



## Norwegian Transparency Act Statement 2023

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 pertains to the parent company and subsidiaries with active operations and 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.

DNO has assessed its business and supply chain for actual adverse impacts or significant risks for adverse impacts on human rights and decent working conditions. In terms of risk identification, DNO has a comprehensive enterprise risk management system in place that is designed to identify, monitor and mitigate risks, not least risks relating to occupational health and safety, corruption, migrant workers, underage workers, and limited freedom of association.

### 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 integrated **Enterprise Risk Management System** identifies potential adverse impacts on all company risks, including risks related to health, safety, security and human rights, and allows us to address any identified significant risk and/or adverse impact in a timely manner and implement mitigating measures.
- 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 2023, DNO had a workforce of 1,085 employees, of which 13 percent were women. A total of 61 individuals were based at the Company's headquarters in Oslo and 1,024 were engaged across our international operations, including in business unit offices in Erbil, Stavanger, Dubai and Aberdeen. Our workforce is characterized by strong cultural, religious and national diversity, with some 39 nationalities represented.

In its own operations, DNO did not identify any actual adverse impacts on human rights and decent working conditions in 2023. The Company minimizes the risk of violations through strict oversight of our facilities and sites. Supported by a comprehensive risk management system, DNO places an overriding priority on a safe working environment. DNO ensures that all employees of DNO are above the legal employment age and working hours and living wages are set in accordance with law (as a minimum). 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**

DNO has a robust supply chain process with a supply chain management team consisting of 55 employees working with 1,100 suppliers worldwide. 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 based on the type of services provided, geographic location, incident reports, contract size and operational location. For suppliers with an increased risk profile, DNO assesses documented policies and practices of suppliers and implements preventive and mitigating measures with continuous tracking and when necessary, DNO takes corrective actions.

In 2023, due to market changes in Kurdistan, DNO had a different set of suppliers and other counterparties than in previous years. As DNO entered into new contracts, the Company used the opportunity to safeguard human rights and decent working conditions. Following last year's assessment, and as a result of dialogue with suppliers and increased security procedures, DNO mitigated a previously identified risk of underage workers attempting to access our facilities. Moreover, we have increased driver safety by regular health and safety checks as illustrated by implementation of an 'In Vehicle Monitoring System' in our vehicles.

## **Looking Ahead**

DNO has long been committed to promote 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 aim to implement improved risk assessment tools to better visualize our supply chain risks. 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 7 May 2024.