2019

Sustainability Report

DOF ASA



Your innovative partner
in offshore solutions.

DOF Sustainability Report 2019
is a publication from DOF ASA.
Released April 2020, this is the sixth
consecutive year of publication.

Cover Photo-Illustration
Courtesy of Equinor: Skandi Vega
and Skandi Iceman participate in tug
out of Asta Hansteen. Photo by
Espen Roennevik and Roar
Lindefjeld.

Production team
The DOF Group Sustainability
Report would not be possible
without the contribution of
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DOF Sustainability Report

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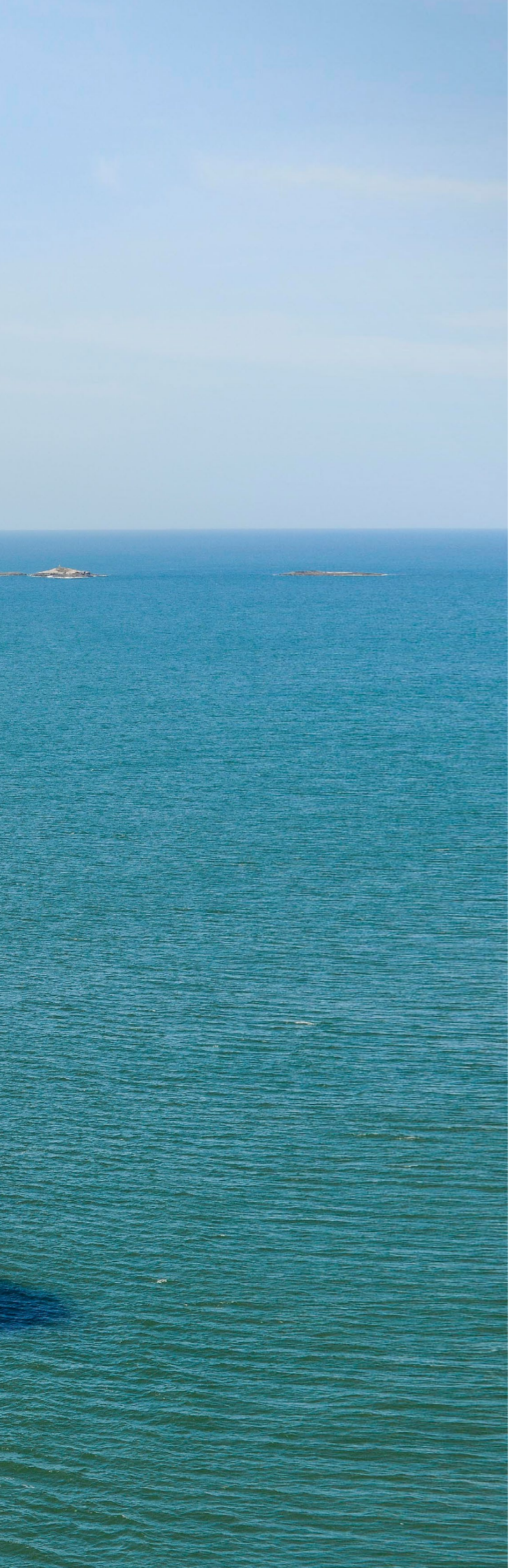
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Welcome to the DOF Sustainability Report for 2019

This report has been put together with great care and DOF is proud to release its sixth stand-alone Sustainability Report. DOF is a 'values driven' company. Our values are active because they guide and build our policies, key documents and our culture. So, it is with this report, DOF's efforts and results in developing sustainable operations are framed within our values.

Not only are we committed to continuous improvement, we welcome and appreciate your feedback. If you would like to send us your views, please use the contact noted on the inside cover of this report: stig.clementsen@dof.com


SKANDI OLINDA
TechnipFMC
DOF



DOF – Balancing risk & opportunity in a sustainable way

Our vision:

To be a world class integrated offshore company, delivering marine services and subsea solutions responsibly, balancing risk and opportunities in a sustainable way, together, every day.

PLSV Skandi Olinda

Balancing risk & opportunity in a sustainable way

The DOF Group is a leading provider of subsea project and marine services and is present in all the major offshore regions in the world. Parent Company, DOF ASA, own and operate a modern fleet of 67 offshore vessels and, through daughter company DOF Subsea, the subsea engineering capability to provide a complete range of integrated, accessible offshore services to the global offshore energy market.

The flexible business model: the combination of an expert team, capability and assets, strong safety culture, and over 39 years' operating experience, position the DOF Group firmly within the Oil and Gas industry.

The fleet, defined by activity and vessel type, operate in three segments of the offshore market: Subsea (Subsea vessels: in combination with subsea project services), AHTS (Anchor Handling Tug Supply vessels) and PSV (Platform Supply Vessels).

As of 31 December, 2019, DOF has a global workforce of approx. 3,500 employees and a fleet of 67 vessels, including three vessels on management. In addition, DOF owns a fleet of 72 ROVs (Remotely Operated Vehicles) and 2 AUVs (Autonomous Underwater Vehicle).

Safeguarding our people and the environment, wherever we operate in the world, is our highest priority. Our actions and decisions have always been guided by and grounded in our values – Respect, Integrity, Teamwork, Excellence – and above all we are safe. In this way, we ensure we are honest, fair and equitable in all our dealings. We strive to be the leader in the field of health, safety and working environment, deserve our reputation and continue to build our future.

Norskan

The Brazilian OSV and marine management activities

9 vessels mainly high-end AHTS vessels

Brazilian built tonnage with local privileges and "blocking" rights

The covers from DOF's previous Sustainability Reports.



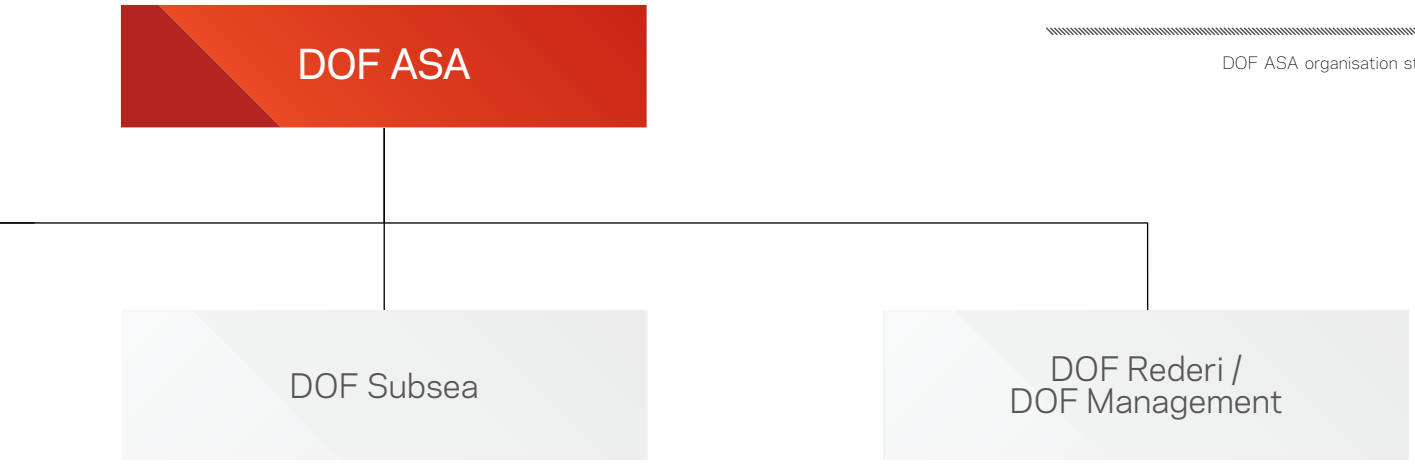
Did you know?

The DOF Group is recognised as a segment-leader in sustainability reporting.

Part of Carbon Disclosure Project (CDP) since 2010, The DOF Group has also produced a standalone, fully audited, annual sustainability report according to GRI Standards: Core option, for the last six years.

The Governance Group (TGC) conducted an independent review of DOF's sustainability reporting activity in 2019. DOF received a stand-out score of 3.2 with the Energy Sector Group (ESG) 100 method, scoring maximum points in both GRI-reporting and UN SDG integration and well above the "energy sector" average of 0.986. We're proud to say DOF's total ESG score ranks within the top 10 of 100 largest (by market cap) companies on Oslo Stock Exchange, for a second consecutive year.

DOF ASA organisation structure



Our approach to sustainability

Management letter:

Globally, companies, industries and governments alike are increasingly tasked with greater accountability and transparency in our actions to reduce Climate Impacts, as well as integrate relevant UN Sustainable Development Goals (SDGs) into strategy and policy.

A decade ago, the DOF Group implemented its commitment to reduce and report greenhouse gas emissions. In 2010 we joined the Carbon Disclosure Project (CDP) where our governance and actions could be assessed by an independent third party and benchmarked against our peers, annually.

The DOF Group has since introduced a structured approach to measure and report our wider sustainability actions. First, by adopting Global Reporting Initiative reporting standards, producing an annual stand-alone report for six consecutive years; by embedding UN Global Compact principles in our policies and code of business conduct and by further aligning with relevant UN SDGs to focus our approach to sustainability.

In the intervening ten years we have also seen the focus on climate action and expectations for global citizenship grow, perhaps no more than in 2019. In the energy sector we see this clearly as energy majors, such as Equinor, align with the Paris agreement and state climate ambitions to reduce the absolute greenhouse gas emissions to near zero within a few decades.

Against this backdrop, and given continued challenging market conditions, I am proud to say DOF has continued its progress and strengthened its efforts and focus on sustainability in 2019. We balance our environmental, social and economic performance and for clarity we report actions towards sustainable operations against our key objectives.

Safeguarding our People and Environment

Wherever we operate, safety is our priority and we aim to be an incident-free organisation. The NOPSEMA investigation relating to a 2017 saturation dive campaign in Australia, is ongoing and continues to be monitored.

We work hard to build a strong safety culture, based the on 'Safe the RITE way' program. The DOF Workbook, a foundation training program for all employees which builds on the "Safe the RITE way" program, was launched in 2019. The DOF Workbook not only incorporates core and enterprise management disciplines, the training program specifically includes the universal principles of sustainability, standards sustainable companies must satisfy and applies these to DOF Group activities.

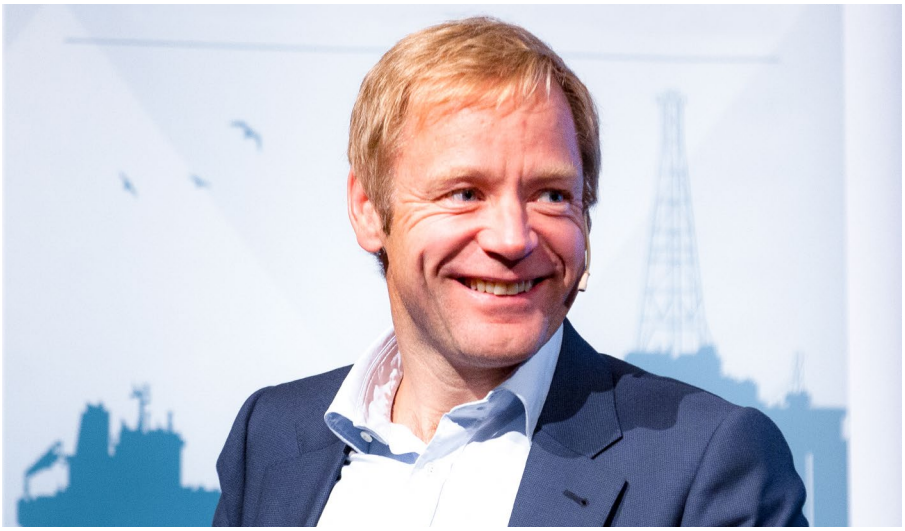
Additionally, the DOF Workbook continues to build safety culture and develops competence in health sciences and enhanced risk perception based on contemporary thinking. The effect will be to strengthen DOF as a values-driven organisation, with a culture shaped by a clear set of ground rules and guiding principles for decision-making, actions and a sense of community.

Sustainable environment

Our actions to reduce greenhouse gas emissions and manage environmental impacts are ongoing. We use a combination of technical solutions, such as shore power and battery packs, and an organisational approach through environmental management systems and strategy. Even so, it was gratifying to receive the 2018 CDP score of Management Level (B), which places the DOF Group among leaders in our industry.

The Research and Development project, in partnership with Kongsberg, outlined in the 2018 Sustainability Report, combines technology and innovation to tackle Greenhouse Gas emissions. In 2019 the project moved swiftly from steering committee ratification to the prototype of the "Intelligent Efficiency" decision support system onboard Skandi Africa and Skandi Vega. The "Intelligent Efficiency" system has the potential to reduce our vessel's fuel consumption by 15 -30 per cent.

Group CEO, Mons S. Aase, takes questions at the a financial presentation event for publicly traded companies with main offices on the West coast of Norway.



Employees

The key to the DOF Group's success remains unchanged – our people. Still, the market in which we operate is very challenging, and we have over the last few years had to adapt the workforce to match market demands. At the end of 2019 we were 3,501 people in the company.

Out of left field, 2020 brought the unprecedented challenge of a global emergency response to COVID-19. I am proud of our team, who focused on our values, showed respect for authorities and observed the restrictions. I have seen great strength and remarkable flexibility as we have joined together in our endeavours to keep people safe, reduce the risk of transmission and maintain our operations.

UN Sustainable Development Goals, Human Rights, and Business

The DOF Group's practices are consistent with the UN Guiding Principles on Human Rights and Business. The organisation operates in compliance with fundamental labour standards. However, working closely with the Rafto Foundation we have gained a new and deeper understanding of how integral Human Rights are to the UN SGDs. In this context, Amnesty International's recent acknowledgment placing DOF Group among the top 10 global companies based in the Nordics, seems more significant as well as demonstrating our commitment to these core principles.

Continuous improvement of our operations

Quality of our work, cost efficiency and smarter solutions will be key in securing work and delivering according to our stakeholders' expectations. Several improvement projects have been ongoing to achieve a more streamlined and efficient organisation. We will continue this effort in order to be competitive. Defining and measuring environmental sustainability aspects and risks associated with our business activities is important, and investment in systems and equipment have been made to record, understand and improve our environmental performance, and secure a sustainable future. ❁

Bergen, 24th April, 2020



Mons S. Aase
Chief Executive Officer

The DOF Group values:

Respect
Underpins everything we do and every interaction we have. Respect for people: our colleagues, our customers, and our business partners.

Integrity
The very corner stone of our business. We behave ethically – always.

Teamwork
Everything we achieve is as a result of teamwork.

Excellence
In everything we do. We are resourceful and responsive to our customers' needs; innovative in the solutions we apply to everyday problems.

Safe
Above all we are safe.

DOF values & priorities

Safe

Above all we are SAFE

We are committed to protect the health and safety of our people and our environment.

Respect

Underpins everything we do and every interaction we have. Respect for people: our colleagues, our customers, and our business partners.

As global citizens we are socially responsible, we respect the individual, the local customs and cultures of our various markets.

Acting with care and consideration is central to our wellbeing and safety and ensures we minimize our environmental impact.

Integrity

The very corner stone of our business. We behave ethically – always.

We are honest, fair and equitable in all our dealings. We are dedicated to good corporate governance.

We strive to do the right thing not because someone is checking, or looking, but purely because it is the right thing to do.

MATERIAL ISSUES

Health, safety and working environment

403-1 Management systems
403-2 Hazards & Incidents
403-3 Occupational health services
403-4 Occupational health and safety engagement
403-5 Occupational health and safety training
403-6 Promotion of worker health
403-7 Occupational health and safety impacts
403-8 Occupational health & safety system coverage
403-9 Work-related injuries

Energy Efficiency & Climate Impact

305-1
305-2 Emissions
302-1 Energy Consumption
307-1 Compliance
306-3 Significant spills
201-2 Financial implication due to climate change

Business Integrity, ethics and payment transparency, Spill avoidance

205-1 Anti-corruption
205-2 Anti-corruption
205-3 Anti-corruption
415-1 Anti-Competitive behaviour
201-4 Financial assistance
419-1 Compliance
414-1 Supplier social screening
308-1 Supplier environmental screening
306-3 Significant spills

OUTSIDE THE ORGANISATION (103-1)

Global: Employees, shareholders, customers, local communities, NGOs, policy makers, shareholders, suppliers

Global: Customers, civil society, policy makers, local communities, NGOs, shareholders

Global: Customers, civil society, shareholders, suppliers, policy makers, civil society

WITHIN THE ORGANISATION (103-1)

Whole organisation: DOF's ambition is to be an incident-free organisation. We are highly committed to our core values – Safe the RITE way - and we work pro-actively to achieving them.

Safe is significant to DOF and is paramount to our ongoing success and sustainability, we work to ensure we are safe and our team returns safely, everywhere we do business.

Whole organisation: Defining and measuring environmental sustainability risks associated with our business activities is an important activity for the Group. DOF is actively working with its partners on finding energy efficient and CO2 reducing solutions as part of their own efforts to reduce carbon footprint.

Whole organisation: For DOF, business integrity and ethics policy are of high priority and DOF expects their companies and employees to follow and adopt behaviours to protect and build the DOF's reputation, in all situations.

For DOF to be in compliance to law and to industry standards is of strategic priority. In all of the regions where DOF operates, it strictly follows all rules and regulations addressed by the national governments.

DOF acknowledges the importance for our customers of a reliable partner and that is why we are always seeking to obtain the highest industry standard certifications before accredited bodies.

UN SDG



Safeguarding our people is the overall objective in everything we do. Through the Safe the RITE way framework, DOF has ambition to ensure the good health and well-being of all employees. Measurable key performance indicators are used as part of this work, to monitor the effect of the activities performed within the area.

A new program was developed in 2019, to stimulate physical activity onboard the vessels. This will be an ongoing campaign throughout 2020.

The new Workbook includes a module on Physical, Social and Mental well-being, which puts the different aspects of health together in a holistic approach.

Our continuous efforts on simplification of our safety system and procedures aim to turn the focus from the industry's inbuilt bureaucracy, back to enhanced safe work practices.



The main source of DOF's climate impact is the fuel used by its vessels. DOF has various activities and programs to reduce its climate impact, including; Ship Energy Efficiency Plans (SEEMP), goal of 3% annual reduction (intensity target) in fuel consumption, installa¬tion of shore power capability, installation of battery packs on vessels, and participation in the Carbon Disclosure Project (CDP) for transparent environmental reporting.

Through an R&D project with Kongsberg, we aim to use digital solutions to reduce energy usage on our vessels, through Intelligent Efficiency. There is potential for 15%-30% reduction in fuel consumption, ultimately leading to significant reduction in emissions.

DOF also has other internal activities such as preparedness for acute pollution from vessels, using environmentally friendly products (for example non-hazardous hydraulic oil in ROVs) and environmental management plans.



By employing local content, DOF contributes to economic growth in the various areas of operation. DOF is also committed to operating responsibly and respecting local laws and regulations. Through its Tax Strategy, DOF ensures that tax is paid fairly to the countries where it operates.

DOF acts ethically and lawfully to protect our reputation and comply with applicable laws and regulations, wherever we do business.

Our Code of Business Conduct gives us clear rules and provides guidance for decision-making in ethical dilemmas. This is particularly important when operating in areas with high risk related to Anti-Bribery and Corruption.

DOF's focus towards Integrity is not limited to ourselves; we strive to ensure that our partners and suppliers operates according to the same standards, for example by assessing all suppliers towards the principles of the UN Global Compact.

Teamwork

Everything we achieve is as a result of teamwork.

Each of us is responsible and open in our professional relationships, cooperative and collaborative, treating one another with dignity and respect.

We do not blame, we find and share solutions and we learn from mistakes. From this platform we build diverse and global teams and strive for free exchange of ideas, experience and knowledge, worldwide.

Excellence

In everything we do. We are resourceful and responsive to our customers' needs; innovative in the solutions we apply to everyday problems.

We safeguard our individuality and the qualities that set us apart from our competitors, protecting our reputation and the professional trust we have built, we do not walk away from our commitments.

MATERIAL ISSUES

Our people;
Labour rights & employee satisfaction

401-2 Employment
402-1 Labour/Management Relations
404-3 Performance & career development reviews
406-1 Non-discrimination
201-3 Benefit obligations

Product reliability and customer service,
Innovation & Climate Resilience

DOF 1 Operational uptime
DOF 2 Results of surveys measuring customer satisfaction

OUTSIDE THE ORGANISATION (103-1)

Global: Employees, shareholders, customers, local communities, NGOs, policy makers, shareholders, suppliers

Global: Employees, shareholders, customers, local communities, NGOs, policy makers, shareholders, suppliers

WITHIN THE ORGANISATION (103-1)

Whole organisation: DOF understands that acting in accordance with its Code of Business Conduct towards their partners and employees is decisive in achieving the highest standards by which DOF conducts their business activities every day.

Whole organisation: DOF continues to acknowledge that achieving excellence in corporate and operational efficiencies across the organisation is the most important thing it can do that will protect long-term sustainability for the organisation.

Whole organisation: DOF is continuously defining and measuring its sustainability risks such as climate change through measurable and innovative control measures that are being applied within the business.

UN SDG







DOF operates in many different areas around the world, and some of these areas lack a strong public education system. Either by direct contribution to employees or partnerships with other members of the industry, DOF contributes to quality edu¬cation of children in challenge areas.

Within DOF, the new Workbook gives the foundation for training in the years to come. By delivering training modules on all aspects of how we work, we have established a unique way to engage training and development of our people.

The DOF Group strives to promote a workplace where all are treated fairly, accepted equally, without any exclusion - in a harassment-free workplace. As a Group, we benefit from the different talents, experiences and perspectives equality and diversity brings to the workplace and the individual contribution employees make. Our guiding principle is that everyone should be treated with dignity and respect at work.

Our industry is now experiencing substantial change, disrupting the way it has traditionally been working. New expectations and requirements appear rapidly, and affect all areas of business, from external environment to operational performance and business ethics.

DOF's Digital Transition strategy highlights different technology development that we expect to see over the next few years. There are many opportunities, but it is not possible to do everything at once. It will therefore be important for DOF to look at the opportunities and make strategic prioritisations of the digital transition and technology development.

In the recent years, DOF has entered into new markets with a developing industry. By bringing decades of experience and expertise, we work together with local stakeholders to facilitate sustainable and resilient infrastructure development.

Our stakeholders:

Employees
Clients
Investors
Suppliers
Local Communities

Learn more about how we define each group in the appendix.

Materiality

The DOF Group is a global organisation, operating in a complex environment. Meeting stakeholder expectations and navigating daily challenges, large and small, requires a deep understanding of our values and clearly articulated priorities.

STEP ONE:
Identify material aspects and conducting a materiality assessment

STEP TWO:
Stakeholder engagement

STEP THREE:
Validation analysis of the materiality matrix

The initial materiality matrix for the Group was developed in 2015. Since then, there has been annual validation of the matrix, with adjustments as circumstances has changed. The analysis used a standardised 'Materiality Tool' which consists of predefined external and internal criteria, by which every topic can be measured. These include a broad set of considerations such as financial criteria, sustainability context, DOF's strategy, peer pressure, and alike. Each topic's relevance was tested, from low to strategic and where the topic could impact in the value chain, whether positive or negative.

The oceans: a vital natural resource and our workplace.



Climate Action and Life Below Water are key SDGs for the Group: as material aspects, and as a Company harnessing our values, it is fundamental we protect the environment. Our actions apply to our ocean settings and our broader climate impacts.

Reduce Greenhouse Gas emissions

The main source of DOF's climate impact is fleet fuel consumption. We use a combination of technical solutions and an organisational approach through environmental management systems and strategy to meet our targets for Greenhouse Gas emissions reduction.

1. Environmental initiatives use technological developments and power innovations.

The "Intelligent Efficiency" project started in 2019. Together with industry leaders including Kongsberg, DOF is developing a proactive, intelligent, and dynamic decision support system for optimal vessel operations, giving fuel and maintenance reductions. The system will inform marine operational decisions by providing more accurate, timely, and easy consumable information to decision makers. The project moved smoothly from steering committee ratification to a prototype onboard Skandi Africa and Skandi Vega. The "Intelligent Efficiency" system has the potential to reduce our vessel's fuel consumption by 15 -30 per cent.

The MARESS system, deployed on 30 vessels, uses data models for ECO Speed curve and fuel statistics to drive efficiency and reduce emissions in the DOF fleet.

Our onshore power project continues, allowing for zero emission during vessel port stay where possible. Typically, vessels spend 25-35 per cent of annual operations in port. Six vessels are part of the project Skandi Vega, Skandi Iceman, Skandi Bergen, Skandi Hera, Skandi Flora, and Skandi Mongstad.

Other cleaner fuel initiatives include the introduction of dual powered LNG vessel, Skandi Gamma and energy storage through the installation of battery packs on Skandi Flora and Skandi Mongstad. All of which are aimed at having a positive impact on our climate impact.

2. Design for efficiency

Reducing emissions also involves fundamental design principles. Our starting point has been to employ the latest technology in ship design and fuel consumption. For example, vessel bow shape is optimised for eco-drive-in all-weather conditions and designed to minimize free-running fuel consumption in three sea state regimes. Additionally, we minimise fuel consumption by specific route optimisation planning, especially for Platform Supply operations.

3. Substitute to non-hazardous products

We have audited controls in place and are prepared to respond to pollution events, but we start with a fundamental 'substitute to environmentally friendly products' principle, for example, using non-hazardous hydraulic oil in ROVs as well as robust environmental management plans.

Did you know?

DOF & Transparency

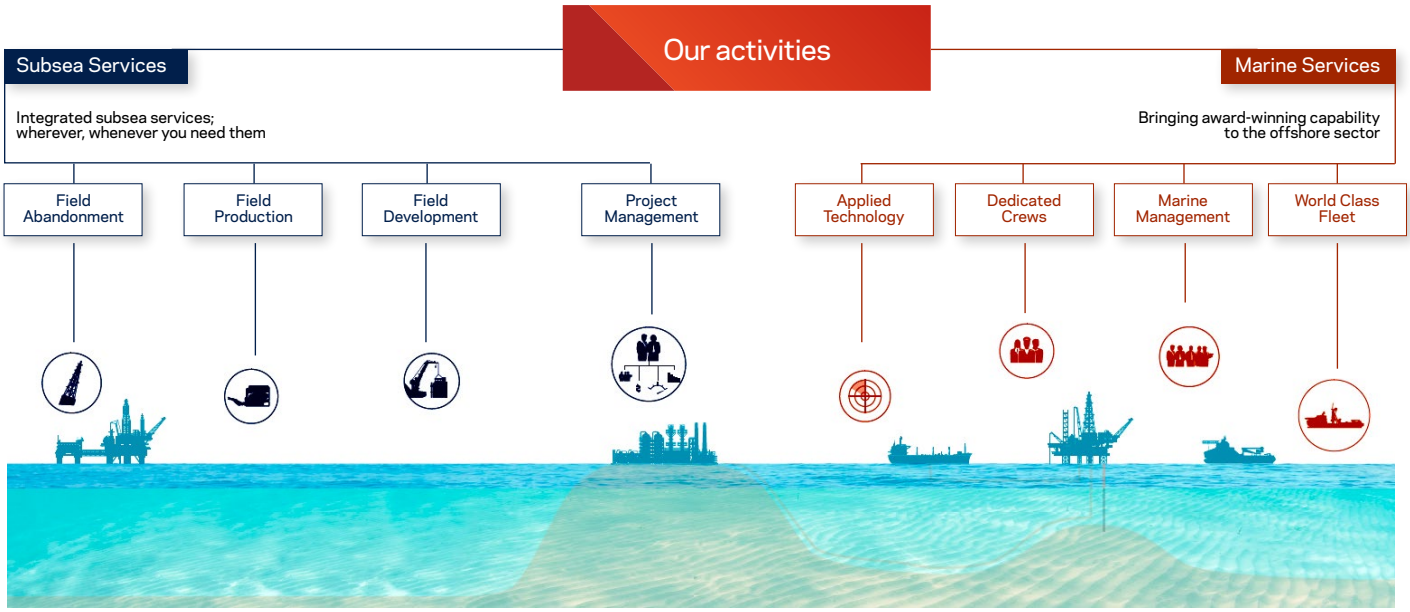
The DOF Group back all our initiatives up with transparent environmental reporting such as the CDP and GRI Standard – and have been doing so for years – it is the only reliable way to measure our progress and drive change.

The DOF Group has reported environmental performance through the Carbon Disclosure Project (CDP) since 2010. We have consistently ranked in the top 30 per cent, along with other companies judged to have more advanced environmental stewardship. In 2019, the DOF Group is back with a solid B score.

The DOF Group's actions to manage and report our Greenhouse Gas Emissions through the CDP link to our actions relating to relevant United Nations Sustainable Development Goals "17 Goals to transform the world: The Sustainable Development Goals are the blueprint to achieve a better and more sustainable future for all".

Our focus for 2020:

A new "Intelligent Efficiency" decision support system project started in 2019 and has the potential for significant fuel saving during vessel operations. The project development will continue over the next few years.



ABOVE: DOF's activities divided into two main segments: Subsea Services and Marine Services.

We conduct business ethically and with integrity, safeguarding people and maintaining the highest principles, wherever we do business.

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

Strong institutions operate to universal principals and give stakeholders the resources to uphold them.

In a complex world, safeguarding people and maintaining the highest principles, wherever we do business, is a modern business challenge. The Code of Business Conduct (COBC) is our own blueprint for conducting business fairly and responsibly as was relaunched in 2018.

In 2019 we launched The DOF Workbook, a foundation training program for all employees which builds on our values based "Safe the RITE way" program. The DOF Workbook not only incorporates core and enterprise management disciplines, the training program aims to promote company-wide understanding of the universal principles of sustainability, standards sustainable companies must satisfy and how these apply to the DOF Group activities.

Additionally, the DOF Workbook continues to build safety culture and develops competence in mental health and wellbeing and enhanced risk perception based on contemporary thinking. The effect will be to strengthen DOF as a values-driven organisation, with a culture shaped by a clear set of ground rules and guiding principles for decision-making, actions and a sense of community.

Promoting Compliance and Governance and the DOF Watertight Integrity Test

The DOF Workbook and training program is designed to promote compliance and governance through education and understanding. There are specific modules and the theme of compliance runs through the whole workbook - "What we do is as important as the way in which we do it".



The "DOF Watertight Integrity Test" was introduced in 2018 as a simple tool to support decision making in any situation and us all comply with all legal and regulatory obligations, worldwide.

Awareness and training for complex issues like Anti-Bribery and Corruption

The COBC was rolled out globally along with comprehensive awareness training and a refreshed mandatory e-learning module. The global Compliance Awareness training program was conducted to promote understanding in this complex area of business. The DOF Workbook and training program covers Business Integrity and Ethics including Bribery and Corruption. The roll-out is a focus in 2020.

Closing the 'feedback loop' with tools for transparency and accountability: The Ethics Helpline

The Group introduced the 'DOF ethics helpline' in 2018 to give stakeholders anonymity and a 24/7 accessible tool to report concerns. Of the total 48 reports in 2019, trend analysis has been undertaken. There were 35 unique cases, four of them serious, resulting in dismissals.

Supporting the communities in which we operate

To develop and support the communities in which we work, we actively engage local businesses and offer career pathways and training for local communities. Other Corporate Social Responsibility activity supports early-life education, cultural and sporting programs.

Did you know?

Ethical business along our supply-chain

The new vendor evaluation is mandatory for all suppliers and will produce a master supplier database in our ERP system. The evaluation process will support quality control of approved vendors, and by 31.12.2019 approximately 300 suppliers had been through the qualification process.

Electronic vendor evaluation is designed to ensure universal principles are upheld along our supply chain. The online forms allow for degrees of scrutiny and corresponding requirements, depending on proof of pre-existing controls such as, third-party certification or, what measures the vendor has taken to protect against child labour, In this way Group ensures it has all checks and balances in place.

Our focus for 2020:

Strengthen our work within compliance with the Introduction and rollout of the DOF Workbook; continued rollout of the Ethical Helpline, with greater education to direct concerns to appropriate channels. Assessing suppliers according to the ten principles of the UN Global Compact.

Highlights

ABC training

Number of employees completing Code of Conduct training:

1,952

in 2019

Events registered

Events reported in the management system with potential for improvement:

33,771

in 2019

THE DOF WATERTIGHT INTEGRITY TEST

The DOF Code of Business Conduct was relaunched in 2018. The new format aims to help everyone understand and meet the Group'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.

Read more in our Code of Business Conduct: www.dof.com/TheCode

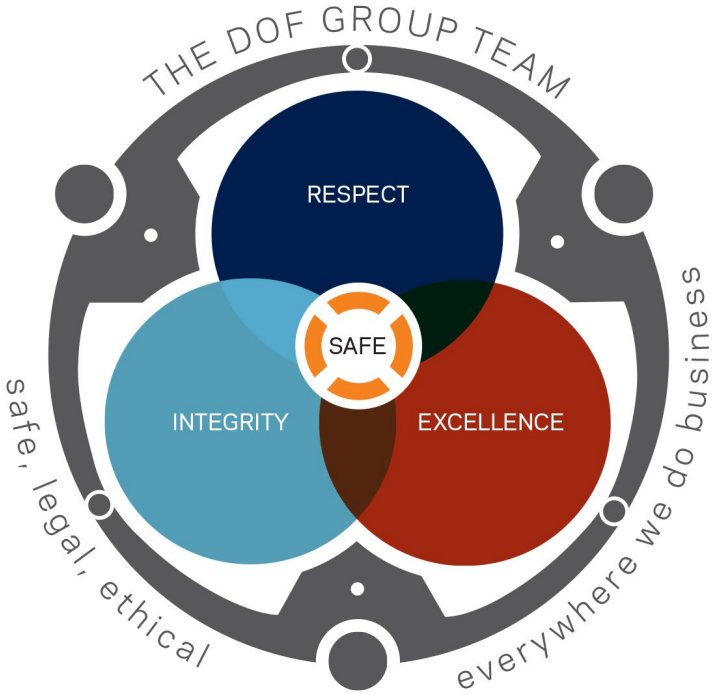


Safe the RITE way

Safeguarding our people, the environment, and communities where we operate is our highest priority.

DOF is a values-driven organisation with world-class safety, legal and ethical standards. Our actions and decisions are always guided by and grounded in our values. We build sustainability by applying our values to define significance, guide our approach, assess our results and set the ambitions into our future. So it is this report is built with each of our core value representing material aspects and relevant GRI standards.

Safety is at the centre of business and the ICON; which illustrates how our values interact to keep us safe. How the Team embrace the values, holding them together which is symbolised by people holding hands around the values.



WHY ARE WE A VALUES-DRIVEN ORGANISATION?

In business 'the only constant is change'. The advantage of having a solid set of beliefs and values is it means the organisation can adapt rapidly to situational or commercial change, but always with an anchor of beliefs and values.

This is the essence of a sustainable organisation: where our values guide our actions to respond to relevant economic, environmental and social factors. We meet stakeholder expectations and navigate daily challenges, large and small, by having a deep understanding of our values, clear priorities and reporting mechanisms. "What we do is as important as the way in which we do it."

Safe the RITE way©

Did you know?

DOF has been using these specific colours with each company value since 2016.

Highlights

Safe

- Improvements focusing on simplification of the HSE toolbox, monitoring of risk factors and focus on safety in diving operations.
- New training tools will be implemented.

Respect

- New communication packages will be launched including new tools.
- A new "Intelligent Efficiency" decision support system project started in 2019, development will continue to deliver energy efficiency.

Integrity

- Adjustment to Ethics Helpline after 2019 trend analysis to support and educate so concerns can be directed to appropriate channels and handled according to established procedures.
- Vendor evaluation process focusing on SDGs will continue into 2020.
- The DOF workbook roll out in which will renew focus on our code of conduct.

Teamwork

- As part of the new ownership structure, a global organisational development project will be undertaken in 2020.

Excellence

- Maintenance the RITE way will continue during 2020.
- Survey in the cloud will continue as part of our digitalisation and modernisation of the service.
- DOF will be certified with a common ISO certification for the entire Group.

Safe

Overview

The safety for our employees is our number one priority. The Group has built on the Safe the RITE way program, strengthening our global safety culture. We work continuously to improve safety systems and our safety performance.

Why is SAFE significant to DOF:
Safety is paramount to DOF's on-going success and sustainability, we work to ensure we are safe, and our team return home safely, everywhere we do business. It is also essential in attracting recruiting and retaining talented employees.

What are we doing about SAFE:
Safety is key for the business which has well established systems in place. However, Safety can never be considered complete. The focus is on ensuring systems are still relevant for our operations and to keep safety in the front of mind. DOF has started to implement new technologies to support the HSE work, known in DOF as the 'modern toolbox'.

How DOF defines SAFE:

According to the DOF Values:

"Above all we are Safe". We are committed to protect the health and safety of our people and our environment.

Occupational Health and Safety Management System
The DOF Group is committed to ensuring the provision of a healthy and safe working environment throughout company operations and through interaction and consultation with stakeholders.

The Occupational Health & Safety management is verified by DNV GL according to requirements in the ISO 45001 standard and the ISM code and forms a part of the Business Management System (available on www.dof.com).

- The Occupational Health and Safety Manual (OH&S) is in line with international standards such as ISO 45001 and the ISM code.
- DOF has established procedures to ensure that hazards are identified, the likelihood and consequence of occurrence is assessed and, as necessary, suitable control measures are introduced along ALARP principals.
- Personnel are trained in the use of appropriate risk assessment and management techniques.

Hazard identification, risk assessment, and incident investigation
DOF implements a hazard and risk management process in order to identify hazards and risks associated company activities - aligned with ISO 31000 Risk Management - Principles and Guidelines:

- Risk assessment processes are audited by internal and external parties such as DNV GL;
- All employees must undertake basic training within risk assessment
- All employees have the stop work authority;
- Incident investigation dependents on the level of severity of the incident, as published in the DOF Workbook;
- All investigations conclude with recommendations in the occupational health and safety management system.

Occupational health services
DOF has an agreement with an international recognised, accredited occupational health service provider. Services may accessed directly or through positions such as a vessel's nurse.

Worker participation, consultation, and communication on occupational health and safety

- DOF's OH&S management system, IT application allows for feedback directly on specific documents, or general improvement suggestions.
- Safety Delegate & Protection and Environment Committee (PEC) committees at vessels and onshore worksites guarantee worker involvement. These committees may vary depending on local legislation.

DOF 2020 SAFE goals:

Overall to score 25% better than IMCA average on all comparable safety statistics within our sector;

All KPIs met for ER Training Exercises and System familiarisation across the Group, globally;

The Group will operate according to the new ISO standards, replacing current OHSAS 18001:2007.

Highlights

TRFC

In 2019, a TRFC (Total Recordable frequency) of:

2.20

per million man-hours

LTIFCs

In 2019, a LTIFC (Lost Time Incident Frequency) of:

0.55

per million man-hours

Ambitious targets

"This is an incident-free organisation"

Balanced KPIs

DOF has established nine KPIs within Safety, balancing leading and lagging indicators.

New Insights

DOF is utilising a data warehouse solution and Power BI, to enable a deeper insight and analysis in our numbers.

Safe

Overview (continued)

Worker training on occupational health and safety
All workers are required to perform mandatory e-learning related to Risk Assessment and the Permit to Work system, which are fundamental to safeguard our people.

Promotion of worker health
DOF aims to ensure that all employees have access to non-occupational medical and healthcare services. This is normally achieved through agreements with local health insurance companies. The coverage of these insurances will be adapted to circumstances such as availability of universal health care and statutory requirements. Overall, DOF follows an industry benchmark for its health insurance coverage.

In some regions, programs have been established for voluntary health promotion services such as annual health check-up.

Prevention and mitigation of occupational health and safety impacts directly linked by business relationships
DOF's offshore operations are where our people have the highest exposure to health and safety risks. The Permit to Work system identifies high risk operations. The system ensures a thorough process before work may commence and includes risk assessment for the specific work to be done.

Workers covered by an occupational health and safety management system
All employees at DOF vessels and worksites are covered by the Occupational Health and Safety management system. This includes both employees and workers who are not employees. By 31.12.2019 the headcount of DOF staff was 3,501 people. An exact number of workers who are not employees is not available.

In addition to regular internal audits, the OH&S Management system is verified by DNV GL according to requirements in the ISO 45001 standard and the ISM code

What are future goals with SAFE:

Safety awareness is a never-ending process, and our goal is to be recognised as the safest provider of subsea and vessel services to our growing international and global client base. The watertight test, launched in our code of conduct, starts with a simple question; "Is it Safe?" If the answer is no, action must be taken.

As personnel join the Group, we ground them in our value-driven approach and provide them with the necessary practical, and theoretical training to appreciate the importance of acting in line with the values and principles.

We continue to enhance safety culture onboard our vessels. We have introduced reflective learning tools for safety awareness; sea riding (where onshore managers sail on vessels in operation) and continue to implement our management visits program.

During 2019 the New DOF Workbook was introduced to our workforce. The DOF workbook is the backbone of training within the group for the next 5-6 years. Through a holistic approach to training employees will be exposed to training ranging from induction to the company, our values, and risk assessment approach to more advance's modules like project management.

Safe: Our focus for 2020

- Our Improvements initiatives focus on simplification of the HSE toolbox, monitoring of risk factors and focus on safety in diving operations will continue into 2020. The efforts to simplify procedures and guidelines will continue and need to be balanced with industry standards in general, and Brazil specifically. The DOF Safe Work Practice concept will be further developed, and there will be further guidance on where they belong in the bigger picture;

- Digitalisation of PTW / TBT / RA / MOC processes will continue. A separate project will be initiated to fulfil implementation in Brazil;

- DOF Group will adapt Oil & Gas Producers (OGP) new life saving rules, in accordance with IMCA recommendations;

- New training tools will be implemented. The HSEQ Workbook has been re-issued with a new version titled the DOF Workbook. The booklet include new chapters and incorporate all Safe the RITE way material developed during the past 4 years. The workbook and be the foundation for all internal training the years to come.

Safe

Results

The DOF Workbook was finalised in November. The first edition was printed and handed out at the Officer's conference in Bergen.

During 2019, a project aiming to stimulate to more physical activity onboard our vessels was conducted working within the framework currently available. The project developed a full campaign that will be launched in 2020.

Based on the dialogue with our employees, we have staked the course going forward for simplification of our management tools and systems. The new marine Integrated Management System was implemented in 2018 and continued into 2019 and is the key element to support the new organisation of DOF Marine. This includes a new setup of our governing manuals and standards that has been developed in close conjunction with our offshore crews and functional managers onshore. Our means of communication and HSE training materials have been revised to address our employees' requests for a clearer language and less content, but more quality.

Several activities were initiated in 2019, including:

- Simplifying the HSE toolbox by introducing DOF Safe Work Practice.
- Introduction of Reflective Learning framework.
- Digitalisation of PTW / TBT / RA / MOC processes..

Work-related injuries 403-9

All HSE incidents are reported through a common system for the DOF Group, "Docmap". The system is available in the office and on all DOF vessels. Among the data captured for each incident is Type of injury, injured body part, Gender, Age and Injury classification.

Being a global company operating within multiple cultures, openness is a key approach.

HSE reporting is done in line with the reporting principles of IMCA.

The man-hours used to calculate frequencies are based on exposure hours and include hours for all personnel on our vessels. This provides the most accurate indicators regarding the overall safety performance.

Significant metrics and Occupational Health and Safety indicators can be found in the Appendix.

Each company / region enters HSE statistics monthly into an internal tool on the DOF intranet, which is used by the corporate organisation to create quarterly and yearly reports.

Number of first aid cases has for 2019 been 5.82 per million man-hours

For 2019 the objective was to be below 0.3 LTIs per million man-hours. At the end of the year we reported 0.55 LTIs per million man-hours for DOF as a whole.

The total recordable frequency (TRFC) for DOF was 2.20 in 2019. The TRFC is an indicator of the total number of LTIs, restricted workday cases and medical treatment cases per million man-hours. The IMCA TRFC for 2018 was 2.08. (Note : IMCA use Total Recordable Injury Rate, TRIR. This is equal to TRFC).

Number of first aid cases has for 2019 been 5.82 per million man-hours.

The main types of injury are lacerations and impact injuries (sprains or fractures).

Being a global company operating within multiple cultures, openness is a key approach. Our result in reporting safety observations, both positive and negative, reaches the impressive figure of 598 reports per 200.000 man-hours.

In 2019, there were two lost time injury cases recorded related to workers who were not an employee but whose workplace is controlled by DOF (client personnel on a vessel). In one case, the injured person (IP) broke their foot when a steel plate fell over the IP. The incident was classified as High Potential Incident as the outcome could with slightly different circumstances have been fatal. The IP has recovered well. The second case was a diver that got trapped between an anchor and the seabed. The IP was released by a fellow



diver and brought to the surface with minor injuries.

Due to the way DOF captures exposure hours, it is not possible to calculate specific HSE frequencies for employees and other workers. With a new vessel reporting system implemented on all vessels during 2019, it is expected to have increased possibility for this split in reporting for 2020.

There were three other lost time injuries during the year. None of them have resulted in any permanent disabilities of the injured personnel. All of these injuries involved hands and fingers caught between or struck against a fixed object.

Four of the injuries have been classified in the category “Line of fire/caught between/struck against”. A safety campaign was launched in late 2018 after several incidents involving hands or feet, to raise awareness around the hazards and promote preventive measures to avoid injuries. This campaign was reinforced several times in 2019. An update of our life saving rules will endorse IOGP new lifesaving rules, with special attention to risk of “Line of fire/caught between/struck against”.

In most locations where DOF operates, trade union agreements contain provisions that address the health and safety of our employees. All our offshore workers are covered by the MLC 2006.

Emergency management

Emergency Management protocols and systems are well developed within DOF; however, this is an area where training and readiness are crucial to the effective management of any emergency situation or crisis. Regular scenario training, conducted by third party organisations specialising in Crisis management, is provided for personnel in the Emergency Response Teams (ERT). Scenario Training is supported by electronic system exercises to ensure individuals remain familiar with the system.

Emergency situation training exercises range from a variety of offshore scenarios to more universal themes of business continuity in order for DOF to ‘Stress Test’ and improve where necessary. Organisational compliance is monitored by Key Performance Indicators.

During the year, there were 50 mobilisations in the Crisis Management system, nine of which were actual incidents; the rest were exercises. This is about the same total mobilisations as the past years. ☸

Respect



Overview

Respect for each other, the environment and our local communities.

Why is RESPECT significant to DOF:

The Group aims to create an environment of empathy, mutual respect and understanding amongst all stakeholders. DOF is an equal opportunity employer and does not tolerate any form of harassment or discrimination within the workplace or local communities where we operate.

Operating responsibly at sea, with minimal impact upon the environment, is fundamental for the DOF Group. There is a well-established zero-mindset to any discharges of harmful material into the sea. By delivering energy efficiency we reduce our environmental impacts and make DOF an attractive business partner.

How DOF defines RESPECT:

According to DOF Values:

"Respect underpins everything we do and every interaction we have. Respect for people: our colleagues, our customers, and our business partners. As global citizens we are socially responsible, we respect the individual, the local customs and cultures of our various markets. Acting with care and consideration is central to our wellbeing and safety and ensures we minimize our environmental impact."

Adapting to the global communities' changing expectations to climate change and pollution is a strategic driver for the Company. It is vital for DOF to develop in the energy sector, together with our key partners, in line with the targets articulated in UN's Sustainable Development Goals.

What are we doing about RESPECT:

Respect for each other and cultural diversity

Respecting cultural diversity while working towards the same goals is a key success factor for DOF. All DOF employees undertake mandatory and regular values-based training. The COBC is in place to guide behaviour and support sound judgement and common sense and DOF's values are embedded in many other business and discipline related training materials.

Robust, respectful and healthy communication between our people in the Group, across geographical borders and "top-down – bottom-up" is valued. In 2019 a new internal portal was designed to meet our need for better communication with our workforce. Launched early in 2020, the new platform has various features allowing employees to access and engage with DOF in a new and better way.

Environmental Performance

Also an aspect of respect, Environmental Performance, is governed by the DOF Environmental Impact Policy. It reflects corporate intentions, principles of actions and aspirations to improve environmental performance. Responsibly for ensuring that DOF is committed to minimising its environmental impacts in line with the 'Polluters Pays Principle', 'Precautionary Principle' and 'Duty of Care', Energy Efficiency and Climate Impact lies with the Board of Directors.

Since 2010, DOF has reported key environmental performance through the Carbon Disclosure Project (CDP) and the reporting has directly influenced the development of our Business Management System and the programs established to manage our environmental performance.

Our Environmental Management System (EMS) ensures that DOF effectively manages our operations and strives for continual improvement of our environmental performance.

Using technology to reduce fuel consumption

DOF has a modern fleet and several of the vessels are fitted with technology reducing fuel consumption and emissions. The diesel electric hybrid propulsion system allows greater operational flexibility and reduces energy consumption, CO2 emissions and maintenance costs. This propulsion system is ideal for DOF's combined anchor handlers and offshore construction vessels. Improvements, particularly on hull design, have been made through close industrial cooperation with main suppliers. This experience transfer ensures continuing enhancement of technology into the future.

Highlights

Spills over 50 litres

Number of unrecovered spills:

0

in 2019

CO_2 emissions

Emissions per operational day:

-8.8%

in 2019

CDP

DOF has since 2010 reported to the Carbon Disclosure Project.

Energy Efficiency

DOF is continuously monitoring and improving the Ship Energy Efficiency Management Plans and establishing eco speed curves for optimal sailing speed.

New tools

DOF is working together with Kongsberg Group and Innovasjon Norge to develop new technology for optimal energy use onboard vessels.

DOF 2020 RESPECT goals:

DOF is an equal opportunity employer and has zero tolerance for any form of harassment within the workplace or local communities.

No harassment or discrimination cases.

By the end of 2020 all DOF companies will operate in accordance with ISO 14001:2015;

CDP: DOF will continue to be in the top 30 per cent of participating companies

Based on 2016 the fuel consumption (intensity target) will be reduced 3 per cent yearly.

Respect

Overview (continued)

The Ship Energy Efficiency Management Plan (SEEMP) is vital to our EMS. The SEEMP was developed in partnership with DNV GL and aligned to the guidelines set out by the IMO marine environmental protection committee. It was implemented in 2012 for the entire Group's fleet to plan, implement and monitor the measures required to maximise vessel efficiency.

The focus on developing shore-side electricity connections for port stays. Modifying vessels for this technology is continuously evaluated based on the availability of shore-side connections where our vessels operate. The environmental benefits of utilising renewable energy are considerable, since carbon dioxide, sulphur dioxide and nitrogen oxide emissions are reduced to a minimum.

Spill avoidance is captured by KPIs and is also a 'bearing element' in the ISO 14001 certification, which is audited regularly. An spill avoidance objective of DOF's maintenance regime is to reduce the risk of environmental impact from incidents.

All vessels have a Shipboard Marine Pollution Emergency Plan (SOPEP/SMPEP) which provides guidance to the Master and officers on board the vessel as to the steps to be taken when a pollution incident has occurred or is likely to occur. The plan is reviewed annually, and regular drill held.

NOX AND SOX - All DOF's vessels operate with Marine Gas Oil – MGO. DOF complies with the regulations in the industry, especially with IMO and MARPOL Annex IV, Regulation 14, regarding strict measures addressed to ship owners to control the emissions of NOx and SOx from their ships, in Emission Control Areas ECA - where ultra-low sulphur fuel is required.

Since 2007, DOF has focused on reducing NOx emission to air: the main contributor is the instalment of Selective Catalytic Reductions (SCR) systems which can reduce NOx emission with up to 90%. SCR is a means of converting NOx with the aid of catalyst urea into N2 and Water. See appendix ix - NOx reduction measures.

DOF's internal procedures for bunker and fuel testing ensure control of fuel supplies to its vessels. The main objective is to ensure good quality and uncontaminated fuel supplies to offshore installations, in accordance with Charterer requirements. All the contracts between DOF Marine and charterers specify the quality of the fuel as per ISO 8217, Bunker Fuel Standard.

Innovation & climate resilience

DOF conducts operations in compliance with best practice techniques and principles, worldwide. As such, DOF standardises its global approach to meet the highest requirements of legislation and the expectations of external parties both locally and internationally.

Risk Identification and Assessment analysis of where we are most likely to deviate from these commitments and what the risks are should this happen. Control measures can be identified to ensure that our levels of exposure are acceptable for all stakeholders.

Development and support of the communities where we operate

A principle of our business model is to train and maintain a dedicated core crew on all our vessels.

This creates value by retaining operational and vessel knowledge between charter or project crew changes and leads to a higher level of safety, efficiency and quality of services, benefiting the Group, our clients and our workforce. The program creates value for individuals, their families as well as local governments and society by creating jobs, assisting in enterprise development and technology transfer to local communities.

DOF's global maritime cadetship program combines the principles of a fair return for our local communities with building a skilled and sustainable workforce. This program gives cadets a structured path to gain qualifications and a long-term livelihood.

Involvement in the Norwegian Training Centre - Manila (NTC) cadet program has been part of DOF's strategy to provide highly qualified officers to our fleet. The courses extend across the complete area of vessel operations. The aim is to train seafarers to the highest standard of safety and quality and promote excellence in maritime operations worldwide.

DOF joined other Norwegian ship-owners who founded AEPM in Brazil to provide opportunities for young adults to start maritime careers via ordinary seamen courses.

Community support is focused on promoting education, culture and sports through a number of specialist organisation's structured programs, primarily in Brazil and Philippines, to give underprivileged children a chance for a better future.



One group from the two crewing seminars held in Philippines in early 2020.

For example, the DOF Group provides Sponsorship to the Renascer foster institute (Brazil), an organization which cares for children of one to five years old, presenting them new life perspectives through sports, art and music, providing them with a home, food and shelter.

As pictured here, we remain very close the community of Comatin since DOF and partner OSM rebuilt the Elementary School after a typhoon in 2013.

What are future goals with RESPECT:

A new communication package, including new tools, with a goal to improve communication with our workforce was launched in 2019. A solution for distributing company news offshore and introduction of an Enterprise Social Network are some activities that will be continue to be developed in 2020.

The ongoing efforts to enhance energy efficiency will continue in 2020. This includes continuous evaluation of vessel modifications such as installation of shore power connection capability and battery packages.

DOF and the Kongsberg Group started a project in 2019 with support from Innovasjon Norge to develop a decision Support system with potential to reduce fuel consumption by up to 30% on our vessels. The project represents a significant investment by all stakeholders and was kicked off early 2019 and will span two or three years.

DOF performed a climate change scenario analysis in 2019, based on the Task Force on Climate-related Financial Disclosures (TCFD). During 2020 a set of strategies will be developed to develop short, mid and long-term strategies and goals related to the external environment.

DOF has an overall objective to reduce CO2 emissions by 3% each year, based on operational days per vessel. CO2, SOx and NOx are gases which are part of the exhaust from combustion engines and reducing the fuel consumption will also reduce the emission of these gasses.

Respect

Results

Respect underpins the flexibility we have in our organisation. We can call on specialist individuals who because of the common respect for each other, have a commitment to meet shared goals. Without mutual respect, the high level of coordination and cooperation required to address corporate or operational challenges is more difficult. DOF has a proven record of quickly adapting assets and developing operational solutions to meet difficult and time sensitive challenges from their clients that delivers successful project execution outcomes. The following reporting concerns all DOF vessels and all environmental initiatives in the group.

Energy Consumption within the Organisation 302-1

The majority of DOF's energy consumption comes from non-renewable sources, which is attributed to fuel consumption on our vessels. The energy consumed in our offices comes from both renewable and non-renewable sources, depending on the energy infrastructure in the area where the office is located.

The organisation's energy consumption in joules, and electricity consumption per country, can be found in the Appendix.

Managing Fuel Consumption and Emissions to Air (Carbon Dioxide Emissions) – Scope 1 and Scope 2 - 305-1 I 305-2

The Environmental Impact Policy sets out clear aspirations for ensuring that our operations have a minimal impact on the environment. This requires DOF to calculate and anticipate potential challenges before activities take place through risk identification processes, to ensure that the environmental impacts are understood and reflected in our activities.

In 2019, DOF, Kongsberg Group, and Innovasjon Norge, will start an R&D project with the aim to reduce fuel consumption.

Data regarding Scope 1 concerns fuel vessel consumption for all DOF vessels (including third party vessels). The resulting CO2 emissions are detailed in the Appendix. Due to long transit voyages, fuel consumption per operational day increased in 2015 and thus resulted in a setback regarding the overall long-term objective of 10% reduction. However, the consumption was reduced in 2017 and the target of 3% reduction in 2019 was met.

Scope 2 data relates to electricity and heat consumption in buildings where DOF has offices or warehouses. Scope 2 accounts for 0.2% of DOF's total CO2 emissions. DOF has decided to use "The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)" to calculate the CO2 emissions originating from onshore electricity consumption.

Number of environmental incidents has for 2019 been 2.64 per million man-hours.

Total number and volume of significant spills 306-3

DOF considers spills of hazardous materials to the external environment that are over 50 litres to be significant spills. This is in line with the definition from IMCA SEL-010. The target is to have zero significant spills to external environment.

DOF considers spills of hazardous materials to the external environment that are over 50 litres to be significant spills. This is in line with the definition from IMCA SEL-010. The target is to have zero significant spills to external environment.

In 2019, there were no liquid spills reported that exceeded the 50-litre target to environment.

One incident was recorded where approximately 100 litres of hydraulic oil spilled on deck. However, most of the spill was recovered and it is estimated that only 0.5 litre was released to the external environment.

During the year, 24 environmental incidents were reported. This results in 2.64 incidents per million man-hours. This is below the KPI of less than 4 spills per million man-hours. The vast majority of the incidents are related to minor spills onboard the vessel which was contained without release to the external environment.

The spills vary from millilitres to litres. It is challenging to record the exact volume of liquid spilt as most of the spills are contained by marine spill kits with different absorbent material. Measuring the volume is based upon individual's best judgement at the time of the incident, often in rough weather, darkness and time constraint. The total volume of spills was 219 litres, whereof 30 litres were



EVP Narve Vaage visits the Comantin elementary school in Tacloban that DOF and OSM rebuilt after the typhoon in 2013.

released to the environment. The KPI for the area set to be zero, but the result is 3.26 litres released to environment per million man-hours.

Compliance 307-1

In 2019, DOF has not been subject to any significant fines or non-monetary sanctions for non-compliance with environmental laws and/or regulations.

Innovation and Climate Resilience - Financial implications and other risks and opportunities for the organisation's activities due to climate change 201-2

A climate change risk and opportunity workshop was undertaken in March 2016 to establish the impact climate change has on DOF's global operations. This assessment is subject to annual review and was last updated in February 2020 to validate the risk assessment and make any necessary adjustments.

Due to its modern fleet, DOF can operate in harsh environments and extreme weather conditions. Combined with the capabilities and training of our senior officers to manage adverse weather situations, DOF ensures continuous operations where less capable vessels seek Safe-haven. This gives DOF a competitive advantage in a future where extreme weather conditions will be more common.

The rapid change as the energy mix shifts from predominantly fossil fuel to renewable energy is expected to bring new opportunities for the energy sector. The knowledge and experience gained by the industry is transferred to new areas such as offshore floating wind farms. This new energy industry will open new areas for DOF where we can take advantage of our unique mooring competence and experience.

Our energy efficiency and environmental management programs have created a robustness within the Group. The DOF Group is prepared for any type of CO2 taxation and can be a preferred partner of choice. The Climate Risk and Opportunity analysis is available on request according to the requirements in the ISO 14001 certification. ☸

Integrity

Overview



The very corner stone of our business.
We behave ethically, always.

Why is INTEGRITY significant to DOF:
DOF believes that its business practices demonstrate the level of integrity expected from its workforce, clients and other stakeholders and as such, will contribute greatly to DOF's sustainability.

Reputation
DOF's reputation as a responsible and competent partner, demonstrating the highest level of integrity in all our activities, is essential as a sustainable organisation. DOF is committed to establishing fair and honest relationships with all stakeholders and to managing all conditions and situations that could impact on our reputation.

How DOF defines INTEGRITY:

According to DOF Values:

"We are honest, fair and equitable in all our dealings. We are dedicated to good corporate governance.

"We strive to do the right thing not because someone is checking, or looking, but purely because it is the right thing to do."

DOF strives to be as good a corporate citizen as possible in all regions where it operates. DOF actively promotes advanced involvement with all stakeholders to confirm all operations, processes and procedures are the best practice requirements necessary to maintain and promote trust with its diverse stakeholders.

Repeat business
Repeat business is a significant indicator that DOF is providing its clients with subsea and marine solutions that meet client expectations and contractual obligations. In a demanding and complex industry repeat business shows client confidence in DOF and its teams and client confidence helps us win future contracts.

What are we doing about INTEGRITY:
Everyone shares the commitment to practise the highest standards of ethical business conduct and integrity in all decisions, and actions. Values-based training is mandatory, including our Code of Business Conduct e-learning module, compliance activities and the correct use of our management systems and tools.

To ensures external providers align with our values and policies, the Group has invested in a more efficient, digital platform to conduct vendor evaluation which is also designed to ensure principles are upheld along our supply chain. The new vendor evaluation is mandatory for all suppliers and will produce a master supplier database in Unit 4.

Compliance to Law, Industry Standards and local regulations
Operating globally DOF works to comply with regulations at both national and local levels.

DOF personnel and subcontractors are required to comply with applicable legislation, regulations and standards as well as client's requirements. The legislation, standards, codes of practice and guidelines register provides a list of applicable requirements.

- Each region has developed registers of applicable legislation, standards, codes of practice and guidelines. When DOF operates in areas where legal requirements are weak, all operations are to follow our policies and operational standards.
- DOF's Management System is based upon OHSAS 18001, ISO 9001/14001:2015. The system is accredited by DNV GL.
- All legislative requirements are listed in the regional Legislation and Other Requirements Compliance Register according to pre-identified areas for the compliance analysis
- The company is subscribed to regular updates from legal databases, and register is being updated accordingly. Compliance with the requirements is verified during internal reviews, inspections, third party reviews, internal and external audits.

Anti-Bribery & Corruption

In 2019, DOF continued the practice of evaluating vendors

Highlights

Fines

There has been no significant fines or non-monetary sanctions due to non-compliance.

0

in 2019

Corruption Cases

There have been no corruption cases in 2019.

0

in 2019

Compliance Awareness

A compliance awareness program has been developed and will be rolled out for the entire organisation in 2019.

UN Global Compact

DOF has implemented a new supplier evaluation program, based on the ten principles in the UN Global Compact.

- Human Rights
- Labour Conditions
- External Environment
- Anti-Corruption

Ethics Helpline

New Ethics Helpline was launched in 2019 and guarantees anonymity for those who wish to report concerns. The serve is provided by internationally recognised third party provider.

DOF 2020 INTEGRITY goals:

A Apply the new ISO 37001 standard to structured governing documentation to achieve the highest standards within Anti-bribery management system.

All Whistleblowing incidences captured and demonstrated as resolved in line with Group polices.

An electronic database: identifying, recording, assessment and controlling, the risks through all company activities visible to all appropriate levels within the organisation is deployed.

Customer Relationship Management system deployed throughout the organisation.

Modern toolbox assessed and deployed in the organisation.

Supply Chain Management deployed throughout the organisation.

Integrity

Overview (continued)

to assess their suitability to meet DOF's requirements for a competent and reliable vendor. A key and mandatory element of the assessment process is the requirement for the vendor to declare their commitment to abide by DOF's Anti-Bribery and Corruption guidelines. Failure to comply will automatically exclude the vendor.

Transparency - Traceability - Trust

DOF's anti-corruption and anti-bribery measures are regularly evaluated in order to ensure that sufficient measures are in place and are a matter of BOD oversight.

Risk and opportunity management

Risk and opportunity management is imperative to all DOF Group business activities. The Risk Management Manual helps DOF to identify threats and opportunities associated with the DOF business and operational activities and establish efficient means of barriers and controls in all phases of the business life cycle. The Risk Management principles and techniques align with the following:

- ISO 31000: Risk management -- Principles and guidelines;
- ISO 31010: Risk management -- Risk assessment techniques;
- ISO 17776: Guidelines on tools and techniques for hazard identification and risk assessment;
- DNV RP-H101: DNV Recommended Practice – RISK management in marine operations.

Modern Slavery Act

The Vendor Evaluation and Recertification process is to incorporate 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 2015, 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.

Training

DOF has incorporated topic specific training such as Anti-Bribery & Corruption into its training programme. Also, where necessary, DOF is committed to training all stakeholders within its supply chain to understand the practical and legal aspects of DOF's Code of Business Conduct requirements, and the possible implications and the consequences to DOF and themselves of failing to comply with DOF's requirement's, and legislative obligations.

Supply Chain Management 102-9

The DOF CEO, supported by an executive management team is responsible for identifying, engaging and where necessary retaining all necessary financial, technological and organisational resources required to support the DOF Supply Chain Management global operations.

DOF's overall SCM system is comprised of three core disciplines and two support disciplines, interacting with each other as shown in the Appendix. All activities undertaken within the various supply chain functions meet the following criteria:

- The best interest of DOF and its partners - Add value to the supply chain system for the benefit of the company and its partners.
- Fairness, Integrity and Transparency - To achieve the best value for money, whilst protecting the company from unwanted and / or illegal practices such as: fraud, corruption, collusion and other unethical practices.
- Best value for money - Trade-off between price and performance that provides the greatest overall benefit under the specified selection criteria.
- Effective competition - Ensure where possible, that there is a sufficient number of independent prospective vendors, allow competition to supply between the vendors, non-discriminatory selection criteria.

Procurement is central to DOF's overall Supply Chain Management system. It ensures that all procurement activities conducted by DOF are performed in a standardised and controlled manner and consistent with DOF′s policies and in accordance with contractual obligations and client requirements and expectations.

The procurement of goods and services is undertaken in a manner that reduces the level of risk and cost for DOF and our clients whilst maintain the highest level of quality, reliability and integrity possible. The process operates in conjunction with the Contract Management and Logistics management processes to achieve a seamless transition of information and knowledge that supports all DOF entities and projects.

In 2019 DOF's global supply chain, consisted of almost 3,900



Chief Procurement Officer Lars Heine Njåstad (right) signs a group-level agreement between DOF ASA and Kuehne+Nagel International AG in 2014.

suppliers and a significant amount of its procurement spending was comprised by bunkering, lay spread equipment, crew agency services, specialised equipment hire, employee travels, vessel hire among other services.

In 2019 the regional split for suppliers was as follows: Asia Pacific 17%, Atlantic 48%, North America 14% and South America 21%.

Risk and Opportunity Management

DOF has an active approach to future risk and opportunity management and strives to clarify its long-term potential, including strategy, value drivers and risk factors, to its main stakeholders.

To produce lasting value for its stakeholders, and a long-term competitive return on the investment of its shareholders, The Board of Directors and the Management regularly evaluates long-term risk and opportunity and potential impact on strategic decisions taken today.

DOF's policy is to continue to invest in the local communities where it operates. This includes investing in training and building technical competencies of our employees and focusing on a local workforce.

DOF's operations are based on asset investments with a long-life span, of up to 30 years. DOF's policy is to have a modern and multipurpose fleet, renewing and converting it over time to ensure that it implements new technology and maintains an attractive and energy efficient fleet to serve our customers and potential new markets.

Our approach is to maintain assets and engineering competencies enabling DOF to be a long-term supplier for offshore industries. There is potential opportunity within offshore renewable energy projects, where DOF can continue to build on capabilities.

In its operations, balancing risk and opportunity is a key concept for DOF; performing operations in low risk areas, such as long-term charter of vessels, balanced with more

Integrity

Overview (continued)

complex operations within subsea projects. Coupled with a global presence, DOF has diversified its risk exposure in today's global offshore energy market. DOF is committed to maintaining a focus on diversifying its risk exposure and adapting to changing landscape of risk and opportunities.

Within DOF Subsea, the distribution of risk between Subsea and IRM projects and long-term charter has been quite stable over the last year 3 years. Subsea and IRM projects are normally regarded to have a higher risk profile compared to long-term chartering of vessels. The distribution of project levels is outlined in the appendix.

By using local suppliers and infrastructure, we support many companies and organisations that are outside the DOF core business, although vital to deliver successful operations to our clients. It is difficult to quantify the exact monetary value of this contribution; however, a conservative estimate is that one DOF employee creates one job position outside of the organisation. This estimate is based on various studies performed by the energy industry trade organisations.

The Board of Directors, is in its assessment of the scope and volumes of dividend, emphasises security, predictability and stability, dividend capacity of the Company, the requirement for healthy and optimal equity as well as adequate financial resources to create a basis for future growth and investment, and considering the wish to minimise capital costs.

What are future goals with INTEGRITY:

Industry Leader: to leverage global assets, knowledge and operational expertise, to strengthen the position towards being recognised as an industry leader capable of delivering large scale projects that add benefit to all stakeholders.

Global Partner of Choice: working with global operators, as a committed and reliable organisation that can supply integrated services and work in partnership to develop optimum solutions for the benefit of both organisations, and other relevant stakeholders.

Equally important, is DOF's approach to forming strategic partnerships arrangements with its own supplier and contractors with the intention of collectively developing a more cost effective and efficient local, regional and global supply chain which benefit DOF and clients.

Integrity: Our focus for 2020

- DOF sees an increase in activity in areas that have low scores in indexes such as Transparency International's Corruption Perceptions Index. This requires us to make extra efforts to ensure that we can meet standards we set for ourselves in our Code of Business Conduct. These efforts include strengthening DOF's due diligence processes for business in challenging areas.

- Various initiatives will be undertaken to increase the awareness of our employees in high-risk areas with regards to facilitation payments. The importance of being prepared, having the correct documentation when entering immigration should be understood an adhered to.

- The new ethical helpline, launched at the beginning of 2019, has been actively monitored and communicated as a way to report unacceptable conduct when normal reporting channels cannot be used.

- A vendor evaluation platform was launched during 2019, and in 2020 all of DOF's vendors will be required to perform the questionnaire. The questionnaire contains a self-assessment within the areas of Corporate Social Responsibility and Anti-Bribery and Corruption, based on the UN Global Compact.

- A Compliance Awareness Training program course was developed in 2018 and during 2019 all executive managers, middle managers and department heads performed the training. During the year the compliance awareness program became a central part in the new DOF workbook and will be delivered to all employees in the Group in the years to come. The objective is to raise awareness and reinforce the mantra that "we are all compliance officers."

United Nations Guiding Principles on Human Rights and Business

- In late 2019, DOF was invited to participate in a project coordinated by the Rafto Foundation for Human Rights. This project develops tools for businesses in the Bergen area to implement the UNGP on Human Rights and Business, will continue to develop throughout 2020. Though participation, we gained a new and deeper understanding of how integral Human Rights are to the UN SDGs, which will guide us in further integrating Human Rights into our operations.

- Amnesty International's recent acknowledgment placing DOF Group among the top 10 global companies based in the Nordics, not only demonstrates our commitment to the core principles of human rights, but that we are on the right track.

Integrity

Results

During 2019, major activities have been initiated to strengthen the integrity of the Group.

Tax strategy: At the beginning of 2020, the DOF tax strategy was reaffirmed and approved by the Board of Directors. The tax strategy is detailed separately.

BEPS alignment: Establishing and reporting transfer pricing according to BEPS action 13.

Supplier evaluation: DOF entered an agreement with a company providing a database for vendor evaluation. During 2019 the approach to transition from a paper system to an electronic database was executed and over 500 suppliers have been evaluated according to the new approach.

General Data Protection Regulation (GDPR): the task force established in 2018 to ensure DOF's compliance with EU's new privacy regulations, GDPR, continued its work. During the year a Data protection officer was appointed by the CEO.

Compliance Awareness: A training program encompassing DOF's compliance requirements and activities was development and delivered to all managers during the year.

DOF Tax Strategy

DOF aims to achieve excellence in all its operations in every jurisdiction it operates. By providing a Tax Strategy, DOF ensures that all tax obligations are complied with, in a timely, efficient and cost-effective manner, in all project locations.

DOF is mindful of its responsibility and is committed to paying the amounts of tax legally due in any country in which it operates, in compliance with applicable laws and conventions and in accordance with the Code of Business Conduct.

In 2019, there were no confirmed incidents of corruption, and there was not any legal action pending or completed regarding anti-competitive behaviour, anti-trust or monopoly practices against DOF.

The strategy aims to demonstrate good corporate practice in the area of tax management and tax transparency, balancing the interests of the various stakeholders, including customers, shareholders, employees and society at large.

Governing Documents

Besides the Code of Business Conduct (COBC) further improvements were made to communicate DOF's ethical guidelines and business conduct with the release of an updated electronic training module made available to and mandatory for all employees. The COBC sets clear expectations on all employees, and provides examples of dilemmas that our people may encounter. The training is also publicly available at www.dof.com.

Additionally, executive and middle management receive regular training regarding anti-bribery and anti-corruption measures.

During 2019, the reporting mechanism for compliance incidents has been actively used on both local and Group level, and compliance incidents were handled and concluded in accordance with the requirements in the policy framework.

Legal compliance 205-3 / 206-1

In 2019, there were no confirmed incidents of corruption, and there was not any legal action pending or completed regarding anti-competitive behaviour, anti-trust or monopoly practices against DOF.

Operations assessed for risks related to corruption 205-1

In regions with a high risk for Bribery and Corruption, DOF has used the know-how of DOF Subsea UK, subjected to the ruling of the Bribery Act 2010, to frame the approach to Bribery and ethics.

Bribery Risk Assessments are performed and recorded on a regular basis regarding operations of the Group, given the risk potential.

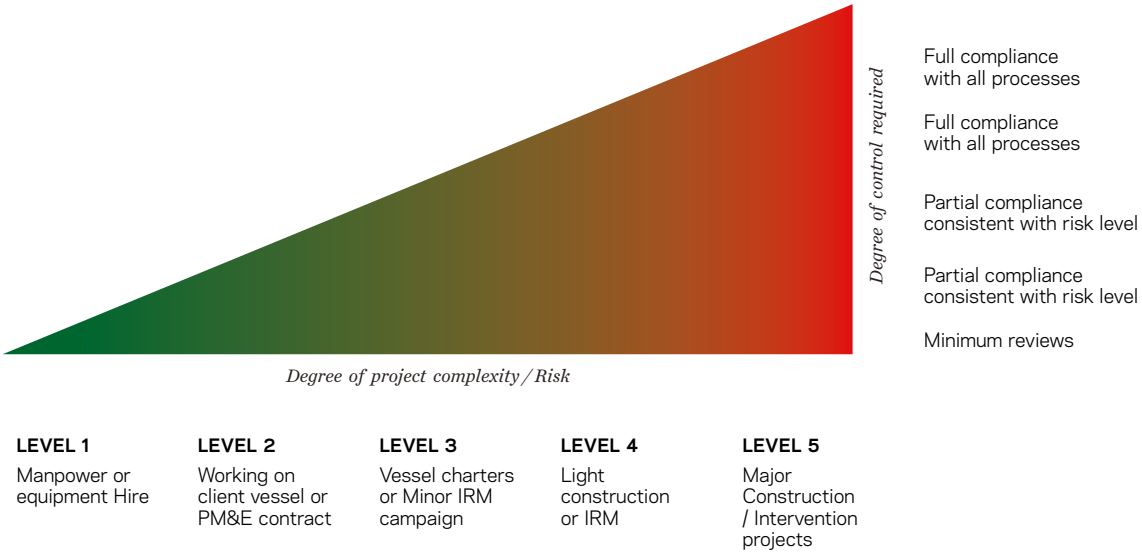
However, risks identified out with the formal Risk Assessment on an ad hoc basis will be added and analysed as appropriate by Regional HSEQ Managers in all the locations where DOF operates.

In addition, assessment related to Business Integrity and Ethics is mandatory in all projects identified as level 3 and above. In 2019, out of 109 projects, 68% were within levels 3-5, and consequently assessed for risks related to corruption. There were no significant risks identified that had not already been treated by existing DOF standards and policies. Control and mitigation required is based upon project risk and complexity (Figure 1).

DOF is committed to conducting our global operations in compliance with

Degree of complexity / risk compared to degree of control required - **Figure 1**

Overall risk management process in DOF is the balance between complexity of risk and complexity in a project, and degree of controls. The figure above gives a visual view on how project levels are combined with what part of the business management system that need to apply.



best practice techniques and principles of strong business integrity and ethical conduct.

A Risk Identification workshop demonstrated this commitment through performing a gap analysis of legal and other requirements in addition to highlighting areas where DOF are most at risk of non-compliance. The workshop was attended by senior management representatives who are either accountable or knowledgeable in the areas of business ethics, bribery or legal matters.

Overall, this Risk Identification process showed a substantial degree of control over managing bribery and business ethics risks at a Group level. However, there are recommendations from this workshop that are considered significant in maintaining business continuity and our duty of care as a responsible organisation. A review was performed in February 2020 to validate the risk assessment and make any necessary adjustments.

It should be noted that this level of control against business ethics and bribery risk is applicable to DOF level. At business unit and worksite levels of the organisation, it is necessary for measures to be implemented to manage compliance against local risks and requirements.

In the UK, DOF follows the ruling of the Anti-bribery act of 2010, and in other regions were DOF operates, a detailed process is followed according to guidelines for Business Acquisition in DOF, including Legal Contractual Risk Assessment, Commercial Risk Assessment, Technical Risk Assessment and Insurance Review.

Risks identified related to corruption may vary according to the activity the company is engaged in. For example, during the tender selection key risks encompass facilitation payments, excessive hospitality and excessive promotional expenditure, to provide a client with excessively luxurious accommodation or transportation, and offer of favourable prices in return for a personal gain.

Regarding donations and sponsorships, they are organised in a transparent way and are regularly checked and audited by external bodies such as PwC and equals.

A typical donation can be to an athletic organisation where DOF donates a fixed sum for sponsoring a sport arrangement. DOF has its name on posters or clothes and in return the company will receive an invoice from the athletic club. The invoice will refer to an agreement. Other sponsorships can be of named athletics with a half yearly payment. This is regulated in a joint agreement signed by both parties.

With respect to donations to support bereaved with education in case of the death of a DOF employee, a separate donation committee is organised by external lawyers. As a guest DOF will donate a given sum of money and this will be followed up by collection given by DOF employees.

In Brazil, DOF donates money to established and reputable organisations that run schools and educational programs.

Results (continued)

These donations are based upon written agreements and payments are based upon invoices referring to the agreements. The agreements are part of the annual audit scope performed by external auditors.

In general, all payments in DOF are regulated in the authorisation matrix. The "four sets of eyes" principle is built into this. The entire payment process is under strict control and in case of donations and sponsorship these rules will apply.

Projects on level 3 and above are assessed regarding risk for bribery and corruption. However, regional Executive Vice Presidents may deviate from this requirement by a Management of Change process. Due to this possibility for deviation, it is currently not possible to obtain an exact number of projects where bribery and corruption risk assessment has been done. Going forward, DOF intends to update routines and processes to capture this information.

Communication and training on anti-corruption policies and procedures 205-2

DOF's Business Integrity and Ethics policy is approved by the Board of Directors. This policy is available on the public website, intranet, and posted at all work sites globally. In addition, the policy is communicated to both suppliers and clients through the business processes.

The policies are reviewed regularly in management review at regional and corporate level. Any changes proposed are given final approval by the Board of Directors.

Introduction training is provided to all employees in DOF, regardless of their role and position. Eight e-learning modules are mandatory, including a module regarding Business Ethics and Code of Conduct, which covers many issues regarding anti-bribery and anti-corruption policies. In addition to completing the module at the start of employment, it must be completed again every two years. In 2019, approximately 2 000 employees completed the module.

Introduction training is provided to all employees in DOF [...] including a module regarding Business Ethics and Code of Conduct, which covers many issues regarding anti-bribery and anti-corruption policies.

One of the aims is to provide to the executive and middle management team regular training regarding anti-bribery and anti-corruption measures.

Board members are informed about any cases, changes or results of audits within the area of Anti-Bribery and Corruption on a quarterly basis.

Business Integrity and Ethics is a mandatory part of the yearly appraisal between managers and employees. This is an important opportunity for monitoring awareness and consciousness of DOF's values.

Financial assistance received from government 201-4

DOF has not received any significant financial assistance from the government during the reporting year, nor is the government present in the shareholding structure.

Norway

- Research & Development grant:
  - » NOK 12 million budgeted from Innovasjon Norge for Intelligent Efficiency project
- Export Credit Agencies
  - » USD 25 million financed through Eksportkreditt (guaranteed by GIEK)

UK

- Other financial benefits
- GBP 3 000 Employment Allowance

Commitments to external initiatives 102-12

DOF endeavours to comply with recognised industry standards and guidelines published by various organisations connected to the oil & gas industry, such as International Maritime Organisation (IMO), International Marine Contractor Association (IMCA), International Association of Oil & Gas Producers (IOGP), International Organisation for Standardisation (ISO), and class societies (DNV GL, Lloyd's etc.).

In the marine segment, a robust system is also in place to allow that vessels and offshore personnel comply with laws and regulations in the locals of operation.

DOF's Integrated Management System (IMS) is based on compliance with IMO regulations and audited and approved by DNV GL. A Document of Compliance certificate is issued. An annual audit is conducted to verify that the Company complies with the requirements of the International Management Code for the Safe Operation of ships and for Pollution prevention. The DOF

internal audit program is annually updated to ensure updates on new regulations are implemented and adhered to in the company.

All the Vessels owned by DOF are audited annually by DNV GL under the same IMO legislation, vessel-by-vessel. Additionally, vessels are audited under the internal audit program.

DOF Management utilises DNV GL Navigator, which provides regular updating of all IMO legislation and flag state requirements on vessel. Any changes in legislation as well any vessel re-certification is communicated daily to our managers.

In 2013, DOF Management successfully implemented the Marine Labour Convention (MLC) on all NIS / NOR, BAH, Cyprus and IOM flagged vessels. In addition, vessel managers ensure that all DOF vessels comply with the SOLAS regulations for Life Saving Appliances (LSA) and Fire Fighting Equipment on board and that masters and officers are given the required training to operate in safety.

Memberships of associations 102-13

In order to facilitate interaction and collaboration with different sectors of the offshore industry, DOF is an active member of many industry associations in the locations where it maintains operations. In addition, there is regular participation by DOF's representatives in projects or committees of those associations.

The International Marine Contractors Association (IMCA) is the international trade association representing companies and organisations engaged in delivering offshore, marine and underwater solutions. DOF has been an IMCA member for many years and has been an International Contractor member since 2015.

IMCA defines the International Contractor membership as follows;

"International Contractor - ICO This category of membership has been developed for contractors who have an international presence -operating in 3 or 4 of the IMCA regions - as offshore oil and gas construction contractors. Such companies should be able to demonstrate their marine construction capability, set out their geographical presence and their commitment and involvement with IMCA."

DOF Subsea APAC
- APPEA (Australian Petroleum Production & Exploration Association)
- Subsea Underwater Technology (SUT)
- Subsea Energy Australia
- Industrial Foundation for Accident Prevention (IFAP)
- Offshore Project Safe - Steering Committee member (Region EVP)

DOF Subsea UK
- British Safety Council
- Subsea UK
- Oil and Gas UK

DOF Brasil
- Abespetro (O&G Association)
- Abeam (Shipowners / Vessel Operators Association)
- Syndarma (Shipowners Union)
- Abran (NSA - Norwegian Shipowners Association)
- NBCC (Norwegian-Brazil Chamber of Commerce)
- AEPM (Association for the Specialisation of the Seafarer)

DOF ASA
- Norwegian Shipowners Association
- Bergen Shipowners Association
- Norwegian Church Abroad – Global ERT membership
- The Bergen Chamber of Commerce and Industry

DOF North America
- American Society of Safety Engineers - ASSE
- International Organisation for Safety and Health - IOSH
- International Association of Drilling Contractors - IADC

Compliance 419-1

In 2019, there were no significant fines or non-monetary sanctions related to fraud, corruption or workplace discrimination under the jurisdictions where DOF operates.

Supplier screening 414-1 & 308-1

DOF vendor evaluation questionnaire is comprised of two parts. The first part concerns anti-bribery and corruption, and also questions based on the UN Global Compact, which asks the supplier to rate their risk towards breaches of the principles. All vendors must complete the first part of the questionnaire. The second part is largely related to management systems (Occupational Health & Safety / Quality / Environmental). In 2019, 307 suppliers completed the new questionnaire (7.9% of suppliers used in 2019). ☸

Teamwork and labour rights



Overview

DOF requires all parties to participate and collectively strive to develop best practice solutions aligned with DOF's values and regional and corporate objectives. Within the same framework, DOF follows a practice that conforms to international standards for human rights, and Group operations are managed in accordance with fundamental labour standards.

Why is TEAMWORK significant to DOF:

Willing and enthusiastic participation and collaboration between team members is a key success factor for the DOF Group. Teams, at every level of the organisation, have built the professional and respected company we are today. Going forward, the need for professional and competent teams is crucial to achieving DOF's strategic goals.

Competency

Ensuring the competency of our workforce is key to DOF's future sustainability. Clients must be confident DOF has the necessary competence to deliver all aspects of the marine and subsea services.

Leadership Development

Developing current and future leaders is integral to our continuous improvement efforts. The Leadership Development program aims to promote and advance leadership skills throughout the organisation. In addition to more formal training routes, opportunities for DOF to utilise its subject matter experts, for specialised or operational topics exist.

What are we doing about TEAMWORK:

In order to build strong and capable teams, DOF is fully committed to training and developing key employees to either be part of important teams, or as potential leaders of its major project teams.

How DOF defines TEAMWORK:

According to DOF Values:

"Everything we achieve is as a result of teamwork. Each of us is responsible and open in our professional relationships, co-operative and collaborative, treating one another with dignity and respect.

"We do not blame; we find and share solutions and we learn from mistakes. From this platform we build diverse and global teams and strive for free exchange of ideas, experience and knowledge, worldwide."

Labour rights & relations (employee satisfaction)

DOF is committed to encouraging and supporting all employees and ensuring all employees align with DOF's vision and values. The DOF Group has systematically performed working environment surveys over the last six years. Surveys are conducted every second year, followed by two-year improvement processes.

DOF follows a practice which conforms to international standards for human rights, and Group operations are managed in accordance with fundamental labour standards. Our guidelines and standards are based on the ILO Convention that prohibits all use of forced labour or child labour. DOF recognises and respects the employees' right of association, organisation and collective bargaining, and the company guidelines conform to the labour regulations stipulated by all local authorities.

Labour / Management Relations

DOF is part of an industry known to be cyclical and in down-times redundancy and down-sizing are an unfortunate part of the cycle. DOF ensure continuous dialogue with employees' representative and trade unions. It is inevitable workforce numbers will change according to demand, however DOF will do its utmost to assist employees affected by down-sizing and have a robust program to support those employees with career and financial counselling.

DOF 2020 TEAMWORK goals:

An overall theme during the year is the enhancement of appraisal, career planning and retention activities.

Highlights

Workplace Harassment

DOF uses a worldwide acknowledged reporting system for workplace harassment.

People

People in the DOF Group::

3,501

As of December 31, 2019

Performance Reviews

DOF has a goal that 100% of eligible staff will have annual performance reviews.

Modern communication

DOF will continue to roll out new tools in 2020 to improve communication and collaboration, significantly across organisations and borders.

Overview (continued)

Training and Education

The DOF training framework is based on nine strategies:

- Cultivate Core Values, Safe the RITE way;
- Partner with different business units to establish core competencies;
- Leverage Intellectual Capital;
- Invest in Strategic Learning;
- Align Strategies with Corporate Objectives;
- Broaden Learning Activities;
- Focus on Performance Solutions;
- Speed up knowledge transfer and knowledge retention;
- Build our employee branding.

In addition to training for DOF employees, all third-party personnel onboard our vessels must complete a vessel induction process, with vessel familiarisation, DOF's operational standards and Code of Business Conduct, and mandatory e-learning modules covering Permit to Work, -Management of Change and Risk Assessment.

What are future goals with TEAMWORK:

To build on the strengths of teams so the efforts of one team can be quickly replicated or adapted in another region. The ability to harness the creative talents from a particular region, by incorporating their solution into a potential business opportunity in another region, will enable DOF to respond to clients with timely, proven solutions and resulting in a cost-effective outcome for DOF and its clients.

DOF will increase the use of Subject Matter Experts selected from appropriate regions to provide corporate, and the project related teams. The implementation of the 'modern toolbox' will support this effort.

Various initiatives in the Human Resourcing areas of resourcing, attraction, privacy compliance, retention and development of employees will be executed. We remain committed to sourcing talent and developing employees and to adapt to market changes. In addition, enterprise social media platforms, both internal and external, have been implemented to improve communication with our workforce and external stakeholders. ❁

Teamwork: Our focus for 2020

- In 2020, DOF will start to take full advantage of modern platforms for communication and collaboration. This includes an Enterprise Social Network solution to improve workforce communication by making it easier to communicate and allowing interactive communication. New tools for collaboration will allow for more efficient collaboration across all DOF entities and regions. A project will also be initiated to improve the way information is made available to offshore personnel.

- A new professional development initiative will be launched in 2020: the DOF Group Ambassador programme. The programme is a platform for employee development and offers potential leaders and executives a structured professional development programme.

Results

Substantial effort was made in 2019 to modernise the communication channels in DOF, bringing the team closer together. The strategy for communication management was updated, to clearly outlines roles, responsibilities and authority for both internal and external communication. This strategy has been the foundation for the implementation of modern communication and collaboration tools available in the 'modern toolbox'.

Many activities within HR have been based upon feedback from the Great Place to Work survey done by DOF Subsea in 2018. These activities have been undertaken with a DOF Group perspective. The focus for activities has been leadership communication, trust and employee engagement.

Projects were initiated for the DOF Ambassador program, in addition to Maritime Trainee program. During 2019, these projects were defined and prepared for start-up in 2020.

Various regional initiatives were developed, including productivity workshops, leadership training, development of presentation skills, technical qualification programs and refining training matrixes. All these initiatives contribute towards our recognition that "Everything we achieve is as a result of teamwork".

Our Employees

DOF aims to provide all employees with a safe working environment where they can advance their careers, develop their expertise and have a flexible working day. The focus on DOF's fundamental values – respect, integrity, teamwork, excellence and safety – has resulted in an improvement in individual efficiency and productive attitudes among our employees. DOF has a long-term plan for training and development of its employees. As part of this plan, DOF has completed a number of courses for employees during 2019, via the DOF training framework.

Diversity and inclusion have always been of high importance to DOF. The Equal employment Opportunities policy ensures a fair recruitment process. Candidates are treated fairly, professionally and with respect. DOF employs the most competent person for a position based on their skills, knowledge and experience.

Our workforce is comprised of 80% full-time employees and more than 2,600 employees are covered by collective bargaining agreements (77%).

Coverage of the organisation's defined benefit plan obligations 201-3

DOF operates various post-employment schemes, including both defined benefit and defined contribution pension plans.

a) Defined contribution plans - For defined contribution plans, DOF pays contributions to publicly or privately administered pension insurance plans on a mandatory, contractual or voluntary basis. DOF has no legal or constructive obligations to pay further contributions if the fund does not hold sufficient assets to pay all employees the benefits relating to employee service in the current and prior periods.

The contributions are recognised as employee benefit expense when they are due. Prepaid contributions are recognised as an asset to the extent that a cash refund or a reduction in the future payments is available.

b) Defined benefit plans - Typically defined benefit plans define an amount of pension benefit that an employee will receive on retirement, usually dependent on one or more factors such as age, years of service and compensation.

The liability recognised in the balance sheet in respect of defined benefit pension plans is the present value of the defined benefit obligation at the end of the reporting period less the fair value of plan assets. The defined benefit obligation is calculated annually by independent actuaries using the projected unit credit method. The present value of the defined benefit obligation is determined by discounting the estimated future cash outflows using interest rates of high-quality corporate bonds that are denominated in the currency in which the benefits will be paid, and that have terms to maturity approximating to the terms of the related pension obligation.

Details regarding pension schemes can be found in the Appendix.

Benefits provided to full-time employees that are not provided to temporary or part-time employees, by significant locations of operation 401-2

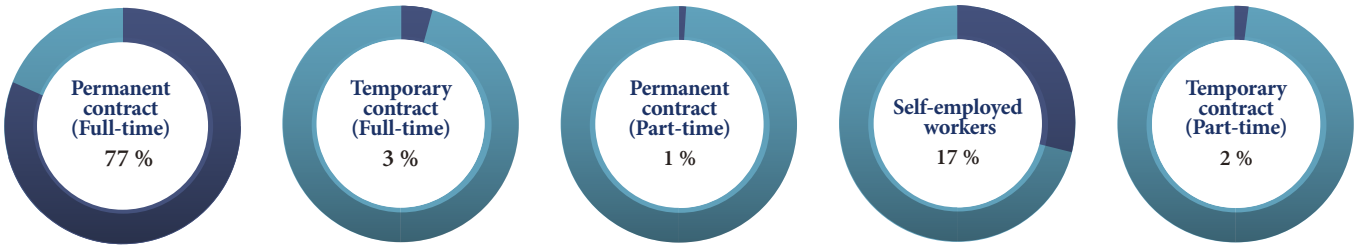
Standard benefits to employees can great vary depending on the country's legislation where DOF operates. The key regions for the marine and subsea operations are the Atlantic encompassing companies located in the UK, Norway; South America in Brazil and Argentina; North America in USA and Canada; Asia Pacific in Australia, Singapore. In general, the same benefits apply to full-time and temporary or part-time employees, with minor variations in the coverage depending on the region / country where they are located.

Details regarding benefits can be found in the Appendix.

Minimum notice periods regarding operational changes, including whether these are specified in collective agreements 402-1

The minimum notice periods may vary, depending on collective bargaining

Employment type - **Figure 2**



Demographics - **Figure 3**



agreements, individual agreements and statutory requirements. A summary of the practices in the different regions where DOF operates is given below.

Asia Pacific - In Australia, the Modern Awards or Fair Work Act Regulatory documents' states that employers shall "...as soon as practicable..." notify the employees of any change that is likely to have a significant effect on the employees of the enterprise. In Singapore, the Ministry of Manpower do not prescribe notice periods. In Philippines labour law there is no minimum notice period prescribed, however DOF seeks to practice and provide a fair and consultative process, giving as much notice as practicably possible.

Atlantic - In UK there is a minimum of one months' notice provided for major operational changes affecting employees and for statutory requirements, notice will be in accordance with valid regulations.

In Norway, the minimum number of notice period defined in the relevant national working legislations or in the employment agreement varies from 4 to 12 weeks. However, there are quarterly meetings with Union representatives and the work environment committee to address organisational and operational changes. Any major issues concerning the operations that would affect employees would be debated with the employee representatives before executed.

South America - In Brazil, the period varies depending on the years of work. In case of contract rescission, the employer must give one-month notice + 3 days for every year worked in the company before executing it.

North America - In the USA, there is no defined minimum notice period, however there are limited circumstances which trigger statutory requirements. In Canada, the minimum period of notice in terms of changes in employment is based on a number of factors, including the circumstances of the change. In general, circumstances outside the control of the employer do not require any significant notice. However other notice that may affect the employment status is given based on years of service.

Percentage of employees receiving regular performance and career development reviews, by gender and by employee category 404-3

DOF seeks to conduct annually career development reviews / appraisal for all eligible employees (depending on operational area / type of position) together with their managers.

An overview of performance reviews is given in the Appendix.

Non-discrimination 406-1

In 2019, there were two confirmed cases recorded regarding discrimination, in the form of harassment. A specific procedure was established for each case, to ensure fair and thorough case handling according to internal routines. ☸

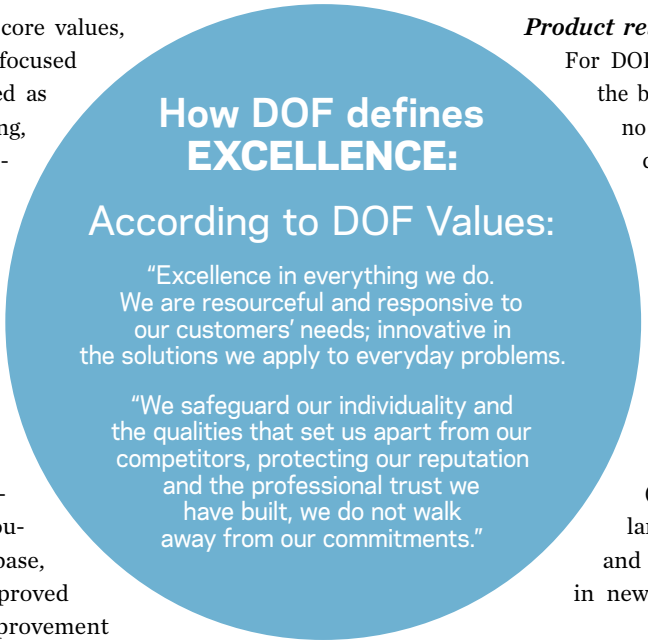
Excellence

Overview

Excellence is being resourceful and responsive to the customer's needs and innovative in the solution applied to everyday problems.

In addition to being one of DOF core values, excellence is not just a quality focused concept, it also needs to be viewed as a commitment, a way of thinking, pride in what DOF does, and a discipline to ensure that the work being done is of the highest standard possible for the stakeholders and will deliver and secure sustainability and future success.

In addition to being one of DOF core values, excellence is not just a quality focused concept, it also needs to be viewed as a commitment, a way of thinking, pride in what we do, and a discipline to ensure that the work being done is of the highest standard possible to secure sustainability and future success.



Why is EXCELLENCE significant to DOF:

Excellence in corporate and operational activities across the organization is important to protect long-term sustainability. Coupled with DOF's excellent assets base, professional workforce and improved internal controls, continuous improvement commitment has succeeded in differentiating DOF from its competitors.

What are we doing about EXCELLENCE:

DOF is committed to continuously improve the organisational performance in all aspects of its operations, including management of processes, knowledge, resources, and change.

Continuous Improvement

DOF monitors operations so areas for immediate or future improvement programs can be identified to provide our employees with the best possible tools and services to perform their roles.

Alliances and partnerships are an alternative option that can provide DOF and its clients with specialised services or products currently unavailable

Product reliability

For DOF, product reliability is providing the best service to our customers with no delays. DOF is committed to delivering quality products and services by working with our customers to understand the needs of their business and consistently meet their requirements.

Product reliability is achieved through the Integrated Management System (IMS) and Business Management System (BMS). DOF is now undertaking larger and more complex projects and contracts, as well as investing in newer and more advanced vessels.

Customer satisfaction

Customer satisfaction is measured through feedback surveys and managing long term contracts and getting repeat business. It is best characterised by delivering services of the best quality, at the best cost, at the right time and to the required location.

Maintenance Management System

The Maintenance Management System is implemented on all DOF Group vessels and for subsea assets, as well as third party vessels on long term charter.

What are future goals with EXCELLENCE:

The DOF has a zero mind-set towards customer complaints and downtime of our operations. Operating in a challenging market with pressure to deliver the same services for less

DOF 2020 EXCELLENCE goals:

Improve monitoring of Vessel Operations by introducing digital tools.

Modernise our ROV organisation, and take Survey into the cloud.

Continue developing our maintenance culture the RITE way.

Refurbish customer feedback mechanisms.

Highlights

Vessel Uptime

Available operative time for vessel:

99.4%

in 2019

ROV Uptime

Available operative time for ROV:

98.9%

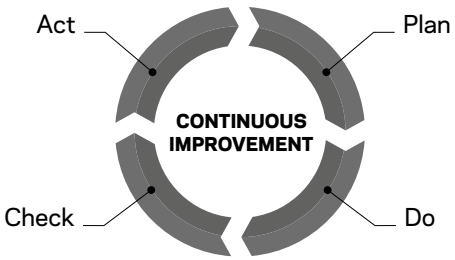
in 2019

"Maintenance the RITE way"

The program aims to build a world-class maintenance culture in the DOF Group.

Continuous Improvement

DOF's has built its management systems on the Plan-Do-Check-Act principle.



Overview (continued)

money, DOF appreciates the importance of maintaining the quality of services. In a complex and demanding world, excellence is not simply having the best product or service.

DOF will work towards delivering ever-improving value to its customers, and other stakeholders involved in contributing to our overall organisational sustainability. The continuous improvement to the overall organisational effectiveness and capabilities will position DOF as a partner of choice to both regional clients and major international clients.

DOF will continue to evaluate and engage with strategic partners to strengthen existing capabilities and to develop new capabilities that will allow DOF to expand its range of services and align with the needs of international clients.

Maintenance Management

A the program launched in 2018, based on best practices from Safe the RITE way, will continue through 2020. The overall objective is to improve the maintenance and housekeeping culture throughout the entire organisation. This program will be continuously developed during the coming years.

Implementing new digital tools will be a focus area to further expand the condition-based maintenance principle. This is in many ways connected to our energy efficiency efforts, as the tools used for monitoring equipment condition can also often be used to run the vessel more efficiently.

The Maintenance Management System, TMv2, will undergo adjustments. The goal is to simplify the system by reducing the amount of maintenance jobs and increase the focus and quality on critical jobs.

ROV & Survey Operations

A separate improvement plan for global ROV operations will be finalised early in 2020 and will cover improvements within areas such as organisational setup, maintenance and reliability, experience transfer and lessons learned, and supply chain processes within ROV.

Based on successful pilot projects using cloud computing for survey processing, the "Survey in the cloud" concept will be further implemented. This will allow DOF to produce deliverables faster and enables our work as a global organisation.

Vessel Operations

To ensure global monitoring of vessel operations, the vessel reporting tool, UniSea will be implemented across the whole fleet. In combination with this, Maress will also be implemented to combine operational data with vessel position data to enable advanced analysis of vessel performance. This creates the opportunity to reduce fuel consumption by identifying ways to run our vessels more efficiently.

DOF 1 - Operational uptime - **Figure 4**

QUALITY INPUT/OUTPUTS	GLOBAL TARGETS 2019 METRICS	2019	2018	2017
Available operative time for VESSEL – Time in % when vessels are in an operating mode and under contract with a client = < 2 % Down time for client due to vessel availability.	> 98 %	99.4 %	98.9 %	97.8 %
Available operative time for ROV – Time in % when ROV are in an operating mode and under contract with a client = < 2 % Down time for client due to ROV availability.	> 98 %	98.9 %	99.2 %	99.3 %



An AB performs maintenance
on the back deck of AHTS Skandi Iceman

Excellence

Results

Our industry is experiencing substantial change, disrupting the way it has traditionally worked. New expectations and requirements appear rapidly, and affect all areas of business, from external environment to operational performance and business ethics.

The DOF Group must keep pace with these changes, work within our values and business strategies, and involve all interested parties. A Digital Transition Strategy was commissioned by the Chief Operating Officer, to outline the main roles and responsibilities that the executive team will need to embrace.

The merger of DOF Management and Norskan, as DOF Marine, has now settled and the new organisation is continuously reviewing its key business systems and processes to be in alignment with current best practice models.

The Subsea organisation has initiated several projects with the aim to improve our product deliveries significantly, with focus in three main areas: ROV operations, diving operations, and survey.

The ultimate proof of excellence is in our reliability figures. The vessel uptime figure for 2019 was 99.4%. The equivalent figure for ROV uptime was 98.9%.

The docking improvement project continued through the year, with the aim to increase quality outcomes of docking, cost efficiency and energy efficiency such as hull and propeller cleaning. A complete set of governing documentation built upon a new docking manual was developed and released in early 2019. The processes have been built into a new docking module in TMv2.

During the year changes have been performed with regards to the organisational setup supporting docking activities, resulting in changes to the responsibility and accountability for the quality and cost efficiency of docking activities. This was a part of the overall reorganisation of DOF Marine.

Throughout the year, DOF has continued the use of "fly squads" consisting of two maintenance teams focusing on preventive maintenance. These teams travel around the global fleet, assisting the vessel crew with performing periodical maintenance on-board instead of taking the vessel to shore. This leads to more availability for our clients.

Work has continued to develop an improved method for condition assessment of vessels, going from annual inspection visits to continuous monitoring of the vessel condition. This has resulted in improved communication and a better understanding of vessel condition, to enable better decision-making in efforts to improve reliability.

Maintenance Management System

During 2019, the new technical organisation was implemented, along with new Docking and Maintenance Manuals. The new Maintenance Manual, which is valid for all DOF assets, divides all equipment into 3 categories. The process of identifying equipment in each category has been started and the equipment will be tagged in TM Master. This will give the opportunity to have special focus on equipment that is important to DOF's core business

Through Maintenance the RITE way the Maintenance Management System team has identified several good improvements and is well underway with these. The team has performed 9 maintenance reviews onboard vessels, giving valuable input for further improvements in the system.

The team has improved the tools for better analysis of the data input to the system. The Datawarehouse and Power BI dashboards have been further developed to analyse maintenance data and equipment failures.

Product reliability results, Subsea ROV Operations 2019

Executive management visited Brazil in late 2019, for consultation and review of DOF Brasil ROV performance. The result of the review will be presented in a global improvement plan for the global ROV organisation and operations.

An online library containing all technical ROV manuals was finalised in 2019. This will provide easy access to information and ensure that the latest versions of the manuals are available in one place.

Product reliability results, Vessel Operations 2019

The new Marine Operations manual was launched in 2018. During 2019, the manual has been subject for smaller adjustments. There have also been various activities to secure full implementation of the manual.

The structure for follow up of activities related to DP incidents has been strengthened, with appointment of a global DP authority, as well as a deputy in Brazil.

Operational uptime DOF1

See Figure 4, page 48.

Customer satisfaction DOF 2

DOF uses different means to monitor our customers' perception of whether their needs and expectation have been fulfilled. Systems are in place for obtaining, monitoring and reviewing this information.

The results are analysed and used as the basis for our yearly improvements plans as continuous improvement requires. Our commitment is to deliver quality products and services, safely and DOF works with its customers to understand their needs and meet their requirements.

DOF's customer satisfaction forms are the main source for monitoring our customers' feedback and cover all phases of our operations.

There were no formal customer complaints registered during 2019. However, some responses in customer feedback have triggered internal non-conformity processes.

The steady improvement in client feedback scores has now stopped. Within Subsea, there is a significant reduction in average scores compared to 2018. Within Marine, there is only minor reduction. However, we cannot pin-point exact reasons for these drops based on meetings with clients and qualitative statements.

Based on the feedback in 2019, the Chief Commercial Officer will initiate a study to identify the root causes for this. It may be that our scoring criteria is not sufficiently set up; where the scoring numbers are misaligned with the description of the ratings. For example, "Expected Performance" results in a score of 3, which is in the middle of the scoring scale. It may be that the general reduction in the scores is the result of a normalisation of the feedback. ❁

DOF 2 - Customer Satisfaction - **Figure 5**

Average ratings DOF Subsea customer feedback (received during 2019)

	#1 - Mobilisation	#2 - Engineering (Project & Design)	#3 - Client's Objectives (Understood & Achieved)	#4 - Client Relationship	#5 - Schedule Management	#6 - HSE Management	#7 - Site Operations	#8 - Overall Project Management (including communications)	#9 - Overall Performance	#10 - De-Mobilisation	Overall Survey Rating
2019	3.8	4.0	4.1	4.4	4.2	3.9	4.1	4.2	4.2	3.9	4.1
2018	4.5	4.3	4.5	4.7	4.3	4.4	4.4	4.5	4.5	4.4	4.4

Average ratings DOF Management customer feedback (for 2019)

	HSE Management	Co-operation	Flexibility	Dialogue	Delivery of service	Cost	Results	Added value	Overall Survey Rating
2019	4.0	4.3	4.3	3.9	4.2	3.6	4.1	4.0	4.1
2018	4.2	4.4	4.4	3.9	4.3	3.6	4.2	4.1	4.2

⇨

Appendix

Appendix i - GRI Content Index for 'In Accordance'

GENERAL STANDARD DISCLOSURES	PAGE	EXTERNAL ASSURANCE
STRATEGY AND ANALYSIS		
102-14 CEO's Statement	8	
ORGANISATIONAL PROFILE		
102-1 Name of the organisation	6	
102-2 Primary brands, products, and services	6	
102-3 Location of the organisation's headquarters	DOF ASA Annual Report 2019	
102-4 Geographical coverage	DOF ASA Annual Report 2019	
102-5 Legal nature	DOF ASA Annual Report 2019	
102-6 Markets served	DOF ASA Annual Report 2019	
102-7 Size of the organisation	6	
102-8 Total number of employees by contract and gender	63	
102-41 Total number of employees covered by collective bargaining agreements	44	
102-9 Supply Chain	32-33	
102-10 Significant changes in organisational structure	No changes	
102-11 Precautionary principle	24	
102-12 Commitments to External Initiatives	38-39	
102-13 Membership of associations	39	
IDENTIFIED MATERIAL ASPECTS AND BOUNDARIES		
102-45 Entities included in the organisation's consolidated financial statements	DOF ASA Annual Report 2019	
102-46 Content and Boundaries of the Report	10-11, 56-57	
102-47 Material Aspects	10-11, 56-57	
103-1 Material Aspect Boundaries within the organisation	10-11, 56-57	
103-2 Material Aspect Boundaries outside the organisation	10-11, 56-57	
102-48 Major restatements of information	None	
102-49 Significant changes in Scope and Material Aspect Boundaries	No significant changes	
102-40 Stakeholder groups	10-11, 56-57	
102-42 Basis for identification and selection of stakeholders	56-57	
102-43 Approach to stakeholder engagement	56-57	
102-44 Key topics and concerns raised and the organisation's approach	10-11	
REPORT PROFILE		
102-50 Reporting period	01-Jan - 31 Dec. 2019	
102-51 Date of most recent previous report	Issued March 2019	
102-52 Reporting cycle	Annual	
102-53 Contact	Stig Clementsen, CSO	
102-54 The "in accordance" option chosen by the organisation	Core	
102-56 Assurance	68	
GOVERNANCE		
102-18 Governance structure of the organisation	DOF ASA Annual Report 2019	
ETHICS AND INTEGRITY		
102-16 Organisation's values	9	

Appendix i - GRI Content Index for 'In Accordance' (continued)

DISCLOSURE NUMBER	DISCLOSURE DESCRIPTION	PAGE REFERENCE	OMISSION	REASON FOR OMISSION	EXPLANATION FOR OMISSION	VERIFICATION
DOF MATERIAL TOPIC: HEALTH, SAFETY AND EMERGENCY MANAGEMENT						
GRI Management approach						
103-1	Explanation of the material topic and its Boundary	18-20	No			Yes
103-2	The management approach and its components	18-20	No			Yes
103-3	Evaluation of the management approach	18-20	No			Yes
GRI 403- Occupational health and safety						
403-1	Occupational health and safety management system	18	No			Yes
403-2	Hazard identification, risk assessment, and incident investigation	18	No			Yes
403-3	Occupational health services	18	No			Yes
403-4	Worker participation, consultation, and communication on occupational health and safety	18	No			Yes
403-5	Worker training on occupational health and safety	20	No			Yes
403-6	Promotion of worker health	20	No			Yes
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	20	No			Yes
403-8	Workers covered by an occupational health and safety management system	20	No			Yes
403-9	Work-related injuries	22-23	Man-hours are not available separately for employees and other workers.	Information unavailable.	System to differentiate man hours DOF / non-DOF was not operational on all vessels during whole of 2019. Expected to be available for 2020 reporting.	Yes
DOF MATERIAL TOPIC: ENERGY EFFICIENCY AND CLIMATE IMPACT						
GRI Management approach						
103-1	Explanation of the material topic and its Boundary	24-27	No			Yes
103-2	The management approach and its components	24-27	No			Yes
103-3	Evaluation of the management approach	24-27	No			Yes
GRI 302- Energy						
302-1	Energy consumption within the organisation	60	No			Yes*
GRI 305- Emissions						
305-1	Scope 1 emissions	61	No			Yes*
305-2	Scope 2 emissions	61	Scope 2 is location based only and not market based.	Information unavailable.	A climate change workshop will be held in 2020 and include evaluation of reporting on market based emissions.	Yes*
** Note: External assurance regarding emissions is provided by Cemasys*						
GRI 307- Environmental compliance						
307-1	Non-compliance with environmental laws	29	No			Yes
DOF MATERIAL TOPIC: SPILL AVOIDANCE						
GRI Management approach						
103-1	Explanation of the material topic and its Boundary	24-27	No			Yes
103-2	The management approach and its components	24-27	No			Yes
103-3	Evaluation of the management approach	24-27	No			Yes
GRI 306- Effluents and waste						
306-3	Significant spills	28	No			Yes

Appendix i - GRI Content Index for 'In Accordance' (continued)

DISCLOSURE NUMBER	DISCLOSURE DESCRIPTION	PAGE REFERENCE	OMISSION	REASON FOR OMISSION	EXPLANATION FOR OMISSION	VERIFICATION
DOF MATERIAL TOPIC: BUSINESS INTEGRITY, ETHICS AND PAYMENT TRANSPARENCY						
GRI Management approach						
103-1	Explanation of the material topic and its Boundary	32-35	No			Yes
103-2	The management approach and its components	32-35	No			Yes
103-3	Evaluation of the management approach	32-35	No			Yes
GRI 201- Economic performance						
201-4	Financial assistance received from government	38	No			Yes
GRI 205- anti-corruption						
205-1	Operations assessed for risks related to corruption	36-38	Yes			
205-2	Communications and training on anti-corruption	38	Total number and percentage of governance body members, employees or business partners that the organization's anti-corruption policies and procedures have been communicated to, broken down by region, employee category or type of business partner. Total number and percentage of governance body members, or employees, that have received training on anti-corruption, broken down by region and employee category.	Information unavailable	DOF will evaluate how to record necessary data to fully report on the disclosure.	Yes
205-3	Confirmed incidents of corruption and actions taken	36	No			Yes
206-1	Legal actions for anti- competitive behaviour, anti-trust, and monopoly practices	36	No			Yes
GRI 308- Supplier environmental assessment						
308-1	Supplier environmental screening	39	No			Yes
GRI 414- Supplier social assessment						
414-1	Supplier social screening	39	No			Yes
GRI 419- Socioeconomic compliance						
419-1	Non-compliance with socioeconomic laws	39	No			Yes

Appendix i - GRI Content Index for 'In Accordance' (continued)

DISCLOSURE NUMBER	DISCLOSURE DESCRIPTION	PAGE REFERENCE	OMISSION	REASON FOR OMISSION	EXPLANATION FOR OMISSION	VERIFICATION
DOF MATERIAL TOPIC: LABOUR RIGHTS AND EMPLOYEE SATISFACTION						
GRI Management approach						
103-1	Explanation of the material topic and its Boundary	40-43	No			Yes
103-2	The management approach and its components	40-43	No			Yes
103-3	Evaluation of the management approach	40-43	No			Yes
GRI 201- Economic Performance						
201-3	Defined benefit plan obligations and other retirement plans	44, 64-65	No			Yes*
** Note: EY does not verify financial information.*						
GRI 401- Employment						
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	44, 66-67	No			Yes
GRI 402- Labour/Management Relations						
402-1	Minimum notice periods regarding operational changes	44-45	No			Yes
GRI 404- Training and education						
404-3	Career and performance reviews	45, 63	No			Yes
GRI 406- Non-discrimination						
406-1	Incidents of discrimination and corrective actions taken	45	No			
DOF MATERIAL TOPIC: PRODUCT RELIABILITY AND CUSTOMER SERVICE						
GRI Management approach						
103-1	Explanation of the material topic and its Boundary	46-48	No			Yes
103-2	The management approach and its components	46-48	No			Yes
103-3	Evaluation of the management approach	46-48	No			Yes
DOF own disclosure						
DOF 1	Operational uptime	48	No			Yes
DOF 2	Results of surveys measuring customer satisfaction	51	No			Yes
DOF MATERIAL TOPIC: RISK BALANCING						
GRI Management approach						
103-1	Explanation of the material topic and its Boundary	32-35	No			Yes
103-2	The management approach and its components	32-35	No			Yes
103-3	Evaluation of the management approach	32-35	No			Yes
DOF own disclosure						
DOF 3	Revenue per segment	62	No			Yes
DOF MATERIAL TOPIC: INNOVATION & CLIMATE RESILIENCE						
GRI Management approach						
103-1	Explanation of the material topic and its Boundary	24-27	No			Yes
103-2	The management approach and its components	24-27	No			Yes
103-3	Evaluation of the management approach	24-27	No			Yes
GRI 201- Economic performance						
201-2	Financial implications of climate change	29	Description of the risk or opportunity and its classification; description of the impact associated with the risk or opportunity; financial implications of the risk or opportunity before action is taken; the methods used to manage the risk or opportunity; the costs of actions taken to manage the risk or opportunity.	Information unavailable.	DOF plans to perform a TCFD-based workshop in 2020 to perform thorough assessments.	Yes

Appendix ii - Materiality

The DOF Group is a global organisation, operating in a complex environment. Meeting stakeholder expectations and navigating daily challenges, large and small, requires a deep understanding of our values and clearly articulated priorities.

The GRI standard gives the DOF Group a structured framework to ensure vital drivers of sustainable operations are factored into decision making. Ultimately, reporting to the GRI standard provides stakeholders with a view of organisational performance in more than financial terms alone.

STEP ONE - IDENTIFYING MATERIAL ASPECTS AND CONDUCTING A MATERIALITY ASSESSMENT 102-42, 102-46
To deliver more sustainable operations, DOF must recognise and respond to the most significant aspects of its activities (also known as material aspects). The Group's material aspects were identified through an internal process which analysed internal reports, studies and customers' surveys to establish the most relevant economic, social and environmental topics on which to focus. As a result of the process, key stakeholders where identified through various analyses and consultations and a comprehensive list of material aspects captured. Stakeholder engagement is described later in this report.

STEP 2 - STAKEHOLDER ENGAGEMENT 102-43
Stakeholder engagement is a continuous and on-going process. Engagement has been conducted through key stakeholder group workshop sessions, as well as dialogue using existing channels and meeting places, for example, investor meetings, engagement surveys, processes with suppliers and customers). Other relevant opportunities for engagement have been used too, for example, advisory panels, public meetings, multi-stakeholder forums, focus groups, surveys, partnerships, etc.

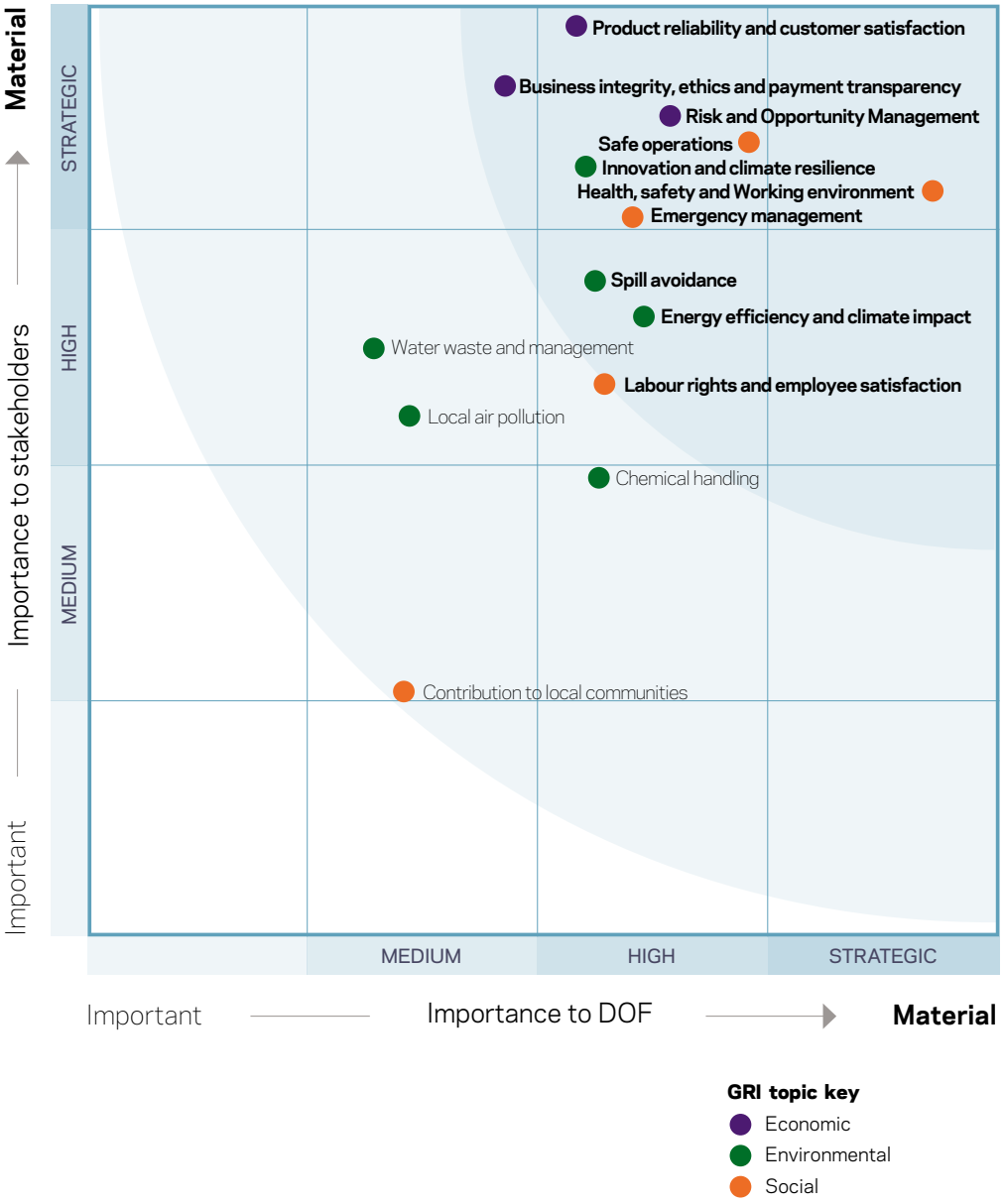
STEP 3 - VALIDATION ANALYSIS OF THE MATERIALITY MATRIX
The initial materiality matrix for the Group was developed in 2015. Since then, there has been annual validation of the matrix, with adjustments as circumstances has changed. The analysis used a standardised 'Materiality Tool' which consists of predefined external and internal criteria, by which every topic can be measured. These include a broad set of considerations such as financial criteria, sustainability context, DOF's strategy, peer pressure, and alike. Each topic's relevance was tested, from low to strategic and where the topic could impact in the value chain, whether positive or negative.

The DOF Group's key stakeholders were originally identified in 2015 as customers, employees, investors, suppliers and local communities. The stakeholder group's relevance has been reviewed and confirmed in various and annual strategic sessions.

The following material issues have been identified as being the most relevant for DOF and its stakeholders. The material aspects are arranged according to the DOF values.

STAKEHOLDER	MATERIALITY
EMPLOYEES	The Group has approximately 3,500 employees. They are the backbone of our organisation and a natural choice as a key stakeholder group. Engagement with employees is conducted through studies of feedback from numerous employee committees, working environment surveys and separate dialogue with individuals.
CLIENTS	The Group works with numerous clients, globally, some key clients are global, and others operate in local or regional areas. This makes engagement with all stakeholders challenging. The analysis of their expectations of the Group are based on reviews of existing and upcoming contract requirements, client transfer of experience meetings, client supplier meetings with focus on future projects and new expectations, and reviews of client's external communication and public web pages.
INVESTORS	DOF ASA is a publicly listed company with many shareholders. In the assessment to identify key stakeholders, it was determined that the most feasible way to represent the investors are through engagement with members of the Board.
SUPPLIERS	In 2019 the Group had almost 3,900 different suppliers. It is not practical to engage with all of them to ascertain their expectations. However, as a key stakeholder, suppliers to DOF are vital. To compensate for a lack of in-depth dialogue, studies and dialogue have been undertaken with key suppliers within global logistics, advanced subsea equipment providers, classification societies and shipbuilding yards as a fair representation of the stakeholder group.
LOCAL COMMUNITIES	The Group has its main operations offshore and is as such not visible in the local community, aside from office buildings, a few warehouses and shore bases. However, in some communities DOF is a major employer. This means there are expectations for the Company as regards contributing to the local community. It has not been practical to maintain a dialogue with all local communities we operate in.

Below: DOF 's materiality matrix rev 2019001



Appendix iii - Figures & tables

Overview of emergency incidents and exercises - **Figure 6**

	2019	2018	2017
Incident	9	18	12
Exercise	41	31	40

Global HSE targets - **Figure 7**

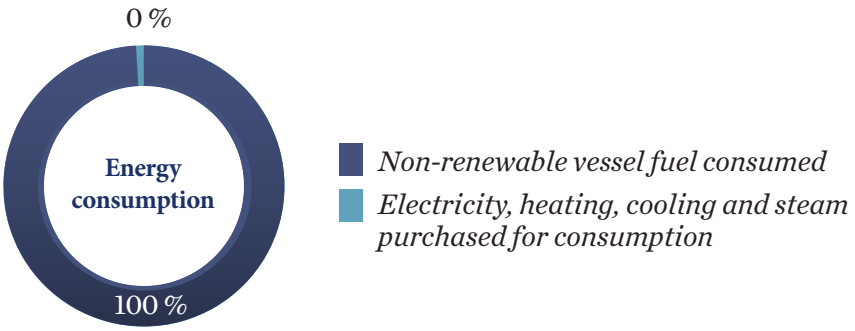
HSEQ INPUT/OUTPUTS	GLOBAL TARGETS 2019 METRICS
Number of Lost Time Injuries	0
Lost Time Injury Frequency Rate (LTIFR)	< 0.3 / 1 000 000 man-hours
Lost Recordable Case Frequency Rate (TRCF) Includes LTIs, Restricted Workday Cases, Medical Treatment Cases and fatalities.	<1.1 / 1 000 000 man-hours
First Aid Cases	< 7.5 / 1 000 000 man-hours
Safety Observation Rate	600 / 200 000 man-hours

Occupational Health and Safety Indicators - **Figure 8**

OHS INPUTS / OUTPUTS	UNIT OF MEASUREMENT	2019 Target	2019	2018	2017
Man-hours	Number		9 104 679	8 882 567	9 038 874
High consequence injuries	Number		0	2	N/A
High consequence injury rate	Injuries per million man-hour		0	0.23	N/A
Fatalities	Number	0	0	0	0
Number of Lost Time Incidents (LTI)	Number	0	5	7	2
Lost Time Injury Frequency Rate	LTIs per million man-hour	< 0.3	0.55	0.79	0.22
Total Recordable Cases	Number		20	16	11
Total Recordable Case Frequency Rate	TRC per million man-hour	< 1.1	2.2	1.80	1.22
First Aid Cases	Number		53	73	90
First Aid Case Frequency Rate	FACs per million man-hour	< 7.5	5.82	8.22	9.96
Safety Observation Rate	SOB per 200.000 man-hour	> 600	598	584	601
Lost Day Rate	% lost days of scheduled days		0.02%	0.05%	0.002%
Absentee rate	% absent days of scheduled days		2.45%	2.69%	2.18%

Appendix iii - Figures & tables (continued)

Energy consumption - **Figure 9**



Total energy consumption within the organisation in joules (see below for conversion factors)

ENERGY CONSUMPTION	GJ
Nonrenewable fuel consumed (fuel oil and LNG, scope 1 vessels)	6 898 322
Renewable fuel consumed	0
Electricity, heating, cooling and steam purchased for consumption	25 279
Self-generated electricity, heating, cooling and steam	0
Electricity, heating, cooling and steam sold	0
Total energy consumption within the organisation	**6 923 601**

Electricity consumption per country - **Figure 10**

ELECTRICITY CONSUMPTION PER REGION	MWH
Brazil	643.5
UK	281.5
Australia	311.5
Canada	149.4
Norway	4914.9
Singapore	104.0
USA	617.0
Total	**7 021.9**

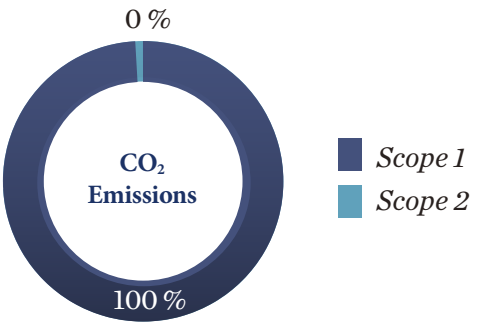
Conversion factors - **Figure 11**

ITEM	SOURCE
Marine gas oil	Quantification of emissions from ships - Part 3 - European Commission
LNG	MEPC.281(70)
Waste (incinerated)	DEFRA 2013
Onshore electricity	DEFRA 2013
Marine gas oil energy (kWh/kg) (gross CV)	DEFRA 2013
LNG energy (kWh/kg) (gross CV)	DEFRA 2013

CO_2 Emissions - **Figure 12**

Scope 1	99.8 %
Scope 2	0.2 %

Direct greenhouse gas (GHG) emissions (Scope 1) and Energy indirect greenhouse gas (GHG) emissions (Scope 2)
Note: Scope 2 emissions are location based.

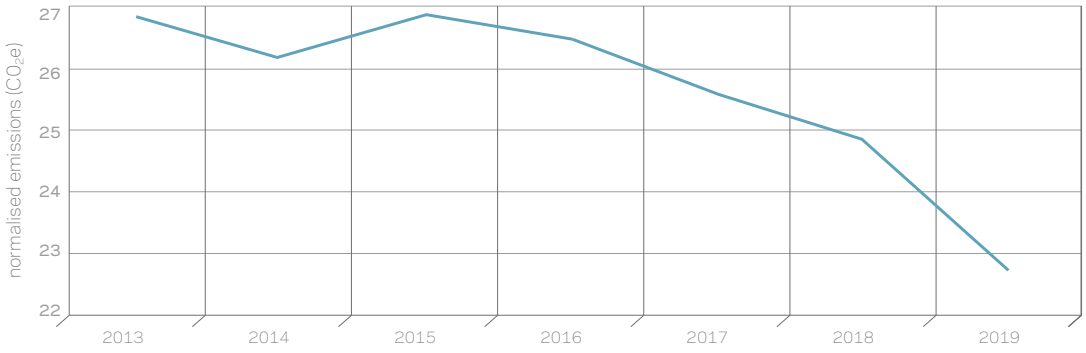


CO_2 EMISSIONS	UNIT OF MEASURE	2019	2018	2017
Scope 1	ton (CO_2e)	481 649	504 471	534 990
Scope 2	ton (CO_2e)	927	1 008	1 568
Total *	**ton (CO_2e)**	**482 576**	**505 479**	**536 558.4**

Methodology used: The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition).
Notes:
1) Although the DOF Group started to report to the CDP in 2010 the base year chosen was 2011, since the data for 2010 was quite weak. Emissions in base year (tons CO2e) was 593 745 (Scope 1) and 700 (Scope 2).
2) As vessel fuel consumption has an element of inaccuracy due to the methods in which fuel consumption are recorded onboard vessels, there is a level of uncertainty associated with the final Scope 1 and Scope 2 emissions.
3) The chosen consolidation approach for emissions is Operational control.
4) GWP source: CO_2 (IPCC Fourth Assessment Report (AR4 - 100 year).
5) CO_2e (CO_2 equivalent) includes all major greenhouse gases; carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O)

* The table identifying factors can be found in Figure 5.

Intensity reduction targets - **Figure 13**

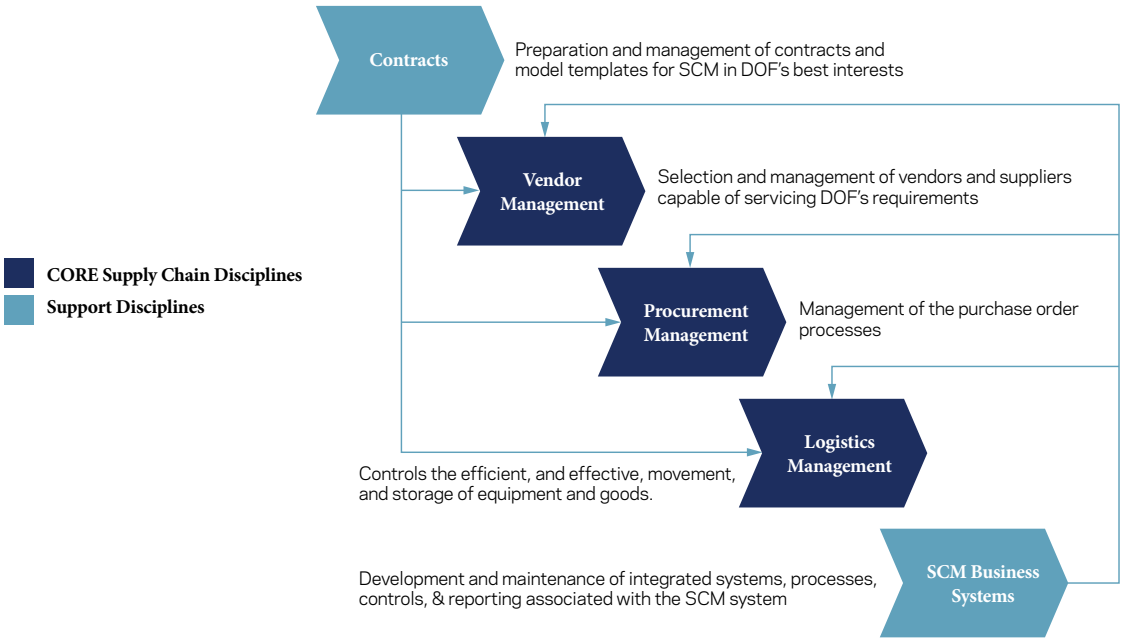


	YEAR	EMISSION PER OPERATIONAL DAYS	% REDUCTION
Verified	2019	22.7	8.8
Verified	2018	24.9	3
Verified	2017	25.7	2.7
Verified	2016	26.4	1.9
Verified	2015	26.9	0
Verified	2014	26.1	3
Verified	2013	26.9	

The above table shows the verified emission per operational day from 2013-2019.

Appendix iii - Figures & tables (continued)

Supply Chain Management - **Figure 14**



General information regarding our Supply Chain Management is also given on page 13 under the Business Overview chapter.

DOF 3 - Revenue per segment (DOF Subsea) - **Figure 15**

	2019	2018	2017
Subsea projects	63 %	71 %	69 %
Chartering of vessels	37 %	29 %	31 %
Total revenue (NOK Million)	5 147	4 607	4 550

Distribution of projects per project level (DOF Subsea) - **Figure 16**

Level 0: Budget Pricing	2.75 %
Level 1: Manpower or Equipment Hire	22.94 %
Level 2: Working on Clients Vessel or PM&E Contracts	6.42 %
Level 3: Vessel Charters or Minor IMR Campaign	56.88 %
Level 4: Light Construction or IMR	8.26 %
Level 5: Major Construction/Intervention Projects	2.75 %

Employment statistics as of 31.12.2019 - **Figure 17**

	TOTAL	MEN	WOMEN	ATLANTIC	ASIA PACIFIC	NORTH AMERICA	SOUTH AMERICA
Permanent Contract (Full-time)	2714	2372	342	894	269	230	1321
Temporary Contract (Full-time)	97	79	18	48	7	0	42
Permanent Contract (Part-time)	40	17	23	26	13	0	1
Temporary Contract (Part-time)	67	49	18	20	34	0	13
Self-employed workers	583	569	14	468	37	75	3
Total	3501	3086	415	1456	360	305	1380

Overview of performance reviews by gender and employee category - **Figure 18**

BY GENDER	PERFORMANCE REVIEWS	TOTAL HEADCOUNT	% OF EMPLOYEES RECEIVED REVIEWS
Female	173	400	43.25 %
Male	1739	2888	60.21 %
Total	1912	3288	58.15 %

BY EMPLOYEE CATEGORY	PERFORMANCE REVIEWS	TOTAL HEADCOUNT	% OF EMPLOYEES RECEIVED REVIEWS
Senior managers	174	427	40.75 %
Managers	316	530	59.62 %
Staff	1422	2331	61.00 %
Total	1912	3288	58.15 %

Appendix iii - Figures & tables (continued)

Summary of pension schemes - **Figure 19**

ATLANTIC	**Norway (DOF Management / DOF ASA)** ▪ In total 24 (16 active, 8 retired) people are covered by the two Defined benefit plans in DOF Management AS and DOF ASA. The plans are closed. DOF Management now operates with a defined contribution plan. ▪ Pension liability in DOF Management AS amounts to NOK -1 046 504 at of 31.12.2019 (is a receivable). ((actuarial calculation stipulates that pension liability is NOK 35 068 410 and pension assets are NOK 36 114 914). ▪ Pension liability in DOF ASA amounts to NOK 2 123 803 as of 31.12.2019. (actuarial calculation stipulates that pension liability is NOK 9 264 203 and pension assets are NOK 7 402 851). ▪ DOF Management AS and DOF ASA external actuarial pension calculation is as of 31.12.2019 (calculated in January 2020 with the latest changes to assumptions).). ▪ Plan is covered. ▪ The defined benefit plan ensures covered persons 70 % of salary. ▪ The employee gets the value of the fund paid in monthly payments when the employee reach the age of pension. ▪ All pension costs are covered by the employer. ▪ Employees not part of the defined benefit plans have a defined contribution pension plan. A percentage of salary is paid to an insurance company in line with the earnings of wages. ▪ All employees not part of the defined benefit plans are part of the pension scheme. ▪ Pension fund is handled by the insurance company. ▪ The company has no liabilities or obligation after payments to the insurance company on behalf of the individual employee. ▪ The individual employee's fund is based on actual payment done by the company and actual returns on funds. ▪ The employee gets the value of the fund paid in monthly payments when the employee reaches the age of pension. **Norway (DOF Subsea)** ▪ DOF Subsea Norway has two Defined Benefit Plans that both are invested with a life insurance company. One agreement covers the onshore employees that had turned 54 in 2011, the second one covers all the offshore people (seamen) in the age period of 60-67 years. ▪ Liability for defined benefit plan for DOF Subsea Norway was NOK 14.7 million at end of 2019. Total funds held by life insurance company is NOK 13.8 million. The coverage is currently 94%. ▪ The defined benefit obligation is calculated by an independent actuary using the projected unit credit method. ▪ DOF Subsea AS and DOF Subsea Norway AS have a defined contribution pension plan for employees. A percentage of salary is paid to an insurance company in line with the earnings of wages. The companies have no pension liability. ▪ All employees not part of the defined benefit plans are part of the pension scheme. ▪ Pension fund is handled by the insurance company. ▪ The company has no liabilities or obligation after payments to the insurance company on behalf of the individual employee. ▪ The individual employee's fund is based on actual payment done by the company and actual returns on funds. ▪ The employee gets the value of the fund paid in monthly payments when the employee reaches the age of pension. **UK** ▪ There is no liability for the company. ▪ In UK there are no defined benefit plans.
SOUTH AMERICA	**Brazil** ▪ There is no liability for the company. ▪ In Brazil the company holds a private pension plan on a private bank. ▪ Pension Plan is based on salary percentage contribution from both employee and the company. Department manager and above positions may contribute with 10% while for other employees the limit will be 4%. ▪ Scheme is voluntary and it is estimated that 40% of all employees are participating.

Summary of pension schemes - **Figure 19** (continued)

NORTH AMERICA	**USA** ▪ There is no liability for the company. ▪ In the USA, the 401(k) plan is fully vested under the Safe Harbor Act. ▪ Pension Plan and there is no liability for the company. ▪ The plan matches the first 6% of contributions dollar for dollar. ▪ The company portion is immediately vested at 100% as soon as the money leaves the company for each paying period. ▪ Scheme is voluntary and it is estimated that 71% of employees are participating. **Canada** ▪ There is no liability for the company. ▪ Canada operates Employer/Employee funded Registered Retirement Savings Plan (RRSP). ▪ Maximum employer contribution is 5%, employees have the option to contribute higher percentage. ▪ Scheme is voluntary and it is estimated that 90% of employees are participating.
ASIA PACIFIC	**Australia** ▪ There is no liability for the company. ▪ Australia operates compulsory superannuation schemes based on employer defined contributions. ▪ Employees have the right to choose which superannuation fund (external funds they are a member of). ▪ External superannuation funds in Australia are monitored by Australian Securities and Investment Commission as well as other Governmental agencies. ▪ 9.5% contribution by employer. Voluntary contributions can be made by the employee, but limits are imposed. **Singapore** ▪ There is no liability for the company. ▪ In Singapore the company is required to pay monthly contributions to the Central Provident Fund with variable rates depending on the employees' age. **Philippines** ▪ In Philippines, the company is required to pay monthly contributions to the Social Security fund based on progressive rates depending on the employees' salary. **Indonesia** ▪ In Indonesia, the company is required to pay monthly contributions to the Workers Social Security fund based on fixed rates.

Appendix iii - Figures & tables (continued)

Benefits provided to full-time employees that are not provided to temporary or part-time employees - **Figure 20**

BRAZIL	▪ Life insurance (employee and spouse/husband) ▪ Funeral Insurance (employee and spouse/husband) ▪ Health and Dental Insurance (employee and direct dependents – spouse/wife and children) ▪ Pension Plan (employee) company do a deposit of the same amount than employee ▪ Supermarket Coupon (monthly basis) ▪ Restaurant Coupon (monthly basis only for on shore employee)
AUSTRALIA	All employees, whether full-time or part-time / fixed term have the same benefits, though if part-time some benefits are pro-rated e.g. leave accruals. With the exception of 9 Day Fortnight (flexibility) Scheme for permanent onshore full-time employees only (or maximum duration >12 months)
NORWAY	Employees who work less than 20% are entitled to most of the benefits except: ▪ Life insurance (in some entities, employees who work less than 50%) ▪ Pension ▪ Disability and invalidity coverage ▪ Paid parental leave Full time employees will be provided with company phones. This is normally not provided for part-time employees.
SINGAPORE	All employees, whether full-time or part-time have the same benefits. If temporary (e.g. fixed term or casual, then benefits are reduced). Different benefits may be offered to employees based on their Singapore residency status (e.g. health insurance, flights) or a car park bay based on their role seniority. Currently there are nil part time employees in Singapore.
PHILIPPINES	All employees, whether full-time or part-time /fixed term, have the same benefits with the exception of: Service Incentive Leave entitlement after one year of service, an employee becomes entitled to a yearly service is provided with incentive leave of 5 days with pay (there are preclusions so must check always as to who this applies to, for example does not apply to Managers or those employed in establishments regularly employing less than 10 employees). Leave can be used in ill health or for general holidays and the balance must be paid out at the end of the year. TOWP (Time Off With Pay) sick - days not used at the end of each calendar year will be converted into money equivalent and paid to the employee. Not available to casual employees.

Benefits provided to full-time employees that are not provided to temporary or part-time employees - **Figure 20** (continued)

UK	Benefits provided to full-time employees that are not provided to temporary or part-time employees: Life Assurance, Group Personal Pension, Sick pay, Parental Leave (unpaid), Private Health Care (BUPA)
US	Benefits provided to full-time employees that are not provided to temporary or part-time employees: ▪ Health ▪ Dental ▪ Vision ▪ Basic Life and Accidental Death and Dismemberment Insurance ▪ Short Term and Long Term Disability Coverage ▪ 401(k) Program with 6% Employer Match ▪ Employee Assistance Program ▪ Sick Time ▪ Vacation
CANADA	The benefits below are provided to full-time employees and not provided to temporary / casual employees. Part-time employees may have some or all of the benefits based on hours worked. Health and Dental Programs, Life Insurance, Critical Illness, Short term and Long term disability, Employee and Family Assistance Program (EAFP), Vacation, Statutory Holidays, Registered Retirement Savings Program, Pegnancy Leave, Family Violence Leave, Personal Leave, Parental Leave, Adoptive Leave, Breavement Leave, Compassionate Leave, Reserve Leave, Sick Leave, Time off to Vote, Jury/Witness Leave Duty.

Appendix iv - Independent Assurance Report - EY

Building a better working world

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To the Board of Directors of DOF ASA

Independent assurance report – Sustainability Reporting for 2019

We have performed an independent verification of DOF ASA's reporting on Sustainability for 2019 (Sustainability Report), which involves an assessment of whether the information presented in the Sustainability Report is based on relevant criteria from the guidelines for sustainability reporting from the Global Reporting Initiative Standards option "core" (GRI Standards). Externally assured information is indicated in the GRI index in the Sustainability Report for the financial year 2019.

Management's responsibility

DOF ASA's management is responsible for the selection of the information and collection of the data for presentation and for the preparation of the Sustainability Report in accordance with the GRI Standards criteria.

Our Independence and Quality Control

We have complied with the independence requirements of the Norwegian Law on Auditors and Auditing and other ethical requirements from the Code of Ethics of the Norwegian Institute of Public Accountants which are founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behavior.
We apply International Standard on Quality Control (ISQC1) "Quality control for firms that perform audits and reviews of financial statements, and other assurance and related services engagements" and accordingly maintain a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Auditor's tasks and duties

Our task is to issue an independent report to the Board of Directors on the Sustainability Report based on our work. Our work is conducted in accordance with ISAE 3000 "Assurance Engagements Other than Audits or Reviews of Historical Financial Information". The standard requires that we plan and perform procedures to obtain limited assurance that the information in the Sustainability Report is prepared and presented in accordance with relevant criteria for sustainability reporting in accordance with GRI Standards and does not contain material errors.
Our work has consisted of the following procedures:

- Review of DOF ASA`s process for the preparation and presentation of the Sustainability Report to provide us with an understanding of how Sustainability is ensured in practice within the business
- Interviewed those in charge of Sustainability reporting to develop an understanding of the process for the preparation of the Sustainability Report
- Verified on a sample basis the information in the Sustainability Report against source data and other information prepared by DOF ASA
- Assessed the overall presentation of the Sustainability Report against the criteria in GRI Standards including a review of the consistency of information

In our opinion the evidence obtained is sufficient and appropriate to provide a basis for our conclusion.

Conclusion

Based on our work, nothing has come to our attention that causes us to believe that the Sustainability Report, in all material respects, is not prepared and presented in accordance with the GRI Standards criteria, or that the information in the Sustainability Report contains material misstatements. Indicators covered by our assurance report are listed in the GRI index.

Bergen, 24 April 2020
Ernst & Young AS

Eirik Moe
State Authorised Public Accountant

A member of Ernst & Young Global Limited

Appendix v - Independent Assurance Report - CEMAsys GHG Verification Statement

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GHG VERIFICATION STATEMENT
DOF ASA

To the readers of DOF ASA's greenhouse gas (GHG) assertions in the CDP investor report 2020. The GHG assertion is based on historical data from 2019 (01.01-31.12) and comprises DOF ASA and its subsidiaries.

Introduction
We have been engaged by DOF's management to review the GHG assertions reported to the CDP report 2020. The Board of Directors is responsible for ongoing activities related to environmental and climate management. Our responsibility is to express a conclusion on the above-mentioned GHG assertions.

Scope of review
We have performed our review in accordance with ISAE 3000 (Revised), Assurance Engagements Other than Audits or Reviews of Historical Financial Information. The Greenhouse Gas assertion is based on historical data from 2019. The criterion on which our review is based is the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard, revised edition, published by World Resources Institute and World Business Council for Sustainable Development. Operational control is used as a boundary for evaluating Scope 1, 2 and 3 in the greenhouse gas inventory. The reported gross global emissions for 2019 are, for scope 1: **481 649** metric tonnes CO_2e, for scope 2: **927** metric tonnes CO_2e and for scope 3: **137 438** metric tonnes CO2e. The reviewed Scope 2 emission was location-based emission. The market-based emission was not reviewed due to lack of data. The year-to-year emissions for scope 1, 2 and 3 as well as the intensity figures were also verified. The quantification method used in GHG assertion is a subject to inherent scientific and estimation uncertainty.

The review provides a limited level of assurance. Based on the process and procedures conducted, there is no evidence that the assertion is not materially correct and is not a fair representation of GHG data and information, and has not been prepared in accordance with the related International Standard on GHG quantification, monitoring and reporting, or to relevant national standards and practices.

Our review has, based on an assessment of materiality and risk, among other things included the following procedures:

- An update of our knowledge and understanding of DOF's organisation and activities.
- Interviews with responsible management, with the aim of assessing whether the qualitative and quantitative information stated is complete, correct and sufficient.
- An evaluation of method and routines implemented for the collection and reporting of information and data.
- An analytical review of reported information, including sampling with error check and cross checking of data
- An evaluation and a verification of emission factors used to calculate the GHG emissions
- We have gained an overall impression of the GHG assertions published in the CDP report, considering the information's mutual conformity with the applicable criteria.

Conclusion
Based on our review procedures, nothing has come to our attention that causes us to believe that DOF's GHG assertions in the CDP report 2020 have not, in all material respects, been prepared in accordance with the above stated criteria.

Oslo, 23.03.2020



Izabella Kazimiera Łęgosz
Senior Advisor
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Appendix vi - Document figure overview

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Appendix vii - Overview of Sustainable Development Goals

The UN's 17 Sustainable Development Goals (SDGs), pictured below, address global social, economic and environmental challenges and are based on the simple principle of "no one left behind".

The SDGs are comprehensive in the issues they address, each goal has specific actions and targets. As an organisation working principally with subsea engineering and offshore vessels, the Group assessed the specific SGDs where we have the greatest impact and can make a significant contribution as part of our operations. We aligned these SDGs with corresponding material aspects. You can see how they fit together on page. Read more about UN SDGs: https://sustainabledevelopment.un.org/



Glossary

AUV:	Autonomous Underwater Vehicle
CAGR:	Compound Annual Growth Rate
CAPEX:	Capital Expenditure
CSV/Subsea	Construction Support Vessels and Subsea vessels
DNV-GL:	Det Norske Veritas. Classification company. Controlling and approving the vessels technical condition, security and quality according to the company's own rules and the national laws
DP:	Dynamic Positioning
EBIT:	Operating Profit
EBITDA:	Operating Profit before Depreciation
E&P:	Exploration & Production
EPIC:	Engineering, Procurement, Installation & Commissioning
FPSO:	Floating Production Storage and Offloading
GOM:	Gulf of Mexico
GRI:	Global Reporting Initiative
HR:	Human Resources
HSEQ:	Health, Safety, Environment and Quality
IFRS:	International Financial Reporting Standards
IMCA:	International Marine Contractors Association
IMR:	Inspection, Maintenance and Repair
IOC:	International Offshore Company
ISM:	International Safety Management Code
ISO:	International Standards Organisation
ISPS:	International Ship and Port Facility Security Code. International framework to detect/ assess security threats and take preventive measures against security incidents affecting ships or port facilities used in international trade
LNG:	Liquefied Natural Gas
MLC:	Maritime Labour Convention
NIBOR:	Norwegian Interbank Offered Rate
NIS:	Norwegian International Ship Register
NOR:	Norwegian Ordinary Ship Register
OHSAS:	Occupational Health & Safety Advisory Services
OSCV:	Offshore Subsea Construction Vessel
PLSV:	Pipelaying Support Vessel
ROV:	Remote Operated Vehicle
SEMS:	Safety and Environmental Management Systems
STCW:	Standards of Training, Certification and Watch keeping
SURF:	Subsea, Umbilicals, Risers & Flowlines
T&I:	Transportation & Installation
Time Charter Party (TC):	Contract for Chartering a Vessel
UDW:	Ultra Deep Water
VAE:	Value Adjusted Equity

A dedication & thank you:

Thank you to all our hard working and dedicated colleagues - it is you that make DOF the preferred OSV manager and subsea services partner.

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Document: Sustainability Report 2019, Version: 1.0