

The DOF Group

Code of Business Conduct

Guidelines for safe, legal, ethical decision-making, everywhere we do business



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Message from CEO

The DOF Group's absolute commitment to honest, ethical business



Dear Colleagues,

The DOF Group is a global organisation with a multi-national team. Each of us plays a vital part in achieving safe, successful outcomes and, understandably, we take pride in the way we do business. We operate in a complex environment, work across geographical borders, and in multiple jurisdictions. Which is the very reason DOF has a Code of Business Conduct (COBC), to support common sense and good decision making at work. To act as a guide in the moments where we are unsure, where we face complex or even simple situations. To be on hand with clear advice when a situation feels wrong. To make it simple for everyone to meet the Group's expectations for professional standards and ensure compliance across a wide range of policies, rules, and regulations. The COBC is here to keep everyone safe. We can't cover every situation you may encounter, so, if in doubt, apply the watertight integrity test.

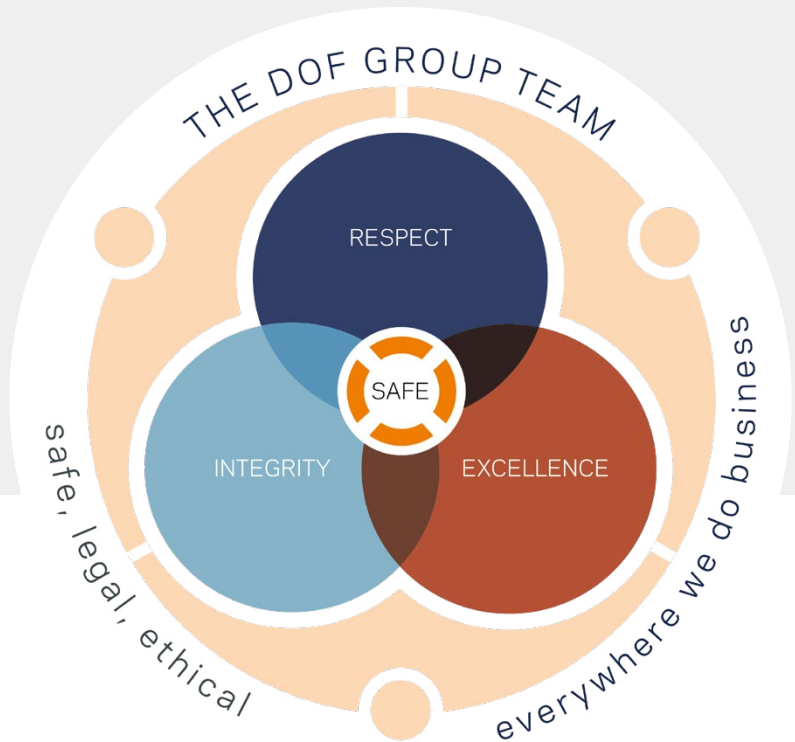
We use the World Economic Forum's four pillars of sustainable economic growth – People, Planet, Prosperity and Principles to group topics. It's clear sustainable economic growth is essential to our collective future. We hope to strengthen understanding of these concepts and share the DOF Group's ESG progress through links and suggested additional reading throughout the book. We aim to support greater transparency and accountability with more ways to access ESG reporting.

Thank you for the professionalism, hard work, and the vital contribution you make in achieving our vision.

Mons S. Aase
Chief Executive Officer

Our values

We conduct our business ethically and with integrity. Our values interact with each other to shape our remarkable team and strong safety culture. They are embedded in our policies, our code of business conduct and our safety culture. The DOF Group values are Respect, Integrity, Teamwork, Excellence, and above all we are SAFE.



Why we need a code of business conduct

The code of business conduct supports **good decision-making** and helps us understand our **roles and responsibilities** in complying with laws, regulations and policies, **everywhere we do business**.

The DOF watertight integrity test

Think the RITE way. Apply this watertight integrity test and **if the answer to any of these questions is 'No', take action.**



IS IT SAFE?

Never compromise safety, your safety is our priority



IS IT LEGAL?

Wherever we work, we never break the law



DOES IT REFLECT DOF VALUES?

Always act safely, respectfully, with integrity, contributing to the team to achieve excellence



WOULD I BE COMFORTABLE TALKING ABOUT IT?

If you wouldn't feel comfortable talking about this with your family, friends and colleagues or if your actions won't withstand scrutiny, change your behaviour; don't do it

If you see something unacceptable ...

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.



What is unacceptable conduct?

- Dishonest, fraudulent or corrupt actions
- Illegal: such as theft, drug sale or use, violence, harassment or intimidation, criminal damage to property or other breaches of state or federal law
- Unethical: such as dishonestly altering company records or data, adopting questionable accounting practices or willfully breaching DOF's policies
- Potentially damaging to DOF or a DOF person, such as unsafe work practices or substantial wasting company resources
- May cause financial loss to DOF or damage its reputation or be otherwise detrimental to DOF's interests
- Involves any other kind of serious impropriety

... raise your voice.



The Code of Business Conduct is approved by the Board of Directors and supported by the management structure. Concerns can be resolved using the structure shown below. However, you can also report them anonymously.



- 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.

If you see something unacceptable raise your voice.

- Report it immediately to your supervisor or any other senior member of your business unit or the human resources manager or a member of the legal department.
- Go to the Ethics Helpline reporting website via links available from either the DOF intranet or the external company website.

If you feel your concern will not be treated impartially or has not been adequately addressed, you can raise your concern with external authorities, directly.

Our non-retaliation policy

Non-retaliation means the DOF Group will not tolerate any threats, acts of retaliation or harassment against you for speaking up and raising concerns. You may speak-up in good-faith without fear of your employment being disadvantaged, or fear of intimidation or reprisal. The DOF Group will review and respond to all reports of unethical or unlawful actions or unacceptable conduct.

Think  the RITE way

DOF leadership principles

Wherever we are in the world, whatever our role in the Company, our individual efforts combine with the effort of others to keep us on course to achieve our vision. Each of us has an important role in the DOF team and our future success. We work towards a common goal.

In this way, leadership is important to us all. DOF's leadership principles include critical leadership behaviours, we can use from our first day in the workforce and which are proven to allow us all make the biggest impact over time.

Related links and documents

[DOF Workbook and training](#)

DOF's leadership principles are based on established theory. Jack Zenger and Joseph Folkman's work confirms the behaviours successful leaders use from their first day in the workforce, no matter how high they rank. See zengerfolkman.com

At every level of management DOF Leaders;



inspire and motivate



show integrity



solve problems



drive for results



communicate

UN Global Compact - Sustainable Development Goals

DOF ensures the UN Global Compact principles for Human Rights, Labour, Environment and Anti-corruption are upheld within our organisation and along our supply chain.

Based on the UN Global Compact, the 17 Sustainable Development Goals (SDGs) are the blueprint to achieve a better and more sustainable future for all. DOF has assessed the specific SDGs where we have the greatest impact and can make a significant contribution as part of our operations.

Related links and documents

sustainabledevelopment.un.org

[DOF's Integrated Annual Report](#)

unglobalcompact.org

We align with eight SDGs



People



Planet



Prosperity



Principles

Tomorrow's success
depends on our dedication
and commitment today.





SAFE, DIVERSE AND INCLUSIVE WORKPLACE FOR OUR PEOPLE

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Companies are their
People. Together, we
strive for a culture of
diversity, equality, and
continuous development,
in a safe, inclusive
workplace. We offer fair
work, with career
prospects to an engaged,
skilled workforce.

MONITORING AND MEASURING

Transparency with external monitoring and measurement agencies ensures we identify areas to review and adjust strategies for continuous improvement in human rights protection and as responsible employers.

Find out more at: www.dof.com



Sustainable Development Goals



Human rights

DOF ensures the UN Global Compact principles for Human Rights, Labour, Environment and Anti-Corruption are upheld within our organisation and along our supply chain.

We support and promote fundamental Human Rights and ensure our operations do not breach international standards and conventions. We avoid causing or contributing to adverse Human Rights impacts through our operations, and seek to prevent adverse Human Rights that are directly linked to activities through our business relationships.

The rules

- **Comply with all applicable laws** and respect internationally recognised human rights, where we operate.
- **Follow consistent procedures** among our companies and business partners to achieve a high common standard even where business practices in the countries in which we operate differ.
- **Ensure all parties we work** with share and implement the same standards of human rights
- **Always report** incidents of unacceptable behaviour or deficiencies in the system.

If you need more information or these rules raise any questions, ask your senior manager or HR representative. If you witness non-compliance with any of these rules you can also contact the Ethics Helpline.

Definitions

Human rights: The rights inherent to all human beings, whatever our nationality, place of residence, sex, national or ethnic origin, colour, religion, language, or any other status. We are all equally entitled to our human rights without discrimination. These rights are all interrelated, interdependent and indivisible.

Trafficking: Human trafficking is the exploitation of children, women and men to perform work and services using force, violence, threats, deception or exploiting the person's vulnerable situation.

Under-age labour: refers to the employment of under-age persons in any work, or work that deprives children of their childhood, interferes with their ability to attend regular school, and that is mentally, physically, socially or morally dangerous and harmful.

The watertight integrity test

Ask yourself the following questions -

If the answer to any of them is 'No', take action.

Can you see due diligence has been followed to ensure business partners comply with applicable Human Rights laws and DOF values?

You suspect a violation of Human Rights laws, and have reported it promptly?

Would you be comfortable if a member of your family, or friendship group was treated in this way?

Think  the RITE way

“ Always conduct business with the principles of honesty and fairness ”

EXAMPLES AND DILEMMAS

One of your peers has refused to accept that his/her employees are part of a union.

At DOF, all employees are free to associate, organise and bargain collectively. You should bring this to your co-worker's attention as it is against the company's policy.

You have been made aware that a supplier is using children to pack their goods for shipment to our DOF vessels. What is the right thing to do?

Notify Senior Management and the Legal Department and suspend use of that supplier.

Is it okay to use a subcontractor who underpays his employees?

No it is not! Notify Senior Management and the Legal Department and suspend use of that supplier.

Related links and documents

- [DOF ASA Human Rights and Slavery Statement](#)

Occupational health and safety

The DOF Group ambition is to be an incident free organisation. By planning, organising and assessing activities, we ensure all identified risks and hazards are reduced to a level that is as low as reasonably practicable.

The rules

- **Always apply applicable laws and regulations:** if they are not clear, or they are lacking, use the company and industry best-practice to guide your actions.
- **Consider all accidents,** incidents and occupational illnesses to be **preventable**.
- **Always speak up** - use your Stop Work Authority - when you see a potential risk. Never remain silent – bring the risk to someone's attention.
- Always **promote a working culture which empowers all personnel** to achieve best practice in Health and Safety performance.
- **Choose products** and technical solutions **with the least impact to your health and environment**.

If you need more information or these rules raise any questions, ask your HSE representative. If you witness non-compliance with any of these rules you can also contact the Ethics Helpline.

Definitions

Occupational health and safety: All aspects of health and safety in the workplace or at work with a strong focus on primary prevention of hazards.

Working environment: The location where a task is completed. When pertaining to a place of employment, the work environment involves the physical geographical location as well as the immediate surroundings of the workplace, such as a construction site or office building.

“ Everybody has my authority to stop work if they see something that places themselves or others at risk ”

Mons S. Aase
Chief Executive Officer

The watertight integrity test

Nothing is more important than your safety and that of your colleagues. IOGP's nine life saving rules assist with planning, organising and assessing activities before starting any task. They help identify hazards, manage risks and put critical controls in place.

Apply this watertight integrity test -
if the answer is 'No', stop and re-plan the task.

Has a proper Toolbox Talk been conducted?

Does the task fit within the rules?

Have risk assessments been conducted and safety precautions implemented?

Are all permits to work and authorities in place?

Am I wearing the correct PPE?

Do I have fall protection equipment if I am working at heights?

Think  the RITE way



Stop Work Authority

Raise your voice when you see a potential risk.
Never remain silent - bring the risk to someone's attention

Your STOP WORK AUTHORITY is one of our most important safety barriers - always use it if you see something that places yourself or others at risk.

EXAMPLES AND DILEMMAS

You see a breach of our PPE standard, what do you do?

You are obliged to stop the person. Address them directly and let them know what they need to do to correct the situation.

You get a minor cut to your arm at work and seek advice by your doctor after work. He gives you a tetanus shot. Should this be reported?

Yes, and as a start you should seek advice from your local HSE advisor.

You are in a rush and are told to skip the permit to work rules. Is this OK?

No, it is never acceptable to skip the permit to work rules. Breaking the life saving rules could have deadly consequences for yourself and others.

Related links and documents

[Health, Safety and Working Environment Policy](#)

[Occupational Health and Safety Manual](#)

Drug and alcohol misuse

The DOF Group has zero tolerance towards employees or third parties who do not adhere to the Drug and Alcohol Policy in the workplace or at work. DOF Group will not accept any content of alcohol or drugs in breath, urine or blood. Our duty-of-care is to ensure all individuals are 'fit for work' whilst undertaking activities on the Group's behalf.

Factors such as substance and alcohol abuse, fatigue, stress and illness impair personal performance and are a risk to a safe working environment. Self-medication using drugs and or alcohol may be linked to mental health disorders and it is essential to seek help to feel good again. If you're finding it challenging to take that first step, please don't wait to use the resources we have in place - they're completely private and confidential.

The rules

- **Never show up for work under influence** or affected by drugs or alcohol and remain unaffected while at work.
- When on board our vessels **always disclose any prescription drugs you are taking** that can impair work performance to the Medic or Captain.
- **Always remember you are still representing the Company** when you are travelling for work. You should not be intoxicated or impaired by alcohol or drugs when travelling on company business.
- **Never use, store, distribute, purchase or sell alcohol or drugs** in the workplace or at work.
- **Know the symptoms** of depression, anxiety, and other mental health disorders. Seek help if you notice any of these symptoms in yourself or others.

If you need more information or these rules raise any questions, ask your senior manager or HR representative. If you witness non-compliance with any of these rules you can also contact the Ethics Helpline.

Definitions

Drugs and alcohol: Includes alcohol, illegal drugs, narcotics, prescription and non-prescription drugs, and other substances that can be inhaled, injected, ingested, or otherwise absorbed by the body and can alter a person's mood, comprehension, coordination, reaction, or judgment.

An illegal or prohibited substance: A substance that has not been obtained by persons authorised to do so. Prescription drugs purchased illegally or not prescribed by a licensed physician are also considered illegal or prohibited substances.

Self-medicating refers to the misuse of drugs or alcohol in an attempt to manage the distressing symptoms of a mental health disorder or other health condition.

The watertight integrity test

Never consume alcohol or illegal substances when performing activities for the DOF Group.

Ask yourself the following questions -

If the answer to any of them is 'No', take action.

Are you sure you are not impaired in any way by drugs or alcohol, illegal or otherwise?

Are you sure none of your teammates are in anyway impaired by drugs or alcohol, illegal or otherwise?

If you are on board a vessel, have you disclosed any medicines you are using to the Medic or Captain?

Do you know the signs of depression, self medication, poor psychological health or strain?

Are you familiar with the 'symptom cards' in the DOF Workbook?

Are you familiar with your local Employee Assistance Program?

Think  the RITE way

“ The DOF Group has ‘zero tolerance’ to drugs and alcohol in the workplace or at work ”

☀️ EXAMPLES AND DILEMMAS

You are receiving medical treatment that includes drugs that may affect your ability to perform your work duties safely.

There is an obligation to report this to the medic/captain when working offshore. Onshore, it is a courtesy to mention this to your manager or HR as it could affect your work.

Some of your colleagues are drinking on the way to the vessel for your next offshore trip. They are still under influence when they come to the gangway. What should you do?

DOF has a zero tolerance policy for alcohol content in the body when entering any vessel. People under the influence of alcohol are not allowed to enter our vessels.

You want to arrange a social function for your team and are planning to do that after work in a bar nearby the office.

This is often common practice and is important for building relationships with our colleagues. If alcohol is served it must be served and consumed in a responsible way. Always remember that it is still a work arrangement.

Related links and documents

[Drugs Fitness Policy](#)

[Drug and Alcohol Standards](#)

See Physical, psychological and social well-being ([page 22](#))

[Workbook Chapter 11](#)

Diversity, equality and inclusion

We value and promote diversity and inclusion in every aspect of our business. It makes us a stronger, more productive, inspirational place to work. A workplace where all are treated fairly, accepted and included equally so we can all benefit from the different talents, experiences and perspectives a diverse team offer and the individual contribution employees make.

Treating people with dignity and respect at work is our guiding principle. We uphold wage and benefit laws and, in line with UN Global Compact, support the right to Freedom of Association & Collective Bargaining and have Grievance Systems in place.

The rules

- **Become familiar with** and follow the applicable company policies, procedures, laws and regulations.
- **Be guided by principles of fairness and respect:** treat employees equally regardless of age, sex, race, disability, political, religious or sexual orientation / preference, or national origin.
- **Recruit, reward or promote** employees, based on merit, using transparent, fair and equitable processes.
- Actively **promote a safe, healthy and fair environment** in which people can work to their full potential and meet business objectives.
- **Be aware and recognise behaviours** that are considered unacceptable.

If you need more information or these rules raise any questions, ask your senior manager or HR representative. If you witness non-compliance with any of these rules you can also contact the Ethics Helpline.

Definitions

Equal Opportunity Employer: DOF gives consideration for employment to qualified applicants without regard to gender, religion, race, national or ethnic origin, cultural background, social group, disability, sexual orientation, gender identity, marital status, age or political opinion.

Diversity: 'LGBTIQA+' is an evolving acronym that stands for lesbian, gay, bisexual, transgender, intersex, queer/questioning, asexual. Many other terms (such as non-binary and pansexual) that people use to describe their experiences of their gender, sexuality and physiological sex characteristics.

Minority group: "any group of people who, because of their physical or cultural characteristics, are singled out from the others in the society in which they live for differential and unequal treatment", *Louis Wirth*

The watertight integrity test

Ask yourself the following questions -

If the answer to any of them is 'No', take action.

All the selection processes you are involved in are based on merit?

Have you removed yourself from involvement in the recruitment, or promotion of a family member or close friend?

Have you made sure no-one in the team you control is involved in the selection of a family member or close friend?

Do you recognise the factors that can bias good judgement?

Are you aware we are all affected by unconscious bias? Have you worked to identify your blind-spots to ensure the highest level of equality in your interactions?

Do you treat everyone with respect, fairly and equally?

Does your behaviour conform to the DOF Group Code of Business Conduct?

Think  the RITE way

Related links and documents

- [Equal Employment Opportunity policy](#)
- [DOF Group HR Manual](#)
- [Human Resources Policy](#)

“ Individual contribution, different talents, experiences and perspectives benefit us and our workplaces ”

EXAMPLES AND DILEMMAS

You see what you think may be an example of inequality.

Always raise concerns regarding behaviour that is contrary to our policies, laws or regulations.

You have been on a selection committee and, although no rules or principles have been broken, you have some thoughts on how it might be improved.

Always record ideas for improvement through the management system so it can be assessed, actioned and not lost.

You hear a team member use language or make comments that could be unintentionally derogatory to others.

If you feel comfortable to do so, speak up and explain to your team member about how their comments or language could be perceived. Otherwise, discuss with a Senior Manager or HR representative. We can all hold one another accountable to improve our inclusive behaviours.

You believe you have experienced discrimination for being part of a minority group.

Immediately report the matter through one of the reporting channels on page 7. The DOF group does not tolerate any form of racial, sexual discrimination or ableism in the workplace.

Workplace misconduct, bullying, sexual harassment

DOF is committed to providing a safe environment for all its employees free from discrimination on any grounds, free from bullying and harassment at work, including sexual harassment.

DOF operates a zero-tolerance policy for any form of sexual harassment in the workplace, treats all incidents seriously and promptly investigates all allegations of sexual harassment.

Any person found to have sexually harassed another will face disciplinary action, up to and including dismissal from employment. All complaints of sexual harassment will be taken seriously and treated with respect and in confidence. No one will be victimised for making such a complaint.

“ If you see something unacceptable raise your voice. ”

The rules

- **Comply** with the non-harassment policy.
- **Be aware of the risk factors for harassment and sexual harassment.** These include circumstances where a power imbalance between team members exists and other factors such as low diversity, isolated or remote work.
- **Know the reporting process** and reporting options – formal, informal, and anonymous.
- **Ensure that a person is not victimised** for speaking-up about misconduct.
- **Speak-up** if you know there is a problem. Report it immediately to; your supervisor or any senior manager or, the human resources manager or, a member of the legal department or, the Ethics Helpline reporting website via links available from either the DOF intranet or the external company website.

If you need more information or these rules raise any questions, ask your senior manager or HR representative. If you witness non-compliance with any of these rules you can also contact the Ethics Helpline. If you feel your concern will not be treated impartially or has not been adequately addressed, you can raise your concern with external authorities, directly.

Definitions

Harassment includes any unwelcome behaviour that offends, humiliates or intimidates a person. Harassment can involve physical conduct, verbal conduct or visual conduct (e.g., in the form of posters, email, or SMS messages).

Sexual harassment is unwelcome conduct of a sexual nature which makes a person feel offended, humiliated or intimidated, where that reaction is reasonable in the circumstances.

Workplace bullying is the repeated and unreasonable behaviour directed towards a worker or group of workers.

Mobbing or 'group bullying', mobbing in the workplace involves groups of people targeting a co-worker for isolation, humiliation, and aggression

Abuse of power is the misuse of a position of power to take unjust advantage of individuals, organisations, or governments.

The watertight integrity test

Ask yourself the following questions -

If the answer to any of them is 'No', take action.

If you have been bullied or harassed, have you reported it?

If you have witnessed bullying or harassment, have you reported it?

If someone has brought a case of bullying and harassment to your attention, have you taken it seriously and reported it?

If you have witnessed a person using their position to take advantage of another individual, have you intervened or reported it?

If someone has threatened your job position, this is harassment. Have you reported it?

Think  the RITE way



- 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.

EXAMPLES AND DILEMMAS

What should I do if I am being sexually harassed at work?

Sexual harassment can cause psychological and physical harm, it should not be ignored. DOF has information and support on how to respond if sexual harassment is directed at you, what you should do if you witness it and how to report it. Seek the help you need in order to report any instances of sexual harassment. Do not stay silent.

What should I do if I see or hear about sexual harassment at work?

Speak up if you know there is a problem. Report the instance using any of the channels listed.

You believe you have been subjected to prohibited workplace conduct.

Immediately report the matter through the reporting channels. The DOF group does not tolerate any form of harassment, (including sexual harassment or bullying) in the workplace. The Group seeks to create an environment of empathy, mutual respect, and understanding amongst all staff.

I saw a post on a private social media group about a colleague that was unkind, should I report it?

If you see something like this, always speak up. Bring it to the attention of your HR Manager.

Related links and documents

- [Ethics Helpline](#)
- [Workplace Harassment Policy](#)

Physical, psychological and social well-being

Physical and Psychological health impact each other. Psychosocial health says the relationship between psychological factors and the physical body can be influenced by social factors* as well as more recognisable factors like stress and fatigue.

Taking care of physical and psychological health (daily personal well-being) can help people cope with stressors in healthy ways, realise their potential and live productively. The World Health Organisation (WHO) Health Promotion guidelines include advice for optimal exercise, nutrition, and sleep habits.

If a person's psychological health is under strain, it can be hard to build healthy habits, lives can be affected negatively, and the signs of strain can show up in work environments and other relationships. Substance and alcohol abuse as self medication may be a sign of poor psychological health. It is essential to seek help to feel good again. If you're finding it challenging to take that first step, please don't wait to use the resources available - they're completely private and confidential.

*Examples of psychosocial factors include social support, loneliness, marriage status, social disruption, bereavement, work environment, social status, and social integration.

The rules

- **Build healthy** well-being habits.
- **Ensure you have adequate fitness for work.**
- **Be proactive** in identifying symptoms of depression, anxiety, and other disorders.
- **Don't remain silent** if you or someone you know is in distress.
- **Have a plan** for potential situations.
- **Know how to contact** your local Employee Assistance Program (EAP).
- If in doubt **seek help, don't wait, speak to a colleague**, onboard medics or local EAP.

If you need more information or these rules raise any questions, ask your senior manager or HR representative. If you witness non-compliance with any of these rules you can also contact the Ethics Helpline.

Definitions

Health is a state of complete physical, mental and social well-being and not merely the absence of disease or infirmity.

Psychosocial is a shorthand term for the combination of psychological and social, but it also implies that the effect of social processes are sometimes mediated through psychological understanding (Stansfeld & Rasul, 2007)

Fact

People who maintain psychosocial health typically have strong support systems, take care of themselves, can work well with others, can control their anger, anxiety, tension and other difficult emotions, value diversity and difference of opinion, can function independently and adapt to change.

The watertight integrity test

Ask yourself the following questions -

If the answer to any of them is 'No', take action.

You've considered the health and well-being of the members of your team and they all seem 100% well?

Do you know the signs of poor psychological health or strain?

Are you familiar with the 'symptom cards' in the DOF Workbook?

Are you familiar with your local Employee Assistance Program?

Does your timetable include plenty of time for exercise and meals?

Are breaks scheduled at regular intervals throughout the day to allow time to recharge and refocus?

Do the provided meals make it easy to ensure a balanced diet?

When you are onboard a vessel, is there somewhere you can exercise?

Think  the RITE way

Related links and documents

- [Workbook chapter 11](#)
- [Regional support centers](#)
- [WHO](#)
- [Workbook Video](#)

“ What we are struggling with at home bleeds over into the workplace, and vice versa ”

Anne Richter, RN, MBA,
Health Management Practitioner

EXAMPLES AND DILEMMAS

You are working offshore and you see one of your colleagues is really struggling. You have checked with the workbook and diagnosis cards and you are concerned the person is suffering from depression. What should you do?

We should recognise this is very challenging to address. If you are not comfortable addressing it directly, speak to your supervisor, or contact the onshore organisation.

You have a colleague that you see is struggling with breathing or non-strenuous physical activity etc. Should you mention anything?

Again, this is challenging to address directly. Speak to your supervisor. You can also model healthy habits.

You observe a colleague who never hangs out in the social areas. They always go straight to their cabin and isolate themselves.

People are different and some people like their alone time. But make sure they feel welcome and are aware of formal and informal social gatherings that happen.

You notice a significant change in your colleague's appearance. E.g. someone who is usually very neatly presented hasn't changed their clothes in a few days or someone who's average weight gains weight quickly. What should you do?

Ask how they are feeling and try to gauge if they need support. If you think they might need help speak to your supervisor, or contact the onshore organisation.





Protecting our **PLANET**

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CLIMATE ACTION is a
shared responsibility
for the world. Equally,
LIFE BELOW WATER is
critical because life
depends on the oceans.

MONITORING AND MEASURING

Transparency with external monitoring and measurement agencies ensures we identify areas to review and adjust strategies for continuous improvement in sustainability and care for our environment.

Find out more at: www.dof.com

PwC is performing a limited independent review of DOF's annual ESG factbook



Sustainable environmental management

We all have a responsibility to safe-guard our environment. It is important to act with care and consideration and ensure we minimise our environmental impact everywhere we operate.

By understanding and taking practical measures to reduce DOF Group's environmental impact we work safely and sustainably.

The rules

- **Familiarise** yourself with the Environmental Impact Policy and use it to guide your approach to environmental care.
- **Implement controls and actions** to meet statutory and non-statutory requirements.
- **Consider environmental impacts and interactions** in decision making and risk management processes.
- **Plan, organise and assess** activities and ask *"what are the direct or indirect impacts of our actions on the environment?"*
- **Take a precautionary approach** if there is an unknown impact to the environment, until there is enough information to make a decision.
- **Ensure due diligence has been followed** to verify business partners comply with the same standards of environmental management.

If you need more information or these rules raise any questions, ask your senior manager or Environmental representative. If you witness non-compliance with any of these rules you can also contact the Ethics Helpline.

Definitions

Environmental aspects:

Elements of DOF Group's activities, products or services that interact or can interact with the environment.

Environmental impact: Change

to the environment wholly or partially resulting from DOF Group's environmental aspects.

Sustainable operations:

The balance of social, economic and environment factors allowing organisations to meet their goals, without compromising the resources available to future generations.

The watertight integrity test

Like other risk management processes we must identify and evaluate the risks and use 'as low as reasonably practicable - ALARP' principles to apply control measures.

Ask yourself the following questions -

If the answer to any of them is 'No', take action.

Has everyone's personal safety been considered?

Have other risk profiles been considered?

Is this a balance of environmental, economic and social considerations?

Are we using the best available Environmental Management technologies, methodologies and management methods?

Have ALL stakeholders been taken into account?

Think  the RITE way

“ Ensure our activities have minimal impact upon the environment ”

Related links and documents

- [Environmental Impact Policy](#)
- [Environmental Management Manual available on BMS](#)

☀️ EXAMPLES AND DILEMMAS

You realise that seven cubic metres of sludge and bilge water delivered from your vessel to a subcontractor for destruction has been tipped into a river instead of being discharged as specified in the contract. What should you do?

You should immediately report this to your senior officers. Local government and nearest coastal state need to be contacted. The sludge and bilge water is still under DOF's responsibility and liability. This is an environmental crime and needs to be dealt with accordingly. To prevent such outcomes, we must carefully select and evaluate the subcontractors who deal with our environmental discharges.

You have an option to replace cable-ties, which are being used to secure cabling subsea with 'biodegradable cable-ties'.

You can replace conventional plastic with biodegradable cable ties only if the functionality of the cable-ties isn't compromised.

You should also consider whether the cable-ties will biodegrade at proposed depth/temperature/light.

A new lubricant has been introduced to the market that is 'marine friendly'. However, consequence of long term human exposure is unknown at this stage.

There is no situation where environmental management should be at the expense of personnel safety.

Conclusive, credible and medically supported evidence must be available regarding safe use, before the new lubricant would be considered for use.

Life below water

DOF aims to maintain a global leader in sustainable environmental operations wherever we operate. The Ocean is our Workplace. DOF's heritage comes from the fishing industry where ocean temperature, chemistry, currents and ecosystem health are paramount to the industry and its longevity. Whether it is fishing, marine or subsea service industry, the health of the oceans is what sustains DOF as an organisation.

The rules

- **Always consider** interactions with Life Below Water in relevant planning and risk management processes.
- **Take proactive measures** within your function or worksite to identify solutions to Life Below Water challenges.
- **Speak-Up: use your stop work authority** where there is an evident and apparent risk to biological systems that can be avoided.
- **Report any damage** to biological systems as soon as reasonably practicable.
- **Take time to understand your actions'** direct or indirect effect on Life Below Water.

If you need more information or these rules raise any questions, ask your senior manager or Environmental representative. If you witness non-compliance with any of these rules you can also contact the Ethics Helpline.

Definitions

Biological diversity—or biodiversity, is the variety of life on Earth and the natural patterns it forms. The biodiversity we see today is the result of 4.5 billion years of evolution and, increasingly, of human influence as well.

Facts

The world's oceans are a living system that supports all life on Earth. Taking up 75% of the earth's surface, the ocean represents 99% of the living space on the planet by volume. The Ocean absorbs 30% of the carbon dioxide emissions we release, buffering the impact of climatic change.

The watertight integrity test

Ask yourself the following questions -

If the answer to any of them is 'No', stop and re-plan the task.

Have you minimised the potential to introduce invasive marine species in ballast water and biofouling structures like hulls, sea chests and propellers?

Have you taken appropriate measures within your work area to minimise the likelihood of hazardous materials being lost to the environment?

Can you manage the potential for discharge of hydrocarbons as part of project activities?

Have you ensured that biodiversity is given appropriate consideration throughout all operational planning and undertaking?

Have you reduced and restricted the production of waste products known to be detrimental to the environment?

Can you minimise DOF's impact on the environment through pollution prevention, efficient use of natural resources and the reduction and recycling of waste?

Think  the RITE way

☀️ EXAMPLES AND DILEMMAS

You are taking your vessel into a biologically sensitive area. The vessel has been cleared for entry into this area by the authorities, however you are aware of biofouling risks that have not been identified. What do you do next?

Consult your operational leader and seek further guidance from subject matter experts.

During an inspection on board, you are made aware of hazardous substances that are potentially damaging for the environment if released. You are aware that this particular substance is banned in a number of regions, but not in yours. What do you do?

You should make your captain or supervisor aware of the observation and suggest or seek alternatives.

Related links and documents

- [IMCA Code of Practice on Environmental Sustainability](#)
- <https://www.globalgoals.org/goals/14-life-below-water/>
- [DOF Environmental Manual](#)
- [Environmental Impact Policy](#)

Circular economy

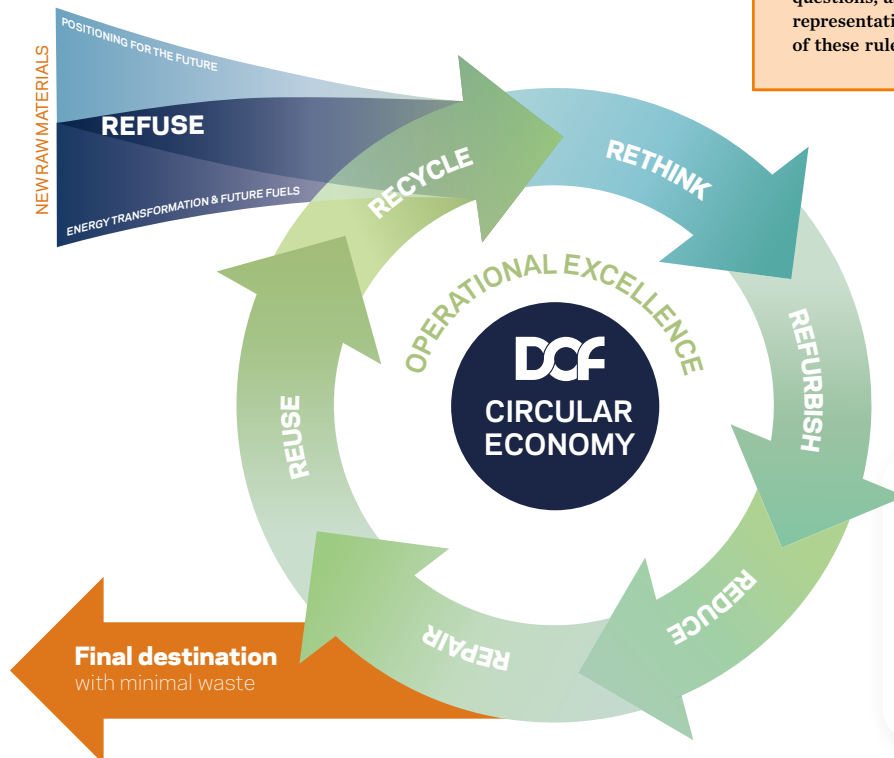
DOF maximises the use-cycles of assets to reduce consumption and greenhouse gas (GHG) emissions.

DOF's Life Cycle Management model aims to maximise use-cycles and reduce consumption responsibly, keeping items in circulation as long as possible and reducing the demand for new products.

The rules

- **Be familiar with** and use circular design and procurement strategies to ensure a positive influence on supply-chain sustainability.
- **Re-use and re-purpose DOF** owned assets and components to retain their highest value as outlined in waste-hierarchy-of-control.
- **Plan meticulously and execute our responsibilities** associated with end-of-life disposal of assets and/or contracting these duties to third parties to reduce DOF's contribution to environmental and social degradation.

If you need more information or these rules raise any questions, ask your senior manager or Environmental representative. If you witness non-compliance with any of these rules you can also contact the Ethics Helpline.



Definitions

The Circular Economy is a systems solution framework that tackles global challenges like climate change, biodiversity loss, waste, and pollution.

The watertight integrity test

Ask yourself the following questions -

If the answer to any of them is 'No', stop and re-plan the task.

Before throwing something out, have you considered if an item could be repaired or used in another way?

Can you use preventative maintenance to make assets last longer?

Have you considered how to extend product's useful life by limiting its use only as required as opposed to consistent use?

Does your design ensure the product is easy to repair?

Can you reduce the need for new products and focus on reusing items to create a circular system?

Think  the RITE way

Related links and documents

- ellenmacarthurfoundation.org/topics/circular-economy-introduction/overview
- [DOF 3-Year Plan / Guideline](#)
- [DOF Circular Economy Policy](#)

EXAMPLES AND DILEMMAS

You are tendering for a decommissioning prospect, and the client has not outlined their preference for recovered components. If you offer a recycling option, you know the costs will be higher than landfill alternatives. What should you do?

You should establish a dialogue with the client, to ensure mutual understanding of the benefits of responsibly disposing on the end-of-life products.

In your role as Project Engineer, you have been tasked with mobilising equipment for a project. You are aware the required equipment is available at the base but have found it to be out of certification. Given the fast-track nature of the project, you are under pressure to complete this task prior to vessel mobilisation. You are aware of DOF's policies related to equipment certification and circular economy. What should you do?

You take into account the principles of both Policies. DOF cannot use uncertified equipment. However, we should ask whether it is feasible to;

- Recertify equipment within the time-frame;
- Find an alternative piece of equipment that is certified within the base;
- Take lessons learned into future projects;

Ultimately, we may have to procure additional equipment.

Decarbonisation commitment

Tomorrow's success depends on our dedication and commitment today. It's an important time for the world and our industry. Meeting new and different demands from our stakeholders and supporting the changes in the energy mix are central to our future organisation.

DOF has outlined an ambitious commitment to reduce its Greenhouse Gas emissions across its value chain. Our commitment is supported by science based targets and a series of practical measures that deliver decarbonisation outcomes aligned to our stakeholders expectations.

The rules

- **Optimise existing systems** and use best practice approaches to minimise consumption of non-renewable fossil fuels.
- **Always seek clarification** on operational decisions that are not consistent with DOF's ambition to reduce Greenhouse Gases.
- **Play your part** within your function, worksite or region to become an enabler of technical, strategic or organisational changes that assist DOF in reducing our Carbon footprint.
- **Take time to understand** our stakeholders' various perspectives concerning Greenhouse Gas emissions.

If you need more information or these rules raise any questions, ask your senior manager or Environmental representative. If you witness non-compliance with any of these rules you can also contact the Ethics Helpline.

Definitions

Decarbonisation commitment: The process by which countries, individuals or other entities aim to achieve zero fossil carbon existence. Typically refers to a reduction of the carbon emissions associated with electricity, industry and transport. IPCC 2020

Background

Climate action is a shared responsibility for the world. People are experiencing the significant impacts of climate change, which include changing weather patterns, rising sea level, and more extreme weather events.

Greenhouse gas emissions from human activities drive climate change and continue to rise. They are now at their highest levels in history. Without action, the world's average surface temperature is projected to rise over the 21st century and is likely to surpass 3°C this century—with some areas of the world expected to warm even more. The poorest and most vulnerable people are being affected the most.

The watertight integrity test

Ask yourself the following questions -

If the answer to any of them is 'No', stop and re-plan the task.

Does your project or charter plan optimise route and transit planning?

Do you or your team have the ability to avoid business travel without compromising the quality of your meeting or visit?

Do you know how to best optimise your engine configuration?

Have you considered emissions associated with your supply chain?

Have you considered measures that optimise or create greater efficiency for material inputs?

Have taken personal ownership of your energy use choices?

Are you aware of what you can do to reduce your personal energy consumption at work?

Think  the RITE way

Related links and documents

- [IMCA Code of Practice on Environmental Sustainability](#)
- <https://www.globalgoals.org/goals/14-life-below-water/>
- [DOF Environmental Manual](#)
- [Environmental Impact Policy](#)

☀️ EXAMPLES AND DILEMMAS

You are a Captain or an Offshore Manager and have just been informed that the client representative has requested a max transit speed. You are aware that this is in breach of both DOF's and Clients' objectives around fuel efficiency and CO2 emissions. What should you do?

DOF expect that the onboard management team challenge our clients in situations like this. The onboard client representatives shall be informed of the expected increase in CO2 emissions in this transit mode and that this has an effect of both DOF's and the Clients' CO2 emission reporting. If this is a repetitive request from the onboard clients, this needs to be reported to onshore Operations- or Project Managers, who will contact their clients' onshore representatives.

You are a procurement specialist and have been offered a very good deal in relation to low-cost and compliant PPE. The PPE supplier and products are sourced from a low-labour cost country and include transportation costs in their quote. You are aware that, in comparison, this PPE supplier will have an additional carbon footprint compared to locally sourced goods. There is a 25% saving in the cost between the overseas and local suppliers. What do you do?

This decision is centred around cost vs. benefit for the business. DOF must take into account the saving potential. However, it is important to consider the non-financial cost that comes with this. We are more concerned with the process of thinking and justification for action, than the outcome.





PROSPERITY

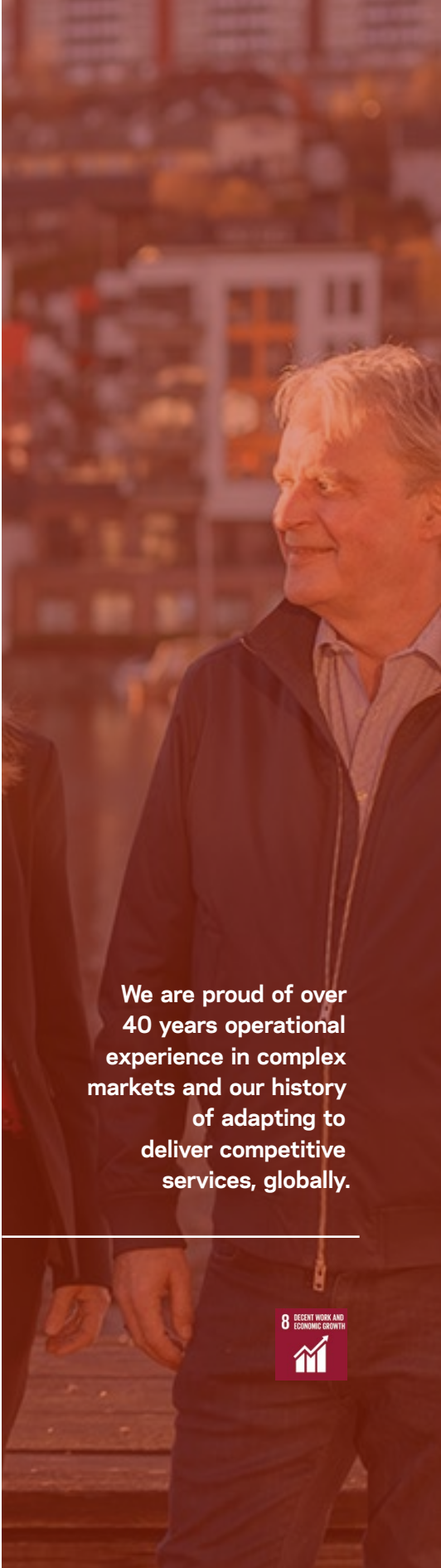
Good Corporate Citizens

Taking care of our people and assets 36

Cyber security 38

Operating responsibly 40

Excellence and our quality commitment 42



We are proud of over
40 years operational
experience in complex
markets and our history
of adapting to
deliver competitive
services, globally.

Taking care of our people and assets

All personnel involved in maintenance activities on behalf of the Group help to keep themselves and colleagues safe, care for the environment and avoid project delays.

Our Fleet and assets are essential to our business and the way we look after them secures our capability to operate safely, efficiently and deliver high quality services to our clients. Properly planned and managed maintenance programs ensure safe and efficient project delivery, and key to the future prosperity of the company.

DOF's Circular Economy approach maximises use-cycles and reduces consumption responsibly. It is applied to our fleet and assets.

Definitions

Preventive maintenance:

Pre-scheduled hour or time-based interval actions taken to maintain the required function(s).

Corrective Maintenance: Work carried out after identification of failure. Purpose is to restore function(s) and prevent failure to develop into full function failure/breakdown of the equipment.

Condition Monitoring: Monitoring to identify potential machinery problems at earliest possible stage, and track significant changes that indicates failure development.

The rules

- **Familiarise yourself** with and follow the applicable company policies, guidelines and manufacturer guidelines.
- **Report** all preventive and corrective maintenance activities into DOF Group maintenance system (all requirements are recorded to ensure equipment operates safely and efficiently).
- **Carry out maintenance** activities safely.
- **Conduct** risk evaluation and management across the maintenance process.
- **Generate and be aware of** technical bulletins - keep your colleagues up-to-date with important information.
- **Never modify equipment** without an approved Management of Change.
- **Ensure** assets, including lifting equipment or handling systems, meet specific requirements for certification.
- **Preserve** equipment according to maintenance requirements when not in use.
- **Speak up** if you see something that needs to be improved - the vessel is your second home.

If you need more information or these rules raise any questions, ask your senior manager or HR representative. If you witness non-compliance with any of these rules you can also contact the Ethics Helpline.

The watertight integrity test

Ask yourself the following questions -

If the answer to any of them is 'No', take action.

Have you planned the job?

Do you have the required work permit for the task you are to undertake?

Have you considered the safety hazards?

Do you have the right equipment for the job?

Do you have the right knowledge to do the job?

Is the asset safe to use/operate?

Has it been maintained as instructed?

Have you considered the risk of environmental pollution?

Think  the RITE way

Related links and documents

- [Maintenance Manual](#)
- [Marine Maintenance Policy](#)
- [Global Asset Storage Guidelines](#)
- [Subsea Assets Maintenance Guidelines](#)
- [Life Cycle Policy](#)

“ Properly planned and managed maintenance programs ensure safe, efficient project delivery and safeguards people ”

☀ EXAMPLES AND DILEMMAS

You think a co-worker signed off a job that hasn't been completed. What do you do?

If you see a job being signed off and you think it may not have been completed, you should first notify the person signing off the job. Ask about the reason for the unfinished job being signed off. Based on the reason, it might be necessary to, for example, make a correction in the Maintenance Management System.

Walking around the vessel, you see a corroded pipe that requires maintenance.

If you see something that requires maintenance, you should notify the person onboard responsible for that equipment/department. Make sure they are aware of the issue and that the job has been registered in the Maintenance Management System.

You see a co-worker operating equipment outside its purpose.

The consequences can be a safety risk to the equipment operator and have economic implications. Your first responsibility is to the safety of your colleagues, intervene when it is safe to do so.

Cyber security

Cyber-attacks are an increasing, unrelenting and costly threat to us all. We all need to keep DOF's intellectual property, private information and systems secure. Protecting business continuity is critical in our ability to function and generate prosperity for all stakeholders.

Information Technology and connectivity are critical but this connectivity makes us vulnerable to cyber-attack, viruses, malware and misinformation - we must be vigilant.

DEFINITIONS

Cybersecurity: The preventative techniques used to protect the integrity of networks, programs and data from attack, damage, or unauthorised access. Cybersecurity involves protecting information and systems from major Cyber-attacks.

Cyber-attack: An attempt to damage or destroy a computer network or system and the information that resides there.

Cyber intrusion: Unauthorised access to a computer or device without owner's permission.

Phishing: The attempt to obtain sensitive information such as usernames, passwords, and credit card details (and, indirectly, money), often for malicious reasons, by disguising as a trustworthy entity in an electronic communication.

The rules

- **Be responsible**, avoid loss, damage, theft and unauthorised use of computers, and other mobile devices.
- **Protect** your computer (or mobile device) with a password when it is not in use. Always lock your computer with CTRL+L.
- **Never** share your passwords and always keep them up to date.
- **Always** be cautious when opening hyperlinks in e-mail attachments. If the link looks suspect – **DO NOT CLICK or follow the link. REPORT immediately to the IT helpdesk.**
- **Do not** download programs and other files unless you trust the sender or the website that they come from. Outsiders are always looking for a way into our systems.
- **Only** provide personal details and credit card information when using a secure connection and when there is a natural need for this information. Check you have a secure connection - follow the latest protocol for your browser software.
- **Reject** any offers of free software, anti-virus programs or other protection. The Company's computers have the protection they need.

If you need more information or these rules raise any questions, ask your senior manager or HR representative. If you witness non-compliance with any of these rules you can also contact the Ethics Helpline.

The watertight integrity test

Apply common sense and sound judgement to computer, phone and other mobile device use.

Ask yourself the following questions -

If the answer to any of them is 'No', take action.

All my devices - PCs, Mobile devices - phones and PDAs are password protected?

Content on my devices is only accessible to authorised persons?

Company information and documents have been saved in the appropriate location/system?

All sensitive information is securely stored?

Are you always careful when you share emails with confidential files attached?

Think  the RITE way

RELATED LINKS AND DOCUMENTS

- [DOF Group IT Standard](#)
- [Cyber Risk Management Manual](#)

“ Be vigilant, outsiders find ways into our systems by tricking you into helping ”

☀️ EXAMPLES AND DILEMMAS

I received an email from a colleague, and clicked on a link, I realise it wasn't a genuine email address. What should I do?

Users who observe or suspect that an IT security incident is in progress or has happened should disconnect from the network immediately and contact our IT's Service desk. Then let a colleague help you to send an email to *support.servicecenter.no@soprasteria.com*

Can I give a DOF Group-owned Computer to my family member for use?

No. You are responsible for protecting the DOF Group's assets at all times. You must follow all security procedures for the DOF Group's property.

You are on holiday and a colleague asks for your password to release an invoice that is business critical.

Giving away your password to anyone (including IT personnel) is strictly forbidden. There are other means built into the various systems that can take care of situations like this.

Operating responsibly

We operate a responsible organisation under laws and regulations which vary and are subject to change. We are always guided by our values and the highest principles of integrity and responsibility. The DOF Group is committed to paying its fair share of taxes to the countries in which it operates; complying with international export, import and trade laws and regulations and operating Anti-Money Laundering principles.

DEFINITIONS

Tax: A compulsory contribution to state revenue. The DOF Group ensures that all tax obligations are complied with in a timely, efficient and cost-effective manner, in all operational locations.

International Trade Compliance: How well a company observes the laws and regulations that govern its international business operations.

Money Laundering: is understood as the process of taking funds obtained through illegal activities and making those funds appear legal.

Sanctions: are commercial and financial restrictive measures imposed by one or more countries against a targeted country and/or individual(s), imposed on the basis of a variety of political, military and social reasons.

The rules

- **Cooperate fully** with legal and regulatory authorities.
- **Know and comply with** tax legislation, law and transfer pricing guidelines.
- **Ensure** our inter-company transactions are based on arm's length terms, in accordance with guiding principles such as the OECD Transfer Pricing Guidelines.
- **Encourage** our employees worldwide to adopt best practice in relation to declaring taxes on personnel income earned whilst working for the DOF Group anywhere in the world.
- **Know and comply with** all export, import and trade laws and regulations.
- **Become aware** of the 'red flags' for potential money laundering activity.
- **Always follow** established Policies and Procedures to observe and record all payments and transactions. Follow Global Financial Standards for acceptable forms of payment and keep current, complete and accurate records of every business transaction.
- **Report** any suspicious activity.
- **Conduct** appropriate due diligence on all subcontractors, suppliers, consultants and agents.

If you need more information or these rules raise any questions, ask your senior manager or HR representative. If you witness non-compliance with any of these rules you can also contact the Ethics Helpline.

The watertight integrity test

Ask yourself the following questions -

If the answer to any of them is 'No', take action.

Has this business transaction been recorded accurately and fairly, ready to appear in company accounts?

Have all the parties required to perform due diligence been involved at the necessary stages of this process?

Are you positioned within DOF's authority matrix to make appropriate decisions concerning this case?

Are you familiar with DOF's requirements to perform due diligence and control compliance towards DOF standards?

Think  the RITE way

RELATED LINKS AND DOCUMENTS

- [DOF Group tax strategy](#)
- [Anti-Money Laundering Regulations](#)

“ Working globally is complex. We are always guided by our values and the highest principles of integrity and responsibility ”

☀️ EXAMPLES AND DILEMMAS

A project manager tells you that you don't need to spend time on tax compliance, as there is no budget for this in his project. How should you respond?

Explain to your colleague that DOF is committed to being tax compliant in any jurisdiction that the Group operates, and that internal budget constraints cannot override a requirement to perform mandatory tax compliance.

You receive an expression of interest from a client who operates in a geographic area subject to international trade sanctions. Due diligence identifies these trade sanctions are not imposed within the business unit and Region you operate from. You remain uncertain about the details of the trade sanction and how this may affect compliance within other areas of DOF business. What should you do?

DOF has a global footprint and is obliged to comply with sanctions as they apply to DOF's geographical footprint and value chain. All contracts must be reviewed to ensure legal compliance. This due diligence extends to verifying the scope and applicability of sanctions from a business unit, regional and global or DOF Group perspective. If in doubt, seek guidance from the Global Legal team. Failure to comply with international trade sanctions has severe consequences that may undermine DOF's reputation and lead to breach of applicable laws and regulations, investigations, fines or other penalties for the company or individual.

A subcontractor wants to be paid for legitimate services, to a private account. Is this OK?

No, payments shall be made according to pre-approved terms and conditions and between public registered and legal entities.

Excellence is our quality commitment

The DOF Group provides technical capability, experience and state-of-the-art assets globally. We ensure our clients' projects run smoothly and to schedule, so it's important we understand our clients' business and meet requirements consistently. Consistency is key to delivering quality products and services, and having ISO 9001 compliant business management systems is essential. Using these systems help us to maintain standards, monitor and improve our products and services.

DEFINITIONS

Quality Assurance (QA):

The process of verifying whether a product meets required specifications and customer expectations.

Quality control (QC): The procedure or set of procedures intended to ensure that a manufactured product or performed service adheres to a defined set of quality criteria or meets the requirements of the client or customer.

Audit: A systematic and independent examination of books, accounts, statutory records, documents and vouchers of an organisation to ascertain how far the financial statements as well as non-financial disclosures present a true and fair view of the concern.

The rules

- **Comply** with The DOF Group policies, procedures and processes in the business management systems.
- **Always** expect high standards of yourself and others at all levels throughout the Group.
- **Use judgment** in establishing appropriate controls beyond the business management systems for specific projects and activities.
- **Always** ensure that all job functions are performed by competent personnel.
- **Make yourself aware** of our quality performance and give feedback so our quality management systems drive continual improvement.
- **Always apply** and maintain the highest technical standards on all vessels and projects at all times.
- **Always communicate** and share Health and Safety experiences with all personnel, industry organisations and the wider community – it helps keep people safe.

If you need more information or these rules raise any questions, ask your senior manager or HR representative. If you witness non-compliance with any of these rules you can also contact the Ethics Helpline.

The watertight integrity test

Ask yourself the following questions -

If the answer to any of them is 'No', take action.

Taken time to review a task and asked yourself how it can be improved?

Highlighted to your manager or supervisor you are working outside of your experience?

Given feedback with the intention of improving the work result?

Highlighted and communicated potential risk?

Rigorously checked your own work before passing it on?

Maintained the highest technical standards on all vessels and projects?

Think  the RITE way

RELATED LINKS AND DOCUMENTS

- [Quality Policy](#)
- [Quality Manual](#)
- [Business Management System](#)

“ Consistency is key to delivering quality products and services ”

☀️ EXAMPLES AND DILEMMAS

You have noticed a gap in one of the company guidelines leading to repeated errors. What should you do?

It is an obligation to make the owner of the guideline aware of your observation. The best way is to use the comments function on the Management System.

You observe that we have entered in wrong figures in our maintenance system over a long period and you fear for the integrity of the system. What do you do?

Raise your voice. Address the concern to your line supervisor and escalate if necessary.

You have received a phone call from a client who is very disappointed with delivery of the last project. What do you do?

This should be regarded as a customer complaint and be raised as a non-conformity report, and handled according to procedure. You should ensure that the client gets a formal notification when the issue has been dealt with.



PRINCIPLES

Safe, Legal, Ethical

Conducting business fairly..... 46

Avoid bribery and corruption 48

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Conflicts of interest 52

Gifts, entertainment and hospitality 54

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Privacy/GDPR/LGPD 58

We have the pillars in place to uphold a culture of legal and regulatory compliance: the foundation for honest, ethical business.

We believe strong institutions operate to universal principles and give stakeholders the resources to uphold standards.

MONITORING AND MEASURING

Transparency with external monitoring and measurement agencies ensures we identify areas to review and adjust strategies for continuous improvement in safe, legal, ethical operations everywhere we do business.

Safe  the RITE way®



Code of Business Conduct
Aligned to the UN's Global Compact

 Find out more at: www.dof.com



Antitrust and competition

Conducting business fairly is a core principle for the DOF Group but also involves some complex areas of law and regulation which can have implications for you and the Company.

If you're in doubt always ask for advice from the Legal Department. The DOF Group promotes competition and free enterprise and will not act in any way that will breach antitrust and competition laws or the principles of fair dealing. We strive to develop positive perceptions and confidence when dealing with all customers, suppliers and other business partners.

DEFINITIONS

Antitrust and Competition: Laws that support free enterprise by prohibiting the practices that unreasonably restrain trade. This definitely includes agreements between competitors that fix prices, and can include restrictive supply or distribution agreements. Ask for advice.

Developing positive perception and confidence: The trust and confidence of those with whom we do business is a vital resource. By behaving with integrity, the DOF Group's reputation and sustainability is safeguarded.

The rules

- **Familiarise yourself and always comply** with competition law in your business and jurisdiction. Ask the Legal Department for advice if you are unsure.
- **Treat customers and suppliers fairly and with integrity.**
- **Never enter into an agreement that is not legitimate** - if you're unsure, ask.
- **Never enter into any contract or commit DOF Group resources unless authorised.**
- **Respect confidentiality** of our customers' and suppliers' information.
- **Communicate honestly** in all proposals, bids or contract negotiations.
- **Keep records** of meetings with competitors and avoid any illegitimate conversations.
- **Note the origin** of information you collect regarding competition on the market.
- **Pay attention** to the existence and operation of purchasing groups in which the Company wishes to participate.

If you need more information or these rules raise any questions, ask your senior manager or HR representative. If you witness non-compliance with any of these rules you can also contact the Ethics Helpline.

Any violation of Antitrust and competition laws can subject The DOF Group to criminal and civil penalties; you are caretakers of our integrity. Anyone responsible for inappropriate conduct will be subject to disciplinary action.

The watertight integrity test

Conduct DOF Group business fairly. Both you and the company can be held responsible for non-compliance with applicable laws and the penalties can be severe.

Ask yourself the following questions -

If the answer to any of them is 'No', take action.

Is this agreement legal, fair and ethical?

Is this information in the public domain?

Is this comparison between our strengths and our competitors fair?

Am I upholding my legal obligations to my former employer(s)?

Think  the RITE way

Related links and documents

For more info, please visit

<http://konkurransetilsynet.no/en/>

“ The confidence of our customers, suppliers and other business partners is vital ”

☀️ EXAMPLES AND DILEMMAS

A former colleague, now working for a competitor, calls you and suggest that you should discuss on a general level an upcoming tender. How should you respond to this?

You should tell your former colleague that such discussions cannot take place as this might be in breach of competition laws. Do not propose or reach an agreement or understanding with any competitor regarding any aspect of competition.

You meet a person working for a subcontractor at a conference, and they want to share some pricing information about their services 'off record'.

Avoid any “off record” discussions on prices. Leave any meeting that enters into this territory.

I have received an email that contains a competitor's confidential information. Can I use the data?

No, you can't use or share this information as it would contravene business laws and the DOF Group values. Bring the email to the attention of the Legal Department.

Avoid bribery and corruption

Working globally is complex. The DOF Group operates across geographical borders, under different regional and international legislation, depending upon each vessel's flag state, country of operation, and type of operation. It is important for us all to understand the risks associated with bribes and improper payments – and the ways in which we can protect ourselves. The DOF Group promotes and maintains the highest level of integrity, ethical behaviour and accountability.

DEFINITIONS

Bribe: Anything of value given, offered, promised, accepted, requested or authorised with the intent that a person who is trusted or expected to act in good faith or with impartiality, performs that function improperly or in order to obtain a business advantage.

Kickback: A gift or payment made with the intention of obtaining or retaining business or a business advantage which is not legitimately due.

Corruption: Corruption is a form of dishonest or unethical conduct by a person entrusted with a position of authority, often to acquire personal benefit.

Facilitation payment: Payment offered to attempt to expedite or secure performance of a routine government action. A facilitation payment must be recorded.

The rules

- **Do not** make payments to political parties, organisations or their representatives.
- **Do not** accept or give a bribe, kickback or other improper payment for any reason.
- **Never offer** gifts or hospitality to influence imminent business decision-making process or cause others to feel under obligation to the DOF Group.
- **It is strictly forbidden** to give any gifts or money to any public official to gain any advantage with regards to any services.
- **Follow consistent procedures** among our companies and business partners to achieve a high common standard even where business practices in the countries in which we operate differ.
- **If you are threatened or in physical danger** due to a hostile situation, your personal safety is the highest priority.

If you need more information or these rules raise any questions, ask your senior manager or HR representative. If you witness non-compliance with any of these rules you can also contact the Ethics Helpline.

Any violation of Anti-bribery and Corruption laws can subject The DOF Group to criminal and civil penalties; you are caretakers of our integrity. Anyone responsible for inappropriate conduct will be subject to disciplinary action.

The watertight integrity test

If you are concerned that something doesn't feel right, speak up. Both you and the company can be held responsible for non-compliance with applicable laws and the penalties can be severe.

Ask yourself the following questions -

If the answer to any of them is 'No', take action.

Have you kept adequate books and financial records?

You suspect a violation of anti-bribery laws and therefore reported it?

Can you see due diligence has been followed to ensure business partners comply with applicable anti-bribery laws and DOF values?

Think  the RITE way

Related links and documents

- [Supply Chain Management Manual](#)

“ We act ethically and lawfully to protect the DOF Group reputation and comply with applicable laws, wherever we do business ”

EXAMPLES AND DILEMMAS

An official asked me to make a payment for goods to clear customs processes?

If a payment is going to an official's agency or department with some sort of agency form or application, it is likely to be a permissible payment; but if it is going in the pocket of the official, it is likely to be considered a bribe.

I would like to invite a client to a fund-raiser dinner. We have a submitted a tender to the Company they represent, but it's a different division. This should be okay?

We never offer gifts or hospitality to influence imminent business decision-making process or cause others to feel under obligation to the DOF Group. If you have a tender underway with the Company, accepting your invitation may be prohibited by the recipient's organisation, so it is best avoided.

A colleague has been using money from the petty cash without receipts and have been accused of corruption.

The act is suspicious but the definition may be wrong. If the money has been used for personal gain this is not corruption, but embezzlement. However if it has been used to bribe an official, this is corruption. Always raise your concerns if you see something like this.

Non-public information

Our reputation and the trust and confidence of those with whom we deal are vital. We must all comply with the legal and regulatory obligations for confidential non-public information about the Group, the Group's activities and related Companies. It is important for the DOF Group to ensure material information is factual, accurate, is always communicated consistently and is not disclosed selectively or inappropriately.

DEFINITIONS

Material information: Any information that a reasonable investor would consider important in a decision to buy, hold or sell stock.

Common examples of material non-public information: Financial results, business acquisitions or sales, gain or loss of a major customer or supplier, management changes, stock splits, major litigation, and communications and rulings from government agencies etc.

Insider dealing: The illegal practice of trading on the stock exchange to one's own advantage through having access to confidential information.

The rules

- **Comply** with all laws, regulations, and policies.
- **Only** disclose information that is publicly available – this ensures company disclosures of financially sensitive and other information which would be expected to be released initially to the stock exchange is disclosed in a timely, consistent and appropriate manner.
- **Do not** participate in any business or investment opportunity you've learned of through your position within the Group or that may be offered to you because of your position.
- **Only provide access to material, non-public information on a strict need-to-know principle.** Do not pass on any inside information to others, such as friends or relatives.
- **Comply** with guidelines for retention and disposal of DOF Group records.
- **Do not disclose confidential information** to regulatory bodies or other third parties without checking with the DOF Group Legal Department.
- **Be aware** of the specific procedure for releasing material information and ensure you have all approvals, including client approvals, for media releases.

If you need more information or these rules raise any questions, ask your senior manager or HR representative. If you witness non-compliance with any of these rules you can also contact the Ethics Helpline.

The watertight integrity test

Keep DOF Group confidential information secure. Both you and the company can be held responsible for non-compliance with applicable laws and the penalties can be severe.

Ask yourself the following questions -

If the answer to any of them is 'No', take action.

Am I authorised to disclose this information to a third party?

Is this information secure? (Computers, offices, documents).

I could be overheard should I discuss this information?

Has this business transaction been recorded accurately and fairly ready to appear in company accounts?

Think  the RITE way

RELATED LINKS AND DOCUMENTS

- [Communication Standard](#)

“ We ensure material information is factual, accurate, is always communicated consistently and is not disclosed selectively or inappropriately ”

☀️ EXAMPLES AND DILEMMAS

We have won a contract and it would seem a good time send out a press release and a good time to buy shares.

Wrong. This is material, non-public information. Consult the DOF Group authorised spokesperson, or the office of the CFO for approval and sign off before any release can be made. It is important the information is released to the Stock exchange prior to any other disclosure. You may not purchase this stock until the financial information is made known to the public through official channels.

I've been contacted by the media to discuss DOF Group.

You are not authorised to speak on behalf of the DOF Group, refer to the Communications Standard for the authorisation matrix.

My manager asked me to add a transaction to my expense claim. Is it OK to do this?

No it is not. All business transactions will be recorded accurately and fairly in the company accounts so the DOF Group can provide timely, accurate, consistent, complete and fair disclosure of information to enable investors to make informed and orderly decisions.

Conflict of interest

A conflict of interest arises when your professional obligations to the DOF Group are influenced by a secondary and competing interest. It is easy to be unaware when a situation constitutes a potential conflict. If you suspect your judgment is no-longer impartial or neutral, ask for advice and remove yourself from the situation.

The rules

- **Be aware of situations** that can create conflict of interest by knowing what can bias good judgement. Good judgement can be biased by things like money, ambition, prestige, love, friendship, even envy. Remember this is not necessarily about 'favouritism' as we may be harder on those with whom we have a relationship.
- **Remove yourself** from the decision-making, if you can see you have a competing interest.
- **Remove yourself** from involvement in the recruitment, or promotion of a family member or close friend?
- **If you are in any doubt**, disclose the potential conflict and ask for guidance.

If you need more information or these rules raise any questions, ask your senior manager or HR representative. If you witness non-compliance with any of these rules you can also contact the Ethics Helpline.

DEFINITIONS

Nepotism: The practice of people with power or influence favouring their relatives or friends, especially by employing them or awarding them contracts (can include business, political, entertainment, sporting opportunities etc.)

Self-dealing: The conduct of a person taking advantage of their position and acting for their own interests rather than for the interests of the beneficiaries of the trust, corporate shareholders, other employees or clients.

Employment: An agreement between an employer and an employee that the employee will provide certain services in return for payment. The work will occur at a site designated by the employer.

The watertight integrity test

Keep DOF Group confidential information secure. Both you and the company can be held responsible for non-compliance with applicable laws and the penalties can be severe.

Ask yourself the following questions -

If the answer to any of them is 'No', take action.

Have you removed yourself from involvement in the recruitment, or promotion of a family member or close friend?

Are you sure you will not personally benefit from the transaction being conducted?

Are you sure your outside employment doesn't compromise your role or your obligations to DOF?

Have you checked the potential recruit is unknown or unrelated to you or anyone in the team you control?

Have you checked the personnel or controllers of the firm you are purchasing goods or services from are unrelated to you?

Have you checked all the equipment and means you are using to support your external business are your own?

Think  the RITE way

RELATED LINKS AND DOCUMENTS

For further information, please contact the [Legal department](#)

“ Always conduct business with the principles of honesty and fairness ”

☀️ EXAMPLES AND DILEMMAS

You've started dating a co-worker you report to or who is in your leadership line, what should you do?

This is difficult but you are obliged to inform your manager or report to HR.

If someone close to you starts working in your team or for a DOF client, you should report the situation to ensure there's no conflict of interest.

One of your co-workers suggests the company gives a donation to a political party or political candidates. What should you do?

The company cannot make donations to political parties or candidates. This is prohibited. Make sure the person who made the suggestion knows this. If they persist, report the situation to a manager.

Your vessel is getting rid of old materials and obsolete IT items. Can you donate them to a charity?

The person responsible for compliance or human resources must give formal approval before any donation of items by the company.

Gifts, entertainment and hospitality

The exchange of gifts, general entertainment and hospitality is often common practice in business. However, this simple practice can easily create a conflict of interest or, in some instances, be considered a bribe. A conflict of interest creates an ethical dilemma and a bribe is unlawful and can lead to criminal prosecution for the individual and/or the Company.

DEFINITIONS

Gifts: Items, including personal gifts, to and from officials or people with whom we have or may have business dealings.

Entertainment: Attendance at social, cultural or sporting events, to and from officials or people with whom we have or may have business dealings.

Hospitality: Meals, drinks, as well as lodging and travel expenses given to and from officials or people with whom we have or may have business dealings.

The rules

Only accept if;

- **The gift, entertainment or hospitality is acceptable** within the business ethics policy.
- **You can return the gesture** with a 'similar' reasonable or modest gift, entertainment or offer of hospitality.
- **The gift, entertainment or hospitality complies with local business and industry practices**, and is not prohibited by the recipient's organisation.
- **You are sure** the Company does not have a current business decision pending (e.g. a competitive tender, an open negotiation, etc.)
- **The offer is not cash or a cash equivalent** (such as a gift cards or voucher).
- **The gift, meal, or entertainment cannot be construed** as or make someone feel like it is a bribe or payoff.

If you need more information or these rules raise any questions, ask your senior manager or HR representative. If you witness non-compliance with any of these rules you can also contact the Ethics Helpline.

The watertight integrity test

Ask yourself the following questions -

If the answer to any of them is 'No', take action.

Can you return the gesture or offer an equivalent gift, entertainment or hospitality?

Does the value of the gift, entertainment or hospitality fall into the usual gift-giving practices in this culture or country?

Have you taken into account the total value of gifts, entertainment or hospitality given or received from a person or entity in this financial year?

Have you considered how the gift, entertainment or hospitality could impact on a business relationship?

Is the value of the gift, entertainment or hospitality below the amount that would be seen as income in the country in which it is offered?

Think  the RITE way

RELATED LINKS AND DOCUMENTS

- [Business Ethics Policy](#)

“ Always follow the Business Ethics policy to protect both your and the Company's reputation ”

☀ EXAMPLES AND DILEMMAS

A supplier has offered me an all expenses trip, airfares, hotels and tickets to a prestigious sporting event. Can I accept?

This isn't a 'modest' gift. If you apply the '*can I return the gesture?*' test - as this is quite an extravagant gift, you would not be able to make or return the same offer to your supplier - it is easier to assess if this is not something you can accept.

A supplier has asked my partner and myself to dinner.

This may or may not be acceptable, depending on a range of factors, '*can I return the gesture?*' or do we have current business negotiations (in which case you can't accept). Refer to your manager for guidance.

I have been offered money to help get a business decision over the line. What should I do?

Report this immediately. This is a bribe and against the law. Neither you or members of your family should accept such offers.

Social media engagement

Social media is an important part of our lives, and a great communication tool when it is used in a sensible way. We acknowledge that we live in a world where digital material (words, photographs, videos) posted on social media cannot be erased, it is in the public domain and under scrutiny. This can have far reaching consequences for the Company and for all of us, where a posting is considered inappropriate, breach the DOF Group's obligations or jeopardise the DOF Group's ability to respond to an Emergency or Crisis. Follow these guidelines and use social media responsibly, if you need more detail please see the Social Media Engagement (SME) Global Standard Document.

DEFINITIONS

Official Use: of social media is where an employee is officially accredited to represent the DOF Group on social media or is required to comment on DOF Group business related issues as part of their work.

Professional Use: of social media is when an employee associates themselves with the DOF Group and is commenting as an experienced person in their particular field. However, they are not officially representing the DOF Group.

Private Use: of social media is when an employee uses social media platforms and makes no reference to the DOF Group's business, activities, its clients, customers or suppliers, or other DOF Group employees.

The rules

- **Always** comply with the DOF Group's policies.
- **Do not** disclose any information about DOF's business, activities, clients, customers or suppliers or other employees that is not public knowledge.
- **Do not post photographs of client/customer/supplier projects, assets or equipment on social media without clear permission.**
- **Before** you contribute to any discussion or post any material, ask yourself if it could have a negative impact on our reputation, or impact on business activities or bring DOF into disrepute.
- **Do not** post selfies, photographs, or videos of employees, colleagues or associates participating in entertainment activities (such as drinking, partying or compromising photos) while undertaking business activities or trips.
- **Check** with DOF Group communications managers before posting any DOF Group material including logos, photographs, technical drawings, videos etc.

If you need more information or these rules raise any questions, ask your senior manager or HR representative. If you witness non-compliance with any of these rules you can also contact the Ethics Helpline.

The watertight integrity test

If you are thinking about posting something in a public forum, apply this DOF Group watertight integrity test.

If you can't answer 'yes' to the following questions, do not share the information.

Is it clear it is my personal view?

Is it information that is publicly available?

Would I like it if someone said this about me?

Does it conform to the DOF Group Code of Business Conduct?

Think  the RITE way

“ Everything our employees post in public forums can affect the DOF Group's reputation and business interests ”

RELATED LINKS AND DOCUMENTS

- [Social Media Engagement Standard](#)
- [Communication Standard](#)

☀️ EXAMPLES AND DILEMMAS

Is it okay to post images of my colleagues out socialising on a recent business trip because it's on my personal Instagram feed?

When you are on business travel, you are representing the company and it this is an example where you could bring the company reputation and your own professional reputation into disrepute.

My teammates have set up a Facebook page for our current offshore project and are sharing stories and photos.

This is not acceptable; the Company and the individual are under contractual obligations to maintain privacy agreements. All images and project details fall into this category.

You are representing the company by posting information about a job vacancy to your LinkedIn status. You aren't sure if a sentence you've written about the company is appropriate.

If you have any doubts about anything you are posting as a representative of the company, discuss with a member of the Communications team.

Privacy

The DOF Group applies all applicable privacy and data protection laws, wherever we do business. We protect the personal information provided to DOF as part of an individual's business or employment-related relationship. Data privacy laws vary by country and can be complex, consult the Legal Department if you are not sure of the legal requirements.

DEFINITIONS

GDPR: General Data Protection Regulation is set by EU for the protection of natural persons with regards to the processing of personal data and on the free movement of such data.

LGPD: “Lei Geral de Proteção de Dados Pessoais” is Brazil’s privacy legislation and is very similar to GDPR.

Personal Information: Any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Legitimate business purpose:

In this context means, but is not limited to, information required for visa applications, crew lists, internal transfers, lists of crew next-of-kin, etc.

The rules

- **Only** access, collect, use, share, transfer or store the personal information of others when authorised and only as necessary for legitimate business purposes.
- **Observe appropriate safeguards** and security measures when handling such information.
- **Make sure** your activities are permitted by applicable law and DOF policies.
- **Never** collect, use or disclose personal information without the knowledge and consent of the individual whose data you are handling.
- **Never** disclose personal information about DOF employees, customers and business partners to third parties.
- **Only transfer data** containing personal information from one country to another, even among DOF Group companies, if you have a legitimate business reason and the consent of the individual.

If you need more information or these rules raise any questions, ask your senior manager or HR representative. If you witness non-compliance with any of these rules you can also contact the Ethics Helpline.

The watertight integrity test

Ask yourself the following questions -

If the answer to any of them is 'No', take action.

Am I authorised to access, store or disclose this individual's personal information?

Is this individual's personal information being collected for legitimate business reasons?

Is the individual whose information I am handling aware that the company is collecting and using it?

Is this information secure (computers, offices, documents)?

Are all my devices; PCs, mobiles devices (phones and PDAs) password protected?

Can this information only be accessed by authorised persons?

Think  the RITE way

☀️ EXAMPLES AND DILEMMAS

You have been asked to send an individual's private information to an immigration agent to assist with a visa application. Is this allowed?

If you have a legitimate business reason and you have the permission of the individual whose personal information you are handling, it is okay to do so.

You want to access the e-mail account of one of your employees to check some correspondence with a client when he is on holiday. Can you do this?

No you cannot. This is illegal.

You have stored your CV on your email account in a private archive, so you can apply for possible new positions in your department. Is this OK?

As a rule, you should not store personal or private information in your business email account.

“ The DOF Group only uses personal information as necessary and for legitimate business purposes ”

RELATED LINKS AND DOCUMENTS

- [DOF Group IT Standard](#)

