

This statement is made by Odfjell Drilling Ltd and is applicable to all Odfjell Drilling Ltd subsidiaries as at 31 December 2022 and is made pursuant to the UK Modern Slavery Act 2015.

Organisational Structure and responsibilities

Odfjell Drilling Ltd is an international operator and owner of harsh environment mobile offshore drilling units, employing over 1,300 people. The company's headquarters is in Aberdeen, and it is listed on the Oslo Stock Exchange. The location of Odfjell Drilling's activities depends on the contract back-log. More detail about our business can be found at [Who We Are - Odfjell Drilling](#) and [Our Fleet - Odfjell Drilling](#). Supply Chain and HR activities are delivered by a centralised service provider with main processes applicable across the business.

As parent company of the Odfjell Drilling group, the board of Odfjell Drilling Ltd acknowledges its responsibility for the ethical and strategic direction of the group and therefore our Human Rights Policy is owned and approved by the Board of Directors. Operational management is delegated to the Chief Executive Officer (CEO) of Odfjell Drilling AS. The commitment stated in this policy is integrated in other key processes such as supply chain management, HR management, tender and contract processes, and risk management. It is the CEO and Executive Management Team's responsibility to ensure that this policy governs the group's business activities and their actual and potential impacts on human rights.

Commitment and Human Rights Policy

Odfjell Drilling Ltd is committed to high ethical standards, compliance and integrity, as presented on our website: [Ethics & compliance – Odfjell Drilling](#). We are committed to the prevention of all forms of modern slavery and human trafficking and to upholding the Universal Declaration of Human Rights.

Our core values, which can be found at [Vision and values - Odfjell Drilling](#), set the tone, help to create our culture and give a common set of principles which everyone working for Odfjell Drilling must follow. These values extend into our supply chain. Our values are promoted and upheld through our group wide Code of Business Conduct which helps us to meet our ethical and legal commitments. It guides our people to do the right thing. We strive to protect and enhance human dignity of our people and those who have dealings with us. Additionally, we have set specific Corporate Social Responsibility Principles which include integrity and anti-corruption, and respect for human rights and contribution to local communities.

The Odfjell Drilling group's business shall be conducted based on the International Bill of Human Rights, the United Nations Guiding Principles on Business and Human Rights, and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work. These include particularly, but are not limited to:

- Right to health
- Right to equality for the law, equal protection of the law and rights of non-discrimination
- Just and favourable conditions of work
- Right to join trade unions and to strike
- Freedom from slavery and forced labour
- Rights for the protection of the child, freedom from child labour

Our Human Rights Policy describes our high-level commitment to human rights and is in line with requirements of the UK Modern Slavery Act and the Norwegian Transparency Act. Odfjell Drilling shall avoid infringing the human rights of others and aim to appropriately address adverse human rights impacts of the business. Risk assessments will form the foundation for continuous improvement of the Odfjell Drilling group's human rights efforts. All employees are expected to comply with the policy and its human rights commitment. [Human rights policy](#)

Due diligence, risk management and risk assessment

It is our target to have human rights integrated into the overall risk assessment processes in the group, ensuring it is operationalised as part of day-to-day business. The objective of the human rights risk assessment process is to identify and assess actual and potential adverse impacts on fundamental human rights and decent working conditions that the Odfjell Drilling group has either caused or contributed toward. This includes anything directly linked with the group's operations, products, or services via the supply chain.

Human Rights risk assessments have been carried out during 2022. These were conducted in the form of workshops consisting of cross functional members, facilitated by subject matter experts from within the business. Details on risk identification and assessment and how risks are prioritised and mitigated can be found on our website: [Human rights - Odfjell Drilling](#)

The main actual and potential adverse risk categories currently identified in the risk assessment process and discussed in the Human Rights section on our website are:

- Third party personnel employment standards, working conditions and compensation
- Working Environment
- Fair Treatment and equitable payment practices

Within our organisation

As a global drilling contractor, Odfjell Drilling meets all the standards and requirements under The Maritime Labour Convention, 2006 (MLC, 2006). This includes the use of licensed private recruitment and placement services where we perform regular third party audits to ensure compliance within the global workforce of the Mobile Offshore Drilling Units. The MLC 2006 establishes minimum working and living standards for all seafarers working on ships flying the flags of ratifying countries.

Areas of priority are to ensure that all locations maintain the highest safety standard and protect the health of our employees and others associated with our operations. Our aim is to ensure individuals are treated with dignity and respect, have the correct competency and mandated certifications to ensure a safe working environment, as well as the opportunity to raise grievances.

Our aim is to ensure equitable pay practices regardless of gender, age, race, sexual identity, religion, or country of origin.

We conduct employee surveys which gives both onshore and offshore employees an opportunity to provide feedback in relation to their employment satisfaction. Findings are analysed and followed up on a group level as well as in the department where an issue is identified. SVP HR in Odfjell Drilling is responsible for conducting the survey and developing action plans relating to the results of the survey.

Odfjell Drilling has close relations with relevant unions and employee associations, which are represented in the business. The common recognition of this relation between the employer and employees is documented through the Union agreements based on national legislation. We support freedom of association and collective bargaining.

Within supply chain

Odfjell Drilling expects all contractors, suppliers, agents and business partners to share our commitment to human rights, implement it in their own value chain and report any situation in which human right infringements are suspected. By signing the Supplier Code of Conduct, our suppliers confirm this commitment, and this is a prerequisite for becoming an approved supplier for the group.

By agreeing to abide by the Odfjell Drilling Supplier Code of Conduct the supplier agrees to:-

- Maintain the highest standards of integrity in all business transactions worldwide
- Actively support and respect the United Nations Universal Declaration of Human Rights
- Maintain the freedom of association and the right to collective bargaining
- Comply with internationally recognised labour standards covering wages, working hours, disciplinary practices, employment contracts and working conditions
- Permit audits by independent auditors upon the request of Odfjell Drilling
- Report any infringement of the Supplier Code of Conduct via our whistleblower link on our website directly to the Compliance Officer

Failure to comply may lead to termination of any contract, disqualification as a supplier and reporting to the relevant authorities.

We have a "become a supplier process" where potential suppliers are required to complete a pre-qualification which incorporates risk assessment of potential for corruption and has now been updated to also cover human rights risks. The nature of the services and country of operation are taken into account when determining the level of risk.

All potential new suppliers are risk assessed and given a "high risk" or a "low risk" score based on self-assessment on human rights. Suppliers with "high risk" are handled as non-conformances and followed up individually. Given the large number of suppliers (over 6,000) we have set priorities to screen the new suppliers coming in and then to screen also the existing suppliers based on risk areas.

Cooperation with our suppliers and participating in key networks is an important focus area for us in fulfilling our human rights commitment.

Key performance indicators

Odfjell Drilling's whistle-blower portal, which can be found on our website, can be used by employees and external parties, including clients, suppliers, business partners and other representatives. This facilitates the raising of concerns in a safe environment for non-compliance including situations where the Odfjell Drilling group has contributed to direct or indirect, actual or potential adverse effects on human rights and decent working conditions.

Our Sustainability Report 2022 [ESG resources - Odfjell Drilling](#), provides more details of activities in the Human Rights and Responsible Supply Chain sections.

Training

New employees and contractors are required to undertake e-learning programmes covering our Code of Business Conduct. Employees receive training on use of our Company Management System where all policies and procedures are available.

Managers in the group shall ensure that all employees are aware of, trained in and understand Odfjell Drilling's commitment to human rights, in addition to ensuring that the human rights risk assessment is duly implemented and followed up where required.

We continue to work on reinforcing the importance of preventing modern slavery and protecting human rights in our organisation and in our supply chain through risk management, employee training and communications. Our website provides a facility to request information regarding how actual and potential adverse impacts on human rights [Human rights - Odfjell Drilling](#)

This Statement was approved by the Odfjell Drilling Ltd Board on 29 June 2023.



Simen Lieungh
Chair, Odfjell Drilling Ltd

29 June 2023