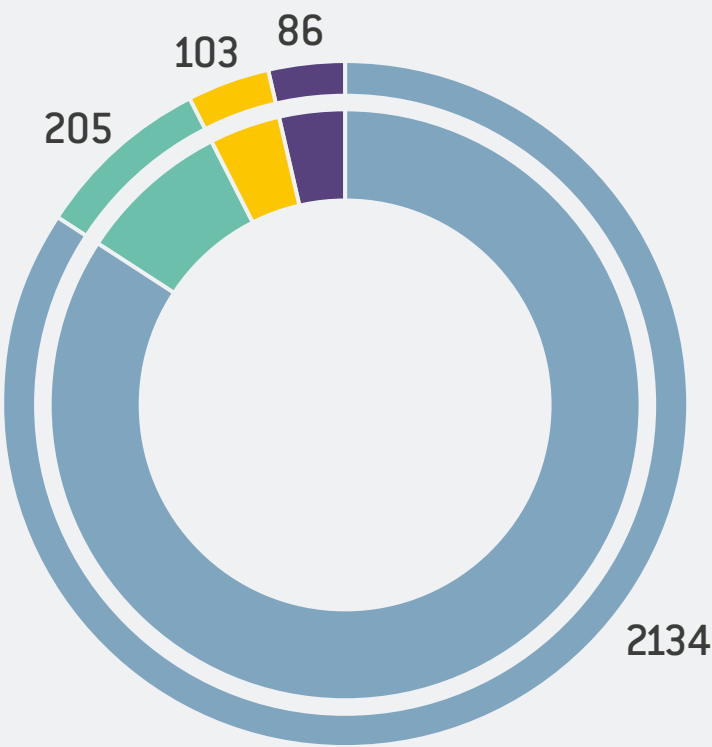
- **supporting local foodbanks:** providing support and donations in Gorleston-on-Sea and Norwich, UK, and in Houston, Texas
- **supporting Ukraine relief funds** by collecting donations of food, toiletries, medical supplies and sleeping bags
- **raising £3735 for Kayleigh's Wee Stars:** our employees in Aberdeen, UK, held fundraising events for this
- **cleaning beaches:** 18 staff participated in beach-cleaning team-building events in Stavanger, Norway, and Aberdeen
- **hosting an educational excursion** for Hamburg University Offshore Wind Technology students at our MENCK site
- **sponsoring local sports teams** and buying team kits in Great Yarmouth and Aberdeen, UK.

charity, which supports the families of terminally ill children



About our workforce

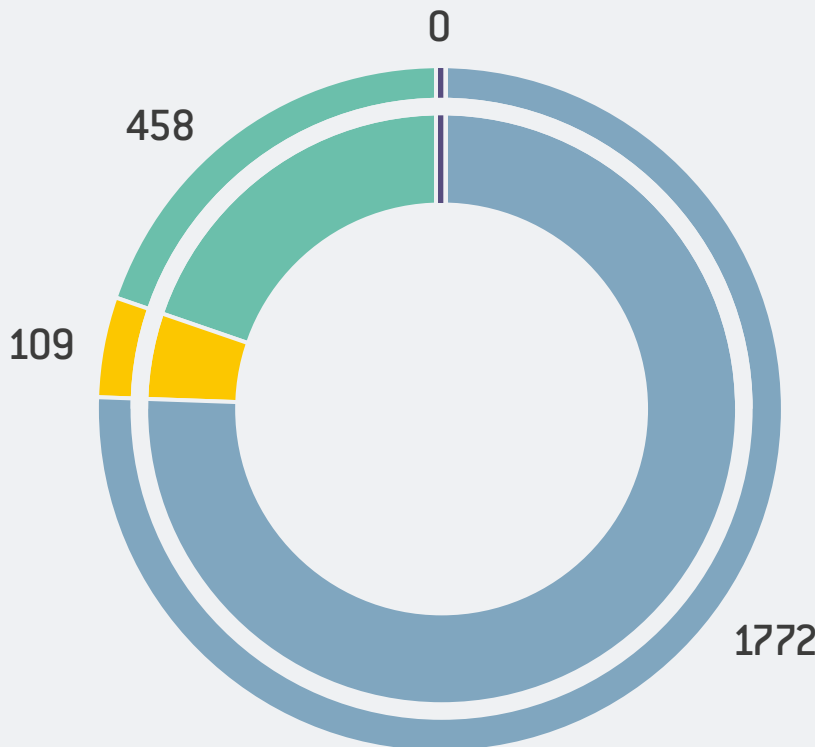
Employment type



We employ 2339 people, 2134 of whom have full-time contracts.

- Full time
- Part time
- Temporary/casual
- Contractors

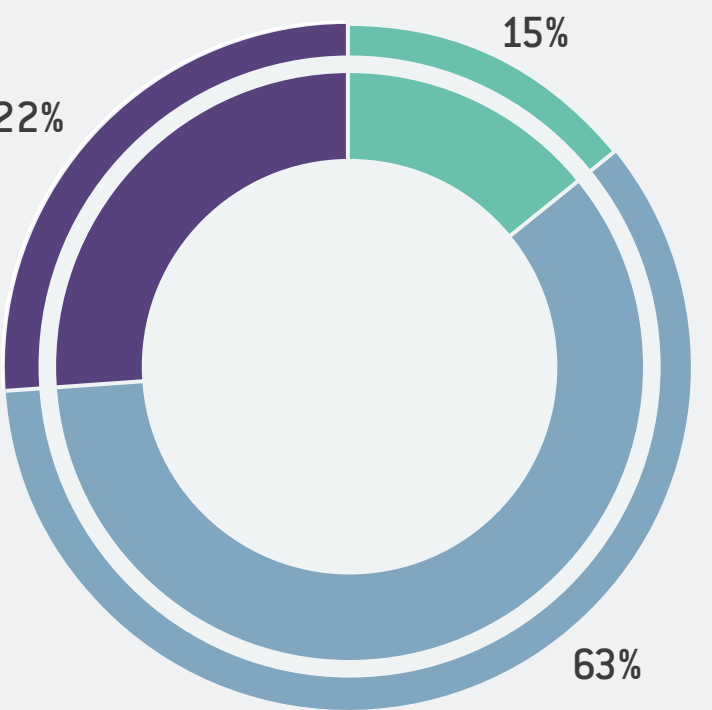
Gender population



Twenty per cent of our employees have self-identified as female.

- Male
- Female
- Not stated
- Non-binary

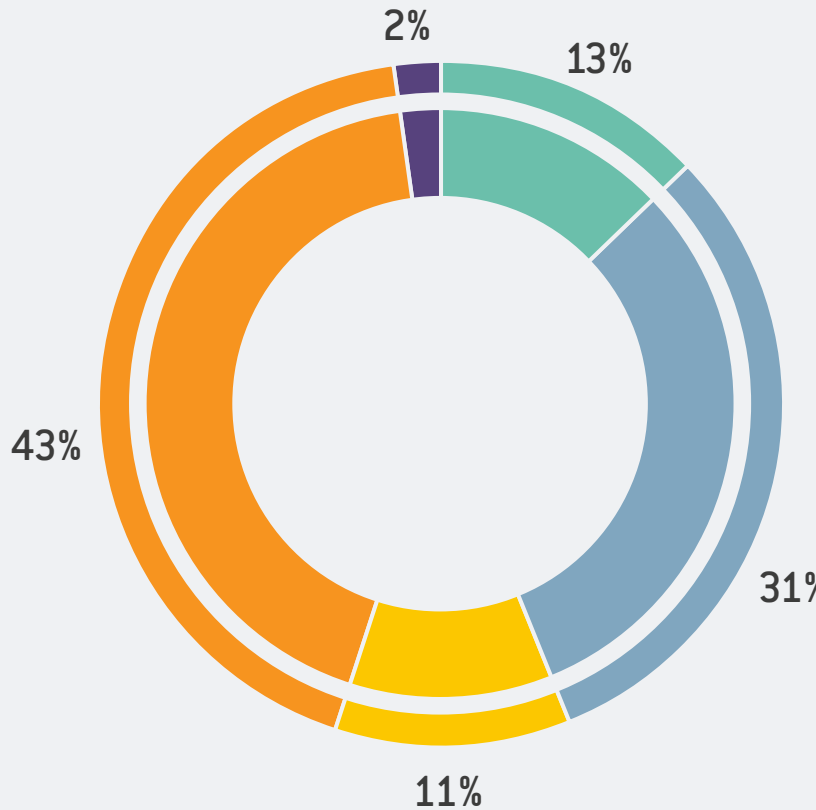
Age demographics



Sixty-three per cent of our workforce are between 30 and 50 years old.

- 30–50
- < 30
- > 50

Regional location



We have employees in five regions.

- Asia Pacific
- Americas (Brazil, USA and Canada)
- Europe
- UK and Ireland
- Middle East

Governance

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Governance – Highlights

In 2022, we expanded our compliance training programme to ensure all our employees have up-to-date, relevant compliance knowledge. Our aim is to ensure we always operate ethically wherever we work and no matter with whom we are interacting.

Ninety-five per cent of our workforce have completed our ethics and code of conduct training.*

In 2022, 3930 individual training sessions were completed, which covered topics such as ethics and

code of conduct, anti-bribery and corruption, data privacy and US import requirements.

Our Governance and Compliance Committee continued to meet quarterly to review our compliance training progress, regulator developments and action from internal investigations. At Acteon, compliance is a commitment. One way we demonstrate this is by making sure the companies we work with, and those involved in them, are not on sanctions lists. We do this by monitoring more than 19,000 third parties.

*The remaining 5% were leavers or people on long-term leave.



Quarterly
Governance and Compliance
Committee meetings



> 19,000
third parties monitored for
sanctions compliance

3930
individual compliance
sessions completed



95%
of workforce participated in
compliance training



Governance – Doing business the right way

Living our values

At Acteon, we are committed to embedding a culture of compliance and operating within a business framework that ensures all decisions are made to the highest ethical standards. Our compliance programme and handbook support this and help us to conduct business appropriately, in an honest, safe, professional and ethical manner.



Executive-level commitment and role modelling	Robust risk-management practices	Shared values and speak-up culture	Risk-driven, third-party due diligence	Protecting privacy and information security
Since 2016, the Governance and Compliance Committee has been led by executives with support from an independent third-party compliance expert. We have clear compliance policies that are implemented across the group to guarantee compliance with the highest level of ethical conduct.	We operate our businesses around the world with a strong emphasis on robust financial controls supported by effective planning and reporting disciplines led by an experienced central group finance function. We ensure that financial processes are undertaken diligently and in compliance with relevant local laws and our Group policy. We conduct our tax affairs and our dialogue with the fiscal authorities in all the territories where we operate openly and honestly, and take professional advice to help us with this.	As part of our compliance culture and ethical business framework, we have a whistleblowing system that enables anyone to anonymously report incidents, breaches or suspected breaches of the principles outlined in our Compliance Handbook or of any law or regulation.	We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or any part of the Group’s business. To ensure we are acting in line with current international sanction regimes, we proactively monitor more than 19,000 third parties to ensure that we are always up to date.	We appreciate the responsibility we have to protect people’s personal information and our clients’ data. Our IT systems are part of our core operating processes and we recognise that cyber threats are ever present. To ensure the resilience of our operations, we have appropriate IT governance and full alignment of our IT, cybersecurity and business strategies. Our IT and cybersecurity strategies follow industry-recognised Information Technology Infrastructure Library (ITIL) and National Institute of Standards and Technology (NIST) frameworks respectively, facilitating effective and prudent management of IT and cybersecurity resources supporting long-term business success.



Bernhard Bruggaier
Group Chief Executive



Mel Zuydam
Group Chief Financial Officer



Barry Parsons
Group Chief Commercial Officer



Jenn McRae
Group Chief HR & QHSE Officer



Sudhir Pai
Executive Vice President,
Data and Robotics Division



David Drysdale
Executive Vice President, Engineering,
Moorings and Foundations Division



Sam Hanton
Executive Vice President,
Energy Services Division



Rolf Althen
Executive Vice President,
Group General Counsel

Governance — Our leadership team

We understand the importance of leadership in building a culture of compliance and an operating framework that ensures we make ethical decisions.

The Board of Directors and the Group's Supervisory Board set Acteon's ESG direction and ensure its structure remains strong. Our governance and compliance, and safety and environment committees, established in 2016, report to the board and include executive team members who deliver our sustainability agenda across the group and independent third-party specialists.

While senior management set our strategy and have oversight of issues, our ESG strategy is carried into each part of our business by ESG champions, strategic and functional leaders, and separate environment, social and governance working groups. These leaders and working groups also provide feedback to senior management so we can continuously improve our ESG performance.

Governance – Speak-up culture

Our employees are empowered to ask questions and raise concerns about values and ethics, and they have a right to do so without fear of reprisal. We have clear processes to encourage employees and others to speak up to a supervisor, or someone from Human Resources or Group Compliance. In every country where we operate there is a 24/7 hotline for employees and contractors to call, and a reporting button on our external website that generates an email to the Group Compliance team.

A rigorous framework ensures every concern is fully investigated, addressed fairly and equitably, tracked and followed up. In each case, Group Compliance triages the issue and assigns it to appropriate managers and people in our Group Compliance, Legal and Human Resources teams who evaluate each report and determine the next steps.





Governance – Ethical business practices

Acteon's Compliance Handbook and supporting policies set out our expectations for ethical business practices. They address topics such as human rights, anti-corruption and bribery, and trade compliance. We also have policies on confidentiality and the protection of company intellectual property and assets; rules on anti-competitive practices; procedures to address conflicts of interest; and strict information security protocols.

Our Group Compliance and Legal teams are responsible for all policies related to ethical business standards. They function under the oversight of the Group General Counsel and Head of Corporate Risk, and all key compliance matters are discussed at quarterly meetings and are subject to Board approval when required.

We operate a speak-up culture and strictly prohibit retaliation against any employee for reporting in line with our policies.





Governance – Human rights and labour

At Acteon, we will not support or deal with any business knowingly involved in slavery or human trafficking. Our modern slavery statement sets out the steps taken to ensure slavery and human trafficking are not present in our supply chains or any part of our business.

We uphold a policy prohibiting retaliation against or victimisation of anyone who reports concerns about slavery and human trafficking. Employees can report concerns to line managers, compliance leads or advocates, the Group Compliance team, or via a confidential third-party compliance helpline and website.

Governance – Supply chain and third parties

Corporate integrity, responsible sourcing, and worker safety and well-being are of paramount importance to Acteon. These core principles are reflected in our Supplier Code of Conduct (“Code”), which establishes the minimum standards that must be met by any entity that supplies products or services to Acteon. The Code is issued to all our suppliers.

Minimum standards set out in our Code include

- **Health and safety:** suppliers are expected to work towards our guiding health and safety principle of zero harm to our employees and third parties.
- **Environmental responsibility:** all suppliers shall ensure their operations comply with all applicable environmental laws relating to waste disposal, emissions, discharges and the handling of hazardous and toxic materials.

- **Anti-bribery and corruption:** all suppliers shall comply with all applicable laws to prevent bribery and corruption.
- **Anti-money laundering:** suppliers shall not engage in any activity that could support money laundering, including transacting in cash.
- **Sanctions and trade compliance:** all suppliers shall comply with all sanctions, embargoes and debarred lists issued by the UK, USA, EU, UN and any other trading bloc or jurisdiction relevant to the supply of products or services.



See our website for governance policies



Governance – Protecting privacy

We appreciate the importance of data privacy and the responsibilities we have as an organisation when processing people's personal data.

Our data privacy and protection approach is guided by our Data Protection Policy, associated procedures and the relevant laws and regulations in the locations where we operate.

We organise annual data privacy training for employees who handle personal data and offer a range of tools and resources in compliance with some of the strictest data protection standards. We also require suppliers and contractors to comply with all applicable privacy regulations. As a global organisation, we have safeguards for the transfer of personal data within our organisation.



Governance – Information security

As a company committed to cybersecurity, we strive to protect our clients and colleagues, their data and the broader digital ecosystem, while promoting a sustainable and responsible approach to cybersecurity. We recognise that cybersecurity is a business imperative and a social responsibility, and we are dedicated to playing our part in creating a secure and trustworthy digital future.

We recognise that cyber threats are ever present. To ensure the resilience of our operations, we have appropriate IT governance and full alignment of our IT, cybersecurity and business strategies. Our IT and cybersecurity strategies follow the industry-recognised ITIL and NIST frameworks respectively, facilitating effective and prudent management of IT and cybersecurity resources supporting long-term business success.

To ensure our colleagues are up to date and on guard, we run regular phishing simulations and a suite of relevant training modules. We currently have a SecurityScorecard B rating (83/100).^{*} Supported by a clear policy, we bring behaviour and technology together to improve our cybersecurity posture and aim to achieve an A rating in 2024.

B 83/100

^{*}Ratings are from F (worst) to A (best).



We understand your challenges and see your opportunities.

Acteon supports the offshore renewable energy, nearshore construction, and oil and gas industries by delivering commercial and environmental benefits and helping to enable the energy transition.

www.acteon.com

