CGG SERVICES (NORWAY) AS

THE NORWEGIAN TRANSPARENCY ACT (ÅPENHETSLOVEN)

STATEMENT 2023
This statement is made on behalf of the Board of CGG Services (Norway) AS in accordance with the Transparency act enforceable from July 1st, 2022. It makes public the policies and processes in place within CGG Services (Norway) AS to ensure respect of fundamental human rights and decent working conditions in connection with the production of goods and services and address adverse impacts on fundamental human rights and decent working conditions.

ORGANIZATION STRUCTURE AND BUSINESS

CGG Services (Norway) AS is a subsidiary of the French CGG SA Group (www.cgg.com), a global technology and HPC leader that provides data, products, services and solutions in Earth science, data science, sensing and monitoring. With a unique portfolio CGG supports its clients in efficiently and responsibly solving complex digital, energy transition, natural resource, environmental, and infrastructure challenges for a more sustainable future. CGG employs around 3,400 people worldwide.

Within the CGG Group of Companies, CGG Services (Norway) AS mainly conducts its business through offices across Norway, which provide a wide range of environmental, geological and geosciences services, alongside a multi-client library of data available for license.

CGG Services (Norway) AS had a 2022 turnover of about $90 million and employed 66 employees at year end 2022.

CGG Services (Norway) AS is a member of the Confederation of Norwegian Business and Industry (NHO) whose work is to promote the business contribution to sustainable development. CGG Services (Norway) AS is also a member of the Norwegian Oil and Gas Association which, among other things, works to improve risk management related to working environment issues, to enhance health and safety and to provide guidelines in the areas of Competence, Employment, Environment, HSE & Operations, and Industrial Policy.
CGG POLICIES ON FUNDAMENTAL HUMAN RIGHTS AND DECENT WORKING CONDITIONS

To manage the risk of non-respect of fundamental human rights and decent working conditions, CGG Services (Norway) AS follows the CGG Group policies and management systems, which function in line with the Transparency Act requirements.

The CGG Business Code of Conduct, available in ten languages, sets out the rules and expected behavior to enable the Group to conduct its business with integrity. All employees must adhere to its principles and requirements. In this code, CGG commits to the Protection of People and Environment by covering notably the health and safety, Security, Human rights, fair employment practices and equal opportunities matters. In 2022, the Business Code of Conduct was promoted using variety of communication channels, including Company Newsflashes, Town hall meetings, company intranet and internal Newsletters.

Furthermore, the Group’s HSE Policy stipulates that CGG recognized all underlying international ILO conventions and laws and complies with all applicable national and industry regulations.

CGG’S SUPPLY CHAINS

CGG Services (Norway) AS supply chain encompasses rental and maintenance of its facilities and IT equipment in addition to the suppliers used to acquire the Earth Data or support our business activities. Suppliers are mainly based in Norway and represent 81% of the supply chain and 63% of the 2022 spend.

In 2022, CGG Services (Norway) AS purchased 67% of supplied good and services from suppliers based in European Economic Union (89% of the suppliers) from countries that have signed all eight International Labor Organization (“ILO”) fundamental labor conventions regarding labor, child labor, discrimination, and freedom of association.

In addition, 31% of the Norwegian supply chain were made through UK based suppliers (where 100% were intercompany transactions with CGG Services (UK) Ltd) and 2% were made through US-based suppliers (where 100% were intercompany transactions with CGG Services (US) Inc.). Although the US has not signed all eight ILO conventions, as a member it respects the principles concerning the fundamental rights which are subject of these conventions.

CGG Services (Norway) AS is part of Achilles suppliers’ network which gives visibility and transparency in the supply chain and registered in Magnet JQS which is a service that supports qualification of suppliers on the Norwegian Continental Shelf.
The “Caring for Human Rights and Communities” document is available to all employees. It reaffirms CGG management commitment to respect and promote human rights, and details rules and recommendations related to the eight fundamental international ILO conventions.

The Group-level CGG Ethics Committee endorses and communicates the Business Code of Conduct, ensuring that our standards are widely distributed and that all CGG employees are properly trained in this topic. Employees and third parties can contact the Ethics Committee at any time (directly or anonymously) via the EthicsPoint Hotline, hosted by NAVEX Global, an independent third party, to report concerns or alleged violations in relation to our Business Code of Conduct. Employees are regularly reminded of the way to contact our Ethics Committee via a variety of communication channels.

CGG SUPPLIERS’ ADHERENCE TO OUR VALUES

In its Code of Conduct, CGG commits to respecting and promoting Human rights. The Company adheres to the United Nations Universal Declaration of Human Rights which proclaims certain fundamental rights and freedoms. These include the right to life, liberty and security, equal rights for men and women, the right to protection under the law and against discrimination, slavery, servitude, torture or inhumane or degrading treatment, and freedom of speech, thought, conscience and religion.

CGG expects all its suppliers to respect the same principles and is committed to using suppliers who operate consistently in accordance with its values, and who maintain high standards for health, safety, and environment (HSE), ethics and corporate social responsibility.

As stated in the Business Code, CGG is committed to managing suppliers and subcontractors to ensure their respect of human rights. CGG has a CGG Supplier Code of Business Conduct document, which describes the minimum social and environmental standards expected from CGG suppliers, in particular regarding compliance with fundamental labor and human rights. It covers Business Ethics, Compliance, Local Communities, Human and Labor Rights as well as Health, Safety, Security & the Environment. We expect all suppliers to CGG to adhere to this Code of Conduct and dated and signed (if applicable) by our suppliers.

If this is not possible (our suppliers may follow their own internal code and/or be so large that it would be impossible to follow all their customers’ codes), we may add terms in our purchasing orders mentioning that they should conform themselves to our Supplier Code of Conduct.

During 2022, all new suppliers were asked to comply with this document during their registration process to become a CGG supplier.
TRAINING TO RAISE AWARENESS

CGG trains personnel and partners to ensure a high level of understanding of the importance of respecting fundamental human rights and decent working conditions in its supply chain and business. For several years, the Group has pursued a program to educate and train employees in ethical practice and the principles and commitments of our Business Code of Conduct. Endorsed by the Ethics Committee, it is reinforced by the implementation of an e-Learning course for all employees, which was introduced in 2012.

CGG has a series of mandatory online training programs that all current CGG employees must periodically complete, and with are included in our onboarding of new employees. These include Anti-Corruption, InfoSec (Information Security Awareness), Ethics@CGG, Trade Compliance Awareness and Prevention of Discrimination & Harassment.

CGG’S EFFECTIVENESS IN RESPECTING OF FUNDAMENTAL HUMAN RIGHTS AND DECENT WORKING CONDITIONS

As part of the initiative to identify risks inherent and relevant to its activities, CGG conducts a Sustainability Materiality analysis every three years. The results from the most recent analysis and resulting key focus areas can be found at CGG.com.

Regarding CGG Services (Norway) AS, the risk of non-respect of fundamental human rights and decent working conditions in connection with our supply chain and Norway operations is considered as very low.

In 2022, CGG has launched a global employee survey organized by Great Place To Work® France in order to measure the quality of working life. The results will be available in the second part of 2022 and based on responses actions will be taken to improve quality of working life.
CGG’S PLANNED IMPROVEMENTS

In 2023, CGG shall accelerate its campaign requesting main suppliers (i.e., those representing 80% of annual spend) to join the EcoVadis program. CGG aims at disclosing in 2023 the first evaluation of the ESG performance of its Supply Chain and initiate a continuous improvement cycle on sustainability issues associated with suppliers.

Oslo, June 2nd, 2023,

Marianne Lefdal
Country Manager CGG Services (Norway) AS