



Maersk Supply Service
(Headquarters)

Lyngby Hovedgade 85
2800 Kongens Lyngby
Denmark

Account of Due Diligence in Accordance with the Norwegian Transparency Act

MSS operations, values, and commitments

Maersk Supply Service (MSS) is a leading provider of global offshore marine services for the energy sector worldwide. We serve our customers with a fleet of 30+ vessels manned by more than 1,000 employees both onshore and offshore. MSS brings more than 50 year's hands-on marine experience in performing complex operations at sea. Our fleet is tailored to meet the unique demands of the energy industry, and MSS takes pride in ensuring our operations are conducted responsibly, adhering strictly to international standards. Headquartered in Kongens Lyngby, Denmark, MSS has regional offices in Angola, Brazil, Canada, Mexico, Norway, Philippines and United Kingdom, and operates regionally within South America, North America and Europe & Africa.

We prioritize the well-being of people, the environment, and assets. Safety is our top priority, and we never compromise on the safety of our employees or business partners. Operating globally, we are committed to conducting our business responsibly, reflected in our adherence to international standards, laws, and universal human rights.

As 2024 marks the first year of MSS being within the scope of the Norwegian Transparency Act, our Code of Conduct and Corporate Social Responsibility/Corporate Governance policies, along with our due diligence procedures, are currently being reviewed by Senior Legal Counsel at our headquarters in Kongens Lyngby, Denmark, to ensure we fully reflect our compliance with the Norwegian Transparency Act. This commitment reinforces MSS's longstanding support for international human rights principles established by the UN and other international bodies.

At MSS, we foster a diverse and inclusive work environment where all 1500 employees, worldwide, have the same opportunities to succeed. We are committed to providing a safe and environmentally responsible workplace, ensuring everyone feels valued and empowered to contribute to our continuous improvement.

MSS and its subsidiaries are committed to conducting business in a responsible and upright manner and to respect human rights across our activities, in line with the UN Guiding Principles. Our commitment to respect human rights is described in our Human Rights Policy Statement. We have zero tolerance for forced or involuntary labour, human trafficking and other practices defined as 'modern slavery', which is outlined in the Maersk Code of Conduct and our Supplier Code of Conduct.

Our supply chain and process for due diligence

We acknowledge the impact of our operations on people within our supply chain and have established clear principles and expectations for our business partners to ensure compliance with human rights and working conditions.

MSS has conducted a Human Rights Self Assessment taking into consideration general human rights, child labour, human trafficking and forced labour, and non-discrimination. Below is a table of the policies and procedures currently in place within MSS to address these issues.



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Scope	Requirements	Supporting Documentation
General	A written policy or document of commitment on the respect of human rights.	Code of Conduct + Commit Rule - Global Employee Relations
Child labor	A written policy or system in place that prohibits employment of persons under the age of 15 (the ILO standard).	Recruitment of Seafarers + Commit Rule - Global Employee Relations
Human trafficking and forced labor	A written policy or commitment document that prohibits trafficking, slavery and forced labor, defined in line with international standards on the subject.	Code of Conduct + Commit Rule - Global Employee Relations
	Self-declaration that workers selected through temporary or employment agencies are not charged the costs for selection.	As our vessels and employment agencies are MLC certified the following prevails from MLC 2006, page 20, Standard A1.4 - Recruitment and placement, section 5, a) and b): "A Member adopting a system referred to in paragraph 2 of this Standard shall, in its laws and regulations or other measures, at a minimum: (a) prohibit seafarer recruitment and placement services from using means, mechanisms or lists intended to prevent or deter seafarers from gaining employment for which they are qualified; (b) require that no fees or other charges for seafarer recruitment or placement or for providing employment to seafarers are borne directly or indirectly, in whole or in part, by the seafarer, other than the cost of the seafarer obtaining a national statutory medical certificate, the national seafarer's book and a passport or other similar personal travel documents, not including, however, the cost of visas, which shall be borne by the shipowner;"
Non-discrimination	A written policy or system in place to protect workers from unethical recruitment practices.	Code of Conduct + Commit Rule - Global Employee Relations
	A written policy or document of commitment to non-discrimination of any kind against workers, in particular migrant workers (in terms of salary equity and employment conditions)	Code of Conduct + Maersk Anti Discrimination Harassment Bullying and Violence Policy

With respect to our supply chain, we require all our suppliers to adhere to our Supplier Code of Conduct, which outlines our expectations, principles, and minimum requirements, expecting them to exercise good judgment, care, and consideration in following it.

Our Supplier Code of Conduct describes expected business conduct by our suppliers, based on international standards. The Supplier Code of Conduct sets out expectations concerning responsible business behaviour in the areas of health and safety, equal opportunity rights, compensation and working hours, child labour and forced or involuntary labour, freedom of association, anti-corruption and environment.

We maintain a comprehensive overview of our suppliers, ensuring close contact and cooperation. Our Frame Agreements (FA) and General Purchasing Conditions (GPC) refer to our Code of Conduct, which can be found here: <https://www.maersk.com/sustainability/supplier-code-of-conduct>. Our contracts also include clauses related to addressing human rights, which requires all suppliers (including their subcontractors) to comply with all national and international laws, including but not limited to those relating to occupational health and safety, wages, working hours and conditions of employment, and International Bill of Human Rights. All suppliers are required to sign either the GPC, an FA, or a bespoke contract including the same minimum requirements.

MSS is committed to respecting human rights in line with the UN Guiding Principles. We take a risk-based approach to our human rights due diligence activities and aim to continuously strengthen key processes that enable us to identify and act upon actual and potential human rights risks in our operations and through our business partnerships. While MSS conducts preliminary desktop risk assessments during our due diligence process, we aim to undertake further measures to ensure compliance with the Norwegian Transparency Act and mitigate potential risks.

In addition to the measure taken to ensure good working conditions for our own employees and other personnel, we will continue to work on ensuring that people working on our premises and performing tasks for us, but not hired by us directly, are offered working conditions that meet the standards in our Supplier Code of Conduct.



MAERSK
SUPPLY SERVICE

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As of today, no actual negative impact on human rights or working conditions has been discovered or reported within MSS operations, its supply chain, or its subsidiaries. MSS acknowledges that this does not necessarily mean there are no negative impacts in its value chain, but rather that none have been detected. MSS acknowledges that there may be risk factors specific to the offshore marine services sector to be taken into account.

Our responsibilities and measures

MSS is prioritizing compliance with the Transparency Act; however, this is the first year under these obligations and therefore we see areas for improvement. Ensuring compliance with fundamental human rights and decent working conditions requires well-established procedures and guidelines, as well as comprehensive due diligence assessments. MSS aims not only to prevent breaches but also to actively reduce the risk of human rights violations and unfair working conditions.

Speak up

MSS encourages employees to report any suspected breaches of our ethical guidelines, including human rights and labour rights violations. You can report any concerns directly with your line manager or escalate them to management or our designated person ashore, DPA.

MSS also has a confidential whistleblower system, which may be utilised by employees or external parties. This can be used to raise concerns about any actual or suspected violations of laws or MSS rules and procedures. The link to our whistleblower system is found at <https://maersksupplyservice.integrityline.com/>

The way forward

In the future MSS will continue to follow up on the Norwegian Transparency Act, to ensure due diligence have been fulfilled within the requirements stated. This will be the responsibility of Senior Legal Counsel, and will be undertaken over the course of the next year.

Planned measures include mapping of the value chain, a structured risk assessment, continued due diligence on current and future suppliers, training on human rights, and assessing the effectiveness of our policies and procedures in relation to the supply chain by conducting, as necessary, audits and assessments.

Bergen, 30 June 2024

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