



DEEPOCEAN GROUP HOLDING AS

Henrik Ibsensgate 4  
0255 Oslo  
Norway

## MODERN SLAVERY STATEMENT 2022

### 1. INTRODUCTION

This statement is made pursuant to Section 54 of the UK Modern Slavery Act 2015. It is made on behalf of DeepOcean Group Holding AS and its subsidiaries (collectively referred to as “DeepOcean”) and sets out the steps that DeepOcean has taken in 2022 to prevent modern slavery and human trafficking from taking place within our operations and supply chain.

DeepOcean is party to the UN Global Compact (UNGC). In signing the UNGC, DeepOcean is committed to supporting and respecting the protection of internationally proclaimed human rights.

### 2. OUR COMPANY

DeepOcean is a world-leading ocean services provider, enabling the energy transition and the sustainable use of ocean resources, offering survey, engineering, project management, installation, maintenance, and recycling services in oil and gas, offshore renewables, deep sea minerals, and other ocean operations. DeepOcean is headquartered in Oslo, Norway, with operations in Europe, the Americas, and Africa. Operational centres are located in Haugesund (Norway), Stavanger (Norway), Aberdeen (UK), Sète (France), Houston (U.S.), Ciudad del Carmen (Mexico), and Accra (Ghana).

DeepOcean is a trusted independent solutions provider with highly skilled industry experts, using world-class fit-for-purpose tools and technology to drive cost-efficient and safe operations. DeepOcean delivers innovative engineering solutions focusing on remote and unmanned operations and digitally enabled services while continuously striving to lower the carbon footprint.

In 2022, DeepOcean had over 1,200 employees worldwide, including over 300 specialised engineers, delivering people-driven, engineering-focused solutions to customers' most complex ocean challenges. Moreover, DeepOcean utilised remotely operated vehicles (ROVs) to perform subsea operations, in tandem with both owned and leased vessels as a platform for ROV operations in various locations across the globe. Furthermore, DeepOcean is developing (i) remote operating centres to enable ROVs to be operated from the shoreside as other vessels and offshore plants in the near future, and (ii) unmanned surface vessels (USVs), to reduce the need of conventional vessels and crew for certain types of work, such as deploying ROVs. This will minimize the offshore transport time and maximize the utilization of the ROV operators and experts.

### 3. POLICIES

Our Anti-Slavery & Anti-Human Trafficking Policy sets out the company's clear and unambiguous commitment to respect and protect human rights and freedoms, and describes the systems and processes that guard those freedoms against abuse of any kind, including guidance on how to report concerns. These systems and processes form our fundamental human resources principles and are

driven by the Business Conduct & Ethics Policy. These policies are available for all personnel through our intranet.

#### **4. SUPPLY CHAIN**

While our policies and procedures are vital in securing commitment to prevent slavery and human trafficking across our operations, they also set our expectations of business partners across the supply chain, which consist primarily of customers, suppliers, and operating partners. All suppliers are required to sign the Supplier Declaration wherein they confirm their commitment in working with us to promote and maintain the highest standards of corporate and social responsibility; this includes commitments to the ethical provision of labour and proper management of their own supply chains. All suppliers are required to register in the Pre-Qualification Database, which involves the carrying out of due diligence on various areas, including integrity and environment, social, and governance (ESG) matters. Questions regarding human rights and labour practices are part of the registration and re-evaluation process.

#### **5. RISK**

We mitigate the various risks which we consider that we are exposed to by means of a compliance program, which consists of mandatory online training and classroom seminars, integrity due diligence of suppliers and business partners, and audits of high-risk suppliers on a case-by-case basis. In addition to risk assessment and raising awareness through training, our procurement contracts incorporate contractual clauses requiring our suppliers to respect and uphold human rights in their operations.

#### **6. TRAINING**

In 2022, compliance classroom training was provided to managers and leadership roles as part of a leadership training program, which included topics on human rights and modern slavery issues as well as how to effectively report and deal with any concerns. We intend to include these topics in compliance classroom training sessions for all non-leadership personnel taking place in 2023. In addition to classroom training, we continue to maintain an annual e-learning certification that is mandatory for all employees where these topics are covered.

#### **7. REPORTING**

Our Business Code & Ethics Policy and Anti-Slavery & Anti-Human Trafficking Policy enable and encourage all our employees, suppliers, and other stakeholders to report any concerns they might have about unethical or illegal behaviour or suspected wrongdoing. We do not tolerate any discrimination or retaliation against anyone who makes such a report. Reports may be made through a confidential telephone line or online form. Our reporting channel is administered by a specialist third party which safeguards confidentiality and the reporter's anonymity by providing the opportunity for moderated and anonymized dialogue with our Compliance Department.

#### **8. COMPANY APPROACH AND THE WAY FORWARD**

As part of our commitment to our stakeholders we continually strive to conduct our business responsibly and comply with applicable laws and regulations with a view to supporting fundamental human rights. We are committed to preventing slavery and human trafficking in our operations and

we recognise that we have a responsibility to take a robust approach to combat human rights violations. Furthermore, we continually endeavour to protect health and safety as well as promote diversity, inclusion, and equality.

In 2022, we commenced a process to review and update our Supplier Declaration Form and supply chain monitoring procedures with a view to achieve compliance with the newly introduced Norwegian Transparency Act that came into effect on 1 July 2022. We expect that in 2023 a revised Supplier Declaration Form will be issued to our suppliers and that the implementation of a supply chain ESG monitoring platform will be implemented into our operations. This is designed to provide greater transparency in relation to human rights in our supply chain and operations generally.

In addition, our future initiatives include: (i) further strengthening our integrity due diligence processes to mitigate risk and enhance transparency; (ii) raising sustainability awareness through education and training; and (iii) continuously mapping human rights risks corresponding with the development of our business and the global geopolitical landscape.

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The information presented in this statement has been prepared in accordance with the requirements of the UK Modern Slavery Act 2015 and associated regulations. The signing of this statement has been delegated to the Chief Executive Officer of DeepOcean Group Holding AS and the DeepOcean group of companies.

A handwritten signature in black ink, appearing to read 'Øyvind Mikaelson', written over a horizontal line.

Øyvind Mikaelson  
Chief Executive Officer, DeepOcean