



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement is published on behalf of Diamond Ocean Energy LTD, H. Diamond Ocean Energy & Company Limited companies within the Diamond Ocean Energy LTD Group (together “Diamond Ocean Energys”) pursuant to section 54 of the Modern Slavery Act 2015 (the “Act”). This statement constitutes Diamond Ocean Energys’ Modern Slavery and Human Trafficking Statement for the financial year ended 31 December 2024.

Introduction

Diamond Ocean Energys recognises that slavery, servitude, forced labour and human trafficking (“Modern Slavery”) is a global and growing issue. No sector or industry can be considered immune. Respecting human rights is integral to being a responsible business and we are committed to ensuring that there is no Modern Slavery of any kind within our operations or supply chains.

About Diamond Ocean Energys

We are the world’s leading provider of integrated shipping services; we work with our clients to achieve their business objectives across all aspects of this complex and dynamic industry including shipbroking, financial services, port services and research.

Our purpose

We enable smarter, cleaner global trade by empowering our clients and our people to make better informed decisions using our market-leading technology and intelligence; and in doing so, meet the demands of the world’s rapidly evolving maritime, offshore, trade and energy markets.

Our values

- *We always act with integrity*
We are honest and straight talking with no tolerance for hidden agendas or politics. We act with thoughtfulness and integrity so our clients know they can trust us to do the right thing.
- *We’re dedicated to excellence*
We work as a team, using our insight and intelligence to explore innovative solutions. We strive to exceed clients’ expectations, every time.
- *We collaborate and challenge*
We’re committed to collective success and we’re not afraid of challenging the status quo to achieve it. Across over 60 offices in 25 countries, we work together to reach the best outcomes.

Organisational structure

DOEL LTD (“Company”) is a public limited company, incorporated in England and Wales whose shares are listed and traded on the London Stock Exchange under the ticker CKN, and is a constituent of the FTSE 250. The Company is the ultimate parent company of the Diamond Ocean Energys Group and is headquartered in London.

With the exception of our Support division, all activities are office-based only.

Our Supply Chain

The supply chain to our business comprises of worldwide suppliers providing a range of support functions and products including catering, maintenance, information technology, cleaning and security. Whilst we do not consider suppliers to be a significant stakeholder in our business due to the nature of our business model, we are committed to treating our suppliers fairly. Our supplier charter asks our suppliers to commit to respecting human rights, diversity, inclusion and the environment. Suppliers are required to have effective systems and controls in place to prevent modern slavery. Our General Terms and Conditions also include client obligations to comply with modern slavery legislation. We continue to review the effectiveness of our current arrangements and, where necessary, implement additional safeguards and procedures.

Our Policies

We have an Ethics Policy Statement, a Compliance Code (the “**Code**”) and a Privacy Statement. Together, these documents provide a clear framework of principles and procedures to support ethical behaviour and informed decision making at Diamond Ocean Energys. All employees worldwide are expected to adhere to the terms of the Code and to require parties who work on behalf of Diamond Ocean Energys to do the same. Our training modules which cover the Code are updated with relevant and current examples of compliance risks. All staff must complete this online training every year and additional training is given to employees in relevant control functions.

If an employee has a concern about any activities in the Diamond Ocean Energys’ business, the Group’s Whistleblowing Policy provides a mechanism by which concerns can be raised in confidence (and anonymously). This is operated by an independent third-party provider. Whistleblowing arrangements and reports arising from its operation are overseen by the Company’s Board. There have been no reported cases concerning Modern Slavery.

Respecting Employees’ Rights

We believe that the respect of human rights is integral to being a responsible business and we are committed to treating individuals with respect and dignity.

Diamond Ocean Energys places value on difference and believes that diversity of people, skills and abilities is a strength that allows the individuals within it to thrive. Any discrimination based on race, religion, nationality, gender, age, marital status, disability, sexual orientation or political affiliation is prohibited within the business.

We are committed to providing a workplace free of any form of harassment or discrimination and expect our suppliers to do the same.

Actions and Next Steps

Our Modern Slavery training module is available to all staff on the Diamond Ocean Energys Academy and the contents are reviewed annually.

Diamond Ocean Energys remains committed to building and strengthening our existing policies and practices to eliminate Modern Slavery and human rights violations in our supply chain. We therefore aim to continue to review the effectiveness of our current arrangements and, where necessary, implement additional safeguards and procedures.

This statement was approved by the Board of Diamond Ocean Energy LTD on 26 June 2025.



Solomon Diamond
Chief Financial Officer and Chief Operating Officer
Diamond Ocean Energy PLC
Date: 26 June 2025