

## MODERN SLAVERY STATEMENT 2019

This statement is made pursuant to Section 54 of the UK Modern Slavery Act 2015 and sets out the steps that the DeepOcean group of companies has taken in 2019 to seek to prevent modern slavery and human trafficking from taking place within our business and supply chain. It is intended to fulfil the legal requirement for a slavery and human trafficking statement on behalf of all companies within the DeepOcean group of companies, as relevant.

We are a world-leading ocean services provider, enabling energy transition and sustainable use of ocean resources, offering survey, engineering, project management, installation, maintenance, and recycling services for oil and gas, offshore renewables, deep sea minerals, and other ocean services.

Across our offices in France, Ghana, Mexico, the Netherlands, Norway, the United Kingdom, and the United States, we employ a team of 1,100 highly skilled industry experts and use world-class fit-for-purpose tools and technology to drive cost-efficient and safe operations. We deliver innovative engineering solutions focusing on remote and unmanned operations and digitally enabled services while continuously striving to lower the carbon footprint.

We live by our guiding values of Attitude, Courage and Teamwork:

- **Attitude**

We ACT with a can-do attitude, striving to achieve the best possible long-term results for our people, our customers, and our stakeholders.

- **Courage**

We ACT with the Courage to embrace new challenges, to stop unsafe practices, always compliant and to shift boundaries with innovative solutions.

- **Teamwork**

We ACT as one team, promoting the continuous development of one another in a learning and evolving organisation.

As part of our commitment to our stakeholders we undertake to conduct business as responsible corporate citizens, to comply with applicable laws and regulations, to support fundamental human rights and to give proper regard to health, safety, and the environment.

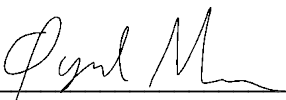
We recognise that we have a responsibility to take a robust approach to slavery and human trafficking, and we are committed to preventing slavery and human trafficking in our business activities, including to ensure that our supply chains are free from slavery and human trafficking.

In the financial year ending 31 December 2019 we took the following steps to ensure slavery and human trafficking did not occur within our business and supply chain:

- **Policies and procedures:** Our Anti-Slavery & Anti-Human Trafficking Policy continued to be implemented throughout our organisation. It sets out our commitment to respect and protect human rights and freedoms and describes the systems and processes that guard those freedoms against abuse of any kind, including slavery, servitude, forced or compulsory labour, child labour, and human trafficking. These systems and processes form our fundamental human resources principles and are driven by our Code of Conduct & Ethics.
- **Supplier management:** We continued to use a Supplier Declaration as part of our formal pre-qualification process. All new suppliers were required to sign this instrument, thereby confirming their commitment in working with us to promote and maintain the highest standards of corporate and social responsibility, including regarding provision of labour and management of their own supply chains. Historic suppliers who pre-qualified prior to the implementation of this instrument were asked to sign it, either at the point they were engaged on a new project tender or via the annual review of the prequalification questionnaire. As at the end of 2019, many historic suppliers, and all new suppliers, confirmed their compliance with our Supplier Declaration. We also continued the process of reviewing and updating the standard legal terms and conditions in our contracts to include human rights

compliance requirements and we continue to enhance our subcontract terms to capture our corporate and social responsibility obligations.

- **Risk assessments:** We continued the risk assessment of our suppliers in which we sought to identify the high-risk areas and companies requiring more detailed investigation. We sought to ensure that high risk contractors on a project signed the Supplier Declaration; some of these suppliers were also audited in relation to specific projects and we verified their compliance during audit or site visits.
- **Investigations/due diligence:** We continued to implement the process for due diligence with respect to any new third-party engagements, which draws upon our experience with anti-bribery and anti-corruption due diligence. In addition, we have also included an additional set of questions focused on human rights within our online pre-qualification questionnaire.
- **Training:** We continued to implement online training for our employees and hired-in contractors to further promote understanding and compliance with our Anti-Slavery & Anti-Human Trafficking Policy.
- **Reporting:** Our Code of Conduct & Ethics and Anti-Slavery & Anti-Human Trafficking Policy enable and encourage all our employees, suppliers, and other stakeholders to report any concerns related to the direct activities, or the supply chains of, our organisation. Our whistleblowing procedure is designed to make it easy for workers to make disclosures without fear of retaliation. Employees, customers, or stakeholders who have concerns can use our confidential hotline or complete a confidential online form to make a report.



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Øyvind Mikaelson

Chief Executive Officer and Executive Director