



## Norwegian Transparency Act Statement 2022

This statement has been prepared in accordance with the Norwegian Transparency Act section 5 and summarizes the policies and procedures in DNO ASA ("DNO") with respect to safeguarding of human rights and decent working conditions. The statement should be read together with the latest published Annual Report, Corporate Social Responsibility Report, CDP Climate Change Disclosure and CDP Water Security Disclosure. All are available on our website [www.dno.no](http://www.dno.no).

### Who We Are

DNO is a Norwegian oil and gas operator active in the Middle East, the North Sea and West Africa. Founded in 1971 and listed on the Oslo Stock Exchange, the Company holds stakes in onshore and offshore licenses at various stages of exploration, development and production in the Kurdistan region of Iraq, Norway, the United Kingdom, Côte d'Ivoire, Netherlands and Yemen.

### Our Commitment to Human Rights and Decent Working Conditions

DNO acknowledges and respects internationally recognized human and labor rights standards. Our human rights policies follow the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

### Governance, Policies and Standards

DNO has a carefully crafted and clear governance framework by which we conduct our affairs:

- Our **Code of Conduct** requires, among other things, that all employees comply with applicable laws and regulations, ensure a safe working environment and respect human rights and dignity.
- Our **Business Partner Code of Conduct** applies to all suppliers and requires a commitment to comply with best employment practices including no modern slavery, no child labor, no harassment or discrimination, freedom of association and working hours and living wages set in accordance with applicable law.
- **Contractual HSSE requirements:** In addition to the Business Partner Code of Conduct, DNO has embedded health, safety, security, and environmental requirements in all its contracts with suppliers.
- Our **Anti-Corruption Policy** sets out DNO's zero tolerance towards corruption and other illegal or unethical business practices, requiring suppliers to adhere to the same principles.
- Our **Whistleblowing Procedures** set out protocols for reporting concerns, including through hotlines, anonymously if preferred, about possible violations of our governance, policies and standards.

### Our Organization

At yearend 2022, DNO had a workforce of 1,449 employees, of which 1,244 were employed outside of Norway. In Kurdistan, DNO had 1,140 employees at yearend 2022 of which 81 percent were local employees.

It is DNO's policy to provide reasonable and competitive compensation and benefits to our employees in all locations. We respect our employees' right to freedom of association. We conduct salary mapping to

avoid discrimination based on gender. We celebrate diversity and inclusion. We do not condone threatening or degrading conduct, nor do we tolerate any behavior which is disrespectful of our differences.

DNO encourages employees, contractors and other stakeholders to raise concerns and report suspected violations of applicable laws and regulations and DNO's Code of Conduct, without fear of retaliation.

DNO organizes Code of Conduct training for its staff, either through computer-based training modules or seminars conducted in local languages where appropriate.

## **Our Supply Chain**

We require that our suppliers adhere to DNO's Business Partner Code of Conduct when they act on our behalf or provide a service to DNO.

As part of its due diligence in purchasing goods and services, DNO requires that its suppliers adhere to a set of practices in relation to human rights and decent working conditions. Notably, we assess and minimize risks relating to occupational health and safety, corruption and childhood labor.

The supplier risk assessment is informed by such factors as the nature of goods and services provided, sourcing and reports of prior violations. When necessary, DNO takes corrective actions.

In 2022, we experienced attempts by some local suppliers in Kurdistan to deploy underage workers in our facilities. In each instance, DNO through its security checks identified the individuals and issued formal warnings to their employers who in turn were required to stop the practice and comply with local laws. On-site security check procedures have been further strengthened in response to these incidents.

## **Looking Ahead**

DNO has long been committed to promoting fundamental human rights and decent working conditions in our operations and supply chain. Within the Company, we continue to improve the quality and measurement of our compliance training for employees. With respect to our suppliers, we will step up due diligence. As risk is ever evolving, we will evaluate and modify our policies and procedures accordingly.

This statement was approved by the DNO ASA Board of Directors on 30 June 2023.