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CEO Statement – Code of Conduct

Dear Colleagues,

At Odfjell Drilling, trust is the foundation of everything we do. This trust comes from our clients, our partners and from each other, and it depends on how we conduct ourselves every single day.

Our vision, Powered by People. Defined by Culture. Enabled through Operational Excellence., is more than words. It reflects who we are and how we work. Living up to this vision means acting with integrity, respecting the law and upholding the highest ethical standards in everything we do.

The Code of Conduct is your guide. It sets clear expectations for how we behave, make decisions and represent Odfjell Drilling. It applies to all of us, whether we work offshore or onshore and in every country where we operate. Doing the right thing is never optional. It is a responsibility we all share.

There will be times when the right course of action is not immediately clear. In those situations, use the Code of Conduct. If you are unsure, speak up. Ask your manager, your HR representative, our Compliance Officer or the General Counsel. We have zero tolerance for retaliation against anyone who raises a concern in good faith.

Compliance is not a formality. It is part of our culture and a cornerstone of our licence to operate. By following the Code of Conduct, you protect our reputation, strengthen relationships and secure the future of our business. I expect every employee, director and representative of Odfjell Drilling to read the Code of Conduct carefully and apply it every day.

Together, we will ensure that Odfjell Drilling remains a trusted partner and a company we are proud to work for.

Sincerely,

Kjetil Gjersdal

Chief Executive Officer
Odfjell Drilling

1 PURPOSE AND SCOPE

1.1 Purpose

Ethical conduct and sound corporate governance are fundamental to secure Odfjell Drilling's integrity, reputation, assets, and relationship with authorities, clients, suppliers, and other business associates, the local communities in which we operate, as well as investor value and confidence.

This Code of Conduct (the "Code") outlines Odfjell Drilling's requirements to ethical conduct, integrity and compliance with applicable laws and regulations, and internationally accepted guidelines and conventions on corruption, money laundering, fraud, human rights and similar activities. The main purpose of the Code is to prevent misconduct by providing Personnel with clear expectations, rules and guidance. Secondly, it aims to ensure that should misconduct nevertheless occur, it is detected, reported and remediated.

1.2 Scope

The Code applies to all companies within the Odfjell Drilling group and to all individuals employed by or serving as a director in a company in the Odfjell Drilling group, whether permanent, temporary or contracted ("Personnel"). Any action taken, active or passive, either on behalf of Odfjell Drilling or when representing Odfjell Drilling in any way, shall be compliant with the Code. This applies at all times and in any jurisdiction.

2 ACCOUNTABILITY

2.1 Internal governance

The board of directors of Odfjell Drilling Ltd. oversees the implementation of the Code.

The executive management team has the overall responsibility for ensuring that the Code is understood and respected and for dedicating necessary resources to ensure effective implementation and monitoring of compliance, including internal control.

The compliance team, comprising the Compliance Officer and the General Counsel, is responsible for Odfjell Drilling's compliance programme, including the Code, the whistleblower portal and the business compliance portal. The compliance team inter alia offers advice and guidance on the Code to all Personnel and handles reports of actual or alleged misconduct.

Each head of department is responsible for implementation and compliance with the Code in the day-to-day operation of his/her department. Each manager with personnel responsibility is responsible for ensuring that Personnel reporting to him/her is aware of and understand the Code and complete required training.

All Personnel have a personal responsibility for reading, understanding, and complying with the Code at all times.

2.2 Business associates and other third parties

Odfjell Drilling is committed to ensuring compliance and ethical conduct throughout the value chain. The standards and actions of our business associates have an impact on workers and society, in addition to Odfjell Drilling's business and reputation.

All third parties (such as clients, suppliers, agents, representatives, joint venture partners, and other business associates) are subject to risk assessments prior to engagement and shall at an early stage be made aware of our expectations relating to ethical business conduct and compliance. For further guidance, please see the SCM Third Party Due Diligence and the High Risk Third Parties procedure.

Suppliers and high-risk third parties are also subject to human rights due diligence. For further guidance, please see the Human Rights Risk Assessment procedure.

All suppliers shall sign and confirm compliance to our Supplier Code of Conduct as part of the prequalification process. The Supplier Code of Conduct is built on the same ethical principles as this Code and establishes equivalent requirements for regulatory compliance, corruption and bribery, human rights, health and safety, conflict of interest, accuracy and retention of business records, fair competition, and business courtesies, including gifts, hospitality and expenses. Suppliers are audited regularly for compliance with the Supplier Code of Conduct.

To further ensure compliance, clauses on anti-corruption and business ethics, sanctions and human rights are included in all relevant contracts with third parties.

3 REPORTING CHANNELS

3.1 Whistleblower portal

The whistleblower portal is a channel for reporting concerns of misconduct or conditions in conflict with the Code. The whistleblower portal is available on Odfjell Drilling's website and intranet and is open to everyone, both internally and externally. Reports may be filed anonymously. Whistleblowers are urged to open a secure inbox in the portal, which opens a two-way dialogue with the compliance team for easy communication, while maintaining the whistleblower's anonymity.

Only the compliance team have access to reports made in the whistleblower portal. Reports will be handled with the required confidentiality and discretion, however, will be shared with other resources required for conducting necessary investigations. If required, reports will also be shared with the involved parties. The identity of the whistleblower, if known to the compliance team, will not be shared without prior discussion with the whistleblower.

All reports shall be investigated within reasonable time. How the report is investigated and handled depends on the nature of the case and may include interviews with the involved parties, the whistleblower and witnesses as well as review of documentation or other evidence. Any investigators working on a case shall be separate from the chain of management involved in the matter. If deemed required, external investigators may also be engaged.

Odfjell Drilling maintains a strict policy prohibiting any form of retaliation against individuals who, in good faith, report ethical or legal concerns.

3.2 Business compliance portal

Personnel shall report any action or situation that might cause a conflict with their role in Odfjell Drilling, such as external board/management positions, own side businesses, ownership in other businesses and gifts received or offered in connection with the role, in the business compliance portal. The portal is accessible from the Odfjell Drilling intranet site. Further guidelines on situations that shall be reported are included in chapter 4 and 5. Reports shall be sent without undue delay.

The business compliance portal is handled by the compliance team, who will evaluate the situation together with relevant resources. If the situation is unavoidable, or if approval shall be granted, the compliance team will require appropriate measures to be taken to eliminate the potential conflict of interest. This may include a change in tasks or department for the involved Personnel.

4 PERSONAL RESPONSIBILITIES

4.1 Compliance

All Personnel are required to fully comply with the obligations set out in this Code, including all applicable laws, rules, and regulations on which it builds or refers to.

If in doubt about how to understand and practice the Code, Personnel are urged to seek advice and guidance from the compliance team before acting. This also applies if Personnel have faced unclear situations or are unsure whether a situation was handled properly or how to proceed. In such situations it is essential that the compliance team is contacted as early as possible, both to ensure that Personnel are provided with the necessary assistance and to ensure the possibility of mitigating actions.

Personnel who fail to comply with this Code, either him-/herself or by directing, approving or condoning violations, who omits to report misconduct or who fails to cooperate with any investigation may be subject to disciplinary action as detailed in the Conflict Management procedure.

Personnel shall annually confirm their compliance with the Code.

Your contribution:

- Familiarise yourself with the Code, as well as other governing documents and applicable laws and regulations relevant to your work
- Conduct yourself in compliance with this Code, including laws and regulations and high ethical standards of integrity
- If in doubt, seek advice and guidance from the compliance team
- Confirm your commitment and adherence to the Code annually

4.2 Training

Personnel shall participate in training and information sessions, regardless of format, as directed by the compliance team. All new Personnel shall complete a course on the Code as part of their onboarding process. For existing Personnel, campaigns on specific courses will be conducted on a regular basis. Personnel who are particularly exposed to bribery and corruption risk through their work, are required to take annual refresher courses. The compliance team will measure and report participation and execution of training.

Your contribution:

- Participate and complete the compliance training assigned to you within the deadlines

4.3 Reporting

Personnel shall report any potential or actual infringement of the Code which they become aware of to the compliance team, either directly or through the whistleblower portal. Personnel may also report infringements and misconduct to their manager or contact person within human resources, in which case such person is responsible for reporting to the compliance team.

Further, Personnel shall report any external board positions, own side businesses, ownership in other businesses and received and offered gifts in the business compliance portal.

Your contribution:

- Report infringements of the Code
- Report situations which may cause a conflict of interests

5 PEOPLE AND WORKPLACE

5.1 Human rights and working conditions

Odfjell Drilling conducts its business in compliance with internationally recognised human rights and working conditions, namely the International Bill of Human Rights, the United Nations Guiding Principles on Business and Human Rights, and the International Labour Organization Declaration on Fundamental Principles and Rights at Work. This commitment is set out in the Human Rights Policy, which gives further information on how Odfjell Drilling works to protect and promote human rights in our own business and in the value chain.

Personnel shall ensure that they do not contribute to human rights violations. If Personnel become aware of any potential or actual violations of human rights that involves Odfjell Drilling, such concern shall be reported as described in chapter 3.1.

5.2 Safety and security

Odfjell Drilling maintains the highest safety standards and protects the health of our Personnel and others associated with our operations. We comply with HSE rules and regulations and have developed an HSE culture based on competence, involvement and commitment. All Personnel shall apply the Life Saving Rules and the Odfjell Drilling HSE rules.

Odfjell Drilling protects its Personnel, assets, and business from potential security threats, including cybersecurity threats. Security is an integral part of line management responsibility; the security and protection of Personnel is the overriding priority of all business activities.

Your Contribution:

- Comply with HSE rules and procedures
- Risk assess your work

- Act when you see unsafe behaviour and conditions

5.3 Harassment and Discrimination

Odfjell Drilling does not discriminate based on gender, gender identity, gender expression, pregnancy, leave in connection with childbirth or adoption, care responsibility, religion, belief, race, national or ethnic origin, descent, skin colour, language, cultural background, social group, disability, sexual orientation, marital status, age, political opinion or union membership, or a combination of any of these factors.

All Personnel have the right to work in an environment free from harassment, bullying and discrimination and have an obligation to contribute to safeguarding this for others. Odfjell Drilling actively work to maintain a working environment in which such behaviour is not tolerated. Personnel that conduct or tolerate harassment, bullying, or discrimination will be held accountable and may be subject to disciplinary action. For further guidance, please see the Harassment, Bullying and Discrimination procedure.

Your contribution:

- Treat you colleagues with respect and do not engage in harassment, bullying or discrimination
- Speak up if you witness harassment, bullying or discrimination and report the incident to your leader or HR Management

5.4 Drugs and alcohol use

Odfjell Drilling has a zero-tolerance approach to prohibited substances and substance abuse and does not accept Personnel arriving at work under the influence of substances. In a work context, substance abuse leads to safety risks, reduced performance, higher absence, a burden for work colleagues and negatively affects Odfjell Drilling's reputation. For all offshore services there is a requirement for total abstinence in relation to alcohol 24 hours before the stipulated departure. Odfjell Drilling may carry out testing for prohibited substances as required.

Personnel shall behave themselves in a way that does not negatively affect their colleagues or Odfjell Drilling in work related social gatherings, also when alcohol is being served.

Your contribution:

- Do not perform work for Odfjell Drilling under the influence of prohibited substances or alcohol
- Abstain from prohibited substances and alcohol 24 hours before stipulated departure offshore
- Behave responsibly in work related social gatherings

5.5 Purchase of sexual services

Personnel shall refrain from buying or selling sexual services in any context where they are representing Odfjell Drilling, including when on business trips. This applies regardless of whether purchasing or sale of sexual services is prohibited pursuant to local laws. The purchasing of sexual services is incompatible with Odfjell Drilling's Ethical Principles and professional standards and are linked to human trafficking and other violations of human rights.

Your contribution:

- Do not engage in purchase or sale of sexual services

5.6 Privacy and data protection

Odfjell Drilling respects and protects the personal information of its Personnel and business partners in compliance with all applicable data protection laws. We will process personal information only where there is legal basis and to the extent necessary for the fulfilment of the purpose. For further guidance, please see the Corporate Data Protection procedure.

Personnel of Odfjell Drilling shall not, via computer systems or in any other way, pursue information concerning other Personnel, clients, suppliers or other business partners unless required for performance of their work tasks. Use of information, IT systems and internet services shall be governed by the needs of conducting Odfjell Drilling business and not by personal interest.

Your contribution:

- Do not pursue information concerning others unless necessary for the performance of your work

6 CONFLICT OF INTERESTS

6.1 What it is

Personnel shall always act in the best interest of Odfjell Drilling. A conflict of interests exists if personal interests or activities may impact, or appear to impact, decisions and actions taken, actively or passively, on behalf of Odfjell Drilling. Such personal interests or activities include, but is not limited to, secondary employment relationships with or directorships in other companies, own side businesses, investments in other companies and personal relationships within or outside Odfjell Drilling.

Personnel shall, as a starting point, avoid any action or situation which may give rise to a conflict of interest. If the situation is unavoidable, or if Personnel wishes to seek approval of the relevant action or situation, Personnel shall register this in the business compliance portal unless another reporting channel is specified in this chapter 6. Such registration shall be done prior to taking the relevant action or, if possible, the situation arises.

Your contribution:

- Always act in the best interests of Odfjell Drilling
- Handle all situations of actual, potential or perceived conflict of interest in accordance with this Code
- Report all possible conflicts of interest in the business compliance portal

6.2 Main occupation

Working for Odfjell Drilling shall be the main occupation for Personnel with a full-time position or engagement. Before accepting any paid work or engagements outside Odfjell Drilling, or at commencement of the employment relationship with Odfjell

Drilling if pre-existing, the HR Management shall be informed in writing. Odfjell Drilling can oppose such work or engagements if it may impact Personnel's work for Odfjell Drilling, cause a conflict of interest or if Odfjell Drilling's reputation in any way can be negatively affected.

The above shall also apply to Personnel with a part-time position or engagement for Odfjell Drilling, however taking due consideration to the agreed hours of duty of such Personnel.

Your contribution:

- Report any paid work or engagements outside Odfjell Drilling to HR Management in writing

6.3 External board positions

Personnel shall not have positions in the board of directors of other companies if it may impact his/her work for Odfjell Drilling, cause a conflict of interest or if Odfjell Drilling's reputation in any way can be negatively affected. Board positions in business associates of Odfjell Drilling, such as competitors, clients and suppliers, are never allowed.

Personnel shall register any potential external board position in the business compliance portal for approval before committing to such directorship or at commencement of the relationship with Odfjell Drilling if pre-existing. This does however not apply to typical private engagements such as joint property boards. Primary insiders shall also register all external directorships on Insider Log.

Your contribution:

- Report any board positions in the business compliance portal

6.4 Own side businesses

Odfjell Drilling values entrepreneurship and innovation among its Personnel. However, having a side business may impact Personnel's work for Odfjell Drilling, cause a conflict of interest or negatively affect Odfjell Drilling's reputation. Personnel shall therefore register any side businesses in the business compliance portal for approval prior to start-up.

Your contribution:

- Report any own side businesses in the business compliance portal

6.5 Ownership in other businesses

Personnel shall not invest in other businesses if it may cause a conflict of interest or otherwise negatively affect Odfjell Drilling's reputation. Investments in Odfjell Drilling's business associates, such as competitors, clients and suppliers, are never allowed.

Personnel shall register any potential investments in other businesses in the business compliance portal for approval prior to investing.

This item 6.5 does not apply to investments in companies listed on a recognised stock exchange, provided that such investment does not exceed 10 % of the issued shares of the relevant company.

Your contribution:

- Report any ownership in other business in the business compliance portal

6.6 Relations with Odfjell Drilling's business associates

Personnel shall not, either personally or through a wholly or partly owned company, have any relations with Odfjell Drilling's business associates such as clients, suppliers or competitors unless this is pre-approved by the compliance team. This applies to financial or other business transactions, sponsorships, donations and similar.

6.7 Personal relationships

Odfjell Drilling does not intend to hinder Personnel from having personal relationships with co-workers or others associated with Odfjell Drilling. However, personal relationships may often lead to actual or perceived conflict of interests. This applies both to personal relationships among Personnel, as well as personal relationships between Personnel and employees or representatives of Odfjell Drilling's business associates, such as clients, suppliers and competitors.

To ensure actual and perceived impartialness, Personnel with a personal relationship, such as relatives, spouses/cohabitants or Personnel in a romantic relationship, shall not be manager – subordinate and shall as a main rule not work in the same department. Further, such Personnel shall not be in positions where they have the possibility to stop, approve, revise or control the other's work.

All Personnel shall report personal relationships in conflict with the above to their HR Management who will ensure that measures are taken to prevent a conflict of interests from arising. Required measures may include changes to the involved Personnel's tasks or a change of department.

Personal relationships with employees or representatives of Odfjell Drilling's business associates shall be registered in the business compliance portal. This does not apply if the Personnel cannot in any way influence Odfjell Drilling's decisions related to the relevant business associate or if the employee or representative of the business associate has a role which not in any way can influence the business associate's decisions related to Odfjell Drilling.

Your contribution:

- 1) Report personal relationships within Odfjell Drilling to HR Management
- 2) Report personal relationships with employees or representatives of Odfjell Drilling's business associates in the business compliance portal

7 FINANCIAL ADVANTAGES

7.1 Gifts and hospitality

Personnel shall not receive or offer gifts and hospitality if this may impact, or appear to impact, business decisions or violate laws and regulations. To ensure compliance with this, gifts and hospitality given or received in connection with ongoing contractual negotiations, tenders, transactions etc. are always prohibited. These restrictions apply regardless of the value of the gift/hospitality.

Gifts of limited value, which are offered for cultural or courtesy reasons, may be accepted or offered provided that this does not violate the above. Personnel may also receive or offer promotional items with a company logo of low value. If in doubt as to whether receiving or offering a gift is acceptable, Personnel shall contact the Compliance Team prior to accepting/offering the gift.

Personnel who are offered or receive a gift which is not in line with the above shall decline or return it. If this is not possible, the gift shall be registered in the business compliance portal.

Hospitality such as seminars, social gatherings and meals may be accepted or offered provided it has a clear and legitimate business purpose, is customary and commonly accepted, not excessive in value and does not violate the above. Hospitality such as tickets to concerts, sports events, other entertainment events and trips shall never be accepted or offered. If accommodation and travel is necessary in relation to acceptable hospitality, the costs thereof shall always be paid by Odfjell Drilling.

Your contribution:

- Do not accept or offer gifts or hospitality if this may influence, or appear to influence, business decisions or violate laws or policies
- If you are offered or receive a gift which cannot be declined or returned and which is not in line with the Code, report it in the business compliance portal
- Only accept or offer moderate hospitality which has a clear and legitimate business reason

7.2 Rebate programs

Personnel shall not receive discounts for personal purchases of goods or services from business associates of Odfjell Drilling unless part of a rebate programme offered to all Personnel (can be geographically limited).

Your contribution:

- Do not request or accept discounts for personal purchases from Odfjell Drilling's business associates unless part of a rebate programme offered to all employees.

7.3 Loans

Personnel shall not receive loans from any of Odfjell Drilling's business associates, except loans on regular market terms from a financial institution with lending as an integrated part of its business.

Your contribution:

- Do not request or accept loans from Odfjell Drilling's business associates

7.4 Sponsorships

Odfjell Drilling provides sponsorship according to separate internal guidelines, as approved by the CEO. Any request for sponsorship or donations shall be forwarded to the Corporate Management Assistant for further processing.

8 BUSINESS INTEGRITY

8.1 Corruption

Corruption is abuse of entrusted power for private gain, for instance through bribery, facilitation payments or misuse of public money. A facilitation payment is a small bribe made to speed up a routine service or action that the payer is already entitled to.

Corruption has negative impacts on society and exposes individuals to risk. Odfjell Drilling objects to all forms of corruption and make active efforts to ensure that it does not occur in our business activities. We comply with all applicable anti-corruption laws, and the United Nations Convention against Corruption and the OECD Anti-Bribery Convention.

Personnel are responsible for ensuring that any payments they make on behalf of Odfjell Drilling are lawful, properly approved, and accurately recorded. Offering or accepting bribes, facilitation payments, or other improper advantages is strictly prohibited. The only exception to this is if accommodating a request for payment or other advantages is necessary to protect personal safety in a duress situation. If such a situation arises, the compliance team shall be contacted as soon as possible.

Your contribution:

- Do not offer or accept any bribes, facilitation payments or other forms of improper payments or advantages
- Know who you are doing business with and the risk related to the transaction

8.2 Money laundering

Money laundering is the process of disguising the illegal origin of financial gains from criminal activities. Money laundering is illegal and supports other criminal activities such as terrorism, corruption, drug trafficking, human trafficking and tax evasion. Odfjell Drilling complies with all applicable anti-money laundering laws in any country we do business.

Your contribution:

- Be suspicious to requests to cash payments and unusual banking arrangements
- Report suspicious transactions and incidents of money laundering to the compliance team

8.3 Sanctions and export control

Sanctions and export control regulations impose restrictions that limit or prohibit trade in goods and/or services with certain countries, groups or persons. The object of imposing sanctions and export control regulations may be to protect and strengthen national and international security, combat terrorism and other criminal activities, uphold respect for human rights, democracy and the rule of law and/or to safeguard the community values and security of the imposing nation.

Odfjell Drilling complies with all applicable sanction and export control laws of the countries in which we are established in and/or do business, as well as sanctions imposed by the United Nations and the European Union. For further guidance, please see the Sanctions and Export Control procedure.

Your contribution:

- Know who you are doing business with and whether they are subject to sanctions or export controls

8.4 Fair competition

Odfjell Drilling shall compete in a fair and ethically justifiable manner within the framework of applicable competition and anti-trust laws in the markets in which we operate. For further guidance, please see the Competition Compliance procedure.

Odfjell Drilling is an independent competitor which sets its own prices, decides on its terms and conditions of sale and selects its customers independently. All business decisions are made based on independent business judgment and not based on direct or indirect contact with competitors.

Your contribution:

- Do not exchange information with or cooperate with competitors unless approved by Corporate Legal

8.5 Company records and accounting

Odfjell Drilling shall communicate and maintain accurate and complete company records in accordance with applicable laws and regulations, including internationally recognised accounting standards. All transactions between Odfjell Drilling and other parties shall be promptly and accurately posted into our books. For further guidance, please see the Corporate Accounting policy.

All forms of financial reporting shall be in accordance with applicable laws and regulations, including applicable securities laws and stock exchange listing standards, and generally accepted accounting principles. All filing requirements shall be accurately met.

Your contribution:

- Post all transactions into our books in accordance with the Corporate Accounting policy

9 PROTECTION OF ASSETS AND INFORMATION

9.1 Protection and use of assets

Personnel shall protect all assets of Odfjell Drilling, such as facilities, property, equipment, IT systems, intellectual property rights, information and funds. Such assets shall be used responsibly for legitimate business purposes only and in Odfjell Drilling's interest.

Your contribution:

- Protect all Odfjell Drilling assets and use them only as directed

9.2 Confidential information

All Personnel shall sign a confidentiality agreement prior to commencing any work for Odfjell Drilling. Personnel are expected to keep information which he or she is given access to in the course of his/her work confidential and to only share such information on a need-to-know basis. This applies both to information about Odfjell Drilling and our business, as well as information about our clients, suppliers and other business associates, and about other Personnel. All Personnel must safeguard passwords and identification codes to prevent unauthorised access to Odfjell Drilling's IT systems.

All Personnel have an obligation to exercise extra care when handling confidential information. Confidential information is information that is not known to the public and which may hold commercial, competitive or other value, such as business plans and marketing data. Confidential Information shall only be shared in accordance with the principles in the Data Sharing policy.

Your contribution:

- Protect all Odfjell Drilling related confidential information
- Safeguard your passwords and identification codes, beware of phishing attempts

9.3 Insider trading

Odfjell Drilling Ltd is listed on the Oslo Stock Exchange and is committed to complying with all applicable insider trading laws and regulations. For further guidance, please see the Insider Trading policy.

Personnel with access to inside information shall keep such information strictly confidential and shall not trade in the share or advise others to trade in the share until the information has become public knowledge. Inside information is information of a precise nature which has not been made public and which is likely to have a significant effect on the share price. It may for instance be the award or loss of a contract, information about contract negotiations, major technical developments or acquisitions or changes to information that has already been communicated to the market.

Personnel may be granted access to inside information about clients, suppliers or other business partners in the course of their work. Such information shall not be disclosed to anyone except with the prior approval of the owner of the inside information.

Your contribution:

- Keep inside information strictly confidential and ensure that such information does not come into the possession of an unauthorised party or is misused
- Do not trade securities or shares based on inside information
- Do not advise any third party regarding trades based on your inside information

9.4 Communication

Personnel shall communicate in a manner that reflects Odfjell Drilling's values of integrity, professionalism and respect. Communication, whether internal or external, shall be accurate, responsible and consistent with applicable laws and regulations, as well as Odfjell Drilling's policies and procedures. External communication, including media statements and public commentary, shall only be given by the CEO or designated spokespeople in accordance with the Communications Policy. Odfjell Drilling's social media accounts shall only be managed by appointed personnel.

Personnel shall clearly separate private views from their professional role in Odfjell Drilling when communicating on their own social media platforms and shall ensure that such communication does not appear to be on behalf of Odfjell Drilling. Personnel shall avoid engaging in online discussions that can reflect negatively on Odfjell Drilling.

Concerns regarding unethical, inappropriate or non-compliant communication shall be reported to HR Management or the compliance team.

Your contribution:

- Always communicate in a respectful and professional manner
- Do not communicate on Odfjell Drilling's behalf unless directed to do so
- Remember your confidentiality obligations

10 REFERENCES

Reference	Name	CMS no
L0-ODL-003	Ethical Principles	92620
L0-ODL-010	Insider Trading policy	83620
L0-ODL-011	Legal and Regulatory Compliance policy	92623
L0-ODL-023	Human Rights policy	93304
L1-CORP-014	Sosial Responsibility principles	39651
L1-CORP-015	Supplier Code of Conduct	65716
L1-CORP-CA-PR-013	Sanctions and Export Control procedure	60511
L1-CORP-CA-PR-012	Competition Compliance procedure	38495
L1-CORP-HR-PR-017	Corporate Data Protection procedure	75451

L1-CORP-CA-PR-018	Human Rights Risk Assessment procedure	93236
L1-CORP- HR-PR-011	Conflict Management procedure	22324
L1-CORP-SCM-PR-010	SCM Third Party Due Diligence (OTL CMS)	61955
L1-CORP-FI-PR-PR-010	Corporate Accounting Policy	83408
L1-CORP-HR-PR-014	High Risk Third Parties procedure	85403
L1-CORP-CA-PR-015	Intellectual Property policy	64727
L1-CORP-CA-PR-017	Data Sharing policy	83976
L1-CORP-IT-PR-001	IT Security	139
L1-CORP-HR-PR-024	Harassment, Bullying and Discrimination procedure	92634
L1-CORP-HSE-PR-008	Intoxication policy and procedure	228
L1-CORP-CA-PR-003	Communications policy	36932

11 APPENDICES

N/A