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VINEYARD OFFSHORE HUMAN RIGHTS POLICY

The Board of Managers of Vineyard Offshore, LLC (“Vineyard Offshore”) oversees the management of Vineyard Offshore and its business with a view to enhance the long-term value of Vineyard Offshore for its members. The Board of Managers of Vineyard Offshore (the “Board”) has adopted this Human Rights Policy (this “Policy”) to assist in exercising its responsibilities to Vineyard Offshore and its members. This Policy is subject to periodic review and modification by the Board from time to time. This Policy and Vineyard Offshore’s limited liability company agreement, corporate governance guidelines and other policies pertaining to corporate governance and regulatory compliance, risk, and social responsibility (collectively, the “Corporate Governance System”) form the framework of governance of Vineyard Offshore. Vineyard Offshore’s Corporate Governance System is inspired by and based on a commitment to ethical principles, transparency, and leadership in the application of best practices in good governance and is designed to be a working structure for principled actions, effective decision-making and appropriate monitoring of both compliance and performance.

1. Purpose

Respect for human rights is fundamental to the sustainability of Vineyard Offshore and the communities in which we operate. We are committed to ensuring that people are treated with dignity and respect. We recognize that governments are ultimately responsible for establishing the legal framework to protect human rights within their jurisdictions. Central to our respect for human rights is our commitment to the rule of law and to compliance with the law wherever we operate. We expect our business partners, both internal and external, to have the same commitment. This policy is guided by, consistent with, and reflects the international human rights principles encompassed in the Universal Declaration of Human Rights, the International Labor Organization’s (“ILO”) Declaration on Fundamental Principles and Rights at Work, the Equator Principles, the United Nations Global Compact, the United Nations Guiding Principles on Business and Human Rights, and the Sustainable Development Goals (SDGs) approved by the member states of the United Nations.

2. Principles

- a) We respect and abide by internationally recognized human rights principles and are committed to treating people with dignity and respect, refraining from discriminatory practices, and protecting the rights of ethnic minorities and indigenous peoples.



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- b) We respect employees' right to associate, form or join trade unions and workers' right to collective bargaining, subject to applicable law and regulations.
- c) As part of our commitment to human rights, we have established internal and external mechanisms to help identify, prevent, and mitigate adverse human rights impacts resulting from or caused by our business activities. In addition, Vineyard Offshore will continue to look for ways to promote and advance human rights within our sphere of influence.
- d) We prohibit the use of child labor, forced labor, prison labor, slavery, and human trafficking.
- e) We are committed to treating all of our project team members with respect and dignity and cultivating inclusive diversity in the workplace. Our Corporate Governance System adheres to all applicable domestic laws and is consistent with the United Nations Guiding Principles on Business and Human Rights, the Equator Principles, and the ILO core labor principles concerning freedom of association and collective bargaining, nondiscrimination, forced labor, and underage workers in the workplace.
- f) We recognize that we are part of a broader community wherever we operate. In the communities where we operate, we believe that engaging stakeholders—including those from more at-risk populations—is fundamental to our respect for human rights. Where practical, we are committed to dialogue and engagement with all relevant parties in an effort to understand, assess and address areas of concern as appropriate.
- g) We are committed to providing a safe and healthy workplace and complying with applicable safety and health laws, regulations and internal requirements.
- h) We are committed to maintaining a workplace that is free from violence, harassment, intimidation, and other unsafe or disruptive conditions due to internal and external threats. Security safeguards for project team members are provided as needed and will be maintained with respect for project team member privacy and dignity.
- i) Training is an important part of effective human rights practices. We continue to work to build awareness about our human rights policies and procedures.
- j) In addition, we have adopted measures to detect human rights violations and, where appropriate, report such violations to the competent government authorities.



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- k) All our suppliers are required to abide by the Supplier Code of Ethics, pursuant to which they are (i) prohibited from using forced labor, prison labor, child labor, slavery, and human trafficking and must develop the necessary measures to eliminate and prevent the use of forced labor, (ii) must adhere to all applicable domestic laws and are consistent with the United Nations Guiding Principles on Business and Human Rights, the Equator Principles, and the ILO core labor principles concerning freedom of association and collective bargaining, nondiscrimination, forced labor and underage workers in the workplace, and (iii) must refrain from engaging in discriminatory practices and treat all their employees in a manner that respects human rights.
- l) We endeavor to create workplaces in which open and honest communications among all project team members are valued and respected. If you believe that a conflict arises between the language of the policy and the laws, customs and practices of the place where you work, if you have questions about this policy or if you would like to report a potential violation of this policy, you should raise those questions and concerns through existing processes, which make every effort to maintain confidentiality. You may ask questions or report potential violations to your direct supervisor, members of senior management, Human Resources, or the Compliance Officers. Employees can also report suspected violations through the Helpline secured website at https://secure.ethicspoint.com/domain/en/report_custom.asp?clientid=89033 or by calling 833-254-3836. No reprisal or retaliatory action will be taken against any project team member for raising concerns under this Policy in good faith.
- m) We are committed to investigating, addressing and responding to the concerns of project team members and to taking appropriate corrective action in response to any violation.