



## Maersk Drilling

# The Maersk Principles of Conduct – in practice

The Maersk Principles of Conduct, introduced in 2007 as a natural extension to our strong values, govern how Maersk Drilling conduct business. The principles were revised in 2009, to align them to our obligations as a signatory to the UN Global Compact.

Taking into account long-term economic, social and environmental perspectives, the Maersk Principles of Conduct form part of our approach to sustainability and play a significant role in implementing sustainable business practices to ensure continued growth and success for our business.

By presenting the Maersk Principles of Conduct in this booklet, we hope to broaden awareness and daily application among Maersk Drilling employees. The principles guide what we stand for as a company and they govern how each location and employee engages with internal and external stakeholders. We encourage all employees to embrace the principles and contribute to the success of Maersk Drilling.

We sincerely value your opinion and we encourage you to contact the listed contacts under each principle, should you have any questions or comments.

If you believe a violation of a law or policy has occurred, we encourage you to report your concern internally, i.e. to your manager or legal department. If you feel that you cannot report internally, report on the Group Whistle-blower System. For more information visit the Maersk Drilling intranet/tools & quick links.

- Supporting and respecting internationally proclaimed **human rights**
- Responsible **business behaviour**
- **A good place to work**
- Protecting **health and safety**
- Maintaining **high security standards**
- Supporting **our customers**
- Protecting **the environment**
- Engaging **with society**



Claus V. Hemmingsen

CEO of Maersk Drilling

15 July 2011



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# Supporting and respecting internationally proclaimed human rights

- We respect human rights and endeavour to ensure that we do not contribute to human rights violations.

## HOW DO WE SUPPORT AND RESPECT INTERNATIONALLY PROCLAIMED HUMAN RIGHTS AT MAERSK DRILLING?

Human rights are “the rights and freedoms to which all humans are entitled”, and we work within this field across the organisation to sustain legitimacy in the many locations where we conduct business. Internationally proclaimed human rights are supported and protected through our policies. We support diversity and inclusiveness and respect fundamental freedom for all humans without distinction as to race, sex, language, or religion. Moreover, we seek to uphold basic human rights for our employees and third party contracted people and reflect our genuine commitment through our words and actions to secure that everyone is treated properly.

To live up to this responsibility we comply with international regulations and standards on human rights and our suppliers have to act in accordance with the ‘third party code of conduct’, which includes observance of:

- Fundamental human rights (freedom, justice)
- Social justice (equality, solidarity)
- Human dignity (mutual respect, decent treatment)

The HR organisation is accountable for formalising and encouraging respect for human rights issues in work processes, but all employees have a shared responsibility to support internationally proclaimed human rights.

## WHAT CAN I PERSONALLY DO?

- Discuss with your colleagues how to support and respects human rights
- Read and comply with the CSR Policy
- In your actions, respect equal rights of all nationalities, genders, religions and sexualities
- Pay attention to how you and your colleagues can protect human rights, and intervene / coach if necessary
- Discuss incidences of disrespect towards human rights with your colleagues
- Report to your immediate manager if you witness situations of human rights violations
- Report violations in Maersk’s global whistle-blower system

## WHO KNOWS SOMETHING ABOUT THIS?

Human Resources Department, Lyngby



# Responsible business behaviour

- We conduct our business in an ethical and lawful manner, and we will promote the same business behaviour within our sphere of influence.
- We work against all forms of corrupt practices, including bribery and extortion.
- We compete fairly everywhere we do business.
- We are committed to promoting sustainable business practices in our supply chain.

## HOW DO WE ENSURE RESPONSIBLE BUSINESS BEHAVIOUR AT MAERSK DRILLING?

At Maersk Drilling we conduct our business in an ethical and lawful manner. We strive to be responsible in our activities, globally as well as locally, to preserve a reputation for being a trustworthy business partner and to build and maintain strong stakeholder relationships. We conduct business in a responsible way by complying with our anti-corruption policy and responsible procurement policy.

Maersk Drilling and our suppliers actively work to prevent all forms of corrupt practices and all our suppliers should live up to our 'third party code of conduct'. We are committed to working with our partners to promote responsible practices in general and throughout our supply chain around the world. To improve our efforts we will cooperate with governments, NGOs, business partners, industry organisations, and others working against corruption globally.

## WHAT CAN I PERSONALLY DO?

### Anti-corruption

- Attend available training on anti-corruption compliance to learn how to minimize the risks of bribery and how to avoid it
- Discuss corruption with your colleagues
- Do not accept that business partners pay for flight and hotel when participating in events
- Record gifts, entertainment or meals exceeding USD 100 in the hospitality book on Group Legal's intranet page no later than 3 working days after the occurrence of the event. Gifts such as wine, chocolate, tie, scarves, etc. may be accepted. The same

applies for gifts commonly received at occasions such as anniversaries and birthdays

- Record and report any unavoidable facilitation payment to your immediate manager
- Report to your immediate manager or to the Group whistleblower system if you suspect any corrupt practices
- Report any request for a bribe to your immediate manager
- Refuse all requests for bribes in any form

### Responsible procurement

- Make sure that suppliers comply with our 'third party code of conduct'
- Conduct thorough due diligence when selecting business partners
- Make sure to formalise contracts and arrangements in writing prior to commitment or work start
- Integrate sustainable thinking in supply chain decisions and risk assessments
- Treat suppliers fairly and equally in all tender processes
- Verify that suppliers conduct business in an ethical and lawful manner and act with integrity and in compliance with applicable laws and terminate contracts if not

## WHO KNOWS SOMETHING ABOUT THIS?

Anti-corruption: Legal Department, Lyngby

Responsible Procurement: Procurement Department, Lyngby



# A good place to work

- We treat every employee with respect and dignity and are committed to creating a working environment free from discrimination and harassment, and one in which diversity is encouraged.
- We respect our employees' rights to associate freely – to form and to join, or not to join, trade unions – and to bargain collectively.
- We do not tolerate any form of forced or compulsory labour.
- We prohibit the use of child labour.

## HOW DO WE ENSURE THAT MAERSK DRILLING IS A GOOD PLACE TO WORK ?

At Maersk Drilling, we aim to attract and retain the best skilled employees by ensuring that every employee is treated with dignity and respect – wherever they work. Maersk Drilling operates in various parts of the world and employs thousands of people representing diverse cultures and varied local legislative requirements. As an international company committed to delivering the highest quality of products and services, providing a good place to work is imperative and we secure this by complying with our global labour principles.

Maersk Drilling offers employees compensation and employment-related benefits on a competitive basis, equivalent to at least minimum wage where specified and the mandated benefits required by law. The HR department has taken the lead and ownership of upholding and encouraging Maersk Drilling as a good place to work. Each Maersk Drilling location and each employee nevertheless has a shared responsibility.

In Maersk Drilling we are committed to providing a healthy, safe and secure working environment. We do this by providing the necessary facilities, training and protective equipment. We shall

contribute positively in maintaining and improving our good working environment by embracing equal opportunity and diversity and respecting our colleagues.

## WHAT CAN I PERSONALLY DO ?

- Contribute to the working environment with a positive attitude
- Read and comply with the CSR Policy
- Live our values
- Support diversity
- Show fairness, decency and respect for others
- Report to your immediate manager, if you experience we are not in accordance with this principle
- Report serious violations in the Group whistle-blower system

## WHO KNOWS SOMETHING ABOUT THIS ?

Human Resources Department, Lyngby



# Protecting health and safety

- We are committed to providing all people working under our direction with a healthy and safe work environment, and continuously strive to improve our performance.

## HOW DO WE PROTECT HEALTH AND SAFETY AT MAERSK DRILLING ?

Safety is a top priority at Maersk Drilling. We want every employee to be safe and sound after each working day. We are committed to maintaining a safe working environment and our goal is simple, yet ambitious: We want to be a company with zero accidents! To reach the goal of being one of the healthiest and safest places to work in our industry, we must all commit ourselves to the task. No matter what we do or where in the company we are, we must keep safety in mind and stop any activity that feels unsafe.

A significant tool to maintain a safe working environment is our commitment to the management of occupational health. We aim to continuously improve occupational health among our employees as well as contracted and third party personnel. For this reason we assess risks associated with the nature of our operations by identifying and mapping workplaces and jobs, and performing measurements and assessments of:

- Noise & vibration exposures
- Illumination levels
- Climate
- Ergonomical exposures
- Chemical exposures
- Psychosocial relations
- Work related absenteeism and illness

Operationally, our safety observation system ACTIVE points us to both process risks and behaviour-related occupational risks. We provide the tools for managing both major hazards and occu-

pational health risks in our systems, and we will use a risk based approach to managing change. By following the leadership of our QM/HSE organisation throughout our daily operational tasks and activities, we become more aware of potential risks and better able to manage existing risks and ultimately avoid accidents.

## WHAT CAN I PERSONALLY DO ?

- Read and comply with the HSSE Policy
- Get familiar with the core management system processes that are part of your daily routines
- Raise your awareness of hazard management and of how your daily actions can impact the overall level of safety of the unit
- Be responsible for your own actions and inspire others to follow our safety rules
- Acknowledge that a healthy lifestyle can improve your performance and well-being
- Maintain the barriers you are responsible for
- Be active in reporting and when performing Safe Job Analysis
- Say stop when a situation does not feel safe
- Report if anything can be improved to enhance safety and health issues
- Learn from mistakes

## WHO KNOWS SOMETHING ABOUT THIS ?

Head of QM/HSE, Lyngby

Locally, contact the Rig Team HSE Advisor



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# Maintaining high security standards

- We endeavour to take all precautions necessary to maintain high security standards and security awareness within our organisation at all times.

## HOW DO WE MAINTAIN OUR HIGH SECURITY STANDARDS AT MAERSK DRILLING ?

Security is an integrated part of our business - onshore and offshore - for our employees, our customers and our suppliers. In close cooperation with the responsible authorities, we assess risks and implement measures to constantly maintain the highest security standards within the organisation. We strive to be recognised as a reliable and accountable company by keeping our internal and external stakeholders protected. To prevent breaches of security associated with our operations we report and investigate any breaches of security to improve our standard. Maersk Drilling ranks security considerations very highly in managing our business.

In recent years there has been an increasing focus on security issues in maritime and marine operations. The initial focus was mainly on issues related to terrorism, but has since broadened to encompass:

- Piracy and armed attack
- Contraband smuggling
- Cargo/general theft
- Collateral damage such as unintended damages or injuries caused by an external action

At Maersk Drilling, the majority of security responsibilities are handled by the Chief Security Officer (CSO). Each rig has its own Unit Security Officer (USO) who is trained to handle security issues on board the rig. The USO is required to ensure that the content of the International Ship and Port Facility Security Code (ISPS) is effectively implemented during daily operations, keeping our employees and assets secure.

## WHAT CAN I PERSONALLY DO ?

- Read and comply with the HSSE Policy
- When travelling to high risk countries always contact the local site for security advice
- Onshore, always follow your guests to and from the reception
- Take responsibility for your own action and inspire your colleagues
- Learn from mistakes
- Report all security breaches internally, to share information, knowledge and best practices

## WHO KNOWS SOMETHING ABOUT THIS ?

Chief Security Officer, QM/HSE Department, Lyngby  
Locally, contact the Rig Team HSE Advisor



# Supporting our customers

- We wish to be recognised as a reliable, trusted and engaged partner in all our business dealings.

## HOW DO WE SUPPORT MAERSK DRILLING'S CUSTOMERS?

At Maersk Drilling our ambition is to establish ourselves as the provider of the best drilling services in the industry, while getting even closer to our customers. We want to support our customers in every way possible, both commercially and operationally. Therefore we work on two levels. Commercially we seek to engage in a closer dialogue with customers when deploying rigs. Operationally we strive to deliver safe and consistent drilling, demonstrating superior performance. Our aim is to maintain close relationships and increase customers' loyalty towards Maersk Drilling and of course to attract new customers.

## WE CONTINUOUSLY AIM TOWARDS IMPROVING OUR PERFORMANCE TO THE BENEFIT OF OUR CUSTOMERS BY:

- Introducing a dedicated Rig Manager for each rig
- Getting closer to our customers and getting our service right by considering our customers' needs and concerns
- Implementing shared KPIs with customers
- Systematically tracking performance through our Business Intelligence System
- Carrying out quarterly performance reviews

At Maersk Drilling the commercial organisation has taken the lead and ownership of upholding and encouraging the highest level of service as well as close relationships with our customers. This ambition can nevertheless only be accomplished with the help and support of all Maersk Drilling employees at every location.

## WHAT CAN I PERSONALLY DO?

- Endeavour to understand our business technologically and commercially
- Engage in dialogue with our customers
- Demonstrate 'can-do' attitude
- Support our customers by listening to their requirements and report back internally
- Deliver what you promise
- Never promise too much
- Always respond to queries

## WHO KNOWS SOMETHING ABOUT THIS?

Commercial Department, Lyngby



# Protecting the environment

- We protect the environment by exercising constant care and optimising our operations, and endeavour to use natural resources responsibly and reduce our environmental impact.
- We are committed to countering climate change by striving to minimise greenhouse gas emissions from our business activities.

## HOW DO WE PROTECT THE ENVIRONMENT AT MAERSK DRILLING ?

Maersk Drilling is committed to protecting the environment, which is reflected in the emphasis we place on the environmental aspects of managing our business offshore and onshore. Maersk Drilling wants to be best in class. We want to demonstrate a proactive commitment to minimizing negative impacts on the environment and by doing so enhance our corporate credibility and license-to-operate. This includes e.g. compliance with regulatory requirements, chemical management, risk assessments, reporting on spills and engaging with clients to find good operational solutions to prevent damage to the environment. Our management system processes include measures to minimize environmental impacts.

## IN OUR PURSUIT OF PROTECTING THE ENVIRONMENT WE ARE:

- Developing an internal environmental standard to unite all environmental procedures
- Following the elimination and substitution principles on the most hazardous chemicals
- Reducing our energy consumption on our rigs
- Reducing discharges and emissions

Through target setting, awareness and training combined with monitoring, we aim to continuously reduce emissions, to avoid harm to the environment and to find innovative solutions for improvement.

## WHAT CAN I PERSONALLY DO ?

- Read and comply with the HSSE Policy
- Apply the tool box talk and safe job analysis to further implement environmental concerns in decision making and risk assessments
- Share ideas on how to reduce energy consumption
- Always consider the risk of spills when you do a job, and report any spill immediately
- Consider your personal environmental footprint. You can i.e.:
  - Reduce printouts and print on both sides of the paper
  - Change coveralls and gloves only when needed
  - Separate waste according to the set-up on your unit or office
  - Switch off lights and other electronic devices when not in use
  - Reduce water consumption and help raise water considerations world-wide
- Report immediately if you notice waste of energy
- Report if anything can be improved to reduce our environmental impact

## WHO KNOWS SOMETHING ABOUT THIS ?

QM/HSE Department, Lyngby  
General Engineering, Lyngby  
Locally, contact the Rig Team HSE Advisor



# Engaging with society

- We strive to improve the ways in which we contribute directly or indirectly to the sustainable development of the communities in which we work and society at large.
- We are committed to being accountable to our stakeholders and report publicly on our performance.

## HOW DO WE ENGAGE WITH SOCIETY AT MAERSK DRILLING?

Engaging with society helps to strengthen our license-to-operate and competitive advantage. By engaging in a frequent knowledge exchange with society, Maersk Drilling and stakeholders increase understandings and appreciation of each other's concerns. For Maersk Drilling the incentive is responsiveness to stakeholders' needs and expectations, and proactive management of issues and risks. Maersk Drilling's engagements with society are grouped into two categories; - local content and strategic social investments, and - stakeholder engagement.

Local content primarily consists of operational and contractual local investments relating to local staffing, sourcing, capacity building, services, and secondarily of community engagement and voluntary investments. Community factors such as standard of living and societal economic development are taken into account when we do business in a given location. Since our workforce and operational strength depend on the economic, social and environmental health of the communities, these relationships must always be mutually rewarding.

Maersk Drilling sees an increasing necessity to strengthen our efforts in terms of stakeholder engagement and dialogue on both a corporate and local community level. Close stakeholder relationships and partnerships play a large role in making the most of society and business related potentials.

Stakeholder engagement at Maersk Drilling is built on the internationally acknowledged AA1000 Stakeholder Engagement Standard. Focus is on the relations we build with our stakeholders, that these are consulted on various issues and that we are accountable to these stakeholders, internal as well as external.

## WHAT CAN I PERSONALLY DO?

- Know how your own organisation engages with society and share ideas on how we can improve
- Integrate social concerns in our daily operations
- Discuss with your colleagues how Maersk Drilling can make a difference in the societies in which we operate
- Do not hesitate to engage in dialogue with stakeholders on business relevant issues
- Aim for mutually beneficial stakeholder relationships
- Report all activities related to stakeholder engagement internally, to share information, knowledge and best practices

## WHO KNOWS SOMETHING ABOUT THIS?

Operations Department, Lyngby  
Communications Department, Lyngby  
CSR Function, Lyngby