

Adopted on 9 May 2019

Modern slavery & human trafficking statement

The DeepOcean Group was formed in 2011 by combining three experienced offshore service companies operating all over the globe. DeepOcean is a pure play subsea services provider; globally recognised, locally differentiated. DeepOcean's vision is to become the world leading subsea services provider. We live by our guiding values of Attitude, Courage and Teamwork (DeepOcean ACTs):

- **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.

This statement, made in compliance with Section 54 of the Modern Slavery Act 2015, sets out DeepOcean Group Holding B.V.'s actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement also addresses the steps taken by our subsidiary companies, DeepOcean AS and DeepOcean 1 UK Limited and is intended to fulfil the legal requirement for a slavery and human trafficking statement on behalf of all companies within the DeepOcean Group, as relevant.

As part of offshore oil & gas and renewables industry, DeepOcean recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

DeepOcean is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

DeepOcean's reach extends across the globe serving the Oil & Gas and Offshore Energy clients with inspection, maintenance and repair, subsea construction, and cable lay and trenching. DeepOcean Group currently employs approximately 1,100 employees and operates in the following countries: Norway, United Kingdom, the Netherlands, Mexico, Ghana, Congo, Gabon, United States of America, Trinidad & Tobago, Israel, Egypt.

This past financial year ending 31 December 2018 we took the following steps to ensure slavery and human trafficking did not occur within our organisation or supply chain:

- **Policy:** We continued to implement our Anti-Slavery & Anti-Human Trafficking Policy. 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 and forced or compulsory labour, child labour and human trafficking. These systems and

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processes form DeepOcean's fundamental human resources principles and are driven by DeepOcean's code of conduct and ethics.

- **Supplier management:** We have continued using a Supplier Declaration as part of our formal pre-qualification process. All new suppliers are required to sign this declaration, thereby confirming their commitment in working with DeepOcean to promote and maintain the highest standards of Corporate & Social Responsibility (CSR) (including with regard to provision of labour and management of their own supply chains). Historic suppliers who pre-qualified prior to the implementation of the Policy are asked to sign the Supplier Declaration, either at the point they are engaged on a new project tender or, more likely, via the annual review of the pre-qualification questionnaire. As at the end of 2018, ca. 70% of historic suppliers (and all new suppliers) confirmed their compliance with our CSR declaration. We are also reviewing and updating the T&Cs in our contracts to include the human rights compliance requirements and we continue to enhance our sub-contract terms to capture CSR obligations.
- **Risk assessments:** We are continuing the risk assessment of our existing suppliers in which we will identify the high risk areas and companies requiring more detailed investigation. We ensure that high risk contractors on a project sign the Supplier Declaration; these companies are also audited for that specific project and we check compliance on this during audit/site visits.
- **Investigations/due diligence:** We have set out in our policy the process for due diligence with respect to any new third party engagements, which will draw upon our experience with anti-bribery and anti-corruption due diligence. In addition, we have also included an additional section of questions within our on-line pre-qualification questionnaire, focused on human rights.
- **Training:** In December 2018 we launched online training for our employees to further promote the understanding and compliance with the policy.
- **Reporting:** Our code of conduct policies, including the Anti-Slavery & Anti-Human Trafficking Policy, each enable and encourage all DeepOcean's employees, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. DeepOcean's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can use our confidential hotline or complete a confidential online report.

This statement has been approved by the DeepOcean Group Holding B.V.'s Board of Directors, who will review and update it annually.

Signed in Montgomery, TX on 9 May 2019



Øyvind Mikaelson, **Executive Director**