## GRI Reference Index

Abbreviations

AR- Annual Report 2021

SR- Sustainability Report 2021

## GRI Reference Index - General Disclosures

Topic	GRI Standard	GRI Disclosure	Odfjell Drilling reference	Boundary Omission
GRI 102: General Disclosures 2016	5			
Organisational	102-1	Name of the organisation	AR page 9	Group
profile	102-2	Activities, brands, products, and services	AR page 8-9 The Group does not operate in markets where any of its services or products are banned.	Group
	102-3	Location of headquarters	Bergen House, Crawpeel Road, Altens Aberdeen AB12 3LG	Group
	102-4	Location of operations	AR page 9 Significant operations: United Kingdom, Norway and UAE	Group
	102-5	Ownership and legal form	AR page 40	Group
	102-6	Markets served	AR page 9	Group
	102-7	Scale of the organisation	i: SR page 5 ii: AR page 8 iii: AR page 75 iv: AR page 63 v: Quantity of services by geographic service income: MODU 1, ENERGY 3, OWS 19	Group
	102-8	Information on employees and other workers	SR page 30-34 Operations are not affected by seasonal variations. Variations are linked to the number of contracts the Group has at any given time.	Group
	102-9	Supply chain	AR page 29	Group
	102-10	Significant changes to the organisation's and its supply chain	i: Retirement of Deepsea Bergen, no changes in manning or supply base locations. ii: Not applicable iii: Not applicable	Group

Topic	GRI Standard	GRI Disclosure	Odfjell Drilling reference	Boundary Omission
	102-11	Precautionary Principle or approach	AR page 31 SR page 54	Group
	102-12	External initiatives	ISO 9001, ISO 14001, ISO 45001, ISO 31000, API Q2 (OWS UAE), IADC (OD UK), IOGP, GRI, ILO, United Nations Universal Declaration of Human Rights, Oslo Stock Exchange, Code of Practice for Corporate Governance	Group
	102-13	Memberships of associations	Bergen Næringsråd, Bergens Rederiforening, HR Norge, Innkjøpsforeningen, International Association of Drilling Contractors (USA), International Association of Drilling Contractors (North Sea Chapter), Kranteknisk Forening, Lifting Equipment Engineer Association, Maritime CleanTech, NIMA Forbund, Norwegian Shipowners Association, Norwegian Business Travel Association - NBTA, Norwegian-British Chamber of Commerce, Næringsforeningen i Stavanger, Philippine Norway Business Council, UK Drilling Contractors Association, PSA Safety Forum	Group
Strategy	102-14	Statement from senior decision- maker	AR page 4 AR page 54	Group
Ethics and integrity	102-16	Values, principles, standards, and norms of behaviour	AR page 9, 53 SR page 41-45	Group
Governance	102-18	Governance structure	AR page 31, 39-40, 44 SR page 6, 43-44, 54 https://www.odfjelldrilling.com/investor/corporate- governance/	Group
Stakeholder	102-40	A list of stakeholder groups	SR page 14-15	Group
engagement	102-41	Collective bargaining agreements	SR page 38	Group
	102-42	Identifying and selecting stakeholders	SR page 13-14	Group
	102-43	Approach to stakeholder engagement	SR page 14-15	Group
	102-44	Key topics and concerns that have been raised	SR page 13-15	Group
	102-45	Entities included in the organisation's consolidated financial statements	a: AR page 118-119 b: Not applicable	Group

Topic	GRI Standard	GRI Disclosure	Odfjell Drilling reference	Boundary Omission
	102-46	Defining report content and topic Boundaries	SR page 11	Group
	102-47	List of the material topics	SR page 13	Group
	102-48	Restatements of information	Not applicable	Group
	102-49	Changes in reporting	No changes since previous report for 2020	Group
	102-50	Reporting period	Calendar year 2021	Group
	102-51	Date of most recent report	2 April 2019	Group
	102-52	Reporting cycle	Annual	Group
	102-53	Contact point for questions regarding the report	Merete Lie Holen, VP Sustainability	Group
	102-54	Claims of reporting in accordance with the GRI Standards	SR page 11	Group
	102-55	GRI content index	SR page 11	Group
	102-56	External assurance	SR page 11	Group

## GRI Reference Index - Material Topics

GRI Standard	Number	GRI Disclosure	Odfjell Drilling reference	Boundary Omission
EMISSIONS				
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its Boundary	SR page 9-11, 13, 18	Operational control
	103-2	The management approach and its components	SR page 6, 14, 18, 54	Operational control
	103-3	Evaluation of the the management approach	SR page 19-20, 54	Operational control
GRI 305: Emissions 2016	305-1	Direct (Scope 1) GHG emissions	a: SR page 19, AR page 13-14 Fuel consumption is logged in each rig's electronic log book in cubic metres of Marine Gas Oil (MGO). The density factor of MGO for converting to tonne MGO is based on average temperature in diesel tanks in the rig fleet, or collected directly from supplier product specification sheets. b: SR page 19 c: No biogenic CO <sub>2</sub> emissions. d: Due to great variations between operating years, we compare current emissions with those from operations when no emission reducing initiatives were implemented per rig, based on Poosmor ATA in anchored operational mode. This reflects rig technical specifications, and remove effects that wind, currents, waves, well conditions and drilling program have on emissions. e: Conversion factor between MGO and CO <sub>2</sub> , is retrieved from NOROG 044 v. 20 "Recommended guidelines for emission reporting". f: Operational control. CO <sub>2</sub> emissions are reported for all rigs, irrespective of ownership and excise tax payment obligation. g: The Group's CO <sub>2</sub> emissions within scope 1 are calculated based on measuring the combustion of Marine Gas Oil (MGO) from the engine and boilers on each rig.	
	Own disclosure	Emissions of CO₂ equivalent e	On contract (1000 tonnes) 2019: 164.5 2020: 179.2 2021: 175 Off contract (1000 tonnes) 2019: 74 2020: 55.8 2021: 17.5 Per contracted day (tonnes) 2019: 97.5 2020: 123 2021: 108 Same methodology and conversation factors as GRI 305-1.	Operational control
	Own disclosure	NO <sub>x</sub> emissions	On contract (tonnes) 2019: 2,157 2020: 2,319 2021: 1,952 Off contract (tonnes) 2019: 1,003 2020: 603 2021: 235.5 Per contracted day (tonnes) 2019: 1.2 2020: 1.5 2021: 1.2 Nitrogen oxide emissions are calculated with conversion factor tonne fuel/kg NOX based on the Norwegian excise tax regulations.	Operational control

GRI Standard	Number	GRI Disclosure	Odfjell Drilling reference	Boundary	Omission
	Own disclosure	SO <sub>x</sub> emissions	On contract (tonnes) 2019: 55.3 2020: 60.2 2021: 58.8 Off contract (tonnes) 2019: 24.9 2020: 18.2 2021: 5.8 Per contracted day (tonnes) 2019: 0.03 2020: 0.04 2021: 0.03 Sulphur Oxide emissions are calculated with conversion factor between tonne fuel and kilo $SO_x$ based on Statistics Norway's "Emission factors used in the estimations of emissions from combustion".	Operational control	
	305-2	Energy indirect (Scope 2) GHG emissions	a: SR page 19 b: The Group has locations in markets where grid customers can be provided with product or supplier-specific data in the form of certificates, contracts with generators or suppliers for specified source electricity, supplier labels, supplier emission rates, green tariffs, contracts, residual mixes, or other contractual instruments. The Group only has a certificate of origin on one location, so total energy indirect emissions are materially the same as location based emissions.  The Group's market based energy indirect emissions in tonne CO <sub>2</sub> /year: 2019: 584 2020: 714 2021: 601 c: SR page 19 d: Base year for calculation is 2019, the first year with available data. e: IEA Annual GHG emission factors and Nordic mix. f: Operational control. g: Emissions are calculated based on consumption records from invoices or online databases from utility provider.		Energy indirect emissions from locations where the premises are leased and shared with other companies, and billing is not based on actual consumption, are not included. This data is currently unavailable, but we are working on applying an area based approach for these locations.
	305-3	Other indirect (Scope 3) GHG emissions	a, b: SR page 19 c: No biogenic CO <sub>2</sub> emissions. d: There are no categories or activities included in the calculation other than those specified. e: Travel: Base year is 2019, the first year with available data. Logistics: Base year is 2021, the first year with available data. f: SR page 20 Travel: DERFA (Department for Environment, Food and Rural Affairs for the United Kingdom and Northern Ireland) conversion factors for greenhouse gas (GHG) reporting: https://www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2020. Logistics: Standards Norway "Methodology for calculation and declaration of energy consumption and GHG emissions of transport services (freight and passengers)". EcoTransit 2020. WRI/World Business Council for Sustainable Distribution og Network for Transport Measures (NTM).	Group	Travel booked outside of official travel agent is not included. Travel booked through travel agent accounts for approx. 90% of total travel cost in 2019, 91.5% in 2020 and 96.8% in 2021.  Freight booked outside of frame agreement logistics provider is not included. Freight booked through logistics provider accounts for approximately 48% of total logistics cost in 2021.

GRI Standard	Number	GRI Disclosure	Odfjell Drilling reference	Boundary	Omission
			g: SR page 20 Travel: Emissions are calculated based on standard $CO_2$ emission factor per kilometre travelled, for each cabin class and categorised by domestic, short haul and long haul. Logistics: Emissions are measured based on pick up locations for goods and trip legs. GPS data is used to calculate number of kilometres, and conversion factor between fuel type and $CO_2$ applied on a per kilometre basis for the relevant freight category (land, sea and air). The Group's portion of emissions when means of transport is shared is calculated by the relevant order's share of the total capacity of the transport vehicle.		
ENERGY					
GRI 103: Management	103-1	Explanation of the material topic and its Boundary	SR page 9-11, 13, 21	Operational control	
approach 2016	103-2	The management approach and its components	SR page 6, 14, 21, 54	Operational control	
	103-3	Evaluation of the the management approach	SR page 21, 54	Operational control	
GRI 302: Energy 2016	302-1	Energy consumption within the organisation	a: SR page 21 b: Fuel consumption from renewable sources is zero. c: i. SR page 21 ii-iii. We do not have separate reporting for heating or cooling, all consumption is reflected in c i). iv. Zero, no steam consumption d: i-iv Zero, no electricity, heating, cooling or steam sold. e: SR page 21 f: Fuel consumption comes from consumption of Marine Gas Oil (MGO) from the engine and boilers in the rig fleet, and logged in each rig's electronic log book. The density factor of MGO for the purpose of converting to tonne MGO, is based on average temperature in the rigs' diesel tanks or collected directly from supplier product specification sheets. Electricity consumption within the organisation is calculated based on consumption records from invoices or online databases where available from utility provider. g: Conversion factor between tonne MGO and Joule is retrieved from https://www.ssb.no/energi-og-industri/statistikker/energiregn/aar/2012-11-13?fane=om	Operational control	Electricity consumption on locations where the premises are leased and shared with other companies, and billing is not based on actual consumption, are not included. This data is currently unavailable, but we are working on applying an area based approach for these locations.

GRI Standard	Number	GRI Disclosure	Odfjell Drilling reference	Boundary Omission
SPILLS (TO SEA A	ND LANI	D)		
GRI 103: Management	103-1	Explanation of the material topic and its Boundary	SR page 9-11,13, 22	Operational control
approach 2016	103-2	The management approach and its components	SR page 6, 14, 22, 54	Operational control
	103-3	Evaluation of the the management approach	SR page 22-23, 54	Operational control
GRI 306: Effluents and waste 2016	306-3	Significant spills	SR page 23	Operational control
OCCUPATIONAL	HEALTH-	- AND SAFETY		
GRI 103: Management	103-1	An explanation of the material topic and its Boundary	SR page 9-11, 13, 27	Operational control
approach 2016	103-2	The management approach and its components	SR page 6, 14, 35-37, 54	Operational control
	103-3	Evaluation of the the management approach	SR page 36, 54	Operational control
GRI 403: Occupational health and safety 2018	403-1	Occupational health and safety management system	a: Odfjell Drilling has implemented an occupational health and safety management system which is in compliance with "ISO 45001 Occupational health and safety" and "ISO 31000 Risk management". It is based on legal requirements applicable to all regions where we operate and risks associated with our operations. b: The Group's management system applies to own employees and third parties working on Odfjell Drilling premises (e.g. rig, workshop) and own employees and subcontractors working on client's facilities (e.g. platforms). Bridging documents are established between Odfjell Drilling and clients to ensure a unified list of procedures to follow.	Operational Control
	403-2	Hazard identification, risk assessment and incident investigation	a,b: AR page 24-26, 31 c: All employees and suppliers have "stop the job" authority and an obligation to do so if safety is at stake. This is communicated by top management and addressed in our management system. Employees and third parties are encouraged to report (anonymously, personally or through safety delegates) any hazard, condition, near miss and	Operational Control

GRI Standard	Number	GRI Disclosure	Odfjell Drilling reference	Boundary Omission
			incident they observe by use of SAFE card or equivalent. Regardless of means of reporting, personnel who reports will not be subject to reprisals. Senior VP QHSE is also designated person according to the ISM Code to ensure the grievance mechanisms. d: AR page 26	
	403-3	Occupational health services	Odfjell Drilling has contracted occupational health service to external providers. This service includes consultations, general advice and specific health risk assessments. Regular evaluation meetings are held with the occupational health service provider. Working environment surveys are used to measure well-being.	Operational Control
	403-4	Worker participation, consultation and communication on occupational health and safety	a: Worker participation and consultation are secured by:  • Hazard identification, risk assessments and determination of controls • Incident investigations • Development and reviews of HSE Policy, objectives and programs • Changes in the occupational health and safety management system. b: Workers engagement and participation processes can be direct or through workforce representatives and/or safety committees. Odfjell Drilling has a full time main safety delegate located onshore, who is elected by employees and acts as a link between safety delegates and management. The main safety delegate is involved in all relevant health and safety processes. Working environment committees are established at relevant levels of the organisation and organised under a corporate working environment committee. Responsibilities, meeting frequencies and decision-making authority are described in procedures.	Operational Control
	403-5	Worker training on occupational health and safety	SR page 38-39 Information to employees and third parties is secured during planning, risk assessments, meetings, intranet, e-mails and information boards. All employees and third parties are trained in accordance with defined requirements based on legislation, relevant standards and contract requirements. On-the-job training, workplace instructions and risk assessments ensure continuous practising and awareness. Competence is evaluated through recruitment, performance appraisals, practical and theoretical tests and competence assurance programs. Odfjell Drilling UK is accredited by IADC for its Competence Assurance Programme.	
	403-6	Promotion of worker health		

GRI Standard Number	GRI Disclosure	Odfjell Drilling reference	Boundary	Omission
		a, b: Health care services are available offshore. Some of our onshore office locations also have an available gym for employees. Odfjell Drilling has private insurance solutions (country based) for non-occupational medical and healthcare services for our employees.	Operational Control	
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	AR page 23-27 SR page 35	Operational Control	
403-9	Work related injuries	a: i, ii, iii and v: SR page 36 iv: The most common body parts injuried in 2021 were fingers (50%) and feet (40%). Most of the injuries were "squeeze" injuries and "struck by" injuries. 25% of the injuries occured during lifting operations and 25% during material handling. The remaining incidents occured during maintenance and drilling operations, workshop and housekeeping activities. In SR 2020, the numbers of work related injuries forMODU and Energy employees included non-Odfjell Drilling workers. This has been corrected in this report. b: i, ii, iii and v: SR page 36 iv: See a iv): Odfjell Drilling does not separate between types of work-related injuries for employees and non-Odfjell Drilling workers. c: Work related hazards are assessed by identifying, understanding and mitigating risk through approved risk assessment methods. Categories of hazards are based on type of activity and accident experience in our industry (best practice, legislations, standards and clients' input). Dropped objects, "struck by"/"caught between" and falls are typical hazards contributing to serious incidents. The hierarchy of controls is used to eliminate hazards or reduce risk level, for example design improvements, update of maintenance programs and establishment of work instructions. d: SR page 36, AR page 26 e: Rates are calculated based on 1,000,000 working hours. f: Onshore employees are not included for MODU and Energy. For non-Odfjell Drilling workers, onshore hired-in personnel are not included. Work related incidents have traditionally only been reported based on offshore operations due to risk profile. We will re-evaluate this going forward. g: SR page 36	Operational Control	b: Frequencies for number of hours worked for non-Odfjell Drilling workers are not included, Odfjell Drilling does not separate working hours for non-Odfjell Drilling personnel on corporate level.

GRI Standard	Number	GRI Disclosure	Odfjell Drilling reference	Boundary Omission
			Work related injuries are captured through the Group's reporting system Synergi. Serious incidents are reported to management by a 1-Alert system within an hour after the incident occured. Statistics are communicated monthly to the Executive Management Team. The reporting standards are IOGP Safety data reporting user guide - scope and IADC Reporting guidelines.	
	Own disclosure	Lost time incident frequency (H1)	AR page 26	Group
		Total recordable incident frequency (H2)	AR page 26	Group
	Own disclosure	Dropped objects > 40 joule frequency	AR page 26	Group
DIVERSITY AND	EQUAL OF	PPORTUNITIES		
GRI 103: Management	103-1	Explanation of the material topic and its Boundary	SR page 9-11, 13, 29	Group
approach 2016	103-2	The management approach and its components	SR page 6, 14, 29-30, 54	Group
	103-3	Evaluation of the the management approach	SR page 31-34, 54	Group
GRI 405: Diversity and equal opportunity 2016	405-1	Diversity of governance bodies and employees	SR page 31-32	Group
	Own disclosure	Nationalties distribution	SR page 33	Group
		% of local staff based on nationality on each location	SR page 33	Group
	Own disclosure	Ratio of basic salary and remunerations of women to men	Gender pay gap reports are published on https://www.odfjelldrilling.com/who-we-are/gender-pay-gap/according to legal requirements.	Norway and UK

	Number	GRI Disclosure	Odfjell Drilling reference	Boundary Omission
ANTI-CORRUPTION	NC			
GRI 103: Management approach 2016	103-1	Explanation of the material topic and its Boundary	SR page 9-11, 13, 46	Group
	103-2	The management approach and its components	SR page 6, 14, 46, 54	Group
	103-3	Evaluation of the the management approach	SR page 47, 54	Group
GRI 205: Anti Corruption 2016	205-1	Operations assessed for risks related to corruption	AR page 31 SR page 46-47 All Business Areas performed risk assessment according to Odfjell Drilling requirements, relevant for anti- corruption risk assessments.	Group
	205-3	Confirmed incidents of corruption and actions taken	SR page 47	Group
	_	Employees undergone anti-	SR page 47	Group
	Own disclosure	corruption training	Six page 47	Огоар
RESPONSIBLE A	disclosure	corruption training	Six page 47	
GRI 103: Management	disclosure	corruption training	SR page 9-11, 13, 48	Group
GRI 103:	disclosure	ND SUPPLIERS  An explanation of the material		·
GRI 103: Management	GENTS AI	ND SUPPLIERS  An explanation of the material topic and its Boundary  The management approach	SR page 9-11, 13, 48	Group
GRI 103: Management	GENTS AI 103-1 103-2	ND SUPPLIERS  An explanation of the material topic and its Boundary  The management approach and its components  Evaluation of the the	SR page 9-11, 13, 48 SR page 6, 14, 48-49, 54	Group
GRI 103: Management approach 2016 GRI 308: Supplier environmental	GENTS AI 103-1 103-2 103-3	ND SUPPLIERS  An explanation of the material topic and its Boundary  The management approach and its components  Evaluation of the the management approach  New suppliers that were screened using environmental	SR page 9-11, 13, 48  SR page 6, 14, 48-49, 54  SR page 50, 54  SR page 49 100 % of all new suppliers are screened on environmental	Group Group Group

GRI Standard	Number	GRI Disclosure	Odfjell Drilling reference	Boundary Omission
GOVERNANCE	AND TRAN	ISPARENCY		
GRI 103: Management	103-1	An explanation of the material topic and its Boundary	SR page 9-11, 13, 43-44	Group
approach 2016	103-2	The management approach and its components	AR page 40-46 SR page 6, 14, 43-44, 54	Group
	103-3	Evaluation of the the management approach	SR page 44, 54	Group
GRI 102: General Disclosures 2016	102-29	Identifying and managing economic, environmental, and social impacts.	AR page 33-34, 44, 53-54 SR page 6, 54	Group
	102-34	Nature and total number of critical concerns	SR page 44	Group
	Own disclosure	Cases reported in whistle- blower portal or other channels	SR page 44	Group