



**DOF Group**  
Transparency Statement 2025

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## TRANSPARENCY STATEMENT 2025

DOF is a prominent organisation with a worldwide presence. Due to the scope and scale of our operations, we are required to comply with multiple legislative requirements concerning human rights and modern slavery. This statement serves as a consolidated report for the following legislations:

- Norway (Transparency Act 2022)
- United Kingdom (Modern Slavery Act 2015)
- Australia (Modern Slavery Act 2018)

DOF regards modern slavery as a breach of human rights and, accordingly, will in general use the term “human rights” throughout this statement to encompass both definitions.

DOF Group ASA is dedicated to maintaining high standards of transparency and accountability. As the parent company, we are responsible for reporting on all aspects of the company, including our subsidiaries, under the Transparency Act. All companies within the DOF Group can be found listed in our 2025 integrated annual report within the note “Companies within the Group”.

DOF Subsidiaries that meet the threshold of reporting, and adhere to this consolidated report, are listed in the compliance table.

DOF Group ASA, along with all its subsidiaries, follows the same set of governing documents related to human rights and decent working conditions. Our due diligence assessments are based on common risks identified through our unified Supply Chain Management system and Integrated Management System, our open reporting mechanisms, and insights from our double materiality assessment. This statement acts as our account of the due diligence assessments for the reporting period of 1st January 2025 to 31st December 2025.



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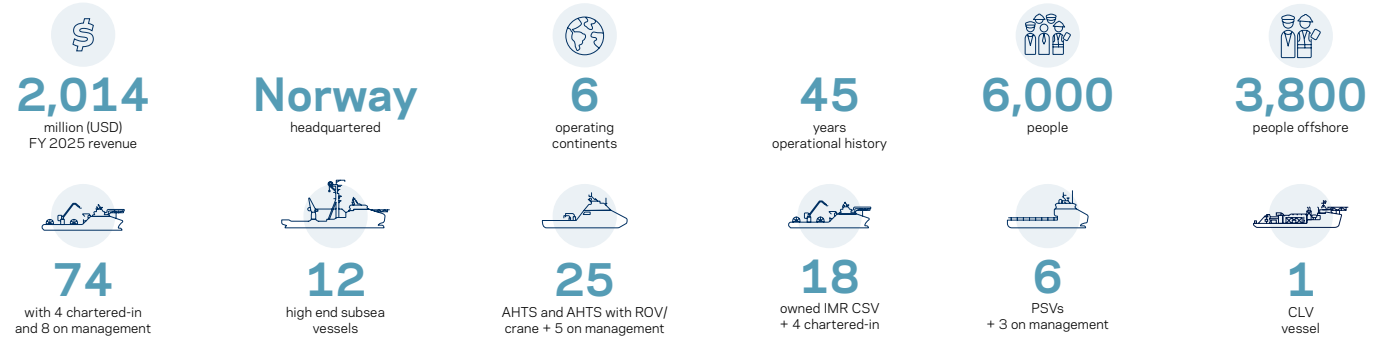
## ORGANISATIONAL STRUCTURE, OPERATIONS, ACTIVITIES AND SUPPLY CHAINS

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 is headquartered in Austevoll, Norway and has offices in Angola, Argentina, Australia, Brazil, Canada, Denmark, Ghana, Indonesia, Norway, Philippines, Singapore, United Kingdom, and United States.

As of 31.12.2025, DOF has a global workforce of more than 6,000 and a total fleet of 74 vessels, of which eight vessels are on management or hired in.

As a public listed company on Oslo Stock Exchange benchmark Index OSEBX, all market related information can be found in the Investor Relations pages of the DOF Group website.



All totals per 31.12.2025

# ORGANISATIONAL STRUCTURE, OPERATIONS, ACTIVITIES AND SUPPLY CHAINS CONTINUED

## SUPPLY CHAIN UNDERSTANDING

DOF has a large, complex and international supply chain that reflects the global nature of our business. DOF offers a wide range of offshore subsea services utilising a large fleet of high-end offshore vessels. DOF is structured around diversified strengths, offering both marine and offshore subsea services, a global footprint, and strong local networks.

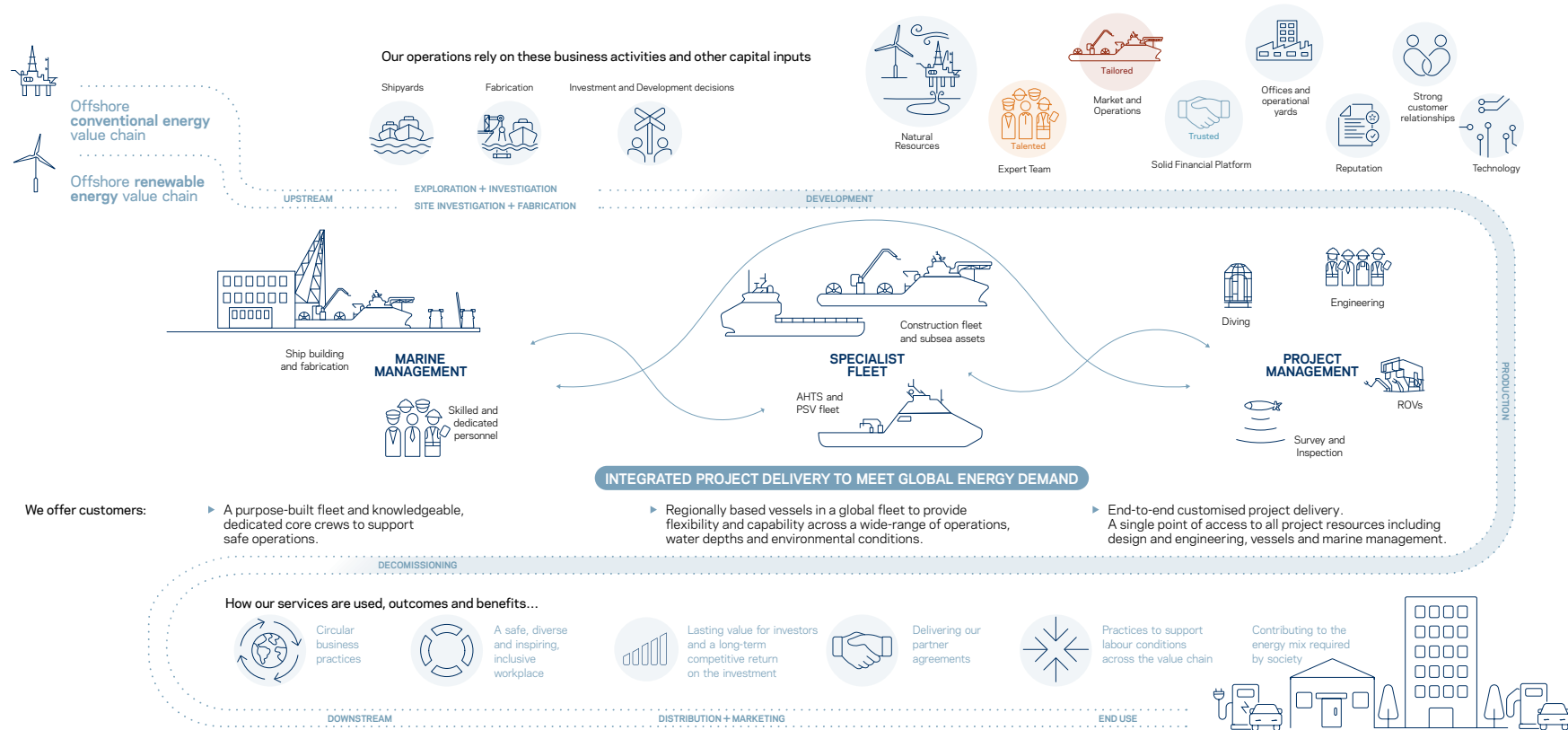
In 2025 the company worked with over 74 conventional energy operators and ten renewable energy developers.

At present, DOF has over 4,000 suppliers globally. DOF seeks to ensure effective and purposeful implementation of the supply chain activities. All activities undertaken within the various supply chain functions shall

meet DOF's criteria of fairness, integrity and transparency to achieve the best value for money, whilst protecting the company from unwanted or illegal practices such as fraud, corruption, collusion, human rights violations and other unethical practices.

identifies material impacts and risks associated with labor conditions and areas of compliance exposure, including the UN Global Compact.

DOF's Double-Materiality Assessment (DMA) process ensures the organisation



## ORGANISATIONAL STRUCTURE, OPERATIONS, ACTIVITIES AND SUPPLY CHAINS CONTINUED

### PRODUCTS, SECTORS AND SERVICES

DOF is a leading provider of integrated subsea project and marine services to the global offshore energy market. 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)
- Subsea (Subsea vessels and Subsea engineering services).



### SHIPOWNING SEGMENT

The Shipowning segment represents DOF's vessel ownership outside of Brazil and forms the foundation of the Group's integrated offshore services model.

Shipowning owns 46 vessels as of year-end 2025. The vessels are chartered on a time-charter basis, both internally to DOF's Subsea Regions and externally to third-party customers. Three vessels were sold during 2025.

The segment's earnings are driven by vessel utilisation, contract duration and rate levels, and utilisation levels are influenced by planned maintenance, vessel upgrades, mobilisations and transits between regions. The Shipowning segment has historically delivered high utilisation across the fleet, supported by long-term contracts and strong demand for high-specification offshore vessels.

Through the Shipowning segment, DOF maintains strategic control over critical marine assets, enabling efficient fleet allocation, operational flexibility and seamless integration with the Group's subsea project execution capabilities. The segment plays a central role in supporting DOF's global project activity and value creation across the offshore energy value chain.

### NORSKAN OFFSHORE

Norskan Offshore represents DOF's Brazil-focused vessel ownership and management segment. Norskan owns nine anchor handling tug supply (AHTS) vessels, all of which are built in Brazil, with the majority equipped with remotely operated vehicles (ROVs). All owned vessels are employed on firm, long-term contracts with Petrobras, providing stable utilisation and earnings visibility.

In addition to owning its fleet, Norskan acts as the vessel manager for DOF's entire fleet operating in Brazil, including vessels not owned by Norskan. As part of this role, Norskan serves as the contractual counterparty towards Petrobras and provides operational and commercial management services for vessels deployed in the Brazilian market.

Norskan's earnings are primarily driven by the owned AHTS fleet, while vessel management activities for third-party and Group-owned vessels contribute additional revenue with limited EBITDA impact. The segment has historically delivered high utilisation levels, supported by long-term contracts and a strong operational track record in Brazil.

Through Norskan, DOF maintains a strong local presence and operational platform in Brazil, combining Brazilian-built vessels, local competence, and long-standing customer relationships to support safe and efficient offshore operations in one of the world's most active offshore energy markets.

### OUR OPERATING SEGMENTS

DOF introduced a new segment reporting structure in 2025. The new segment reporting reflects the corporate structure and financing structures. The Shipowning segment includes the vessels previously reported under DOF Subsea, DOF Rederi, Iceman and DOF Denmark. The Subsea Regions segment represents the value-added services performed by the subsea regions in addition to the vessel earnings. DOFCON JV is now reported separately. The remaining segments, Corporate and Norskan, remain unchanged from previous structure.

### SUBSEA REGIONS

The Subsea Regions segment represents DOF's regional subsea operating companies, which deliver integrated project services in support of offshore subsea construction activities. The segment is organised into four geographic regions: Atlantic, Asia-Pacific (APAC), North America, and Brazil.

Subsea Regions provide project execution capabilities and value-adding services that complement DOF's vessel fleet. These services typically include project management, engineering, planning, logistics, and operational support required to deliver subsea projects across a wide range of scopes and water depths.

When executing a subsea project, the regional subsea organisations normally charter vessels internally from the Shipowning segment, and where required, may also charter vessels externally if suitable capacity is not available within the Group. This structure allows DOF to optimise fleet utilisation while maintaining operational flexibility and competitive project delivery. Activity levels are supported by tendering, contract awards, and backlog development across all operating regions, contributing to DOF's integrated offshore services offering and global execution capability.

### DOFCON JV

DOFCON is a 50/50 joint venture between DOF Group ASA and TechnipFMC, established to own and operate a fleet of large pipe-laying support vessels (PLSVs) in Brazil. The joint venture represents a key pillar of DOF's long-standing presence in the Brazilian offshore market.

DOFCON owns six PLSVs, which are deployed exclusively in Brazil and are employed on firm, long-term contracts with Petrobras. These vessels are purpose-built for complex subsea construction activities, including installation of flexible pipelines and associated subsea infrastructure.

The DOFCON fleet has historically delivered high utilisation, primarily due to multi-year contract coverage, and as a result, the joint venture provides stable and predictable earnings to the Group.

Under the joint venture structure, DOF provides marine and vessel-related services, while TechnipFMC delivers topside and project-related services, reflecting the complementary competencies of the two partners. This integrated operating model enables efficient execution of complex subsea installation scopes in Brazil.

## ORGANISATIONAL STRUCTURE, OPERATIONS, ACTIVITIES AND SUPPLY CHAINS CONTINUED

### SUPPLIERS

We have established strong, long-term partnerships with many of our direct suppliers. These relationships provide a solid basis for transparency and effective collaboration throughout our supply chain.

Our extensive network of direct and indirect suppliers supports the full scope of our operations. The principal supplier categories are as follows:

- Maintenance, repair and overhaul
- Subsea equipment
- Chartering
- Logistics
- Crewing
- Yard services
- ITC
- Insurance
- Catering and provision
- Bunkering
- Safety equipment and clothes

### GOVERNANCE

#### *BOARD OF DIRECTORS*

The Board of Directors has ultimate responsibility for decision making on economic, environmental and social impacts, including human rights and modern slavery. The Board ensures sound corporate governance and oversees the work of DOF's ESG impacts, risks and opportunities.

#### *CHIEF EXECUTIVE OFFICER (CEO)*

The CEO is accountable to the Board for ensuring that DOF's policies, including those related to human rights and business conduct, are implemented across the organisation. Transparency Statement is approved and signed by both the CEO and the Board of Directors.

#### *CHIEF FINANCIAL OFFICER (CFO) AND GRC COMMITTEE*

As Chair of the Governance, Risk and Compliance (GRC) Committee, the CFO is responsible for the day to day management of identified impacts, risks and opportunities (IROs), including human rights related risks, in dialogue with the Board, Audit Committee and Executive Management.

#### *EXECUTIVE AND REGIONAL MANAGEMENT*

Executive Management Teams and Regional Management are responsible for identifying, assessing and managing human rights risks within their areas of responsibility, in line with DOF's risk appetite and Integrated Management System.

### *ESG FUNCTION*

The ESG function operationalises the human rights agenda across the business, including modern slavery. This includes coordinating human rights due diligence, supporting double materiality assessments, and embedding human rights considerations into ESG processes and reporting.

#### *SUPPLY CHAIN MANAGEMENT AND PROCUREMENT*

Human rights and modern slavery risks in the supply chain are addressed through vendor evaluation, due diligence and ongoing monitoring. Supply Chain Management applies human rights assessments aligned with the UN Global Compact principles, including vendor self assessments.

#### *RESPONSIBILITY EMBEDDED INTO DAILY OPERATIONS*

DOF's Risk Management framework ensures that all Regions, Business Units and Functions identify potential risks impacting their objectives and operations. DOF's Risk Management Framework is built upon a process where risks and opportunities are escalated to the correct level of the organisation to obtain a comprehensive view of the risks to DOF Groups objectives. Risks and opportunities are shared through interviews and registers by risk owners. The identified or escalated risks are categorised as Compliance, Strategic, Occupational Health, Operational or Financial risks and assessed and consolidated into an enterprise-wide risk landscape.

### *RISK OWNERS*

Risk management in DOF relies on the concept that all risks or opportunities should have a 'risk owner'. It is the risk owner that ensures appropriate controls are in place and necessary plans are in place to main risk levels within agreed risk appetite levels. Additionally, the Board of Directors and Audit Committee hold deep dive sessions with executive risk owners throughout the year to discuss selected key risks.

In DOF we all have a part to play in fostering a culture of corporate compliance, ethical behaviour and good corporate governance. The DOF Group maintains an open working environment in which employees and contractors can feel comfortable reporting any breach of law or any violation of the DOF Group's policies, or other legal or ethical concerns, without fear of intimidation or reprisal.

## ORGANISATIONAL STRUCTURE, OPERATIONS, ACTIVITIES AND SUPPLY CHAINS CONTINUED

### INFORMATION GATHERING

This report has been compiled by DOF's ESG Reporting Department (ESG Function), which collected information in accordance with legislative requirements from DOF's global Supply Chain, HSEQ, HR, Legal, and Operational teams. The data includes interviews, input from grievance mechanism reports and audit documentation generated through our integrated management systems, as well as our vendor evaluation tool. All gathered information is systematically assessed utilising a risk assessment framework and correlated with insights from our double materiality assessment.

The process is structured to align with the OECD due diligence guidelines. Additionally, in pursuit of enhancing the consistency of DOF's public disclosures, we have reviewed international standards pertinent to the Norwegian, United Kingdom and Australian reporting obligations, including statutory guidance provided by the UK Government.

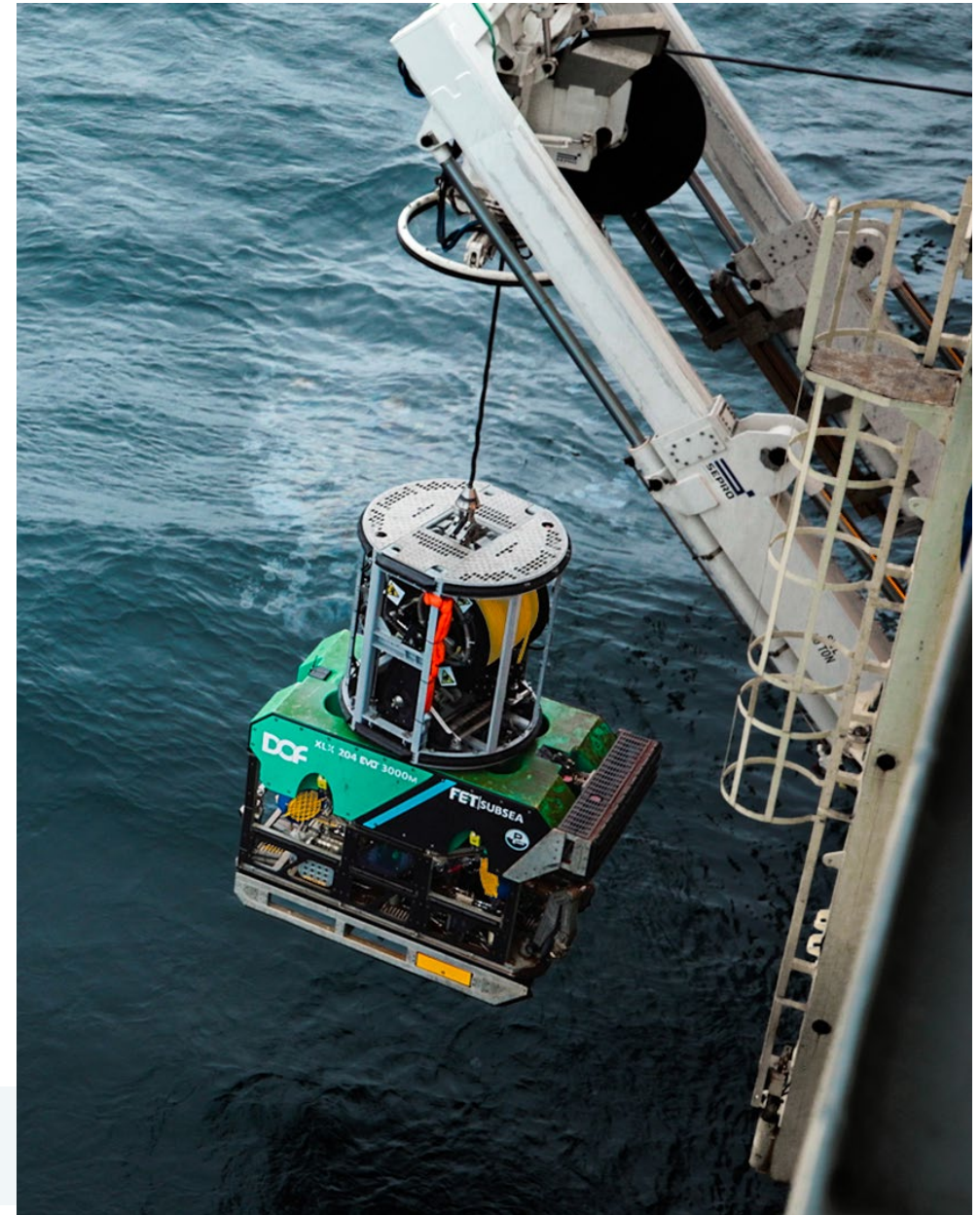
### STAKEHOLDER ENGAGEMENT IN MAPPING SUPPLY CHAIN

DOF also receives input from external stakeholders who are engaged to support supply chain mapping and transparency:

- Factlines – supply chain tool used to manage supplier relationships and support supplier mapping through structured supplier self-assessments and performance data.
- Slave-Free Alliance (part of the anti-slavery charity Hope for Justice) – partner since 2022 supporting identification and management of human rights and modern slavery risks across the supply chain, including updates to DOF's corporate human rights impact assessment.

### CONTINUOUS IMPROVEMENT

We are consistently enhancing our knowledge and understanding of our supply chains. Since 2025, we have recognised that evaluating vendors from a materiality perspective enables us to better identify areas where our actions may have the greatest impact. We intend to continue utilising this approach to determine our most significant human rights impacts moving forward by conducting targeted stakeholder interviews, comprehensive vendor evaluations and criteria based vendor audits.



## POLICIES

### INTERNAL OPERATING POLICIES

Here is a full list over DOF's available policies and training material, relevant to human rights.

Description	Document type	Link
DOF Group Code of Business Conduct	Policy	<a href="#">DOF Code of Business Conduct</a>
DOF Supplier Code of Conduct	Policy	<a href="#">DOF Supplier Code of Conduct</a>
DOF Group Business Integrity and Ethics Policy	Policy	<a href="#">DOF Policy Business Integrity Ethics</a>
DOF Group Equal Employment Opportunity Policy	Policy	<a href="#">DOF Policy Equal Opportunity</a>
DOF Group Workplace Harassment Policy	Policy	<a href="#">DOF Policy Workplace Harassment</a>
DOF Group Dignity and Respect at Work Guide	Guide	<a href="#">Dignity and Respect at Work Guide</a>
Mandatory e-learning - DOF Code of Business Conduct	E-learning	<a href="#">DOF Contractors Trainingportal</a>
Modern Slavery Awareness	E-learning	<a href="#">DOF Contractors Trainingportal</a>
Human Rights and Business	E-learning	<a href="#">DOF Contractors Trainingportal</a>
Prevention of Bullying and Harassment	E-learning	<a href="#">DOF Contractors Trainingportal</a>

Table 1

### INTERNATIONAL STANDARDS

Our internal policies and standards are aligned with the UN Global Compact expectations.

DOF's supplier evaluation process is risk-based and aligned with The Ten Principles of the UN Global Compact, covering human rights, labour, environment, and anti-corruption.

Here is a list of international standards that are linked to our policies.

Description	Principles and standards
UN Global Compact	Initiative
OECD Guidelines for Multinational Enterprises	Guideline
UN Guiding Principles on Business and Human Rights (UNGPs)	Principles
International Labour Organisation (ILO)	Standards
Maritime Labour Convention (MLC)	Standards
ISO 45001:2018 Occupational Health and Safety management system	Certificate

Table 2

## POLICIES CONTINUED

### STAKEHOLDER ENGAGEMENT IN DEVELOPING POLICIES

Stakeholders engaged in developing and implementing DOF's policies include:

- The Board of Directors, which is responsible for reviewing company policies and advising on their implications and effectiveness.
- The CEO and executive management, accountable to the Board for ensuring policies related to business conduct are implemented.
- Employees, whose feedback is integrated into decision-making and into the development and implementation of workforce-related policies.
- Global supply chain department, which reviewed and approved the DOF Supplier Code of Conduct.
- Slave-Free Alliance (a not-for-profit social enterprise part of the anti-slavery charity Hope for Justice), which has supported DOF in crafting and refining the DOF Supplier Code of Conduct and strengthening the company's approach to human rights.

### COMMUNICATION AND ENFORCEMENT

DOF communicates and enforces all policies across the organisation by incorporating them into its Integrated Management System. This system is grounded in our vision and values, with policies serving as Level 1 executive documents. Manuals, standards, guidelines, and procedures are aligned to support the established vision, values, and policies.

Policies are accessible through DOF's management systems, on the intranet, on our webpage and are displayed on all vessels and at all sites globally. Additionally, these policies are linked to our ESG-related impacts, risks, and opportunities, and are comprehensively detailed in our published DOF Group Integrated Annual Report.



## RISKS & IMPACTS

### RISK ASSESSMENT FREQUENCY

DOF carried out its latest risk assessment during 2025, including documenting risks identified through its due diligence process in a dedicated software tool to support evaluation and identification of salient human rights impacts and risks. The risk assessment is updated on an ongoing basis through DOF's dynamic due diligence process. In addition, the double materiality assessment is reviewed and updated annually, and the DOF Group risk register is subject to quarterly review, control testing and surveillance through the GRC Committee. Further information on our double materiality assessment, risk management and the outcomes can be found in our DOF Group Integrated Annual Report 2025.

### RISK ASSESSMENT GOVERNANCE

Responsibility for DOF's risk assessment is distributed across the organisation. Risk owners within each region, business unit and function are responsible for identifying and escalating risks and opportunities through Integrated Management System, interviews and risk registers. The Global ESG Reporting department is responsible for conducting the double materiality assessment and for consolidating the overall human rights due diligence assessment. The outcome of the DMA is reviewed by the Audit Committee and approved by the Board.

Established in 2025, the Governance, Risk and Compliance (GRC) Committee provides independent oversight of the DOF Group Risk Register, reviewing and validating

regional and functional submissions and performing quarterly control testing and surveillance. The GRC Committee reports to the Audit Committee via the Chair, and key risks are escalated for discussion by the Board of Directors.

### HIGHEST PRIORITY IMPACTS TO WORKERS IN DOF AND SUPPLY CHAIN

Below is a list of DOF's impacts linked to human rights and decent working conditions, identified through our double materiality assessment and human rights due diligence assessment from 2025.

The full list of findings of the double materiality assessment is detailed in the DOF Group Annual Report 2025.

	Double Materiality Assessment (Potential Impact)	Human Rights Due Diligence Assessment (Potential Impact) – Top 3 risks
Own operations	<ul style="list-style-type: none"> <li>Occupational Health and safety</li> </ul>	
	<ul style="list-style-type: none"> <li>Occupational Health and Safety</li> <li>Occupational Health and safety at Shipyards</li> <li>Child and forced labour within extended value chain</li> </ul>	<ul style="list-style-type: none"> <li>Occupational Health and Safety</li> <li>Occupational Health and safety at Shipyards</li> <li>Child and forced labour within extended value chain</li> </ul>
Supply chain	<ul style="list-style-type: none"> <li>Labour conditions</li> </ul>	

Table 3

## RISKS & IMPACTS CONTINUED

### DESCRIPTION OF OUR IDENTIFIED IMPACTS

#### *OCCUPATIONAL HEALTH AND SAFETY*

DOF's highest priority is safety, which is deeply embedded in our values and governance structure. As a company in the offshore industry, we know that our operations come with an exposure to severe accidents and incidents.

High consequence low probability incidents can have fatal or serious consequences for workers, in our own operations affecting both own workforce and supply chain workers.

These risks can have immediate and long-term impacts and are directly connected to DOF's core business model.

Through standard operations, personnel working for or on behalf of the organisation are exposed to occupational health and safety hazards as an inherent part of activities. DOF has a duty-of-care to manage safety for personnel in our operations and on our worksites.

#### *OCCUPATIONAL HEALTH AND SAFETY AT SHIPYARDS*

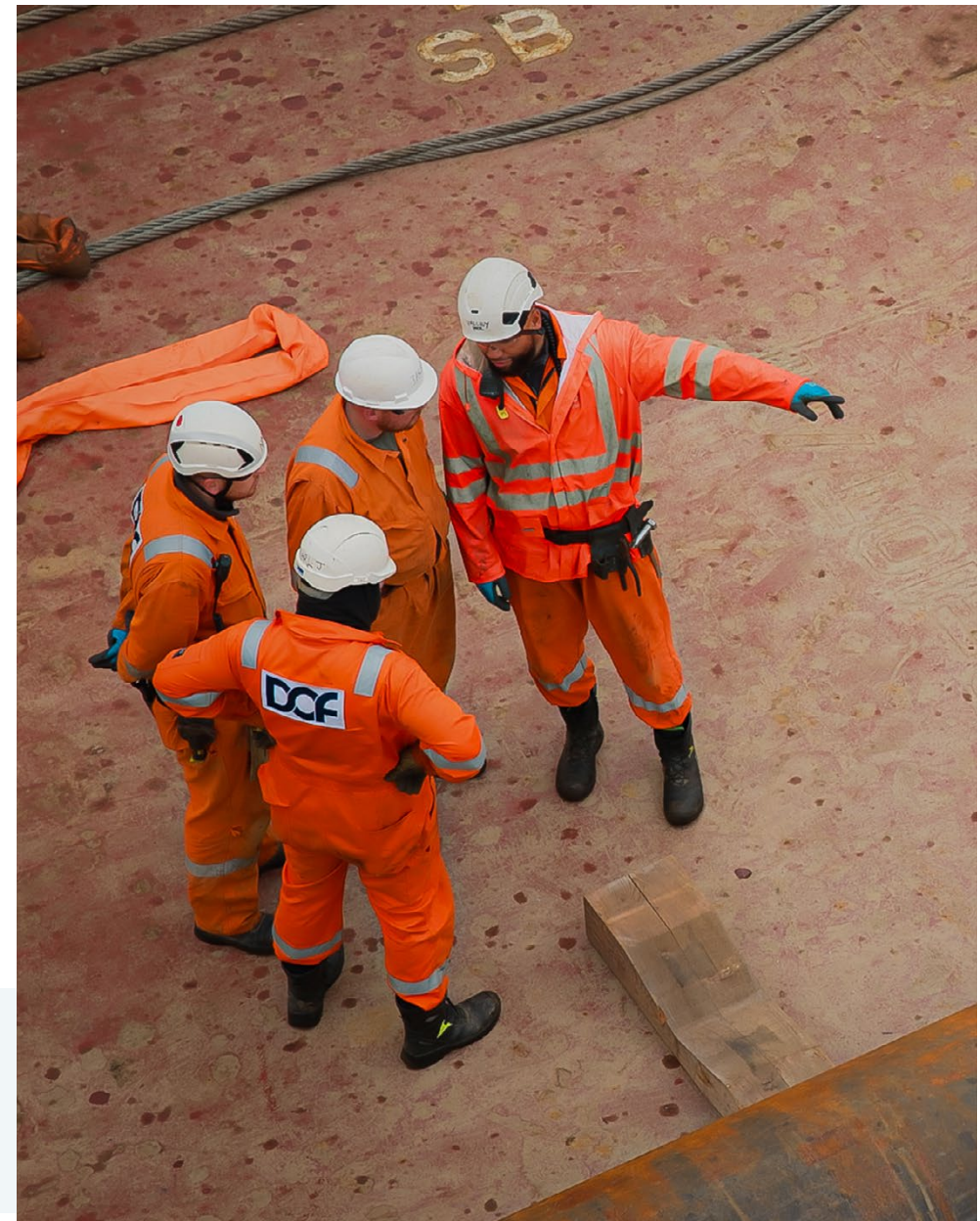
Maintaining adequate health and safety standards within shipyards is a significant challenge as tasks are performed using third-party management systems. Occupational health and safety hazards affect everyone working on vessels or in shipyards, including both hired and contracted staff.

#### *CHILD AND FORCED LABOUR WITHIN EXTENDED VALUE CHAIN*

DOF is exposed to the use of child and forced labour as a result of business relationships with shipyards, manning agencies and the use of some manufactured products.

#### *LABOUR CONDITIONS*

DOF is not always able to assure the labour conditions of its extended value chain, exposing it to non-compliance to UN Global Compact. DOF has limited tools, resources and ability to assure value chain beyond direct supply chain. Whilst pass-on requirements exist within standard contract terms, it is difficult to enforce and assure compliance towards this.



## RISKS & IMPACTS CONTINUED

### IDENTIFYING AND ASSESSING RISKS AND IMPACTS

The following table explains how DOF recognises and evaluates human rights risks, outlines the sources it relies on, and details the impacts that various processes aim to prevent and reduce.

DOF Process / actions / programmes and initiatives	Description	Identification of risk	Sources and framework	Verification	Impact or risk addressed
Global Supplier Audits and Inspections Regime	DOF's global supplier audit and inspections regime ensures regular assessments of its vendors. These audits are conducted in alignment with ISM and ISO standards and include worker interviews to identify any practices that might suggest human rights violations. In 2025, DOF completed 24 supplier audits worldwide	Findings during supplier audit and inspections	Integrated Management System	Follow up and close out findings	<ul style="list-style-type: none"> <li>Occupational health and safety</li> <li>Occupational health and safety at shipyards</li> <li>Child and forced labour within extended value chain</li> <li>Labour conditions</li> </ul>
Supplier audits performed by third party	In addition to audits carried out by DOF auditors, we also engage independent third-party auditors to conduct supplier audits on our behalf. Any non-conformities or other findings identified during these audits are addressed through DOF's integrated management system.	End reports Findings	Integrated Management System	Follow up on findings	<ul style="list-style-type: none"> <li>Child and forced labour within extended value chain</li> <li>Labour conditions</li> </ul>
Double materiality assessment	DOF has applied a double materiality approach that is consistent with CSRD and allows the organisation to evaluate financial, environmental and social materiality across DOF's Value Chain. This involves analysing both the potential breach of human rights in our operations and supply chain, as well as the potential impacts it might have. DOF continuously evaluates the outcomes of its double materiality assessment by analysing its stakeholder's needs and incorporating risks, opportunities and impacts as they arise. The purpose of a double materiality assessment is to achieve a balanced and comprehensive understanding of our impacts, supporting sustainable and responsible business practices while meeting the expectations of a diverse range of stakeholders.	Impacts, risks and opportunities (IROs) are identified through assessment	DOF Group Annual Report	IROs are linked to policies, actions and targets and annually handled through our global improvement programmes	<ul style="list-style-type: none"> <li>Occupational health and safety</li> <li>Occupational health and safety at shipyards</li> <li>Child and forced labour within extended value chain</li> <li>Labour conditions</li> </ul>
Integrated management system	DOF operates an integrated management system designed around the principles of widely recognised ISO standards and the ISM Code. This system is grounded in our governance framework, encompassing policies, guidelines, and procedures, while also ensuring continuous monitoring of occupational health and safety reports and compliance with ISO certifications. A well-structured and consistently maintained management system underpins the integration of ethical standards, fosters a unified organisational culture, and enables the effective tracking of occupational health and safety trends throughout the organisation.	Observation Audits Inspections	ISO 45001 Certified	Workflows Close outs Reports Document governance framework provides value, vision, policies, manuals, guidelines and procedures how to conduct business for our employees	<ul style="list-style-type: none"> <li>Occupational health and safety</li> <li>Occupational health and safety at shipyards</li> <li>Child and forced labour within extended value chain</li> <li>Labour conditions</li> </ul>
Vendor prequalification and supplier tool	Suppliers of DOF are evaluated in a supplier self-as 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, Global Rights Index, The Corruption Perceptions Index, Global Slavery Index and The Global Freedom Index.	Risk score based on questionnaire and country risk	ITUC Global Rights Index Corruption Perceptions Freedom House Slavery Prevalence Slavery Vulnerability	Follow up with vendors, screening and audits	<ul style="list-style-type: none"> <li>Child and forced labour within extended value chain</li> <li>Labour conditions</li> </ul>

Table 4

## RISKS & IMPACTS CONTINUED

DOF Process / actions / programmes and initiatives	Description	Identification of risk	Sources	How we assess	Prevents and mitigates risks / impacts:
Screening counterparties against World-check Risk intelligence database	DOF is actively screening counterparties to ensure we are not engaging in business activities with sanctioned or regulatory listed organisations. "High-risk" vendors were identified in 2025 through a combination of evaluating the scope of service they provide, Factlines score in prequalification phase, and compliance exposure as a result of their geographical location. Those vendors considered 'high-risk' were screened against World-Check Risk Intelligence database to flag sanctions, politically exposed persons (PEP), adverse media coverage and instrument screening.	Identify if there are any cases connected to our vendors	World-Check Risk Intelligence database	Investigate and evaluate if information is connected to Human Rights Breaches	<ul style="list-style-type: none"> <li>Child and forced labour within extended value chain</li> <li>Labour conditions</li> </ul>
Grievance mechanism	DOF has implemented several grievance mechanisms, both onshore and offshore. These include escalating concerns directly to a vessel's onshore contact, through a vessel's chain of command, or through our confidential Ethics helpline. Worker welfare and human rights concerns have been received predominantly through the latter two escalation routes. While most of these channels are designed for employees, the ethics helpline is also accessible to external stakeholders. These mechanisms are integral to DOF's due diligence practices, enabling the collection and monitoring of feedback from employees as well as entities within the value chain. All reports received are promptly assessed and investigated by a qualified, impartial team, ensuring swift action and the identification of emerging trends or adverse impacts. The reported cases will be monitored by the audit committee on a regular basis.	Cases of allegations of Human Rights breaches	DOF's Ethics Helpline	Each case is handled All cases are classified by theme and severity, helping DOF to see trends and identify impacts	<ul style="list-style-type: none"> <li>Health and safety</li> <li>Occupational health and safety at shipyards</li> <li>Child and forced labour within extended value chain</li> <li>Labour conditions</li> </ul>
Stakeholder Interviews	Conversations with stakeholders that are close to DOF's supply chain, Health and safety or working close to high-risk areas or operations. This gives unique insight into experience and knowledge in DOF around the globe and in different part of our value chain.	Outcomes such as increased awareness on the different risks or challenges that has been experienced or observed	Supply Chain HSEQ HR Operations	Perspectives are included in the overall Due diligence	<ul style="list-style-type: none"> <li>Legislation Occupational health and safety</li> <li>Occupational health and safety at shipyards</li> <li>Labour conditions</li> </ul>
Due diligence on new high-risk areas and critical suppliers	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 detail before going into business.	In high-risk areas and with critical suppliers, the company will perform a thorough due diligence and risk assessment process to analyse and evaluate the supplier in closer detail	Integrated Management system	Investigation, follow up and reporting	<ul style="list-style-type: none"> <li>Occupational health and safety at shipyards</li> <li>Child and forced labour within extended value chain</li> <li>Labour conditions</li> </ul>
Collaboration with NGOs	DOF has partnered with Slave-Free Alliance since 2022, which is a not-for-profit social enterprise owned by the anti-slavery charity Hope for Justice and is dedicated to helping businesses to achieve slave-free supply chains. This organisation supports us to identify and address human rights risks that impact our business and helps us to update our corporate human rights impact assessment. DOF is also a member of FUTURE PROOF, a network that brings corporations together to share experience and strengthen the work on human rights due diligence. DOF is a member of Maritime Anti-Corruption Network (MACN) is a global business network dedicated to eliminating corruption in the maritime industry, promoting transparency, fair trade and integrity across ports and shipping operations.	Membership, Discussions, knowledge sharing		Perspectives and best practice are implemented to continuously improve due diligence	<ul style="list-style-type: none"> <li>Child and forced labour within extended value chain</li> <li>Labour conditions</li> </ul>
Training and awareness	DOF recognises that training and raising awareness of human rights, and particularly modern slavery, across its employee base and supply chain is key to mitigating, identifying and remediating human rights risks and issues		E-learning modules DOF Workbook Classroom and online awareness training Campaigns Safety Themes DOF Conferences and workshops	Having different channels for mandatory and voluntary training and awareness for our employees and suppliers is essential in building capability in identifying breaches and incidents, spread good culture and value creation.	<ul style="list-style-type: none"> <li>Occupational health and safety</li> <li>Occupational health and safety at shipyards</li> <li>Child and forced labour within extended value chain</li> <li>Labour conditions</li> </ul>

Table 4 (continued)

## RISKS & IMPACTS CONTINUED

### STAKEHOLDER ENGAGEMENT TO IDENTIFY, UNDERSTAND AND PRIORITISE RISK

DOF Group's approach to identifying, understanding and prioritising current and future human rights impacts is based on structured engagement with both internal stakeholders (employees, management, functions) and external stakeholders (suppliers, contractors, clients and authorities).

#### INTERNAL STAKEHOLDER ENGAGEMENT

##### *Governance, risk and compliance structures*

Human rights impacts are addressed through DOF's governance, risk management and compliance framework, with clear roles assigned to the Board, executive management and operational management. Human rights due diligence, grievance and ethical conduct are embedded in the Integrated Management System and monitored through compliance activities.

##### *Employee consultation and reporting mechanisms*

DOF actively engages employees and contractors through formal communication and consultation processes, including participation in risk assessments, audits, management reviews and regular meetings. These forums provide channels to identify and escalate human rights-related risks, including labour conditions and unacceptable conduct.

##### *Grievance and ethics reporting*

Internal and external stakeholders are encouraged to report concerns related to unethical behaviour, human rights breaches or modern slavery through DOF's reporting channels. Reports are investigated and used to identify systemic risks and improvement needs.

##### *Training and awareness*

Mandatory internal training, including the Code of Business Conduct, supports awareness and understanding of human rights, labour standards and modern slavery risks among employees and managers, strengthening early identification and prevention.

#### EXTERNAL STAKEHOLDER ENGAGEMENT

##### *Supplier engagement and contractual expectations*

DOF engages suppliers and contractors through its Supplier Code of Conduct, which sets explicit requirements on human rights, prohibition of forced and child labour, fair working conditions and freedom of association. Suppliers are required to comply as a condition of doing business, enabling DOF to identify and prioritise risks in its supply chain.

##### *Supply chain due diligence and vendor management*

Human rights are addressed through DOF's Supply Chain Management and Vendor Management frameworks. These include supplier pre-qualification, risk assessment and re evaluation processes, allowing DOF to identify higher risk suppliers and geographies and apply enhanced controls where required.

##### *Incident and non conformity management*

External stakeholders, including suppliers and subcontractors, are subject to DOF's non conformity and incident management processes. Reported incidents, near misses or breaches related to working conditions or labour practices are investigated and used to inform risk prioritisation and corrective actions.

##### *Client, regulatory and NGO engagement*

DOF engages with clients and relevant authorities through structured communication channels, audits and compliance reporting. These interactions support alignment with regulatory expectations and provide additional insight into emerging human rights risk in operating regions.

##### *Risk prioritisation and forward looking assessment*

Human rights impacts are prioritised through DOF's materiality and risk assessment processes, including double materiality assessments that consider impacts, risks and opportunities across environmental, social and governance topics. Stakeholder input from internal functions and external parties informs the identification of current and emerging risks and the focus of mitigation measures.

### CHANGES FROM PREVIOUS STATEMENT

In 2025, we strengthened our approach to identifying and managing human rights risks by systematically mapping all such risks through a dedicated risk assessment tool. This tool enables us to capture, categorise and monitor risks across our operations, ensuring that no significant threat is overlooked. At the same time, we analyse the risk based on severity, probability, knowledge, risk impact, attribution and risk strategy. This eventually help us identify the risks and impacts with the highest risk score.

Furthermore, we are committed to deepening our analysis of completed audits. By thoroughly reviewing both internal and supplier audit findings, alongside discussions and interviews with workers who are directly involved in operational activities, we gain valuable insights into where risks and impacts are most likely to occur. This practical engagement with personnel on the ground is critical in recognising and addressing concerns related to human rights and modern slavery.

We have also intensified our focus on these issues within our internal processes, checklists and audit frameworks. By embedding the consideration of human rights into our operational protocols, we aim to enhance vigilance, accountability and responsiveness throughout our organisation.

In our 2024 statement, the high-risk areas were identified as shipyards, hired labour and ethical behaviour. After our ongoing due diligence in 2025 we see that our risks are similar, but the outcome is now aligned with the impacts, risks and opportunities identified in our double materiality assessment.

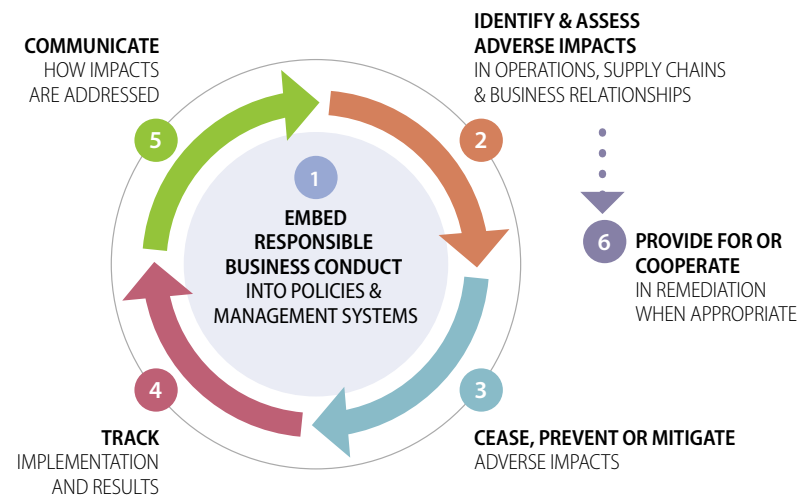
## DUE DILIGENCE PROCESS

### HUMAN RIGHTS DUE DILIGENCE APPROACH

DOF carries out due diligence assessments in line with the OECD Guidelines for Multinational Enterprises. Due diligence is carried out regularly and is an ongoing and iterative process that is constantly evaluated.

The guideline splits due diligence into six steps that the enterprise should follow for compliance with the requirements.

Our compliance table at the end of this report highlights how we adhere to the OECD due diligence steps.



Reference: OECD Due Diligence Guidance for Responsible Business Conduct (EN)



## DUE DILIGENCE PROCESS CONTINUED

### GRIEVANCE MECHANISMS

DOF has implemented several grievance mechanisms, both onshore and offshore. These include escalating concerns directly to a vessel's onshore contact, through a vessel's chain of command, or through our confidential Ethics Helpline. Worker welfare concerns have been received predominantly through the latter two escalation routes. While most of these channels are designed for employees, the Ethics Helpline is also accessible to external stakeholders. These mechanisms are integral to DOF's due diligence practices, enabling the collection and monitoring of feedback from employees as well as entities within the value chain. All reports received are promptly assessed and investigated by a qualified, impartial team, ensuring swift action and the identification of emerging trends or adverse impacts.

### ETHICS HELPLINE

DOF adheres to conducting business according to applicable laws, rules, and regulations. Therefore, we encourage anyone inside or outside our organisation to report any suspected ethical breaches or unethical behaviour by DOF or its employees. A robust feedback loop is an essential tool in a compliance culture. DOF's third-party managed Ethics helpline provides all stakeholders a 24/7-accessible tool to report serious concerns. Reports can be submitted anonymously. The helpline can be accessed from our webpage. We take all concerns or issues seriously, consider them on a case-by-case basis, investigate them thoroughly, and provide an appropriate remedy.



- The [Ethics Helpline](#) is hosted and staffed by an independent third-party provider, who screens all reports for potential conflicts of interest. Reports are then forwarded to DOF for investigation team to be assigned.
- A link to the helpline can be found from the DOF intranet and on our external website - 24 hours a day, 7 days a week and is available in multiple languages.
- Reports can be made by phone or online. **You have the option to remain anonymous.**



An example of how the DOF Ethics Helpline is presented in our company materials.

## DUE DILIGENCE PROCESS CONTINUED

### REMEDIATION POLICIES AND PROCESSES

In DOF, we take all concerns or issues seriously. If an incident has occurred or we find breaches of human rights through our due diligence, we consider them on a case-by-case basis, investigate them thoroughly, and provide an appropriate remedy.

### INCIDENTS OF HUMAN RIGHTS AND MODERN SLAVERY

DOF has not identified any severe incidents of Human Rights Breaches in either our own operations or supply chains in 2025. We have however identified that we have potential impacts on human rights in our value chain. See chapter “Risks and Impacts”. Should DOF identify a concern, the business will investigate the concern thoroughly and ensure that appropriate remediation is provided. DOF will responsibly exit from a supplier found guilty of modern slavery or human rights breaches, should all attempts to ensure compliance through corrective action plans be exhausted. In 2025 DOF did identify improvement areas when doing supplier audits. The audit reports registered in our integrated management system capture non-conformities and observations which are followed up with the supplier after some time and the audit report is not closed out until the findings are handled.

The primary objective of the vendor evaluation process is to ensure that DOF works only with reputable, capable and responsible suppliers who align with DOF’s values and sustainability commitments.

See the list of some of the areas of improvement that DOF suggested that can mitigate human rights impacts and decent working conditions in the value chain.

ACTIVITIES IN THE SUPPLY CHAIN	Improvement suggestions after audit and proactive actions taken through engagement
Supplier in high-risk country	<ul style="list-style-type: none"> <li>DOF suggested that the supplier establish Working Environment Committee.</li> <li>DOF suggested that they Improve whistleblower procedure to protect the identity of the reporter.</li> </ul>
Shipyard	<ul style="list-style-type: none"> <li>DOF suggested to retain Language translators (hand device) for workers with language barriers on site.</li> <li>DOF suggested they implement methods to obtain more worker observations, such as visible QR codes for reporting.</li> <li>DOF suggested that the supplier adjusted working hours of apprentices working on site in accordance with law.</li> <li>DOF suggested they make the tool for reporting non-conformities and incidents known by the workforce.</li> </ul>
Manning agencies	<ul style="list-style-type: none"> <li>DOF held Workshops focusing on DOF values, Code of Conduct and presentation of our ethics helpline.</li> <li>DOF held Crew conference in collaboration with manning agency focusing on safety, leadership, and crew welfare.</li> </ul>
Third-party Maintenance and Repair	<ul style="list-style-type: none"> <li>DOF Suggest establishing an anonymous Whistleblowing procedure. This should be established for both external and internal stakeholders.</li> <li>DOF Suggested to have Safety critical information available in multiple languages for migrant workers.</li> </ul>

Table 5

### VENDOR EVALUATION HIGHLIGHTS

**636**

Vendors assessed in 2025

**95%**

DOF's vendors operate in low prevalence countries for modern slavery risks in 2025

**95%**

DOF's vendors achieved acceptable performance levels in 2025

## DUE DILIGENCE PROCESS CONTINUED

### BUSINESS MODEL

DOF has considered whether our business model may cause, contribute or directly result in any human rights impacts.


We recognise that human rights risks can occur in our own operations, in our supply chain, and associated with our extended business partnerships. DOF also appreciates the high risk nature of offshore work, that can have negative occupational health and safety outcomes for our own and extended value chain.

### PARTICIPATION IN PEER-LEARNING GROUPS

FUTURE-PROOF is Bergen Chamber of Commerce and Industry and The Rafto Foundation for Human Rights' collaboration for business and human rights. DOF is a proud member of FUTURE-PROOF and has signed the FUTURE-PROOF poster to highlight that we stand in this unique commitment together.


The purpose of FUTURE-PROOF is to help businesses to fulfill their human rights responsibilities, through due diligence, both within their own operations and throughout their supply chains.

Through competence and capacity building, combined with the sharing of experiences, FUTURE-PROOF serves as a forum where difficult issues, challenges, and dilemmas can be aired, discussed, and resolved collectively.



## We stand together for human rights

We know that sustainability is about the climate, environment, economic and social conditions. Human rights are a common thread through the UN Sustainable Development Goals. By working together, we stand stronger. By sharing our own knowledge and experiences, we contribute to FUTURE-PROOF, where challenges are expressed, discussed, and solved together.



We take our collective responsibility to respect human rights seriously. We do this, by complying with the UN Guiding Principles on Business and Human Rights (UNGPs).

**This means to:**

- Avoid causing or contributing to adverse human rights impacts through our own activities and address such impacts when they occur.
- Seek to prevent or mitigate adverse human rights impacts that are directly linked to our operations, products or services by our business relationships, even if we have not contributed to those impacts.

**We do this by establishing policies and processes appropriate to our size and circumstances, including:**

1. A **policy commitment**, anchored at the highest level in the organization, to meet our responsibility to respect human rights
2. A **human rights due diligence process** to identify, prevent, mitigate and account for how we address our impacts on human rights
3. **Processes to enable the remediation** of any adverse human rights impacts we cause or to which we contribute

It is not about where we are today, but where, together, we shall stand tomorrow.

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Jostein Hole Kobbeltvedt  
Executive Director  
Rafto Foundation for Human Rights

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Mons S. Aase  
Chief Executive Officer  
DOF Group

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Marit Warncke  
Chief Executive Officer  
Bergen Chamber of Commerce and Industry

## TRAINING

### INTERNAL AND EXTERNAL TRAINING

DOF recognises that training and raising awareness of human rights and modern slavery, across its employee base and supply chain is key to mitigating, identifying and remediating human rights risks and issues. All employees have access to training material in DOF Training Portal, and the course catalogue gives access to both optional and mandatory e-learning courses. The Code of Conduct module is mandatory for all DOF staff, which includes awareness of DOF's stance on human rights. Vessel captains and their crews must complete our Maritime Labour Convention e-learning, which provides an overview of our international labour standards obligations, the training material is delivered by DNV.

The voluntary training on the topic include:

- The Amnesty eLearn modules that have been made by Amnesty with input from companies in the industry and DOF. The modules are interactive and provide the basic Human Rights requirements and means to be a responsible employer.
- Modern Slavery Awareness Training produced by Slave Free Alliance

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

### TRAINING PROGRAMME MATERIALS

In 2024, DOF enhanced awareness of human rights violations in shipyards by conducting specialised training sessions for internal auditors and other key personnel. These sessions were delivered by Slave-Free Alliance using an interactive workshop format to foster greater engagement and commitment from employees. Insights gained from this training led to improvements in DOF's internal shipyard assessment tools, incorporating additional checkpoints to address potential human rights impacts and violations.

In 2025 DOF decided to continue this training by making it an annual offer to internal stakeholders and broadening the scope and focus to other risk areas. The training also included valuable insight from our first human rights audit on Shipyard performed earlier that year, including the use of the updated shipyard assessment form.

### CONTINUOUS IMPROVEMENT

During the year DOF will continue internal training to raise the awareness of human rights and modern slavery among DOF's global workforce. The training is given in e-learning courses as well as in classrooms and workshops, and at our conferences and gatherings. DOF is always seeking to improve the quality of e-learning training material in addition to ensuring it reaches the most applicable audience.



## EFFECTIVENESS

### GOAL SETTING

DOF annually refreshes its double materiality assessment, which informs strategic priorities and goal setting for social risks, including human rights exposure across the value chain.

Following the global gap analysis conducted with Slave Free Alliance, DOF has established a multi year human rights action plan designed to drive continuous improvement and target key risk areas where DOF has leverage. This action plan is designed to ensure continuous development of DOF our human rights and modern slavery focus. In 2025 DOF committed to continue its collaboration with Slave Free Alliance for three more years to ensure continuous improvement and development.

We are committed to continually improving our efforts in addressing human rights risks and modern slavery in our operations, as well as increasing the visibility of our supply chain and maintaining transparency of the process. We commit to prioritising the following actions activities as part of our short to medium term timeframe:

- We will provide ongoing training to the Global Supply Chain teams, focusing on responsible procurement and increasing awareness of governing documents related to this area.
- Supplier audits will incorporate a stronger human rights focus, while our internal auditors will receive additional

training to enhance their awareness.

- We continue working on our visibility of worker demographics, recruitment journeys, and employment practices concerning all workers in our supply chain.

### TARGETS AND ACTIONS

Since starting our collaboration with Slave Free Alliance, DOF has already performed improvement actions aligned with the gap analysis and action plan, this includes, but is not limited to:

- Developing a DOF Supplier Code of Conduct and integrating it into our processes.
- Delivering annual Modern slavery awareness training to internal stakeholders.
- Making awareness training available as e-learning course for all employees.
- Including human rights focus on our audit and inspection procedures.
- Continuous improvements on our due diligence and risk assessment processes.
- Collaboration and knowledge sharing with external stakeholders.
- Conducting a full Human Rights audit on Shipyard and using lessons learned from the audit in our annual modern slavery awareness training.
- During 2025 DOF has enhanced our Vendor Evaluation Questionnaire to include information and questions regarding the welfare of workers. This

includes questions on minimum wage and overtime pay.

- Since 2024 and in accordance with CSRD, DOF reviews minimum wage levels for employees in each country to ensure that all wages paid are above these standards. Additional details can be found in the annual report.

### MONITORING AND EVALUATION

Progress against human rights related goals is monitored through DOF's management systems using the Plan-Do-Check-Act principle, with annual actions and targets established where relevant.

Implementation and progress are tracked via global and regional improvement plans, reviewed in management review meetings and reported to the CEO and Board of Directors through regular reporting cycles.

DOF reports year on year progress publicly through its Transparency Statement and Integrated Annual Reporting.

## EFFECTIVENESS CONTINUED

### USE OF DATA

#### QUANTITATIVE DATA

DOF uses structured data points to monitor implementation and outcomes, including:

- **Supplier and value chain data:** Results from supplier due diligence and evaluation processes, including vendor assessments against human rights and labour standards, are used to identify risk levels and track coverage across the supply chain.
- **Audit and compliance metrics:** Findings from internal audits, vessel audits and compliance reviews (including Maritime Labour Convention elements) are recorded and tracked, allowing DOF to monitor non conformities, corrective actions and close out rates over time.
- **Incident and reporting data:** Data from formal reporting channels, including the Ethics Helpline and internal reporting systems, is analysed to identify trends, recurrence and effectiveness of response and remediation actions.
- **Training completion data:** Quantitative tracking of mandatory and role specific training (e.g. Code of Business Conduct and human rights awareness modules) is used to assess workforce coverage and compliance.

#### QUALITATIVE DATA

Quantitative metrics are complemented by qualitative inputs to assess effectiveness in practice, including:

- **Audit interviews and observations:** Vessel and site audits include crew interviews and on site observations, providing qualitative insight into working conditions, awareness of rights and effectiveness of preventive measures.
- **Case by case assessments:** Reported concerns related to human rights or worker welfare are investigated individually, with qualitative evaluation of root causes, remediation effectiveness and lessons learned.
- **Management reviews and materiality assessments:** Outcomes from annual double materiality assessments and management reviews provide qualitative judgment on whether existing controls adequately address evolving human rights and modern slavery risks.
- **External engagement and benchmarking:** Input from external partners, including expert organisations involved in human rights gap analyses, is used to qualitatively assess maturity and identify areas for improvement.

### OUTCOMES AND FINDINGS

How findings from monitoring and evaluation have fed into and influenced business practice:

- **Strengthened governance, policies and frameworks:** DOF has a Supplier Code of Conduct. Our Shipyard assessment form has been further adjusted to include Human Rights aspects of an audit/inspection.
- **Due diligence and supply-chain controls implemented:** DOF Utilises Factlines software and vendor evaluation questionnaire that is built up on the UN Global Compact. It has also been further adjusted to capture more of the human rights compliance in the value chain.
- **Audits, issue identification and remediation:** In 2025 DOF conducted 24 supplier audits, including one Human Rights audit on a Shipyard, supported by Slave free alliance
- **Training, awareness and workforce coverage:** DOF Conducts annual Modern Slavery Awareness sessions with internal stakeholders. In 2025 the focus was built around the approach and findings of the Human Rights audit provided by Slave Free Alliance.
- **Reporting and transparency:** DOF ensures compliance on due diligence and responsible conduct by being transparent and reporting in accordance with international laws

### INTERNAL AND EXTERNAL ENGAGEMENT TO ENSURE EFFECTIVE MONITORING AND EVALUATION

DOF's monitoring and evaluation of human rights impacts and modern slavery risks is carried out through structured collaboration with internal functions, the workforce, suppliers and external expert organisations, embedded within its governance and management systems.

#### BOARD AND EXECUTIVE MANAGEMENT

- The Board of Directors has overall responsibility for oversight of human rights and modern slavery risks, with executive management responsible for implementation and follow up. Monitoring outcomes are reviewed through formal governance and reporting processes, as described in the Integrated Annual Report.

#### OPERATIONAL MANAGEMENT AND HSEQ FUNCTIONS

- DOF's operational management, including vessel management and HSEQ functions, plays a central role in monitoring human rights impacts through audits, inspections, observations and reporting systems. Vessel audits include Maritime Labour Convention elements and crew interviews, ensuring direct operational input into evaluation of labour and welfare conditions.

## EFFECTIVENESS CONTINUED

- Findings from audits and reports are managed through DOF's Non Conformity and Incident Management framework, enabling structured investigation, corrective actions and organisational learning.

### EMPLOYEES AND CREW

- Employees and offshore crew are key internal stakeholders in monitoring effectiveness. DOF provides multiple reporting channels, including line management and the Ethics Helpline, enabling workers to raise concerns related to human rights or labour practices. Reported issues form part of DOF's evaluation of risk exposure and control effectiveness.
- Mandatory training (e.g. Code of Business Conduct and Maritime Labour Convention training) supports awareness and enables employees to contribute meaningfully to monitoring and early identification of risks.

### SUPPLIERS AND BUSINESS PARTNERS

- DOF engages suppliers through due diligence, evaluation and ongoing dialogue. Suppliers are assessed against human rights and labour standards, and findings from these

assessments influence follow up actions, additional due diligence or continuation of business relationships. This engagement is a core element of DOF's monitoring approach across its supply chain.

- Suppliers are required to align with DOF's Supplier Code of Business Conduct.

### EXTERNAL EXPERT ORGANISATIONS

- DOF works with external human rights specialists, including its partnership with Slave Free Alliance, which has supported gap analyses and development of a multi year human rights strategy. This external engagement provides independent input into how DOF evaluates the effectiveness of its controls and identifies areas for improvement.

### STAKEHOLDERS AND RIGHTS HOLDERS

- DOF recognises the importance of access to grievance mechanisms for workers and other stakeholders. The availability of confidential and, where legally permitted, anonymous reporting channels is described as a key mechanism for gathering feedback and monitoring real world impacts.

### CONTINUOUS IMPROVEMENT ON MONITORING AND EVALUATION

In 2022, we partnered with Slave-Free Alliance for three-years to support DOF in maintaining its approach to human rights. Slave-Free Alliance acts as an extension of our team and critical support. In 2023, together we carried out a global, multi-stakeholder gap analysis across our business to identify best practice and areas for improvement and focus.

From the document review and discussions, we developed a multi-year human rights action plan which will ensure that we continuously develop our human rights program in a way that considers our leverage in the most effective spaces and targets our key risk areas.

In 2025 DOF renewed its partnership with Slave-Free alliance to continue the collaboration and improvement of DOF's work for Human rights.

In 2025 DOF has improved its risk and due diligence assessment by assessing a tool to monitor and evaluate all risks related to human rights impacts and modern slavery. This allows for improved assessment and ongoing monitoring of risk changes. The

impacts are measured from information available in DOF's management systems, such as audit reports, interviews and complaints received.

DOF has also worked on identifying all international laws that the organisation is required to comply with regarding human rights and modern slavery across the globe. In order to strengthen compliance and improve efficiency, DOF has consolidated all relevant statements, information, and disclosure requirements into a single document. This approach enables the company to operate in a more effective and unified manner, ensuring consistency in its response to international legal obligations.

## DEFINITIONS

		REGIONAL REPORTING LANGUAGE		
		UK Modern Slavery Act	The Australian Modern Slavery Act	The Norwegian Transparency Act
TERM	Modern slavery	Slavery, servitude, forced or compulsory labour and human trafficking.	Human trafficking, slavery, servitude, forced labour, forced marriage, debt bondage, the worst form of child labour and deceptive recruiting for labour or services.	
	Human rights			<p>Fundamental human rights refer to the internationally recognized human rights that result from, among other things, the UN Covenant on Economic, Social and Cultural Rights from 1966, the UN Covenant on Civil and Political Rights from 1966 and the ILO's core conventions on fundamental principles and rights at work.</p> <p><i>* Modern Slavery is interpreted by DOF to be a human rights violation.</i></p>
	Decent working conditions			Decent working conditions means work that safeguards fundamental human rights and health, safety and environment in the workplace, and that provides a living wage.

## INQUIRY RELATED TO HUMAN RIGHTS PERFORMANCE

Should you have any other inquiries related to our Human Rights Performance, please contact us at [management@dof.com](mailto:management@dof.com). If you use this channel, please include the subject "Åpenhetsloven". This information is also available on our website.

## COMPLIANCE TABLE

TOPICAL DISCLOSURE REQUIREMENTS	REGIONAL REPORTING REQUIREMENTS			PAGE
Reporting entities covered by the joint statement	<p>( United Kingdom )</p> <p>DOF UK Ltd DOF Shipowning UK Ltd DOF Offshore UK Ltd DOF Subsea UK Ltd</p>	<p>( Australia )</p> <p>DOF Australia Pty</p>	<p>( Norway )</p> <p>DOF Group ASA DOF AS DOF Offshore Holding AS DOF Rederi AS DOF Management AS DOF Sjø AS DOF Subsea Atlantic AS DOF Shipowning Norway AS DOF Subsea AS DOF Subsea ROV AS DOF Subsea Rederi III AS DOF Subsea Rederi AS DOF Subsea Chartering AS DOF Subsea Norway Offshore AS DOF Subsea Norway AS Skandi Hera AS</p>	24
Organisation and supply chain structure	The organisation's structure, its business and its supply chains.	Describe the structure, operations and supply chains of each reporting entity covered by the joint statement.	General description of the enterprise's structure, area of operations.	3-7
Policies and management systems	The organisation's policies in relation to slavery and human trafficking.		How responsible business conducted is embedded into DOF's policies. How responsible business is conducted into management systems.	8-9
Risk assessment and due diligence	<p>The parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk.</p> <p>Due diligence processes in relation to slavery and human trafficking in its business and supply chains.</p>	<p>Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls.</p> <p>Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.</p>	<p>Information regarding identification and assessment of adverse in operations, supply chains and business relationships.</p> <p>Information regarding measures the enterprise has implemented or plans to implement to cease, prevent or mitigate adverse impacts or mitigate significant risks of adverse impacts, and the results or expected results of these measures.</p> <p>Information regarding how we track the implementation and results of measures.</p> <p>Information regarding how we communicate with affected stakeholders and rights-holders regarding how adverse impacts are addressed and provide for or co-operate in remediation and compensation where this is required.</p>	10-18
Training	The training about slavery and human trafficking available to its staff.			19
Effectiveness	Effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate	<p>Describe how the reporting entity assesses the effectiveness of such actions.</p> <p>Describe the process of consultation with any entities the reporting entity owns or controls.</p>		2, 20-22

## SIGNING STATEMENT

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This statement has been signed electronically by the board of directors and CEO of DOF Group ASA:

Storebø, 21 May 2026

Harald Thorstein, Chair of the Board of Directors

Erik Bergöö, Vice Chair of the Board of Directors

Christine Morris, board member

Adrian Geelmuyden, board member

Kristin Holth, board member

Mons Aase, CEO

*Company subsidiary signing statements can be viewed here.*





[www.dof.com](http://www.dof.com)