



Human Rights and Decent Working Conditions Policy

PURPOSE

The purpose of this policy is to state BW Offshore's commitment to Human Rights and Decent Working Conditions.

SCOPE

This policy is applicable to BW Offshore Limited and its subsidiaries and anyone who works for or on behalf of any of those entities.

RESPONSIBILITIES

Process and Document Owner:
SVP Compliance

Approval:
CEO

Implementation:
SVP Compliance

INTRODUCTION

BW Offshore is committed to meeting its responsibility to respect human rights and decent working conditions. The Company supports internationally recognised human rights standards, including those set out in the International Bill of Human Rights (collectively herein referred to as "Human Rights") and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work (collectively herein referred to as "Decent Working Conditions"). BW Offshore observes applicable OECD Guidelines for Multinational Enterprises and supports the objectives of the UN Global Compact. In addition, BW Offshore complies with applicable laws and regulations in the countries in which it operates.

Existing BW Offshore policies and procedures, such as the Code of Ethics and Business Conduct, Supplier Code of Ethics and Business Conduct, Human Capital Policy, Supply Chain Policy, Modern Slavery Statement and HSE Policy, support the Company's commitment to Human Rights and Decent Working Conditions.

BW Offshore includes responsible business conduct principles and regulations in management systems and includes identification and assessment of possible adverse impacts on Human Rights and Decent Working Conditions as part of the Vendor Qualification Programme.

BW Offshore expects our business partners, including suppliers, agents or other third parties (collectively herein referred to as "Suppliers"), to observe equivalent principles when conducting business for or with BW Offshore. This expectation is reflected in BW Offshore's Supplier Code of Ethics and Business Conduct and standard terms and conditions.

Responsible Sourcing

BW Offshore recognises the critical role Suppliers play and requires its Suppliers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities.

BW Offshore expects our Suppliers to comply with Human Rights and Decent Working Conditions and participate in its Vendor Qualification Programme (a due diligence exercise), which may include questionnaires, site visits, audits, etc., to help identify and remediate slavery, human trafficking, forced or child labour or any other violation of Human Rights and Decent Working Conditions.

The Company will not engage an external party if the compliance risk is deemed too high.



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Human Rights for workers

BW Offshore is committed to treating people with respect and dignity. The Company encourages diversity, remains receptive to diverse opinions, promotes equal opportunities for all and fosters an inclusive and ethical culture.

Anti-Discrimination, equality, and appropriate workplace conduct

BW Offshore prohibits unlawful discrimination based on race (including colour, nationality, ethnic or national origin), social status or origin, age, gender or gender identity or expression, sexual orientation, marital or civil partnership status or family structure, maternity or pregnancy, religion, political beliefs, trade union membership, or disability. Inappropriate workplace conduct, such as harassment, violence or discrimination, is not tolerated.

BW Offshore believes that diversity promotes healthy collaboration and positive development of the Company's capabilities and operates with multinational teams on all offshore units and in all onshore locations. The Company is committed to ensure equal opportunities and aims to provide a comfortable and adequate work environment to all employees, as stated in the Human Capital Policy, as well as in the Diversity, Equity and Inclusion statement, and the Code of Ethics and Business Conduct.

BW Offshore consists of employees with a wide range of experiences and backgrounds. The Company continues to build a diverse workforce by attracting, recruiting, developing and retaining people to always strive for equal opportunities, across all types of positions.

Forced labour, child labour, modern slavery and human trafficking

BW Offshore declares that human slavery, human trafficking, forced labour, child labour and brutal treatment are unacceptable. The Company is committed to ensuring that child labour and forced labour are not used in the performance of its work.

The Company adheres to regulations prohibiting human trafficking and complies with applicable laws in the countries in which it operates. BW Offshore's expectations are further described in BW Offshore's Supplier Ethical Employment Practice Guidelines, which are disseminated throughout the supply chain.

BW Offshore's annual Human Rights and Decent Working Conditions Statement is posted on the Company website and describes policy, procedure, risk assessment, risk management and due diligence activities, together with the ongoing goals and commitments for the Company.

Fair compensation and collective bargaining

The Company is committed to the UN Sustainable Development Goal #8 of decent work and economic growth. BW Offshore applies a meritocratic approach to ensure that its compensation framework supports the Company's long-term business strategy and delivers a total compensation that fairly reflects each employee's contribution and performance.

BW Offshore believes a living wage is a human right. The Company has a defined minimum standard of living through employment without subsidies, which supports the Company's commitment to Human Rights and Decent Working Conditions.

BW Offshore reviews employees' wages through annual salary review, pay scales, union agreements, etc., to reflect fair remuneration and sustainable living wages.

The goal of paying a living wage throughout the Company's supply chain is stated in the BW Offshore Supplier Code of Ethics and Business Conduct. BW Offshore recognises that it is not easy to influence and change the behaviour of all our supply chain partners; nevertheless, the Company has commenced activities



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to review wage levels and working conditions of our supply chain partners, using a risk-based approach, with the long-term objective that highest risk Suppliers meet this expectation first.

In addition, BW Offshore employees have the right to free association and collective bargaining.

Working conditions and health and safety

BW Offshore is committed to limiting its negative impact on the people, environment and communities in which it operates. BW Offshore strives for the lowest possible lost-time injuries and high-risk incidents. BW Offshore gives all employees, contractors, visitors and others who have a responsibility for performing work the explicit authority to stop all actions that they think are unsafe and/or are unsure of, and to initiate a process to define and clarify without any repercussions.

Local Work Environment Committees or equivalent are in place within BW Offshore to ensure that a secure, safe and healthy working environment is implemented, discussed between management and employee representatives and maintained appropriately. Offshore units in operation are maintaining the same dialogues in the Offshore Safety Committee (OSC) to discuss subjects regarding occupational health and HSE related topics.

Workers and visitors at all locations have access to feedback cards on which observations and suggestions on safety critical actions, improvements, positive actions or recommendations may be submitted to the Company. Online observation cards are available on the Company's website. All cards are recorded and reviewed by the Company and further action, if necessary, is taken.

Impact on the Community (Non-labour related human rights issues)

Privacy

The right to privacy is a human right. BW Offshore is committed to protecting privacy and personal data by appropriately collecting, using, storing, or transferring personal data.

BW Offshore has established a Privacy Policy, accessible on its Internet site.

In the event of a data breach, it must be reported immediately to the Data Protection Officer.

The ethical cost of bribery and corruption

Corruption is widely considered to be a barrier to economic and social development and may lead to violations of Human Rights and Decent Working Conditions. As stated in the UN Convention Against Corruption, corruption disproportionately and negatively impacts the poor and "is a key element in economic underperformance and a major obstacle to poverty alleviation and development".

BW Offshore is committed to complying with applicable anti-corruption laws and has a compliance programme to support this commitment, which includes a prohibition on facilitating payments. If there is an imminent threat to the life, health, safety or liberty of an individual (or those around them), it is recognised that he or she may take steps reasonable under the circumstances to avoid that risk, including if necessary, making a payment that is demanded in connection with the threat and immediately thereafter report to Finance and Compliance any such payment.

Supporting Local Communities and Indigenous people's rights

Stakeholders are important to BW Offshore, and the Company is committed to treating all people with dignity and respect. The Company carefully considers the effect and impact on local communities and indigenous



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people where its activities might have an impact. Therefore, the Company supports the UN Sustainable Development Goal #10 Reduced Inequalities and #8 Decent Work and Economic Growth.

Consequences of violation

Breaches of this policy or relevant statutory provisions may result in disciplinary action or dismissal, with or without notice, and may also be reported to the relevant authorities. Anyone involved in a violation of law may be subject to fines, penalties, imprisonment or litigation.

Reporting a concern

Questions about this policy or reports of potential violations of it or any relevant law or regulation may be made to a local supervisor, Human Capital, or Legal or may be submitted through the BW Offshore "Speak Up Channel" (speakup.bwoffshore.com) or bc.compliance@bwoffshore.com. BW Offshore does not tolerate retaliation against anyone who raises a good-faith concern, question, grievance or complaint. Reports are treated confidentially and investigated, if necessary, promptly, thoroughly, and fairly. Should an improper practice occur within BW Offshore, the Company is committed to making necessary corrections and taking remedial action to prevent recurrence, which may include

- Implementing suitable measures to cease, prevent or mitigate adverse impact on Human Rights and Decent Working Conditions,
- tracking the implementation and results of such measures,
- communicating with affected stakeholders and rights-holders regarding how adverse impacts are addressed, and
- providing for or co-operating in remediation or compensation where required.