

ACCOUNT OF HUMAN RIGHTS DUE DILIGENCE

Macro Offshore has initiated a Human Rights Due Diligence based on the OECDs Guidance for Responsible Business Conduct.

Human rights due diligence is a ongoing process, and we are continually working to improve it to help us map the risks and to be able to fully implement required improvements.

Due Diligence is a 6-step process:

1. Assessment of the business conduct, policies, and management system.
2. Identification and assessment of adverse impacts in operations, supply chain and business relations.
3. Ceasing, prevention, or mitigation of adverse impacts.
4. Tracking implementation and results.
5. Communicating how impacts are being addressed.
6. Grievance mechanism and remediation.

COMPANY STRUCTURE

Macro Offshore AS is the parent company in the Norwegian part of the Macro Offshore Group and is located at Vestre Svanholmen 6, 4313 Sandnes.

In addition to the parent company the Group consists of the 100 % owned subsidiaries Macro Offshore Management AS, Macro Offshore Crew AS, Macro Offshore Crew DK ApS, Crossway Eagle LLC and CBI-MMEER R2 Ltd. Crossway Eagle LLC is the owner of the harsh environment accommodation jack-up rig Crossway Eagle.

Macro Offshore Management AS provides technical and commercial management services to Crossway Eagle. In addition, Macro Offshore Management AS has a technical and commercial management agreement with Jacktel AS, who is the owner of the accommodation rig Haven. Macro Offshore Crew DK ApS provides crewing services for both Eagle and Haven.

ASSESSMENT OF BUSINESS CONDUCT, POLICIES AND MANAGEMENT SYSTEM

At Macro Offshore Management we are committed to respecting the human rights as contained in the Universal Declaration of Human rights (UDHR), the United Nations Guiding Principles on Business and Human Rights, the ten principles of the LN Global Compact & the International Labor Organization Declaration on Fundamental Principles and Rights at Work.

We are committed to uphold and respect human rights for all people:

- Health & Safety - The wellbeing of our employees is of great importance to us, and we constantly work to maintain a healthy & safe workplace by addressing and remediating identified risks of accidents, injury, and health impact.
- Labour rights - We respect our employees right to freedom of association and right to collective bargaining.
- Equality & Inclusiveness - We respect the worth and dignity of all our employees, business partners and stakeholders.

Our Ethics Code of Conduct sets a standard of business conduct and ethics that applies to its individual employees, board members, hired personnel/consultants, suppliers, intermediaries and/or others who act on Macro Offshore Management's behalf.

Suppliers must ensure that they and their subcontractors and suppliers shall respect the rights of their employees and comply with all relevant legislation, regulations in the country or countries of operation.

This shall include:

- Wage
- Benefits & working conditions.
- No child labour.
- No exploitation of vulnerable groups (e.g., illegal immigrants).
- Act according to the local laws, directives and regulations relating to slavery and human trafficking.

The above have been set out in the following policies:

- Human Rights Policy
- Ethics Code of Conduct
- HSEQ Policy

We are ISO 9001, ISO 14001 & ISO 45001 certified, to ensure that we maintain and place quality management system guidelines at the center of our organization.

We have initiated a Human Rights Due Diligence questionnaire based on the OECDs Guidelines for Responsible Business Conduct.

A dedicated team has been put in place to assess the human rights risks in our own operation, including suppliers, and based on the outcome we are committed to introduce any necessary measures.

IDENTIFICATION AND ASSESSMENT OF ADVERSE IMPACTS IN OPERATIONS, SUPPLY CHAIN AND BUSINESS RELATIONS

We have assessed risks in both our operation and our supply chain:

Risk assessment of own operation:

We have conducted risk assessment to identify the highest risks specific to our operation.

Based on the fundamental Human Rights Conventions we have identified the following two human rights that pose a risk:

- Right to equality before the law, equal protection of the law, and rights of non-discrimination.
- Right to just and good working conditions.

Risk assessment of supply chain:

Risk assessment of the supply chain has been divided into two categories:

- Key crewing suppliers have been asked to conduct Human rights due diligence, which has been used as part of risk assessment according to the Norwegian Transparency Act (Åpenhetsloven, 2021).
- Critical suppliers have been identified and the Supplier Evaluation tool has been utilized in the evaluation process.

We have identified the following human rights risks:

- Right to not be subjected to slavery or forced labour.
- Right to equality before the law, equal protection of the law, and rights of non-discrimination.

CEASING, PREVENTION, OR MITIGATION OF ADVERSE IMPACTS

Macro Offshore is committed to creating a fair and positive working environment. Our Code of Conduct sets clear principles to ensure ethical conduct of business. Our employees are encouraged to report any potential Human Rights violations, and whistleblowing tools are in place to facilitate this.

In FY22 there has been no cases raised linked to human rights.

TRACKING IMPLEMENTATION AND RESULTS

The Managing Director is responsible for human rights management system by monitoring and reviewing its practices and policies.

COMMUNICATING HOW IMPACTS ARE BEING ADDRESSED

Macro Offshore commits to communicate Report on human rights impact annually to fulfil its reporting obligations under the Norwegian Transparency Act (Åpenhetsloven, 2021). Report is available on company's website.

GRIEVANCE MECHANISM AND REMEDIATION

Macro Offshore promotes transparency and openness in all its activities, therefore all its employees, subcontractors, and business partners are encouraged to report any violations.

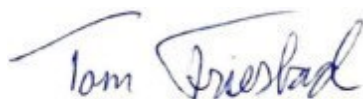
All grievance cases raised through Macro Offshores internal channels are managed by HSEQ Manager through a standardized process described in "Whistleblowing" procedure.

ACCESS TO INFORMATION REQUESTS

According to section 6 of the Transparency Act, any person has the right to information from and enterprise regarding how the enterprise addresses actual or potential adverse impacts in accordance with the Act. Such requests shall be addressed by Macro Offshore Management within a reasonable time and no later than three weeks after the request has been received.

(Åpenhetsloven, 2021, § 6). Such requests should be directed to the Managing Director.

Sandnes, 18th April, 2023

A handwritten signature in blue ink that reads "Tom Friesstad". The signature is written in a cursive style with a long horizontal stroke at the beginning.

MACRO OFFSHORE MANAGEMENT AS

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NORWAY