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Transparency Act statement

The Norwegian Transparency Act entered into force on 1 July 2022. The Act shall promote enterprises' respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services and ensure the general public access to information regarding how enterprises address adverse impacts on fundamental human rights and decent working conditions. In compliance with this law, DOF will publish an annual statement describing the steps taken to ensure safeguarding of fundamental human rights and decent working conditions. The DOF Group does not tolerate any violation of the UN global Compact principles or the Business Code of Conduct, which is the foundation of this statement.

Below is the DOF Group's annual Statement in relation to the Act. The statement has been approved by the CEO of DOF.

Our statement

Our business

DOF is a leading provider of integrated subsea project and marine services to the global offshore energy market. Established in Austevoll in 1981, DOF has continued a proud tradition of delivering safe and quality services to our customers.

DOF operates globally and have regional offices in Norway, UK, Africa, South America, North America, and Asia-Pacific.

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), and Subsea (Subsea vessels and Subsea engineering services).

Guidelines and procedures

Guided by our values, DOF is committed to respecting human rights. Our policies and standards ensure our operations do not breach laws, conventions, or UN guidelines, upholding International Law and Labour Organisation Conventions. Our effort to handle actual and potential adverse impact on fundamental human rights are supported by the following initiatives:

- UN Global Compact
- OECD Guidelines for Multinational Enterprises
- UN Guiding Principles on Business and Human Rights
- The Universal Declaration of Human Rights
- The ILO Declaration of Fundamental Principles of Rights at Work
- The United Kingdom Modern Slavery Act 2015
- The Norwegian Shipowners Association's approach to Labour and Human Rights

DOF Due Diligence approach ("Aktomhetsvurdering")

We have applied the contemporary approach of a double materiality assessment to guide strategy and provide a more accurate and complete accounting of our ESG commitment. Analysing both the potential breach of human rights in our operations and supply chain, as well as the potential impacts it might have.

The outcome of the assessment conclude with exposure for breach of Human Rights is mainly when DOF is entering shipyards with many subcontractors involved, fulfilling local content in contracts and personnel supplied by manning companies and agencies.

DOFs mitigating activities built up on our Business Management System has reduced the risk into an acceptable level.

Supplier Self-assessment

All suppliers of DOF are evaluated in a supplier self-assessment data base. The self-assessment is a risk-based approach and built up on the requirements in the UN Global Compact. The assessment also evaluates the geographical area according to Transparency International.

Vendor evaluation

Based on the supplier self-assessment it is decided if the supplier fulfil DOF requirements for Human Rights.

Global Supplier Audit Regime

DOF have a global supplier audit regime where supplier audits are done regularly.

Complete Due Diligence approach

In high-risk areas and with critical suppliers the company will perform a thorough Due Diligence process to analyse and evaluate the supplier in closer details.

Our initiatives**The Code of Business Conduct**

DOF COBC is the backbone of ethical guidance and supports our organisation and partners to comply with Human Rights and Business principles. If a vendor does not have an Anti-bribery and corruption policy or an anti-slavery statement in place, they are required to agree to operate in accordance with the DOF Code of Business Conduct.

Training

All DOF employees are required to complete a Code of Conduct training course to ensure knowledge and awareness of our ethical principles including human rights.

Amnesty International's eLearning course on Business and Human Rights has been rolled out in our training portals and is mandatory for employees in positions that are exposed to issues related to Human Rights.

DOF training material within Human Rights and Code of Conduct is available for suppliers and partners on our DOF webpage.

Employee rights

The right to freely associate, organise and collectively bargain is maintained within DOF.

Freedom from slavery

Protecting human rights along the supply chain is a duty as global citizens, and by auditing for human rights in our supply chain, we lift standards, enable wealth generation, additionally create opportunities for local business and suppliers. DOF has partnered with the Slave-Free Alliance, an organisation dedicated to slave-free supply chains, to update our corporate human rights impact assessment.

Ethics helpline

DOF is committed to conducting business with the highest ethical standards and according to applicable laws, rules, and regulations. Therefore, we encourage anyone inside or outside our organisation to always report any suspected ethical breaches/unethical behaviour by DOF or its employees.

A robust 'feedback loop' is an essential tool in a compliance culture. DOFs 'ethics helpline' give all stakeholders a 24/7-hour accessible tool to report serious concerns. The report can also be submitted anonymously.

The helpline can be found and used from our webpage.

Enquiry related to Human Rights performance.

Should you have any other enquiries related to our Human Rights Performance, please contact us on: management@dof.com. If you use this channel, please include in the subject "Åpenhetsloven" and we will respond within 3 weeks of receiving the inquiry.

This information is also available on our web page.

Responsibility and application

The Chief Executive Officer of the DOF Group is accountable to the Board of Directors for ensuring that this statement is implemented.

Bergen, 25th of April 2023



Mons S. Aase
CEO - DOF GROUP ASA