

The human rights policy outlines Odfjell Drilling Ltd's (the "Company", with its subsidiaries the "Group") commitment and work to protect and avoid infringements of human rights of employees, contractors, suppliers, agents and business partners, as well as communities affected by the Group's business activities

This policy applies to all employees, directors, contractors, suppliers and agents of the Group.

1 RESPONSIBILITIES & AUTHORITIES

This policy is approved by the Company's Board of Directors. The CEO is ultimately responsible for the implementation and monitoring of its operational effectiveness in the Group.

2 COMMITMENT TO HUMAN RIGHTS

The Group's business shall be conducted based on the International Bill of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, UN Global Compact Ethical Principles, and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work. These include, but are not limited to:

- Right to health
- Right to equality before 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

The Group expects all parties to whom this policy applies to uphold these commitments.

3 HOW WE WORK

To uphold the Group's commitments to human rights, the following measures guide the Group's approach:

- The Group regularly assesses actual and potential human rights as part of its overall risk management processes, prioritising the areas with the highest risk, and taking preventive or remedial action where necessary.
- The Group provides accessible channels for raising concerns about actual or potential adverse human rights impacts, including an anonymous whistle-blowing portal available on the Group's website. All reports are handled promptly, treated

confidentially, and without retaliation. Where the Group has caused or contributed to adverse impacts, appropriate remediation will be provided.

- The Group communicates the human rights policy regularly to all stakeholders it applies to, through articles, meetings, surveys and training programmes. This policy is included in the Group's "How to become a supplier" process, in addition to being communicated through regular supplier follow-ups.

Simen Lieungh

Chair, for and on behalf of Odfjell Drilling Ltd

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