



2024 ANNUAL REPORT



TRUE.
BLUE.
TRANSITION.

3 SUSTAINABILITY STATEMENT

In line with the EU Corporate Sustainability Reporting Directive (CSRD), SBM Offshore is committed to comply with European Sustainability Reporting Standards (ESRS) requirements.

This section explains how SBM Offshore has managed potential and actual impacts, along with risks and opportunities related to environmental, social and governance matters, focusing on the ESG Material Topics defined through a Double Materiality Assessment (DMA).

In 2023, SBM Offshore conducted the DMA in accordance with CSRD and ESRS requirements. This assessment focused on identifying and evaluating material impacts, risks and opportunities, laying the foundation for an enhanced sustainability statement.

Since then, SBM Offshore has reviewed and realigned the structure and narrative of the annual report to facilitate compliance with CSRD and ESRS requirements and give a clearer description of business activities and how strategic priorities are aligned with the defined ambitions and targets.

With a better defined reporting framework, SBM Offshore is focusing on refining data disclosures, which involves optimizing processes to collect, manage and validate the information, to ensure data accuracy and compliance. This included carrying out gap assessments to guide CSRD and ESRS implementation, and concentrating on areas such as governance, strategy alignment and the integration of SBM Offshore's business model with identified material impacts, risks and opportunities. As a result, SBM Offshore is also reviewing and enhancing policies, actions, metrics and targets.

SBM Offshore will focus on continuously improving ESG data management and internal controls to enhance data quality, performance management and reporting. Concurrently, SBM Offshore will monitor the upcoming sector-specific standards and prepare for XBRL tagging requirements to ensure readiness and compliance.

3.1 GENERAL INFORMATION

GENERAL BASIS FOR PREPARATION

This sustainability statement was prepared on a consolidated basis for SBM Offshore N.V. and its subsidiaries and aligns with the consolidated financial statements scope, covering information from January 1 to December 31, 2024.

The report aims to provide relevant information based on the outcomes of due diligence processes and the Double Materiality Assessment. To enable understanding of SBM Offshore's material impacts, risks and opportunities and produce a set of data that meets the qualitative characteristics⁷ required by ESRS, this sustainability statement is divided per material topic in different topical sections, 3.4 to 3.8, and a final section, 3.9, along with the methodologies and boundaries adopted. Where relevant, the sections include material information related to upstream and downstream value chain actors (e.g. clients and suppliers in the emissions section, and suppliers and yards in the human rights section), disclosing at which level within SBM Offshore's value chain and own operations the material topic arises, as well as the related policies, actions and targets.

Voluntarily, SBM Offshore started the CSRD/ESRS implementation at the beginning of 2023. The implementation and compliance process continued in 2024, but now with a more mature approach. SBM Offshore's sustainability statement focuses on the affected stakeholders⁸ and the users of sustainability statements⁹ and was prepared in accordance with ESRS' cross-cutting standards and topical standards (according to material topics). At the time of publishing this Annual Report, there is no approved ESRS sector standard. Where relevant, other international reporting sector standards or frameworks have been used (e.g. IPIECA, IOGP, SASB, GRI), alongside a reference to clarify the guidance applied.

DISCLOSURES IN RELATION TO SPECIFIC CIRCUMSTANCES

TIME HORIZONS

Instead of the five-year period mentioned generically by ESRS, as permitted, SBM Offshore has adopted intervals of 1 year, 1 to 6 years and more than 6 years, for short-, medium- and long-term respectively, in order to align with the existing processes of identification and management of material impacts, risks and opportunities.

⁷ ESRS requires fundamental and enhancing qualitative characteristics of information: relevance and faithful representation; and, comparability, verifiability and understandability, respectively.

⁸ Individuals or groups whose interests are affected or could be affected, positively or negatively, by SBM Offshore's activities and direct and indirect business relationships across value chain.

⁹ Primary users of general-purpose financial reporting and other users of sustainability statements.

EMISSIONS ACROSS THE VALUE CHAIN

This sustainability statement includes the disclosure of emissions across the value chain in section 3.4.2 – scope 3 GHG emissions. Among the fifteen different categories of scope 3 GHG emissions defined by GHG Protocol, three are the most relevant and significant to SBM Offshore: Category 13 – Downstream Leased Assets, which covers more than 95% of the total; Category 1 – Purchased Goods and Services and Category 6 – Business Travel.

The Downstream Leased Assets category involves GHG emissions from assets under lease contracts. As a service provider, SBM Offshore collects primary data and reports emissions on behalf of the clients, ensuring accuracy and transparency in the most significant part of the emissions data from the value chain.

SBM Offshore has been reviewing the scope 3 GHG emission categories and aims to keep improving the value chain emissions accounting and reporting in the coming years, in order to explore significant opportunities for

improvement and to support strategies to partner with suppliers and clients to address climate impacts throughout the value chain.

To support transparency and enable comparability, SBM Offshore employs well-recognized emission factors and industry-average data sets. Further details on the GHG emissions boundaries and methodology is included in the Boundaries section 3.9.

INCORPORATION BY REFERENCE

In addition to references made throughout the Annual Report to different topics and chapters, the complete ‘incorporation by reference’ table, specifying ESRS data points disclosed outside the sustainability statement, can be found in in the ESG content index, section 3.10.

GOVERNANCE

The overall ESRS governance information is incorporated into chapter 2 with the below reference.

Role of the Management Board and Supervisory Board (ESRS 2 – GOV-1)	Reference
The composition and diversity of the Management Board and Supervisory Board	Sections 2.1.2; 2.1.3; 2.2
The roles and responsibilities of the Management Board and Supervisory Board in exercising oversight of the process to manage material impacts, risks and opportunities	Sections 2.1.2; 2.1.3; 2.2
The expertise and skills of the management and supervisory bodies regarding sustainability matters, or their access to such expertise and skills	Sections 2.1.2; 2.1.3; 2.2
Sustainability matters addressed by the Management Board and Supervisory Board (ESRS 2 – GOV-2)	
The description of how the Management Board and Supervisory Board are informed about sustainability matters	Sections 2.1.2; 2.1.3; 2.2; 2.5
Integration of sustainability-related performance in incentive schemes (ESRS 2 – GOV-3)	
The incentive schemes and remuneration policies linked to sustainability matters for members of administrative, management and supervisory bodies	Sections 2.3
Statement on Due Diligence (ESRS 2 – GOV-4)	
Embedding due diligence in the governance, strategy and business model	Sections 1.4; 2.1.2; 2.1.3; 2.2; 2.5
Engaging with affected stakeholders in all key steps of the due diligence	Sections 3.2; 2.5.2; 3.5.3; 3.6.1
Identifying and assessing adverse impacts	Sections 1.4; 2.5; 3.2; 3.4; 3.5; 3.6
Taking action to address those adverse impacts	Sections 1.4; 2.5; 3.2; 3.4; 3.5; 3.6
Tracking the effectiveness of these efforts and communicating	Sections 1.4; 2.5; 3.2; 3.4; 3.5; 3.6
Risk Management and internal controls over sustainability reporting (ESRS 2 – GOV-5)	
How sustainability is embedded and integrated in SBM Offshore’s overall risk management and internal control processes and systems	Sections 1.4; 2.1; 2.5; 3.3

Integration of sustainability-related performance in incentive schemes (ESRS 2 – GOV-3)

The Management Board remuneration policy includes a short-term incentive based on key performance indicators. One of the performance areas is sustainability performance. For each of the performance measures, the Supervisory Board, upon the recommendation of the Appointment and Remuneration Committee, determines the target achievement. There are no performance targets for the Supervisory Board, which allows for an unmitigated focus on long-term value creation. For a further description of the

key elements of the Management Board remuneration policy, the integration of sustainability-related performance therein and the proportion of variable remuneration dependent on sustainability related targets, see sections 2.3.1, 2.3.2 and 2.3.4.