



**POLICIES**

**DDMS DOC NO.  
PO-900-0007**

**MODERN SLAVERY POLICY STATEMENT**

**REV NO.  
04**

The Company operate in UK, Norway and international sectors. Modern Slavery is a crime and violation of fundamental human rights. It can take various forms, such as slavery, servitude, forced labour and human trafficking.

Consistent with section 54 of the Modern Slavery Act 2015 and The Transparency Act 2022, Dolphin Drilling (hereinafter referred to as the 'The Company') have a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in its business dealings and relationships.

The Company is committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its business or any of its supply chains.

The Company take the following measures:

- Company procedures including; Code of Conduct, Third Party Due Diligence Procedure, Whistleblowing Procedure.
- All vendors must go through a robust vendor registration and due diligence process prior to being accepted on the approved vendors list.
- Everyone we do business with is required to comply with our Code of Conduct.
- All employees are also required to complete the Anti-Corruption and Business Ethics Course.
- Independent Whistleblowing line to report any concerns.
- Information on our Company website on how to make an information request related to potential and actual impacts on human rights.

The Company encourage everyone to raise concerns about any issue or suspicion of modern slavery in any part of the business or supply chains.

The above measures are reviewed annually to ensure effectiveness.

Approved By		Date Approved	Page No.
Jon Oliver Bryce	Chief Executive Officer	29/01/2025	1 of 1