



Modern Slavery Statement 2020 - Australia



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Introduction

DOF ASA and its subsidiaries (collectively, **DOF**) recognise that freedom from slavery is a fundamental human right and operate in compliance with fundamental labour standards. DOF's practices are consistent with the UN Guiding Principles on Human Rights and Business, and DOF operates in compliance with all applicable laws prohibiting modern slavery. DOF's policies and standards, which are based on International Labour Organisation conventions, prohibit any use of forced or child labour in DOF's operations or supply chains. Additionally, DOF recognizes and respects employees' right to freely associate, organise and collectively bargain, and complies with working hour requirements as established by local laws.

Working closely with the Rafto Foundation has resulted in DOF having gained a new and deeper understanding of how integral Human Rights are to the UN SDGs. In this context, Amnesty International's recent acknowledgment placed DOF in the top-five global companies based in the Nordics with the best score related to human rights and responsible employment practices.

DOF's efforts to respect the human rights of DOF's employees and workers in DOF's supply chains include developing, implementing and enforcing ongoing measures to prohibit and remedy breaches of laws prohibiting modern slavery.

This Modern Slavery Statement (**Statement**) describes the actions taken by the covered subsidiaries of DOF ASA (collectively referred to as **DOF Australia** and described in detail in Section 1 of this Statement) during fiscal year 2020 to prevent modern slavery and human trafficking (**Modern Slavery**) in our operations and our supply chains as required by the *Modern Slavery Act 2018*.

DOF Australia's senior management have contributed to and reviewed the content of this Statement. This statement for DOF Australia was approved by the board of DOF ASA as the parent entity on 26 June 2020.



Mons S. Aase
CEO
DOF ASA
26 June 2020

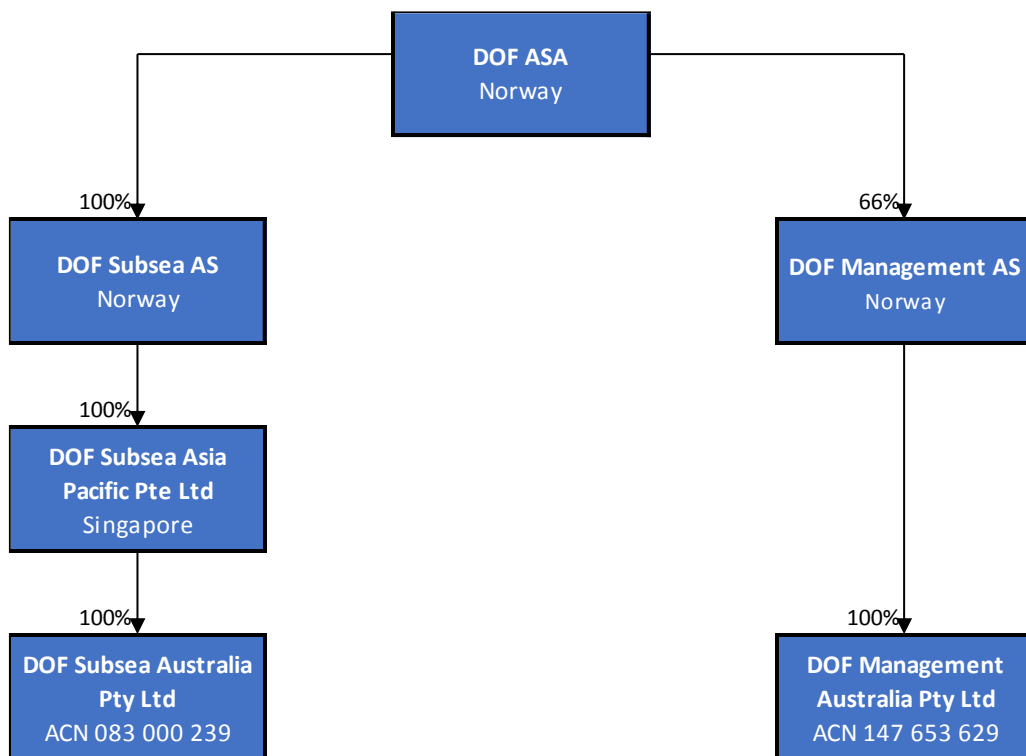
1. Mandatory Criterion 1: Identify Reporting Entities And Describe Their Structure

DOF ASA was founded in 1981 and is the parent company of the DOF group of companies which provide essential offshore and subsea services to the global offshore industry. As of 31 December 2020, DOF has a global workforce of 3,126 employees. Detailed information on DOF is available at www.dof.com.

DOF ASA’s Australian subsidiaries covered by this statement (referred to as **DOF Australia**) are:

- DOF Subsea Australia Pty Ltd, a proprietary limited company (ACN 083 000 239) incorporated in Australia with registered address Level 5, 181 St Georges Terrace, Perth Western Australia 6000, Australia.
- DOF Management Australia Pty Ltd, a proprietary limited company (ACN 147 653 629) incorporated in Australia with incorporated in Australia with registered address Level 5, 181 St Georges Terrace, Perth Western Australia 6000, Australia.

DOF Australia’s relationship with DOF ASA is detailed below:



DOF Australia operates primarily in Australia, with both entities sharing common management and Directors, and operating in accordance with the DOF’s globally applicable values, policies & operating procedures.

2. Mandatory Criterion 2: Describe the Reporting Entities' Operations and Supply Chains

2.1 DOF Australia's Operations

Since its founding in 1981, DOF has continued a proud tradition of delivering safe and quality services to its customers. DOF operates in three segments of the offshore services market, strategically defined by activities and vessel types: PSV (Platform Supply Vessels), AHTS (Anchor Handling Tug Supply vessels) and Subsea (Subsea vessels and Subsea engineering services). During the last decade DOF has invested in key regions such as the Atlantic, South America, North America and Asia-Pacific. No matter where DOF operates in the world, safety is held as the highest priority. DOF strives to be the leader in the fields of health, safety, environment and quality (HSEQ) and systematically promotes these areas in the execution of all activities and operations.

DOF Australia's operations primarily cover Australia and its territorial waters, with offices and facilities in:

- Perth, Western Australia
- Kewdale, Western Australia
- Darwin, Northern Territory

DOF Australia's clients are primarily large oil & gas multinationals operating in Australia.

The entities comprising DOF Australia share common leadership, management, policies, and procedures.

2.1 DOF Australia's Supply Chain

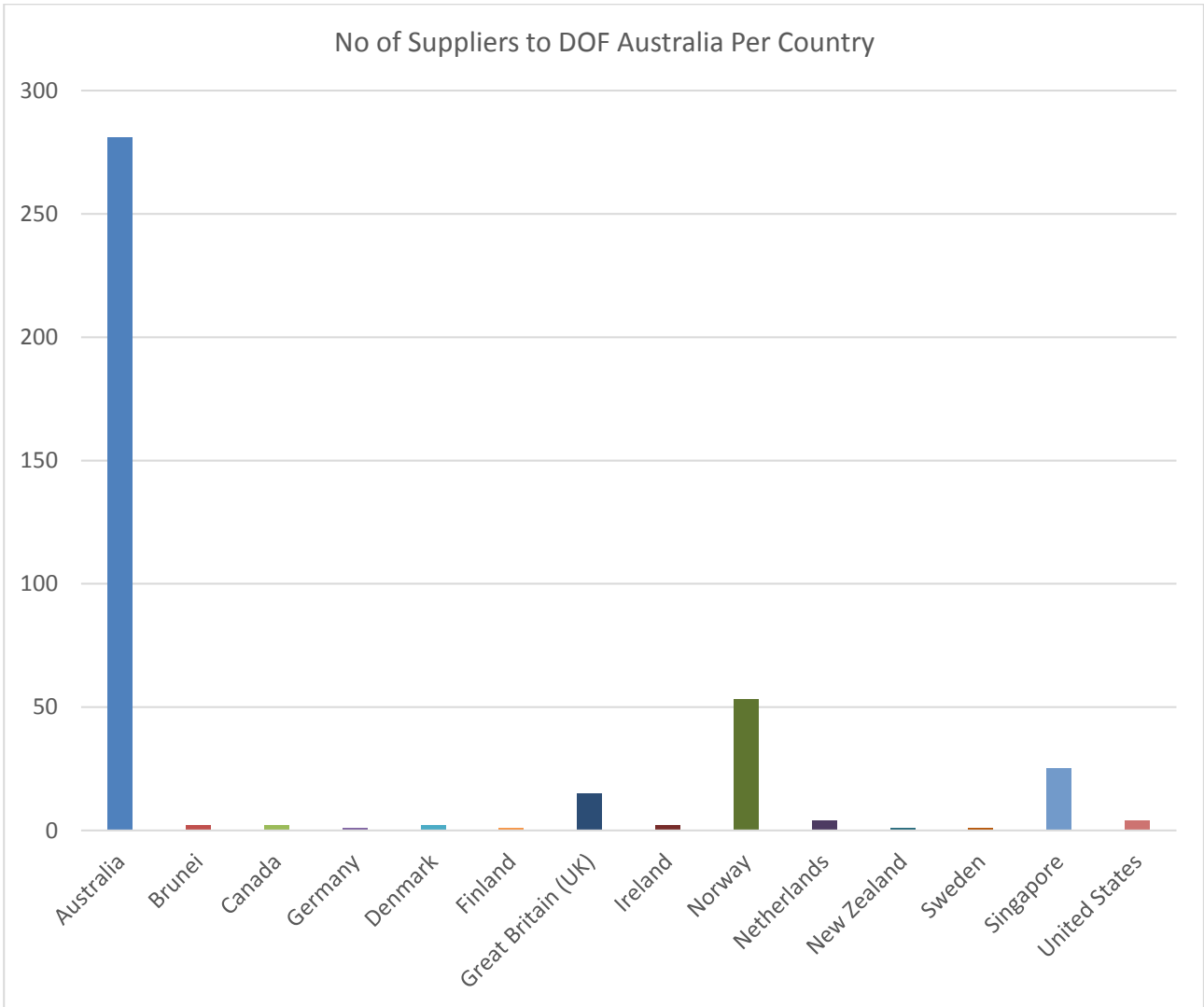
In 2020 DOF's global supply chain consisted of almost 3,500 suppliers and a significant amount of its procurement spending was comprised by bunkering, lay spread equipment, crew agency services, specialised equipment hire, employee travel, vessel hire among other services.

In 2020 the regional split for DOF's suppliers was as follows: Asia-Pacific 16%, Atlantic 49%, North America 14% and South America 21%.

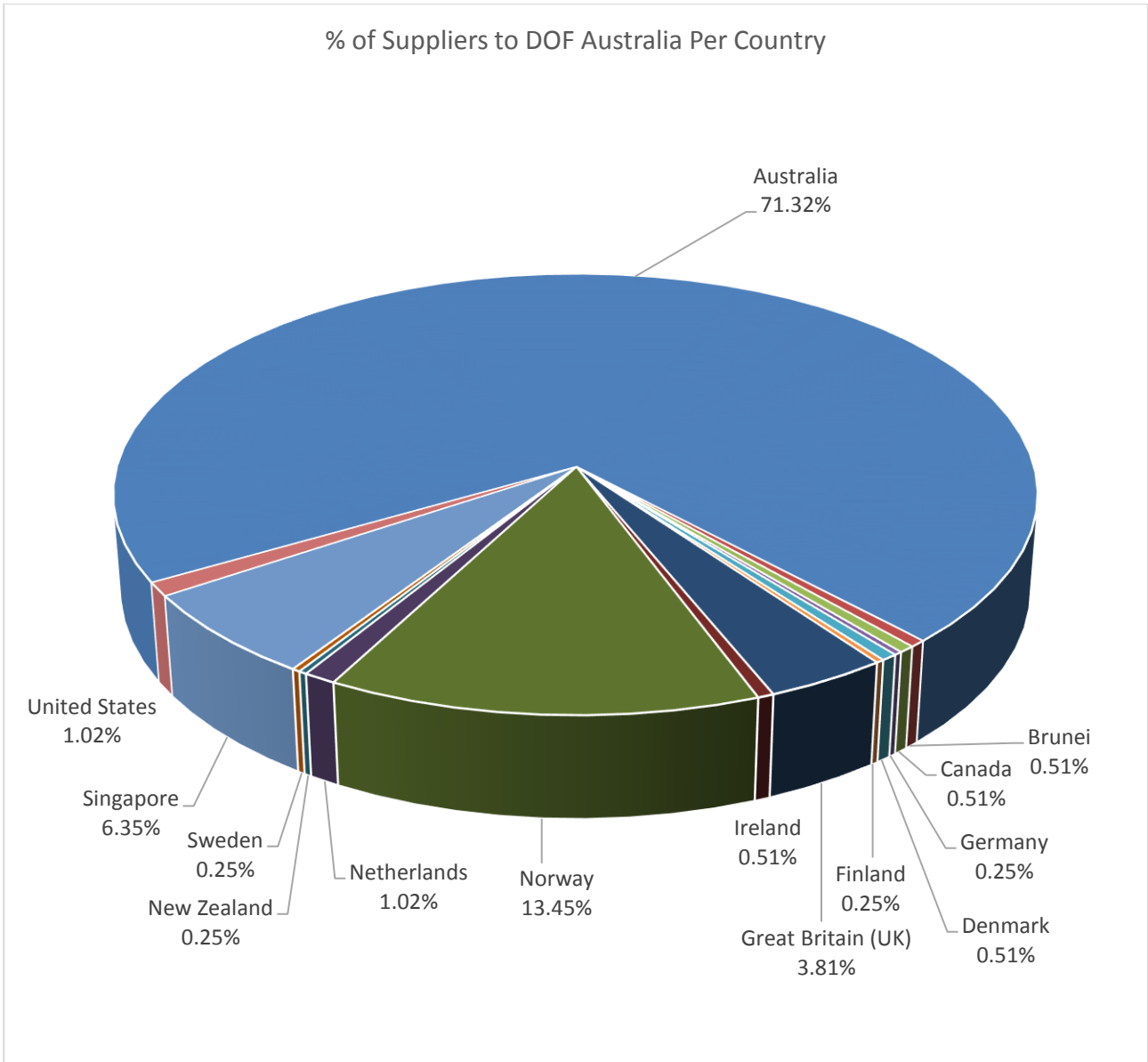
DOF Australia's supply chain forms part of DOF's Asia Pacific supply chain percentage. In calendar year 2020, DOF Australia engaged approximately 400 suppliers.

Depictions of DOF Australia's supply chain by (i) number / percentage of suppliers to DOF Australia by country and (ii) number / percentage of suppliers to DOF Australia by category of supply are presented below:

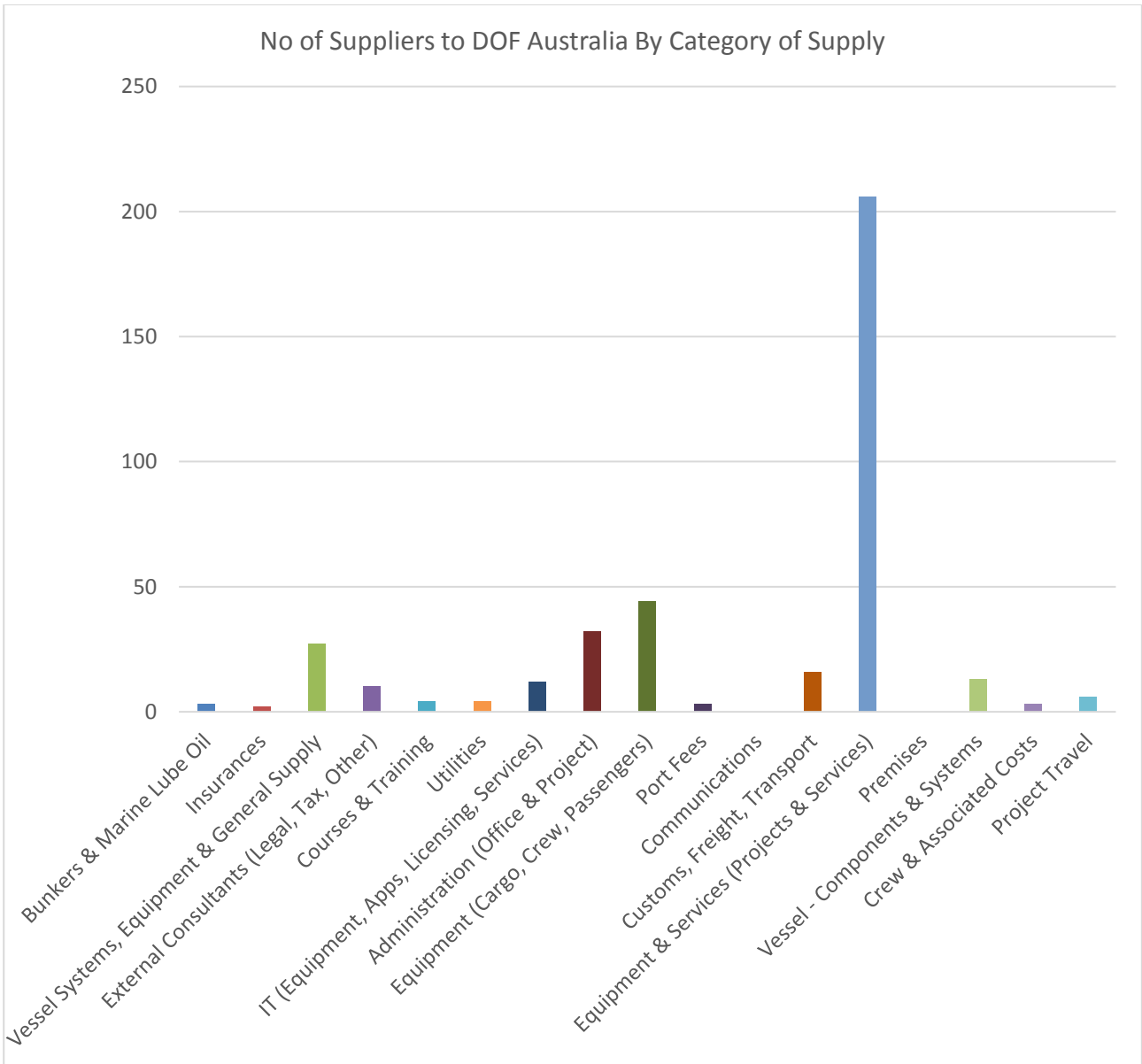
2.1.1 Suppliers to DOF Australia By Country



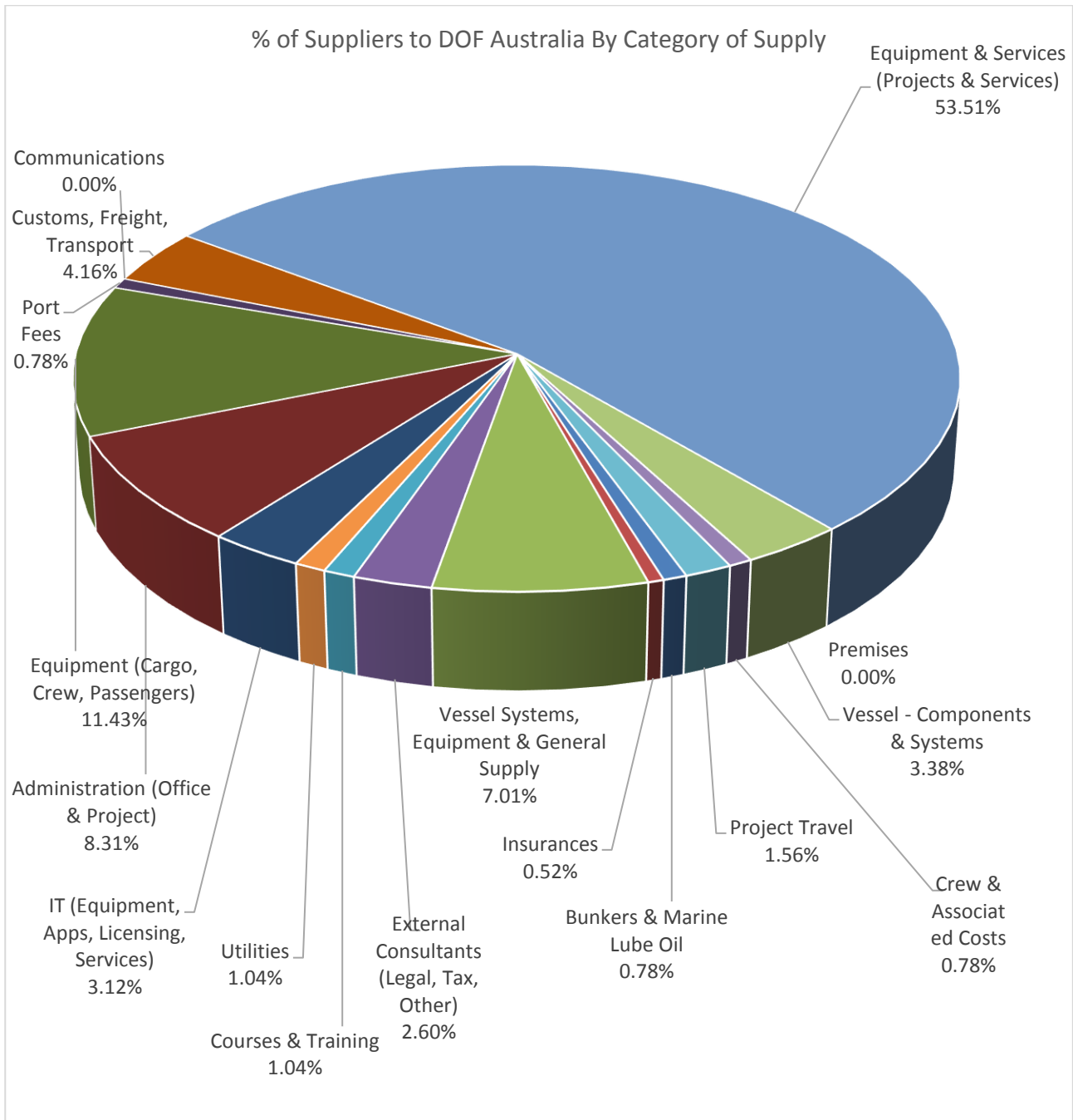
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2.1.2 Suppliers to DOF Australia By Category of Supply



Continued overleaf



3. Mandatory Criterion 3: Describing the Risks of Modern Slavery Practices

Describing the Risks of Modern Slavery Practices in the Operations and Supply Chains of the Reporting Entity and any Entities the reporting Entity Controls or Owns

3.1 DOF Australia’s Operations

DOF Australia does not condone modern slavery in its operations. The DOF Group’s practices conform to international standards for human rights, and it manages its operations according to fundamental labour standards. The DOF Group’s guidelines and standards are based on the ILO Convention that prohibits all use of forced labour or child labour.

In preparing this Statement, DOF Australia has performed a risk assessment on the risk of Modern Slavery in its operations. A summary of the findings is presented below:

Category	Description	Risk Ranking	Controls & Mitigations
Recruitment & Employee Relations	Current DOF Australia employees	Low	See section 4 of this Statement.
	Engagement of new employees / contractors	Low	
DOF Australia owned or controlled facilities	DOF Australia offices & workshops	Low	
	DOF vessels operating in Australia	Low	

3.2 DOF Australia’s Supply Chain

Reference is made to the depiction of DOF Australia’s supply chain in section 2.1 of this Statement. DOF Australia comments as follows:

- (i) Generally speaking, DOF Australia does not have suppliers based in countries that present a high risk of Modern Slavery. Specifically:
 - (a) The majority of DOF Australia’s suppliers are based in Australia (having an overall weighted average vulnerability to Modern Slavery of 6.1 according to the Global Slavery Index 2018).
 - (b) Except for Brunei, no DOF Australia supplier is sourced from countries presenting a high vulnerability to Modern Slavery risk (as analyzed by the Global Slavery Index 2018).
 - (c) DOF Australia’s two suppliers in Brunei are (i) a legal services provider and (as per all DOF Australia’s suppliers) is subject to DOF’s Modern Slavery compliance measures outlined in section 4 of this Statement and (ii) a document storage company (and therefore not in a high risk category of supply).
- (ii) In relation to potential high-risk categories of supply to DOF Australia:
 - The majority of the categories of supply in DOF Australia’s (by number of suppliers) are not in the top 5 high risk industries for imports into Australia (being, as presented by the Global Slavery Index 2018, electronics, garments, fish, rice and cocoa).



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- Whilst some specific scopes of supply to DOF Australia may fall within the Global Slavery Index 2018's high risk category for Australian imported goods (namely PPE & other garments, phone, computers, and accessories), no suppliers of these items based in high risk jurisdictions.
- In any event, all suppliers to DOF Australia are subject to the mitigations & controls outlined in Section 4 of this Statement.

This is an informal assessment based on information found in Commonwealth Modern Slavery Act – Guidance for Reporting Entities, and the Global Slavery Index 2018 and in relation to DOF Australia's operations and supply chain in general (not on a project specific basis).

4. Mandatory Criterion 4: Actions Taken By The Reporting Entity

Describe the Actions taken by the Reporting Entity and any Entities that the Reporting Entity Owns or Controls to Assess and Address these Risks, including Due Diligence and Remediation Processes

4.1 DOF Compliance Overview

DOF has existing policies and standards regulating modern slavery risk within the group's operations. These have been developed to comply with global laws prohibiting modern slavery. These are detailed below and throughout this Statement. For reference, DOF ASA also has a Modern Slavery Statement available online in relation to the UK Modern Slavery Act, available at <http://www.dof.no/en-GB/People/DOF-CAREERS/Respecting-Human-Rights>.

4.1.1 Values

As part of DOF, DOF Australia conducts its business responsibly and ethically. DOF's values are Respect, Integrity, Teamwork, Excellence, and above all we are SAFE. These values are embedded in DOF's policies, code of business conduct, and safety culture. DOF therefore recognises and is driven to comply with international legal and ethical standards and expectations in relation to human rights and modern slavery. These are formally expressed throughout DOF's policies, code of business conduct, and safety culture.

4.1.2 Requirements and Standards

DOF's practices conform to international standards for human rights, and it manages its operations according to fundamental labour standards. DOF's guidelines and standards are based on the ILO Convention that prohibits all use of forced labour or child labour.

DOF has several codes of conduct, policies and other documents prohibiting Modern Slavery. These are:

DOF Doc No	Description	Document Type
DG-PY-012	DOF Group Code of Business Conduct	Policy
DG-PY-001	DOF Group Business Integrity and Ethics Policy	Policy
DG-PY-005	DOF Group Equal Employment Opportunity Policy	Policy
DG-PY-006	DOF Group Workplace Harassment Policy	Policy
DG-PY-0010	DOF Group Human Resources Policy	Policy
-	DOF ASA Human Rights and Slavery Statement	Modern Slavery Statement

4.2 Employment & Labour Rights

DOF does not condone Modern Slavery in its operations. DOF recognises and respects the employees' right of association, organisation and collective bargaining, and its guidelines conform to the labour regulations stipulated by all local authorities.

DOF does not employ or engage employees less than the minimum age for work in any of the regions in which we operate; and there are no junior positions in the corporate organisational structure where younger than the minimum age is a requirement.

DOF prohibits discrimination in hiring, wages, equal pay, protections and conditions of employment. DOF reiterates the documents outlined in section 4.2 above, and also refers to the following relevant documents.

DOF Doc No	Description	Document Type
DSA-HR-ST-008	Global Standard – Recruitment Management	Global Standard
DG-HR-ST-003	Global Standard – Reporting Unacceptable Conduct	Global Standard

The policies referred to above are available on DOF’s website, downloadable through the DOF intranet, and provided to all DOF personnel upon joining the company or when updated. All DOF personnel are required to complete a mandatory Business Integrity & Ethics E-Learning Module upon joining the company and thereafter on a periodic basis. DOF refers the following relevant documents and media:

DOF Doc No	Description	Document Type
-	DOF Subsea Business Integrity & Ethics E-Learning	E-Learning

4.5 Training and Awareness

As a responsible organisation DOF supports and promotes human rights. DOF ensures its operations do not breach international standards and conventions in line with United Nations guidelines; avoid causing or contributing to adverse human rights impacts through our activities and DOF seeks to prevent adverse impacts on human rights that are directly linked to activities through its business relationships.

DOF’s Code of Business Conduct (**COBC**) is approved by DOF ASA Board of Directors and supported by its management structure. The COBC clearly communicates core principles to support DOF’s organisation and partners to align with UN Global Compact:

- Comply with all applicable laws and respect internationally recognised human rights everywhere DOF operates;
- Follow consistent procedures to achieve a high common standard among DOF’s companies and business partners even where business practices in the countries in which DOF operates differ;
- Ensure all parties DOF works with share and implement the same standards of human rights;
- Always report incidents of unacceptable behaviour or deficiencies in the system;
- Uphold the right for all employees to be free to associate, organise and bargain collectively.

Promoting Compliance and Governance and the DOF Watertight Integrity Test

The COBC was relaunched in 2018. The new format aims to help all DOF personnel understand and meet DOF’s expectations for professional standards and how to comply with all legal and regulatory obligations, worldwide. The “*DOF Watertight Integrity Test*” was introduced as a simple tool to support decision making in any situation.

Awareness and training for complex issues

The COBC was rolled out globally along with comprehensive awareness training and a new, mandatory e-learning module, undertaken annually by all DOF employees. The resources and e-learning modules are available to stakeholders on DOF’s website.

In addition, a new global Compliance Awareness training program as introduced to promote understanding in this complex area of business (Human Rights, Labour and Environment compliance). The training also covers obligations and measures to tackle Bribery and Corruption and is part of senior and middle management training program.

Raise YOUR voice program

Stop Work Authority: Everyone – DOF’s employees, contractors and clients have the right to ‘stop work’ if something is not safe, or poses a risk, it is one of DOFs most important safety barriers. By extension the raise YOUR voice program gives permission ‘when you see a potential risk, are concerned or something is not right’. ‘Never remain silent – bring it to someone’s attention’ is reinforced as part of DOF’s safety compliance culture.

4.6 Supplier Due Diligence

As part of the process of due diligence recommended in the OECD Guidelines for Multinational Enterprises, DOF ensures universal principles are upheld along our supply chain. DOF’s electronic vendor evaluation platform is based on the UN Global Compact principles, where all vendors must describe their approach to Human Rights, Labour, Environment and Anti-Corruption compliance. This includes a risk assessment of potential violations within their own supply chain. DOF’s management system requires all vendors and sub-contractors be evaluated prior to the placement of orders for work, services or products.

This process incorporates requirements to ensure that all existing and future vendors to DOF agree to abide by the principles of the Act, and that they do not promote or carry out any unlawful human rights practices, as covered in the *Modern Slavery Act 2018*, and also ensure that all vendors do not engage in any type of human trafficking, child or forced labour practices, etc., whilst doing business with DOF. Suppliers will be required to provide DOF with a Transparency Statement stating their position with regards to the Act and associated Human Trafficking and related exploitation practices, or a declaration that they will abide by DOF’s Code of Business Conduct. Failure to comply with this requirement will automatically exclude the vendor.

In limited circumstances, a potential vendor that does not meet DOF’s approval threshold or a subsequent in-depth review can nonetheless be approved for use, but only subject to approval by the regional Executive Vice President (or equivalent authorised person).

DOF Australia reiterates the documents referenced above, and also refers the following relevant documents:

DOF Doc No	Description	Document Type
DG-SC-MN-001	Manual – Supply Chain Management	Manual
DSA-SC-GL-006	Guideline – Supply Chain Management Responsibility	Guideline
-	Factlines Vendor Evaluation Questionnaire	Questionnaire

4.7 Remediation

DOF has in place a reporting framework, through which employees, contractors and members of the public are able to report instances, using multiple channels, of actual or suspected unethical or unlawful conduct, without fear of intimidation or reprisal that maintain confidentiality and protect the rights of both the reporter and the potential subject of a report.

DOF is committed to fully investigating all concerns raised, and to rectifying any wrongdoing which may have occurred to the extent practicable in all circumstances, and to the principle of fairness in all investigations.

DOF encourages reporting concerns immediately and within the management structure. If that is not an option DOF makes Ethics Helpline available to anyone concerned. The Ethics Helpline is hosted and staffed by an independent third-party provider. It is available via a link on the DOF BMS, DOF MyPortal, DOF websites and by phone 24 hours a day, 7 days a week and in multiple languages.

Anonymous reporting is available where local law allows. Additionally, this is the tool used by DOF’s investigation teams to communicate with the reporter and maintain privacy.

During fiscal year 2020, no human rights or modern slavery concerns were identified within DOF’s operations or supply chain.

5. Mandatory Criterion 5: Assess the Effectiveness of Actions Taken

Describe How the Reporting Entity assesses the Effectiveness of Actions being taken to Assess and Address Modern Slavery Risks

DOF undertakes regular internal and external auditing of its practices and business relationships to assess adherence to our policies and regulatory compliance requirements.

DOF is ISO certificated (ISO 9001:2015, ISO 14001:2015, and ISO 45001:2018) audited annually by DNV-GL T

Amnesty International ranked DOF in the top-5 global companies based in the Nordics with the best score related to human rights and responsible employers. The Company has robust awareness, assessment and structures to comply with the Act including:

1. Regularly review the actions taken to assess risks, identify instances and incidents involving Modern Slavery, and the remediation processes developed;
2. Engaging with suppliers to review their risks and responses to Modern Slavery, and entering into dialogue to determine the effectiveness of our action with regard to their responses to Modern Slavery;
3. Putting in place measures to track awareness of and compliance with our actions in the Modern Slavery space, including assessing the effectiveness of internal education and training;
4. Reviewing and, if necessary, updating training programs, or creating training and education modules specific to Modern Slavery.

No incidents or practices that could be described as causing or contributing to Modern Slavery have ever been reported in any DOF Australia operations, and while we are aware of the risks of contributing to or being linked to Modern Slavery practices through our supply chain, we are not aware of any such incidences for the reporting period.

The Raise YOUR voice program and annual Ethics Helpline report reveal no complaints or grievances related to Modern Slavery were made during the reporting period.



6. **Mandatory Criterion 6: The Process of Consultation**

Describe the Process of Consultation with any entities the Reporting Entity Owns or Controls

This Statement was primarily drafted by DOF Australia's Legal Counsel with assistance from key stakeholders within DOF Australia, and subsequently reviewed by all relevant senior stakeholders within DOF Australia and DOF ASA.

7. Mandatory Criterion 7: Any Other Relevant Information

Not applicable.