

SUSTAINABILITY POLICY

Introduction

Since its inception in 2012, Shelf Drilling Ltd (“Shelf Drilling” or the “Company”, or the “Group”) has placed sustainability at the core of everything we do. At Shelf Drilling we define sustainability as achieving commercial profitability in a way that is consistent with our fundamental ethical values and with respect for individuals, the environment and society. Our commitment to sustainability is also expressed through our core values:

- “Protect” yourself, your team, your asset and our environment
- “Lead” by conducting business ethically, with responsibility and accountability
- “Execute” business by delivering outstanding performance for all our stakeholders

Shelf Drilling is committed to protecting the environment, establishing health and safety standards, respecting human rights and upholding ethical business conduct. We strive to actively engage with our stakeholders and operate in strict accordance with applicable regulatory frameworks and good business practice.

This sustainability policy sets forth the basic principles for business practices, management approach and personal behaviour for Shelf Drilling. Drawing on key existing policies, requirements and standards, the sustainability policy provides stakeholders with an overview of how Shelf Drilling is committed to and operationalizes its sustainability work.

Scope

The policy applies to all employees of the Group, as well as persons/entities holding a position of trust with the Company and hired consultants acting on behalf of the Company.

Standards and Applicability

Shelf Drilling’s sustainability policy is based on our commitment to internationally recognized principles and guidelines including:

- UN Global Compact (UNGC)
- The Fundamental Labour Conventions of the International Labour Organization (ILO)
- UN Guiding Principles on Business and Human Rights (UNGP)
- OECD Guidelines on Responsible Business Conduct
- The Foreign Corrupt Practices Act (FCPA) and the UK Anti-Bribery Act
- The Task Force on Climate-related Financial Disclosures (TCFD)
- The UN Sustainable Development Goals (UN SDGs)

Sustainability Reporting Governance

Shelf Drilling is committed to transparent and responsible sustainability reporting, aligning with key sustainability reporting frameworks and regulations such as the EU Corporate Sustainability Reporting

Directive ('CSRD') and European Sustainability Reporting Standards (ESRS), the Norwegian Transparency Act (NTA), CDP, the UK Modern Slavery Act (MSA) and the Task Force on Climate-related Financial Disclosures (TCFD).

The Board has delegated responsibility to the Audit Committee for overseeing Shelf Drilling's sustainability reporting, as outlined in the Audit Committee Charter. Its responsibilities include engagement with auditors, monitoring of sustainability reporting processes and controls, and the fulfilment of other sustainability-related obligations, including approval of Sustainability Statement and Annual Report prior to publishing.

Additionally, the governance for sustainability reporting is incorporated into our Company Management System (CMS). The Sustainability Reporting process in the CMS defines management committee level accountabilities and responsibilities relating to key processes, such as the Double Materiality Assessment, the management of Impacts, Risks and Opportunities and processes relating to Sustainability Reporting as a whole.

Key Sustainability Areas

1. Climate and Environment

a. Environmental Sustainability

Shelf Drilling recognizes the value of protecting the climate and our natural environment and operates in compliance with the relevant environmental regulations and strives to reduce any negative impact on climate and the environment from our activities. Shelf Drilling has implemented comprehensive environmental policies, processes and systems and utilizes an integrated management system to monitor performance throughout all offshore and onshore operations. Environmental performance, including energy efficiency, is tracked in our HSE reporting system, and a monthly HSE report is produced for Management and the Board, and any incidents are reported to the relevant authorities.

b. Resource Use & Waste

Shelf Drilling aims to promote awareness, knowledge and innovation by educating its employees on how they can support the Company's efforts including the minimizing and reduction of waste from our operations. Shelf Drilling looks to maximize the recycling of equipment which makes good business sense while further limiting the impact on the environment.

c. Pollution & Biodiversity

Shelf Drilling is committed to mitigating impacts on biodiversity and ecosystems through pollution control, as outlined in our HSE policies. These policies emphasize the company's dedication to zero discharge of any environmentally harmful substances, particularly with regard to marine ecosystems. In alignment with these principles, no contaminants are permitted to be discharged into the ocean without prior treatment. Contaminants that cannot be treated onboard are securely stored and returned to shore for safe and compliant disposal according to local regulations.

d. Rig Recycling

Shelf Drilling is committed to the recycling and dismantling of Rigs at the end of their useful life in accordance with applicable laws and regulations and minimize risk to the people and the environment. Our commitment is defined in our Rig Recycling policy and for detailed requirements, kindly refer to the document available on website.

2. Our People and Human Rights

a. Health & Safety

Shelf Drilling's operations present a variety of potential risks to our people and to the environment. Shelf Drilling sees the safety of employees, customer representatives, and service providers as our greatest responsibility. Our Management and employees are responsible for creating and working in an environment that results in an incident-free workplace where no one gets hurt. All employees at Shelf Drilling are given the necessary training, tools and empowerment to be individually responsible for the safety of themselves, their co-workers, and the environment. We have also implemented comprehensive HSE policies and requirements processes which are in line with industry best practice. Shelf Drilling's commitment to the health and safety of our employees is outlined in our Code of Business Conduct and Ethics.

b. Human Rights, Freedom of association & Collective Bargaining

Shelf Drilling is committed to respecting fundamental human and labour rights, as described in the UN Guiding Principles on Business and Human Rights, which includes the International Labour Organization (ILO) Fundamental Conventions, both in its own internal business and in its relations with business partners, suppliers, customers and others who are directly affected by the Group's activities.

In particular, Shelf Drilling respects the right to freedom of association and collective bargaining, the right to privacy, employment contracts; the Company strictly forbids the use of forced and compulsory labor, child labor, modern slavery, human trafficking and discrimination in respect of employment and occupation.

Shelf Drilling meets its commitments in relation to human rights and working conditions by conducting human rights due diligence within its own operations and value chain. This includes maintaining monitoring and accountability mechanisms that support management of potential and actual identified human rights issues. Our commitment to Human Rights is outlined in our Norwegian Transparency Act and UK Modern Slavery Act Statement, available on our website.

c. Diversity, Equality & Inclusion

The Company is committed to equal opportunity and non-discrimination, and this governs all terms, conditions, and actions related to recruitment and employment as described more fully in our Code of Business Conduct and Ethics. The Company will not tolerate discrimination or harassment of any form in either the workplace or other work-related environment. We are committed to establishing and maintaining a work environment in which all individuals are treated with respect and dignity. We believe in driving employee performance and development by providing access to professional and personal growth opportunities.

d. Reporting & Non-retaliation

Shelf Drilling is committed to promoting and sustaining a culture where everybody is comfortable to report concerns on actual or suspected illegal, dangerous or any other act in breach of Company regulations or law. Anyone who, in good faith, raises a concern about a possible compliance breach, will be supported by management, and not be subject to retaliation.

Shelf Drilling has established various channels through which employees and third parties can ask compliance and ethics questions, raise concerns and report actual or suspected wrongdoings, confidentially and when requested, anonymously. Incidents are reported to the Audit Committee of

the Board and followed up on by an investigations team who report back on the outcome and actions taken (where relevant).

3. Responsible Business Conduct

a. Business Conduct & Ethics

Shelf Drilling is committed to honest, transparent and ethical conduct in our dealings with Customers, Suppliers, Government Agencies and other parties. We further expect the same conduct from suppliers and contractors who act on behalf of or with the Company.

Our commitment is defined in our Code of Business Conduct and Ethics (“the Code”) which all employees and contractors are required to acknowledge. Annual training and recertification to the requirement of the Code and its supporting policies are specific requirements for all management and other defined employee groups.

b. Confidentiality & Data Protection

The Code also defines requirements for our employees and contractors to manage confidential information and ensure safe use of Company assets, including our IT systems. Data privacy requirements have been defined to ensure that the Company is in compliance with the relevant legislations, including General Data Protection Regulation (GDPR).

c. Anti-corruption

Shelf Drilling has zero tolerance for corruption and has adopted a Global Anti-Corruption Policy, which requires all employees and third-party representatives to comply with applicable anti-corruption laws and regulations in countries where we conduct business, including the U.S. Foreign Corruption Practices Act (FCPA) and the UK Bribery Act 2010.

The Global Anti-Corruption Policy is further supported by specific policies or requirements covering the prohibition of facilitation payments as well as procedures for accurately documenting and approving gifts, meals, travel and entertainment.

d. Vendor Code of Conduct

Shelf Drilling’s selection of vendors and agents will follow the Company’s tiered vendor due diligence process which will be completed prior to any commitment undertaken for goods and services to be provided. All vendors will adhere to the Vendor Code of Conduct which is a contractual requirement for them to be engaged. Where relevant, contractual terms will follow the Company’s master agreements to ensure fair and equitable terms and conditions for all parties. For detailed requirements, kindly refer to the Vendor Code of Conduct document, available on our website.

Policy Review

The Audit Committee of the Board reviews and approves this policy on an annual basis.