

DOF Group ASA human rights and slavery statement

The United Kingdom's Modern Slavery Act 2015 requires companies that supply goods and services in the UK and have a total annual turnover of GBP 36 million or more, to publish an annual statement describing the steps it has taken to ensure that slavery and human trafficking are not occurring in its supply chains or in any parts of its own business.

The DOF Group recognises that slavery and human trafficking are some of the worst forms of human rights violations. DOF respects and protects human rights, and we prohibit all acts of modern slavery, including use of forced and child labour.

DOF recognises the following definitions:

- Modern slavery: One person controls another person for personal gain, such as profit. The control can be physical, financial or psychological.
- Human trafficking: the act of transporting or coercing people in order to benefit from their work or service.
- Forced labour: a person has no control or choice over their work. Their earned wages are often taken by someone else, who also often controls where they live and who they can speak to.
- Child labour: work that deprives children of their childhood, their potential and their dignity, and that is harmful to their physical or mental development.

We do not tolerate any violation of the UN Global Compact Principles¹, Maritime Labour Convention² or its corporate Business Code of Conduct³, which are the foundations of our practices and this statement.

Below is the DOF Group's Human rights and Slavery Statement for the period 1st January 2024 to 31st December 2024. The Statement has been approved by the CEO.

Our structure, business, and supply chain

Our structure

DOF AS ('the Company') is the parent company for the DOF Group of companies ('the Group'). As a public listed company on Oslo Stock Exchange benchmark Index OSEBX, all market related information can be found in the Investor Relations pages of the DOF Group website⁴.

DOF is headquartered in Bergen, Norway and has operations in Angola, Argentina, USA, Australia, Brazil, Canada, Norway, Singapore and United Kingdom.

Our business

DOF is a leading provider of integrated subsea project and marine services to the global offshore energy market. DOF operates in three segments of the offshore services market, strategically defined by activities and vessel types:

- PSV (Platform Supply Vessels).
- AHTS (Anchor Handling Tug Supply vessels).
- Subsea (Subsea vessels and Subsea engineering services).

DOF is positioned as a solid player in the oil and gas industry with our investment in a state-of-the-art fleet, combined with a strong safety culture and a flexible business model.

1. <https://unglobalcompact.org/what-is-gc/mission/principles>

2. <https://www.ilo.org/global/standards/maritime-labour-convention/lang-en/index.htm>

3. <https://www.dof.com/documents/code-of-business-conduct>

4. <https://www.dof.com/investor-relations>

As of 31st of December 2023, DOF has a global workforce of more than 4,000 and a total fleet of 54 vessels, of which eight vessels are on management or hired in.

Our supply chain

At present, DOF has approximately 3,500 suppliers globally.

DOF seeks to ensure effective and purposeful implementation of the supply chain activities towards the promotion of a sustainable business for the benefit of the Company and its partners.

All activities undertaken within the various supply chain functions shall meet DOF's criteria within fairness, integrity and transparency to achieve the best value for money, whilst protecting the company from unwanted or illegal practices such as fraud, corruption, collusion, human trafficking, modern slavery and other unethical practices.

We have good, long-term relationships with many of our tier 1 suppliers, which gives us a strong foundation for transparency and collaboration.

Governance

DOF is a values-driven business with an open-door policy and "people over profit" mindset. The Board of Directors is ultimately responsible for decision-making on economic, environmental and social impacts.

The Board of Directors observes and ensures that the Company implements sound corporate governance and the Sustainability team operationalise the human rights agenda across the business, which includes modern slavery.

Addressing modern slavery and the wider human rights agenda sits in the 'people' pillar of Environment, Social and Governance (ESG) strategy. The foundation of our ESG strategy are the World Economic Forums four pillars of 'principles of governance, planet, people and prosperity'⁵, which align with the UN Global Compact Sustainable Development Goals⁶.

Annually, we refresh our double materiality assessments which gives DOF an overview of the progress of its sustainability activities and impact. The purpose of the assessment is to identify the biggest materialistic risks, to further ensure strong governance and create effective policies and guidelines for the organisation.

The Board of Directors is obliged to provide a report on the Company's Corporate Governance in the Directors'

report or in a document that is referred to in the Directors' report. The report on the Company's Corporate Governance must cover sectional items of the Corporate Governance Code of Practice and provide an explanation of the reason for any deviation and what alternative solution it has selected. The Group has drawn up a separate policy for Corporate Governance, and the Board of Directors has decided to follow the Norwegian Recommendation for Corporate Governance without reservation.

Our human rights/ anti-slavery policy suite

In line with our people over profit mentality, we have several policies that are relevant to upholding human rights and for preventing, identifying and addressing modern slavery in our operations and supply chain. Our policy set is developed and continually reviewed by in-house experts, suppliers and external specialists. Our Policies are approved at Executive level.

Our policy set that mitigates human rights risks is as follows:

- [Integrated Annual Report 2022](#)
- [DOF Group Code of Conduct](#)
- [Speak up for Ethics – Quick Guide](#)
- [Business Integrity and Ethics Policy](#)
- [Workplace Harassment Policy](#)
- [DOF Group Ethics Helpline](#)
- [DOF Anti-Corruption Policy](#)
- [DOF Equal Employment Opportunity Policy](#)
- Declaration of Maritime Labour Compliance
- Global Standard – DOF Internal Training Requirements
- Global Standard - Procurement Management
- Global Standard - Recruitment Management
- Global Standard - Reporting Unacceptable Conduct
- Guideline – DOF Compliance Activities
- Guideline – Just Culture
- Crew Manual
- Manual – Risk Management
- Onboard Compliant Procedure
- Disciplinary Procedure

The Group recognises and respects the employees' right of association, organisation and collective bargaining, and the Group's guidelines conform to the labour regulations stipulated by all local authorities.

5. <https://www.weforum.org/stakeholdercapitalism/our-metrics/>

6. <https://sdgs.un.org/goals>

We report on our progress in the human rights space in the following reports and statements:

- Integrated Annual Report 2022
- DOF ASA Human Rights and Slavery Statement 2023
- Transparency Act Statement 2023
- Materiality Report 2022

DOF recognises that it has many policies relating to human rights and will seek to consolidate our policy set in the coming year. This will make it simpler for rights holders to understand their rights and entitlements, and access supports and processes.

This year we have updated these policies to ensure they are addressing key issues, challenges and enable the right opportunities:

- Anti-corruption Policy
- Safety, Environment, Health and Quality Policy of DOF Brazil

Our due diligence processes to prevent and address modern slavery in our business and supply chains

Vendor process

DOFs support using local suppliers and infrastructure to support the economies in our areas of operation.

DOF assesses a potential vendor's human rights commitment and program against the UN Global Compacts Ten Principles⁷, which includes key areas of human rights and labour conditions through a Vendor Evaluation Questionnaire and assessment process which includes evidence requests. On the back of these assessments, DOF scores the vendors responses and decides whether to progress with a vendor, carry out further due diligence or to stop a candidate progressing in the process. DOF also collaborates with Factlines⁸ to gain more visibility and evidence on required documentation.

If a potential vendor does not have a required policy or a modern slavery statement, they are required to agree to operate in accordance with the DOF Code of Business Conduct – Business Integrity & Ethics requirements and obligations. A refusal to comply with the DOF Code of Business Conduct requirements will automatically terminate the assessment process.

Recruitment and management of direct and third-party workers

DOF operates in a highly regulated sector. Levels of education and certification, combined with rigorous checks during the hiring process, provide a strong degree of protection for DOF permanent workforces via its direct recruitment. However, DOF recognises that anybody may become vulnerable to exploitation through situations relating to real or perceived debt, mental health, substance abuse, or even via the requirements for visas.

Due to the project-based nature of our work, we also rely on temporary workers. We carry out due diligence in our manning agencies and recognise that this supply chain is high-risk to modern slavery and labour exploitation.

DOF supports hiring temporary workers as permanent members of staff where it is viable to do so. We recognise that this creates economic stability for our workforce and reduces exploitation risks.

Audit process

DOF conducts its own audits, and these are mostly carried out on vessels while docked at shipyards. Audits are completed at least once a year per vessel and cover all shipping functions through a vessel tour and seafarer interviews. Audits measure against the standards of ISO elements like environment and HSE, in addition to Maritime Labour Convention elements such as seafarers' rights, contracts, welfare and work/rest balance.

Responding to issues and providing remediation

DOF takes many steps to ensure the safety and welfare of our permanent, temporary and supply chain workforces on land and at sea, but we know that we must remain diligent with issues, and remedy them when we find them.

DOF has a number of channels for workers to raise their concerns. These include escalating concerns through a vessel's chain of command, directly to a vessel's onshore contact or through our confidential Ethics Helpline. DOF has received worker welfare and human rights concerns predominantly through vessel chains of command and through the Ethics Helpline⁹.

We take each concern or issue seriously and consider them on a case-by-case basis, investigate them thoroughly and provide an appropriate remedy.

7. <https://unglobalcompact.org/what-is-gc/mission/principles>

8. <https://en.factlines.com/>

9. <https://www.dof.com/documents/business-integrity-and-ethics-policy>

Our key human rights risks

DOF recognises that the maritime sector has many human rights risks which are constantly evolving.

Issues associated with our sector of operation include: weak implementation of regulations and standards, high use of migrant labour and lack of awareness of labour rights in working countries, operating in isolation which gives limited visibility of labour practices, limited access to legal remedies, especially in countries with weak legal systems, and challenges with responsibility where there is mass subcontracting.

The procurement team has categorised all its suppliers and has a good system that allows for visualisation of risk. DOF recognises the following as our key risks, and we plan to address these by collaborating with our suppliers over the coming years:

Shipyards: DOF vessels go to various shipyards around the world for maintenance and refit. Shipyards have many businesses operating and stakeholders working on sites which can cause a lack of defined responsibilities, especially for labour standards and human rights. Typically, these docks and yards are large, there are lot of people going in and out every day and there is often a high number of migrant workers. These workers provide different services, such as lower-skilled manual labour, like cleaning and painting, and are vulnerable to exploitation due to limited fluency in the local language and in-country support network.

Because of the nature of shipyards, it is hard for DOF to attain visibility of worker demographics and employment practices. There are also challenges with who holds responsibility for remediation in shipyards should a victim of modern slavery be identified.

Manning agencies: DOF uses manning agencies to source temporary labour. Charging recruitment fees to seafarers is explicitly prohibited under the Maritime Labour Convention, but sadly it is still a widespread and systemic issue in our industry. Such fees are often very expensive, forcing many seafarers to take loans from loan sharks with high-interest rates, leaving them in debt and trapped in bonded labour. In addition, unscrupulous manning agencies can illegally deduct fees from their wages. Being isolated at sea makes it even harder to escape bonded labour because of limited freedom of movement.

Catering: Many often forget that catering and hospitality

staff are seafarers too and that they are also susceptible to human rights risks, such as withholding of wages, debt bondage and forced labour. By working at sea, catering workers are isolated and leaves little opportunity to escape potential exploitative situations. DOF has received concerns and issues relating to its catering staff on vessels and continues to view this as a key risk.

DOF has risk controls in place for these risks (see due diligence section), but we are looking to increase our visibility of worker demographics, recruitment journeys and employment practices over the next two years. This will enable us to tailor further controls to our key risks, to ensure we prevent them from materialising as much as possible.

Our effectiveness in ensuring that slavery and human trafficking is not taking place

Our award-winning approach

DOF has received Amnesty International's acknowledgment as one of the top-five global companies based in the Nordics in 2022, with the strongest score relating to human rights and employer responsibility for a third consecutive year. DOF is committed to maintaining this position and recognises that collaboration is key to ensuring we are up to date on evolving social issues and risks as well as applying pressure for change.

Our Partnerships

Slave-Free Alliance: In 2022, we partnered with Slave-Free Alliance for three-years to support DOF in maintaining its industry leading approach to human rights. Slave-Free Alliance acts as an extension of our team and critical friend. In 2023, together we carried out a global, multi-stakeholder gap analysis across our business to identify best practice and areas for improvement and focus. From the document review and discussions, we developed a three-year human rights strategy which will ensure that we continuously develop our human rights program in a way that considers our leverage in the most effective spaces and targets our key risk areas.

Our key performance indicators

Key projects over the next two years include:

- Update our Transparency Statement for 2024
- Develop and communicate a Supplier Code of Conduct

- Create a responsible exit process which will be part of our responsible sourcing process
- Exploring new training formats for crew which they can do on their phone in an appealing gaming format to increase engagement on the topic.

By using local suppliers and infrastructure, we support many companies and organisations that are outside the DOF core business and vital to delivering organisation. This estimate is based on various studies performed by the oil & gas industry trade organisations.

Our training and capacity building program

DOF recognises that training and raising awareness of human rights, and particularly modern slavery, across its employee base and supply chain is key to mitigating, identifying and remediating human rights risks and issues.

Training program

All employees have access to training material in DOF Training Portal and the course catalogue gives access to both optional and mandatory e-learning courses. The Code of Conduct module is mandatory for all DOF staff, which includes awareness of DOF's stance on human rights.

Employees can also complete additional training on the topic. This includes:

- The Amnesty eLearn modules that have been made by Amnesty with input from companies in the industry and DOF. The modules are interactive and provide the basic Human Rights requirements and means to be a responsible employer.
- Vessel captains and their crews must complete our Maritime Labour Convention e-learning, which provides an overview of our international labour standards obligations.

Supply chain

Also, where necessary, DOF will commit to training all stakeholders within its supply chain to understand the practical and legal aspects of DOF's Code of Business Conduct requirements, and the possible implications and the consequences to DOF and themselves of failing to comply with DOF's requirements, and legislative obligations.

Awareness raising

DOF recognises the effectiveness of promoting regular information to promote knowledge of human rights, resources and employee obligations.

In 2023, DOF created 'spot the signs literature' for its vessels which highlights the key signs of exploitation in maritime environments and the safe channels to raise concerns. These will be placed in the communal and private quarters of our crews so they can safely access material. While DOF crew must have a good level of English to work on our vessels, we are translating these posters in the main native languages of our seafaring workforce to support their understanding of their rights.

During the year DOF will continue internal and external training to raise the awareness of modern slavery among DOF's global workforce. The training is given in e-learning courses as well as in classrooms and at our offshore leaders' conferences.

Our engagement with Rafto foundation in their "FUTURE-PROOF" program will continue, allowing interactions with other companies sharing best practice and learning from each other. The program aims to help businesses with implementing the United Nations Guiding Principles on business and human rights.

Through our partnership with Slave Free Alliance, we will utilise their global expertise to strengthen our efforts to prevent human rights violations through all parts of DOF's value chain.

Bergen, 2 January 2024



Mons S. Aase
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