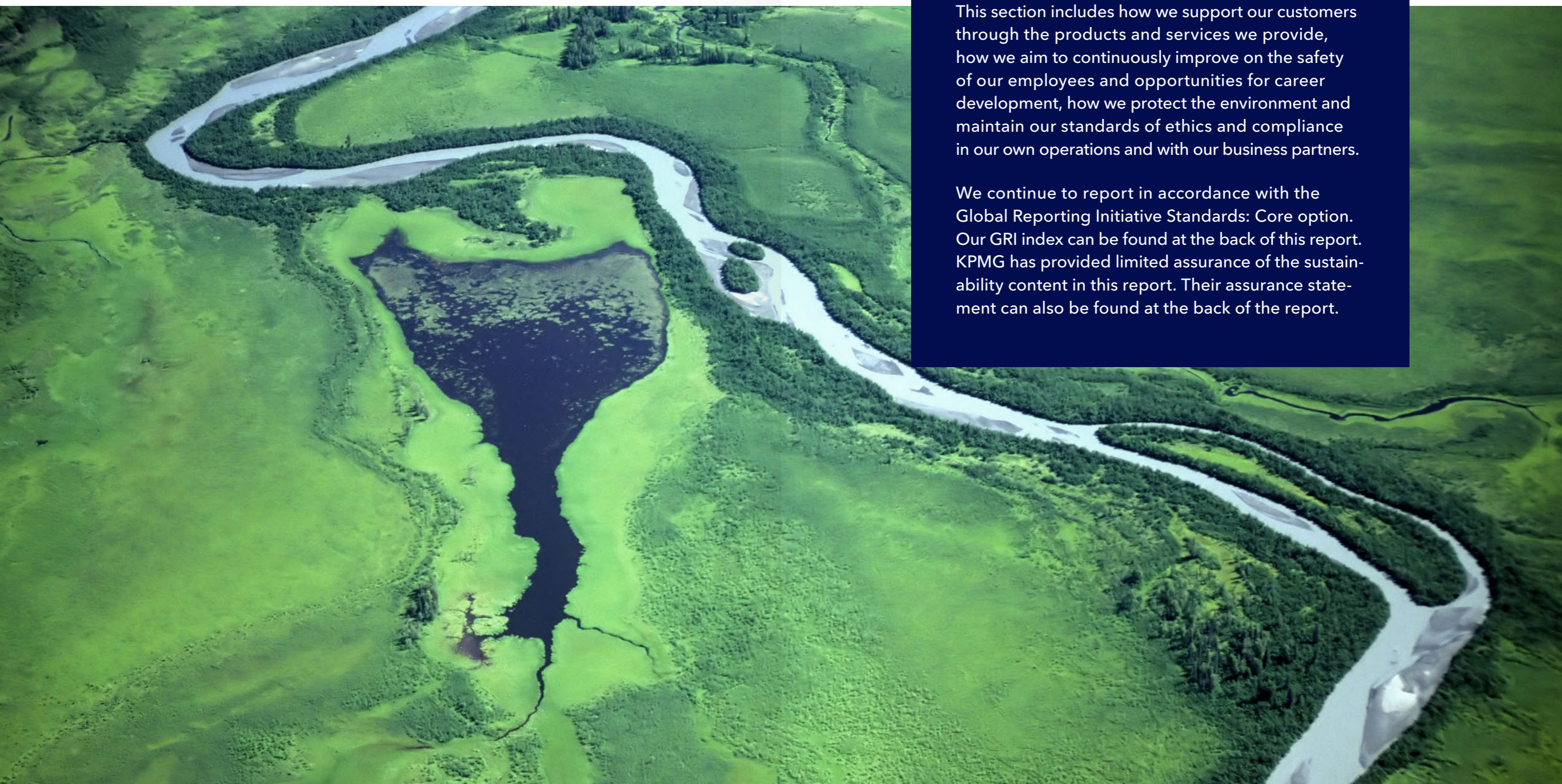


SUSTAINABILITY



Our vision of being a trusted voice to tackle global transformations sets the direction of our business and our conduct.

This section includes how we support our customers through the products and services we provide, how we aim to continuously improve on the safety of our employees and opportunities for career development, how we protect the environment and maintain our standards of ethics and compliance in our own operations and with our business partners.

We continue to report in accordance with the Global Reporting Initiative Standards: Core option. Our GRI index can be found at the back of this report. KPMG has provided limited assurance of the sustainability content in this report. Their assurance statement can also be found at the back of the report.

HOW WE MAKE AN IMPACT

We assure and advise customers on technology that can help advance safety and sustainable performance. This includes assurance services related to renewable energy, sustainable supply chains, decarbonization, energy efficiency, new fuel technologies and ship design, ESG reporting and green financing.

Guided by research

To remain relevant in today's fast-changing world, and to enable our customers and their stakeholders to confidently manage

technological and regulatory complexity, we invest 5% of our annual revenue in research and development. Our research feeds into how we develop our products and services and how we help customers seize opportunities and tackle the risks arising from global transformations.

Our research spans a wide range of areas including digital assurance, maritime, energy, ocean space, health-care and sustainable food systems and supply chains. (See the *Research and innovation* section).

A strategic approach to sustainability

Our strategy to 2025 outlines DNV's core focus areas to deliver our purpose of safeguarding life, property and the environment, and our vision to be a trusted voice to tackle global

transformations. Fundamental to the strategy are DNV's growth ambitions, including our focus on customers, sustainability and our people.

With more than 100,000 customers and operations in 100 countries, DNV is involved in an array of industries. Our customers are either affected by or pushing the boundaries of digital transformation and the energy transition, and our role is to support them every step of the way as a trusted voice to tackle global transformations.



Investing in our people

Our people focus involves supporting employees to develop their skills and grow within DNV, enabling and empowering them to make a true difference. Our employees provide the knowledge and technical expertise allowing us to help our customers achieve their business goals. We focus on our employees' career paths and their professional development, and work to promote diversity and inclusion in our workforce and foster purpose-led and future-fit leadership.

DNV's focus on employee development and well-being is described more in-depth in the [Our employees](#) section.

DNV's customer focus and growth ambitions are covered in the [CEO statement](#) and the [Board of Directors' report](#).

Sustainable business operations

DNV's sustainability strategy is twofold. On the one hand we work to become more sustainable in our own operations, and on the other we help our customers and partners reach their sustainability targets. We see the biggest impact DNV can have on sustainability being linked to the expertise and services we provide to our customers, to help them decarbonize and become more efficient in their daily operations.

To narrow down our focus, we have identified the most important sustainability topics for DNV (see material topics). Our strategy focuses on how we can enhance the sustainability of our business, in line with the UN Sustainable Development Goals (SDGs), and our goal of becoming a climate net positive company.

Supporting the Sustainable Development Goals (SDGs)



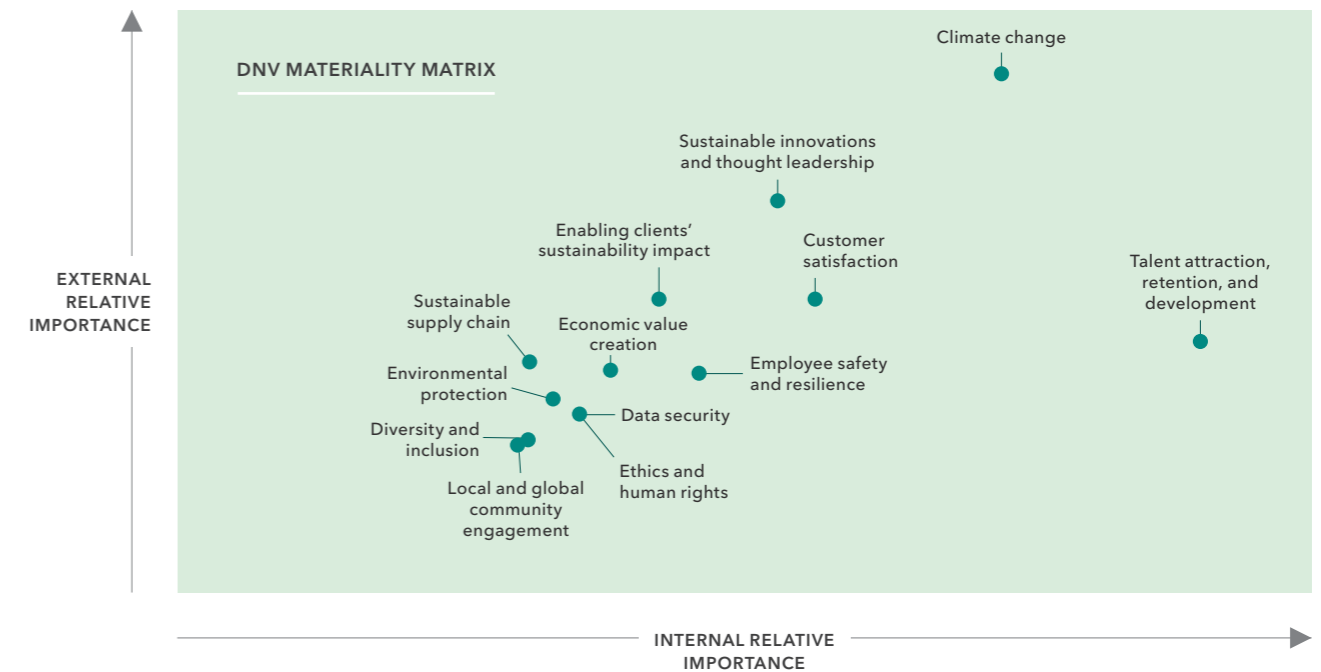
Dubbed the 'Decade of Action' by the UN, the 2020's is the decade in which humanity will succeed or fail to deliver the UN Sustainable Development Goals (SDGs). DNV contributes to the SDGs through our business activities and our strategy defines four priority Goals where DNV can contribute the most and have the largest impact:

- SDG 3:** Good health and well-being
- SDG 7:** Affordable and clean energy
- SDG 13:** Climate action
- SDG 14:** Life below water

DNV provides a wide range of business solutions that support these goals. These includes maritime solutions and clean shipping, renewable energy, safe and sustainable industrial operations and infrastructure, climate change mitigation and adaptation, technology innovations, healthcare and hospital safety and efficiency. The *Sustainable innovation* examples from across DNV business areas showcase some of the ways we work with customers to enhance sustainability and support the SDGs.

We are in the process of reviewing and classifying our products in line with the EU taxonomy for sustainable activities and to showcase how they support the SDGs. By doing so, we will be able to measure and demonstrate more clearly the impact of our work towards the SDGs and sustainable outcomes.

Material topics



Our material topics are those that matter most to our business and stakeholders, especially our employees and customers. To increase understanding of our material topics and update our last assessment from 2018, we conducted desktop research and a series of online surveys in 2021.

We researched peer and comparable companies to update and refine our material topics. Following this, we conducted stakeholder surveys in early 2022. We now have a better understanding of what matters most to our stakeholders.

Our stakeholders include our customers, employees and our owner, Stiftelsen Det Norske Veritas. Other stakeholders that are important to us are our suppliers, research institutions, industry associations, government bodies, civil society organizations, and the media.

The online survey consisted of 16 questions and was sent to internal and external stakeholders. We received almost 3,500 responses, giving a robust evidence base to assess the relative importance of our identified material topics and providing a clear view of stakeholders' priorities. Internal stakeholders included employees across all grade groups, business areas and geographies within DNV.

The external survey approached a wide range of stakeholders, and responses received mainly consisted of customers (73%) with additional input from NGOs, suppliers, regulators, media, and others (27%).

Overall, the responses provided by internal and external stakeholders on the relative importance of the topics were well aligned, although there were some subtle differences in priority. Climate change and talent attraction, retention and development were identified as most important from the list of 13 topics, while diversity and inclusion, and local and global community engagement, were considered relatively less important.

External stakeholders consistently highlighted the importance of sustainable innovations and thought leadership, especially when asked about the areas where they felt DNV could support them. Material topics on tackling climate change, enabling clients' sustainability impact, and customer satisfaction were also areas where respondents felt DNV could have the greatest impact.

For internal respondents, talent attraction, retention and development, climate change, customer satisfaction, and employee safety and resilience were considered important.

The materiality matrix above shows the results of the topics that were prioritized by internal and external stakeholders.

Our material topics as identified in our materiality assessment:

- Climate change
- Customer satisfaction
- Data security
- Diversity and inclusion
- Economic value creation
- Employee safety and resilience
- Enabling clients' sustainability impact
- Environmental protection
- Ethics and human rights
- Local and global community engagement
- Sustainable innovations and thought leadership
- Sustainable supply chain
- Talent attraction, retention, and development

Governance

Responsibility for DNV's sustainability performance lies with DNV's Group CEO and our Executive Committee. Our Board of Directors has formal oversight of DNV performance, and this is executed by the Board's Audit Committee. Our [Corporate Governance report](#) describes our governance processes in more detail.

DNV's corporate sustainability initiatives that relate to our impact on the environment and climate are managed by the Group Sustainability Development and Climate team, supported by DNV's Health, Safety Environment network and our business areas. Other material topics are managed by our Group People and Global Shared Services functions and our Ethics and compliance organization.



Reporting

DNV's definition of sustainability is broad and we report on performance relating to all our material topics in this annual report. The reporting covers how we support our customers through the products and services we provide, employee safety and resilience, employees' opportunities for career development, as well as how we protect the environment.

A significant part of our environmental reporting focuses on DNV's climate impact. We also report on our high standards of business ethics and compliance, which apply just as much to our business partners' operations as our own.

Our reporting is in accordance with the Global Reporting Initiative (GRI) standards, core option. Our GRI index can be found at the back of this report. Our auditor, KPMG, has conducted limited assurance of our sustainability report and underlying data. Their feedback and feedback from other sources, such as the World Business Council for Sustainable Development, are actively used to improve our reporting.

The sustainability information in this report covers the calendar year 2021.



Partnerships

As the challenges facing today's societies are very much global in nature, the solutions provided must also be global in perspective; combining knowledge, ideas and effort across sectors, disciplines and borders.

As a knowledge-based organization, DNV constantly seeks to learn by working closely with our peers and partners, to be challenged and inspired by them, and to also challenge and inspire them in return.

We are a signatory to the UN Global Compact and are committed to embedding its ten principles on human rights, labour, environment, and anti-corruption into our business. Our annual report acts as our Communication on Progress, outlining our progress against the ten principles and the Sustainable Development Goals. In 2021, we joined the UN Global Compact's Climate Ambition Accelerator.

We partner with the World Business Council on Sustainable Development (WBCSD). DNV has been an active member of the council since 1999 and our CEO is a member of the Executive Council. We are part of two working groups that are working towards WBCSD's Vision 2050 agenda; these relate to 'Energy Transformation' and 'Circular Economy'.

We have committed to the Science-Based Targets initiative and are working to validate our climate change goals. (See the [Environment and climate](#) section for more details).

We also have a longstanding partnership with the Norwegian Red Cross. See case study in the [Sustainable innovations](#) section for more details. We are members and active contributors to industry associations that are relevant to us such as International Association of Classification Societies (IACS).

Maritime

- Maritime International Association of Classification Societies (IACS)
- Entity for the Quality Assessment and Certification of Organizations Recognized by the European Union (QACE)
- International Council on Combustion Engines (CIMAC)

Energy Systems

- Energy Industries Council
- Global Wind Energy Council (GWEC)
- Eurelectric

Digital Solutions

- Institute of Electrical and Electronics Engineers (IEEE)
- American Gas Association (AGA)
- Norwegian Offshore Wind Cluster

Business Assurance

- Independent International Organisation for Certification (IIOC)

Supply Chain and Product Assurance

- International Association of Trusted Blockchain Applications (INATBA)

How we make an impact

¹ We wrongly reported that we are targeting a Customer Relationship Strength Score of 85 by 2025 in the 2020 Annual report. The correct goal is 86 by 2025. We have also set an interim target of 84.2 by the end of 2022 (more details on page xy).

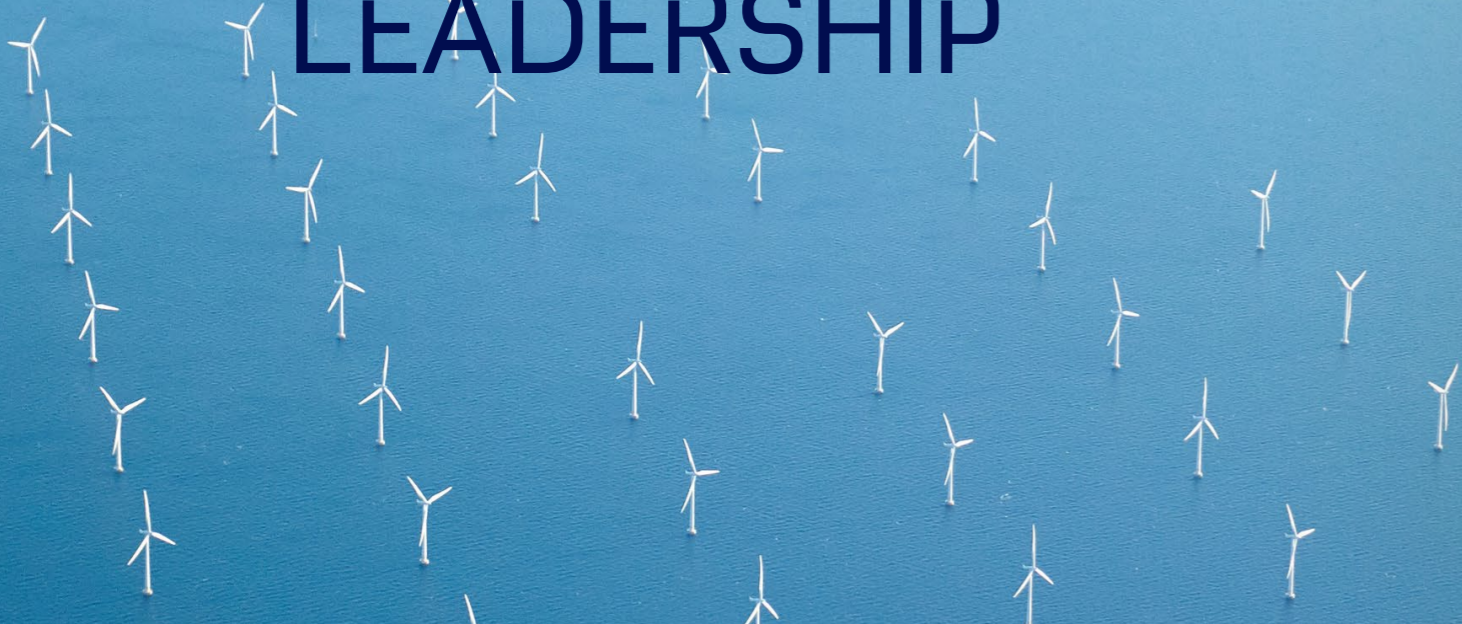
² Internal training only, 1 day = 7.5 hours.
³ 2020 total CO₂e emissions figure has been corrected from that published in our 2020 Annual Report (23,383 tonnes) due to replacing estimated data with final measurements.

⁴ New code of conduct training was launched in mid-2021, we continue to follow up to achieve our target.
⁵ As some employees are hired or leave during the year, 100% is not possible.

Our priorities	Why	Indicator	2021 performance	2020 performance	2019 performance	Our targets and ambitions
Sustainable innovations	We aim to be a trusted voice to tackle global transformations. Our customers rely on our products and services to help them operate safely and sustainably and meet their sustainability goals.	Developing ways to measure the impact of our work with customers	Under development	Under development	Under development	
Customer satisfaction	We believe that a customer-centred approach - one that delivers excellent customer experiences and creates close, value-adding relationships - leads to competitive advantage.	Group Customer Relationship Strength Score (CRSS)	84.2	83.5	N/A (CRSS was first developed in 2020)	84.2 by 2022 86.0 by 2025 ¹
Data privacy and security	The trust of our customers is crucial to our business and keeping customer data secure is an important part of maintaining this trust.	Continual improvement of information security management	Achieved Group certification to the ISO 27001 standard on information security. Data privacy is managed in line with ISO 37301 on compliance management.	Data privacy managed in line with ISO 19600 standard on compliance management.	Data privacy managed in line with ISO 19600 standard on compliance management.	Maintain Group ISO 27001 certification on information security.
Talent attraction, retention and development	Our customers expect us to provide the expert skills and knowledge that can deliver the best solutions for their needs. To support our offer, we want to attract and retain the best people, and develop their skills while they work at DNV so that they can grow and make a difference.	Average training hours per employee per year ²	Female: 19.9 hours Male: 20.3 hours	Female: 18.8 hours Male: 15.6 hours	Female: 15.1 hours Male: 17.2 hours	In 2022, we will review these processes to determine how we can improve their quality and efficiency. Recruiting capacity will be increased in order for DNV to achieve its growth ambitions.
		Employee turnover (%)	9.9%	7.4%	8.8%	
Diversity and inclusion	Diversity and inclusion in DNV is a source of strength and we must make it part of everything we do, every day. It enhances our ability to deliver on our purpose, enables us to attract and retain exceptional people, and to create an inclusive culture where all viewpoints are valued.	Deliver year-on-year improvements in how we foster an inclusive culture, promote diverse backgrounds and ensure fair access through our processes and practices.	Female-to-male ratio: 34 : 66%	Female-to-male ratio: 33 : 67%	Female-to-male ratio: 33 : 67%	We are developing new diversity and inclusion indicators during 2022 and our target will remain to make year-on-year improvements.
Employee safety and resilience	We strive to be the safest place to work, and safety is embedded in our purpose. We continually work to find improved ways to safeguard our people, support them in developing their resilience, and deliver on our purpose.	Resilience index	7.95	7.8	7.5	8.0 by 2025
		Injury rate (per million hours worked)	0.5	0.7	0.9	We strive for zero harm.
Environment and climate	Environmental sustainability is embedded in our purpose and values. Our extensive research shows that the energy transition needs to be accelerated to stay within the 1.5°C pathway of the Paris Agreement.	Greenhouse gas emissions (tonnes CO ₂ e)	16,036	21,305 ³	77,860	Reduce our CO ₂ footprint by 50% by 2025 and become climate net positive.
			10,727	Additional Scope 3 reporting available for 2021 only; no earlier comparison available		
		Renewable electricity	60% (certified)	38% (estimated) (12% certified)	25% (estimated)	100% renewable electricity by 2025.
Sustainable supply chain	Helps to manage risk in our supply chain and deliver best value for DNV sustainably and according to our Supplier Code of Conduct.	Supplier risk assessment and audits	11	11	13	10 (minimum) supplier audits in 2022.
Ethics and compliance, integrity, anti-corruption, fair competition, and human rights	Our vision is to be a trusted voice for our customers. Our stakeholders and every one of us has a role in protecting our independent position and upholding our code of conduct. We emphasize this through high awareness and training.	Percentage of employees that completed DNV's mandatory e-learning	96% ⁴	99%	99%	99% ⁵
Economic value creation	Economic sustainability is a prerequisite for running our business and for retaining our independence.	EBITDA (million NOK)	3,673	3,481	3,529	

OUR CUSTOMER STRATEGY

1 SUSTAINABLE INNOVATIONS AND THOUGHT LEADERSHIP



DNV has an ambitious sustainability agenda with regards to how we conduct and operate our business. Our greatest impact, however, is how we work with customers to help them achieve their sustainability goals and in doing so amplify the impact we have. In support of this, we invest over 5% of our revenues in research and development, a reinvestment in R&D above most of the companies that we serve. To read more, see the *research and innovation* section.

Helping customers make an impact

The following projects are examples of how we help customers make an impact. We are working to quantify how DNV contributes to decarbonization and the SDGs.

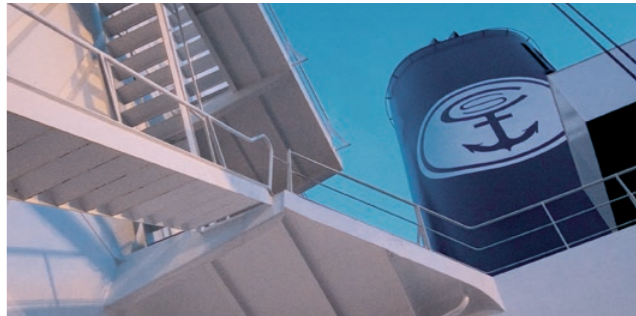
Maritime

Belships collaborates with DNV to modernize its fleet and optimize existing vessels

DNV's Maritime business area supported Norwegian shipowner, Belships ASA, to use Environmental, Social and Governance (ESG) reporting as a tool to help them optimize their fleet in line with tightening emissions requirements for shipping and shifting market demands.

DNV performed an assessment of Belships' existing fleet, identifying operational measures to improve vessel performance and ensure compliance with upcoming emissions requirements. This included issues like antifouling programmes and engine tuning to reduce emissions and operational costs, as well as retrofitting options, voyage optimization, and improved maintenance routines.

DNV has also helped Belships document compliance with reporting requirements relating to ESG, the Energy Efficiency Existing Ship Index (EEXI) and Carbon Intensity Index (CII). This enables Belships to show investors how they will reach their sustainability targets.



Supporting Bastø Fosen's shift to electric ferries



With DNV Maritime's help, Bastø Fosen is transforming its fleet of ferries that ply Norway's busiest ferry route from Moss to Horten, setting new standards for clean, efficient and comfortable transportation with all-electric ferries. In January 2020, Bastø Fosen took delivery of Bastø Electric, the world's largest all-electric ferry. The 144-metre-long, 20-metre wide DNV-classed vessel, has a capacity for 200 cars, up to 24 heavy goods vehicles and 600 passengers.

DNV is supporting Bastø Fosen in converting two diesel-powered sister ships, Bastø IV and VI, to electric propulsion. Bastø IV was relaunched in 2021 and Bastø VI will come into operation in 2022. When this is complete, 75% of Bastø Fosen's 36,000 annual departures will be all-electric, saving 6 million litres of diesel out of a total consumption of 8.5 million litres per year.

Digital Solutions

Helping companies track their progress to net zero

In line with the Paris Climate Agreement, a growing number of companies have announced plans to achieve net-zero carbon emissions. Tullow, a multinational oil and gas exploration company and DNV customer, has committed to achieving net-zero with its scope 1 and 2 emissions by 2030.

Tullow is using DNV's QHSE (quality, health, safety and environment) software, Synergi Life, to track emissions and progress against its decarbonization plan as well as safety incidents. Synergi Life's dashboard enables Tullow to use the data to manage their operations effectively, in a safe and sustainable way and has helped to identify options to reduce emissions by 40-45%. Using Synergi Life, Tullow can capture and compare emissions data and report against Global Reporting Initiative (GRI) reporting standards within their annual sustainability report.

Energy Systems

The world's first multi-megawatt integrated solar and green hydrogen power plant

DNV gathered an international, multi-disciplinary team from to provide technical advice and due diligence on a world-first combined solar and hydrogen power plant in French Guiana. The innovative power plant will produce 100% renewable electricity 24 hours-a-day by combining photovoltaic (PV) solar electricity with a 128 MWh of hydrogen-based energy storage.

Construction of the project started towards the end of 2021 and is scheduled for commissioning in 2024. Once complete, the power plant will supply renewable power to the equivalent of 10,000 homes in Western French Guiana preventing the emission of 39,000 tonnes of CO₂ per year. It is also estimated that the project will generate sales of around 17 million euros for local businesses.

DNV's multidisciplinary team evaluated technical risks and mitigation measures and advised on the technical status, including project description and site assessment, the license and environmental permits, the energy production modelling,

and the design and technology review assessing PV modules, inverters, battery, electrolyzers and fuel cells. We also reviewed the grid, power purchase agreement and financial model, and the engineering, procurement, and construction, operations and maintenance agreements.



Business Assurance

Ensuring authenticity of Hydro's products



Hydro, one of the largest aluminium companies worldwide, has set ambitious goals to produce and source responsibly and ultimately make zero-carbon aluminium. Supplying sustainable aluminium is a competitive edge that requires Hydro to share trusted information, documenting the footprint of the materials used and production process to customers and consumers. Hydro is using DNV's blockchain-powered Tag.Trace.Trust system to ensure the authenticity of their products' environmental profile. In essence, this is a 'product passport' with a unique digital ID that shows the product's carbon footprint and life cycle.

As the sole certification body for multiple standards, ranging from quality, environmental and energy standards to occupational health and safety, automotive and emissions, DNV helps Hydro manage quality and safety in its complex operations and lay a foundation for communication to its customers and other stakeholders. For Hydro, this is a central pillar in delivering on its purpose to develop natural resources into products and solutions in innovative and efficient ways and contributing to advancing the SDG goals.

Supply Chain and Product Assurance

Providing chain of custody certification for reclaimed ocean plastics

DNV has certified plastic reclaimed from rivers and oceans in Indonesia by Danish company, ReSea. ReSea documents each step of the plastic collection process, storing the data in a blockchain ledger that enables tracking of every reclaimed piece of plastic. The tracking system allows companies that recycle the plastic to prove they are reusing plastic collected from the ocean, ensuring trust in the recycling process.

Verifying the authenticity and origin of ocean plastics further supports transparency and credibility, proving the provenance of recycled plastics. With DNV's certification, the complete chain of custody for single parties or the entire end-to-end supply chain can be demonstrated.

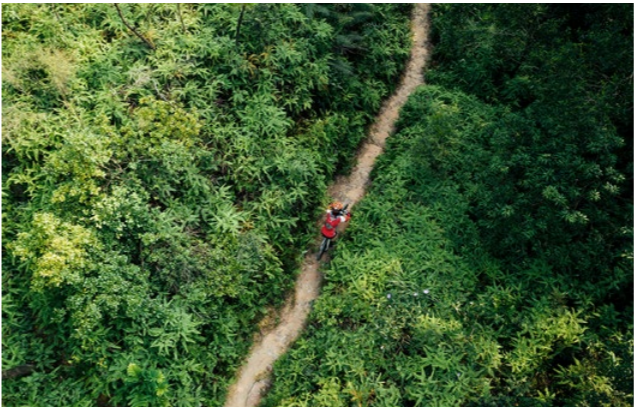
Transparency in the recycling process is key to realizing circular economy business models. Claims of the re-use of materials, and other environmental, social and ethical claims, should be verifiable. Certification of reclaimed plastics enables companies and consumers to fully trust that their purchase contributes to cleaner oceans and rivers.



In 2021, ReSea recovered 1,200 tonnes of plastic from the waterways in Indonesia and on average pays its local clean-up team 75% more than the average minimum wage in Jakarta.

Helping the Red Cross with climate accounting

DNV has been assisting The Norwegian Red Cross with creating their climate accounts. Consultants from DNV's sustainability advisory team identified the Red Cross' most important



emission sources and associated emission factors to establish the carbon footprint of their operations. Data has been collected from their 2019 baseline year onwards.

The Red Cross' climate accounts show emissions from their activities at a national and local level, and will soon include the activities of their many volunteers. The project has measured energy usage from buildings, air and car travel, their main sources of emissions. The Red Cross are currently putting in place processes to enable regular reporting, set goals and follow up on their emission reduction initiatives.

The Red Cross has also taken the initiative to develop a climate charter for non-governmental organizations. DNV supported the Red Cross' strategic group in planning a series of activities, including a preparation workshop with their local offices and a webinar for their voluntary groups to explain the climate charter and encourage other organizations to conduct climate accounting for their activities. The webinar took place in November and featured the President of the Norwegian Red Cross and included activities to secure participants involvement in the charter.

OUR CUSTOMER STRATEGY

2 CUSTOMER SATISFACTION



Our ambition and objectives

Strong customer relationships are essential to our success and our vision is to be a trusted voice to tackle global transformations. A customer-centred approach - one that puts our customers at the heart of our business - is central to our new strategy and underpins our growth plans. By delivering excellent customer experiences and creating close, value-adding relationships we can build competitive advantage and increase customer lifecycle value.

A strategic goal is to enable our customers' aspirations and we work to deliver an the best customer journey that meets customers' needs, helps them solve problems, and makes the most of their opportunities. Ultimately, our success is strongly linked to the success of our customers. Each of our business areas and Group functions is tasked with strengthening customer relationships, improving experiences and increasing customer satisfaction.

Performance in 2021

Putting our customers first

Throughout 2021, we have focused on initiatives that will support our customer centric focus and launched projects to contribute to our goal of building strong customer relationships:

Our first project focused on optimizing our customers' digital journey from 'awareness to loyalty' and supporting customer relationships with systematic customer insight. Digital customer journeys are growing in importance and we see them as a source of competitive advantage. To enhance this area, we are focusing on enhancing the DNV website, the main entry point for potential customers to discover DNV, further developing our digital products and services for new and existing customers, and implementing a voice-of-the-customer system into our customer relationship management software to collect and analyse customer feedback.

We also launched a new Customer Relationship Management (CRM) software system that improves how we approach and manage our customer accounts. Our Energy Systems, Maritime and the Accelerator business areas were first to start using the system. The Digital Solutions and Veracity business areas will launch the new system in early 2022.

Measuring satisfaction at Group level

We continue to measure customer satisfaction at Group level by gathering feedback from all business areas on three core dimensions: overall customer satisfaction; customers' preference for DNV over other suppliers; and their willingness to recommend us.

The scores across these dimensions are combined to create our Group Customer Relationship Strength Score (CRSS), which serves as a leading indicator for the Group's future business performance. It is an average score for all business areas, weighted by revenue, and the purpose is to monitor and improve the overall satisfaction trend for DNV as a whole.

Our CRSS score of 84.2 in 2021 is above our target of 84 and an improvement from 83.5 in 2020. A score above 80 is considered very good according to industry standards. We are aiming to keep our score at a high level with an ambitious target to achieve a customer satisfaction score of 86 by 2025.

TABLE 01 | CRSS DIMENSION SCORES AT GROUP LEVEL

Dimensions	2021	2020
Group CRSS	84.2	83.5
Customer satisfaction	87.0	86.1
Preferred partner	82.9	81.6
Willingness to recommend	85.8	84.7

Business area satisfaction

All our business areas conduct continuous transactional feedback surveys. In addition to this, most of our business areas also conduct more in-depth customer satisfaction studies. Differences between the business areas occur because we use different methodologies and systems to measure satisfaction.

One of the objectives of implementing a voice-of-the-customer solution within our CRM software is to have a common approach across DNV on how and what we measure with respect to customer feedback, while still allowing business areas to adapt customer feedback to their business needs.

In 2021, CRSS was measured according to the legacy business area structure as shown in the table. In 2022, the CRSS will be reported according to the new business area structure (shown on the [Group structure](#) spread).

TABLE 02 | CUSTOMER RELATIONSHIP STRENGTH SCORES 2021

Group / Business Area *	CRSS 2021	CRSS 2020
DNV Group	84.2	83.5
Maritime	79.9	80.3
Oil & Gas	89.9	89.5
Energy	90.9	87.9
Business Assurance	79.0	78.6
Digital Solutions	86.5	84.1

The DNV Group CRSS is a weighted average, based on the business area target revenue at year beginning.



Looking ahead

Throughout 2022, we will continue optimizing our customer journey to ensure our processes are fit for stakeholders and decision makers. To make this happen we will further develop our technological platforms, operating models and business models as we work to enhance our customer-centric culture. Particular areas of focus are listening to the market and applying insights into how we improve our processes and deliver services for customers, as well as responding to our customers' feedback.

We will continue to develop our CRM system in 2022, focusing on digital commerce and optimized business processes, to ensure that we deliver excellent customer experiences whether we meet in person or digitally. We will complete the roll out

of the new system to all relevant business areas and develop new functionality. This will ensure we adopt best practices for measuring, reporting, and improving customer satisfaction and relationship strength across the Group.

Brand strength

Maintaining the trust of customers and other stakeholders has enabled DNV to grow over its 158-year history. In our last brand survey, 77% of respondents expressed trust in DNV. In first half of 2022, we plan to re-run our global brand survey to update our understanding of stakeholder trust in DNV compared to our competitors. As with the previous survey, we use the results to identify trust drivers and areas where we can improve our attractiveness to existing and potential customers.

Approach

A customer-centred approach to business is anchored in our strategy and enabling our customers' aspirations is our overriding goal. For DNV this means:

- We will deliver an engaging customer experience, informed by a 360° view of our customers' needs
- Our customers recognize us for superior value creation, ease of doing business, quality and integrity – as one DNV.

Our aim is to continually serve our customers in a proactive and responsive way, including utilizing digital solutions and channels to improve their journeys and our cost competitiveness. We focus on developing a customer-centred working culture, one in which our commitment to customers drives a curiosity and desire among our people to anticipate customer needs.

The success of our customer-centred approach is measured by the value we create for the customer through projects, cross-business area sales, customer satisfaction and relationship strength, and market share within specific market segments.

Our aim is to continually serve our customers in a proactive and responsive way, including utilizing digital solutions and channels to improve their journeys and our cost competitiveness.

OUR CUSTOMER STRATEGY

3 DATA PRIVACY AND SECURITY



Our ambition and objectives

We are at the beginning of a decade that will be defined by transformations to many of our global systems – energy, transport, healthcare and food – and digital technology will be central to most of these. Automation, electrification, artificial intelligence and internet of things are just a few of the areas that will accelerate rapidly. Our strategy responds to these trends and aims to deliver future-fit services that are digital, automated and data driven. Alongside the benefits of worldwide digitalization there are digital security and data protection risks to manage. Increased cyber threats and high-profile hacking cases show the need for constant vigilance

across our business. We invest widely in systems and awareness raising to manage our data security and protect personal data.

DNV is also making significant investment to support our customers in managing emergent cyber security risks. DNV provides real-world cyber security expertise to some of the world's most complex infrastructure projects, helping customers identify their cyber risks, build powerful defence against threats, recover from attacks and win stakeholder trust and support. To read more, see [The Accelerator](#) section.

Progress in 2021

Data security

In June 2021, we achieved Group-wide certification to the ISO 27001 standard on information security, replacing previous certifications held across different parts of the business. We also created a cyber team to enhance governance of DNV's cyber security and software development.

We set up an information security risk forum in March 2021 with participants from all business areas, our Veracity IT platform, Global Shared Services (GSS) IT and Group functions. The forum works to identify, assess and mitigate information security risks and report these to the DNV risk manager as part of our quarterly risk reporting.

Following the arrest of a former employee on espionage charges in 2020, an information security improvement task force was immediately set up to examine potential data security breaches. The task force remained in place until mid-2021, establishing a project with the Group digital & development function to improve information classification. The project began in Q3 2021 and will continue to summer 2022 with the aim of improving information handling.

Personal data protection

We conducted a follow-up data protection maturity assessment with an external provider to evaluate changes from the assessment completed in 2020. Our data maturity level improved in the areas of third-party risk management, privacy training and employee awareness.

We also addressed data protection risks during 2021 that were identified in our personal data risk assessment from 2020. This included improving processes for retention and deletion of personal data, which had the highest risk rating.

A new data protection risk assessment survey was launched in 2021 to capture input from selected internal stakeholders. The outcome of the risk assessment will be used to identify and prioritize focus areas for data protection in 2022 and beyond. Areas of focus in 2021 included the consequences of the EU-US Privacy Shield invalidity, such as necessary contractual safeguards; cookie consent; prominent personal data breach cases; and interpretation of documents related to the GDPR. We also reviewed privacy statements on our websites.

We monitor developments in the privacy landscape by participating in relevant networks, conferences and external channels.

Awareness and training

Successful data protection starts with a high level of awareness and security consciousness, and we provided further data protection training for our employees in 2021. The new mandatory express training for line managers launched at the end of 2020 was completed by 90% by year-end. The training guides line managers on handling personal data and enables them to provide guidance to their teams.

We took advantage of the international Personal Data Protection Day in January to launch a new mandatory training for all employees focused on handling personal data outside core IT systems (so-called unstructured personal data). By year-end the training had been completed by 93% of employees.

A personal data clean-up workshop for participants from our Finance and Legal functions was organized by the Global Data Protection Officer and Group compliance, focusing on handling and cleaning up unstructured personal data and advising on relevant practical follow-up actions.

COVID-19 increased the need for handling personal data related to infection and vaccination status. As a result, we took the opportunity to improve awareness related to those handling employee personal data by providing guidance on interpreting data protection law in light of COVID-19 measures.

For cyber security, a new wave of security awareness training was made available to all employees and associates covering

emerging potential threats, such as phishing emails using COVID-19-related topics. We have also increased information sharing on cyberattack incidents using our internal Yammer social media platform.

A global 'cyber and data Tuesday' series was launched in 2021 with the aim to build security and data protection competence across DNV so that employees are equipped for tackling serious IT security and data protection threats. The series was a collaboration between Group digital & development, the Global Data Protection Officer, Group compliance and Global Shared Services (GSS) IT. Nine live sessions were delivered and recordings have been made available, reaching almost 5,500 employees in total.

We launched a security black-belt scheme for our software developers, where developers can advance their software security knowledge through three levels ranging from green, red and black belt. By the end of 2021, we graduated 83 green-belt software developers and seven red-belt developers. In late 2021, we also added the software tester role to the scheme's green-belt.

Looking ahead

Data security

Awareness of cyber security among our employees is critical. Our plans to enhance security awareness, skills and behaviour in 2022 include: training managers on data security and protection; phishing campaigns and related mandatory training throughout the year (see case study); continuing our security black-belt training for software developers and testers; adding IT infrastructure and operations roles to the black-belt training scheme and a white-belt level for non-technical roles linked to software development.

During 2022, employees will be subject to security vetting for specific security and digital roles.

Personal data protection

Personal data protection will remain in focus throughout 2022. We will improve our organizational setup for data protection with formalized roles and responsibilities; follow up on 'Schrems-2' ruling (including risk assessments and transfer impact assessments) and implementation of new standard

DNV has a Computer Security Emergency Response Team that is activated during more complex and advanced cyber security situations.

contractual clauses; and update and improve DNV's Binding Corporate Rules and internal instructions, such as access to email accounts and employee files.

Improvements are planned for our approach to mapping and documenting record of processing activities. Further action areas for 2022 and onwards are based on risks identified in the 2021 data protection risk assessment survey and will be followed up by each data protection manager. Examples of focus areas include retention and deletion of personal data in HR systems and managing personal data aspects within Imatis, the digital health business unit belonging to DNV's Accelerator business area.

We will continue to monitor and address personal data protection in a number of areas, including: lifecycle management of applications from launch to end-of-life; new legal requirements such as those in China; improving metrics for privacy compliance; and emerging financial or reputational risks related to data protection.

Training and communication remain crucial to achieve awareness of personal data protection for all employees. The personal data training programme will be reviewed and updated in 2022 to deliver improved and targeted training for selected employee groups. To build on the success of the cyber and data Tuesdays sessions in 2021, a new joint awareness and training programme is being planned for security and data protection in 2022. We will also develop a new training course for new hires and integrate data protection training topics into other training initiatives in 2022.

CASE STUDY

Phishing campaign

A phishing campaign was completed in December as part of a Group internal audit. More than 4,500 employees in various DNV countries were sent a fake phishing email to test cyber security awareness levels among employees.

In the group who had not taken the mandatory security awareness training, 22.5% clicked on the link. This dropped to 13% for employees who had taken the training.

This indicates that our training is effective at reducing employee susceptibility to phishing approaches, but that there is still a need to continuously raise cyber security awareness and to ensure all employees take the training available. In 2022 we will run quarterly campaigns and measure improvement we will also require all employees to complete a mandatory nano-learning.

Approach

IT and data security

DNV employees are contractually obliged to maintain strict client confidentiality and in accordance with local laws and regulations undergo background checks before employment.

Our GSS IT function invests significant resources in continuously monitoring and prevent new and emerging threats or vulnerabilities to our IT systems in line with best practices. We work on the cyber-security principle of 'assume breach', assuming that competent and resourceful attackers will be able to break into our systems. We therefore invest resources into our ability to detect and mitigate such security breaches.

In partnership with our main IT vendors, IBM and Microsoft, we use machine learning to develop smarter algorithms to identify the most significant threats and detect and prevent cyberattacks. Most attack attempts on DNV are phishing or payload/malware attacks received by email. As a result, we believe that investing in employees' cyber security awareness and competence is essential.

To ensure that DNV adheres to the highest level of data protection, our information security management systems are certified to the ISO 27001 information security standard across the Group. We have a detailed information classification system to segment and secure sensitive information within our IT system. We use our regular audits to check and identify opportunities for improvements. DNV's Board of Directors reviews DNV's cyber security risk annually.

Our GSS IT function operates a Computer Security Emergency Response Team that is activated during more complex and advanced cyber security situations.

Personal data protection

Data privacy is an essential part of ensuring legal compliance. We maintain and build our knowledge of the data protection landscape through our data protection network, training, legal advice and monitoring cases raised by data protection authorities in the countries and regions where we operate.

DNV's data protection management system is part of our Group-wide compliance management system, which was set up according to ISO 37301 (in 2021 replacing ISO 19600) (see the *Ethics and integrity* section). Responsibility sits with the Group Compliance Officer and the Global Data Protection Officer. Data Protection Managers for each business area, GSS and selected Group units are responsible for managing risks related to data privacy, including implementing relevant mitigating actions for their units.

We have a comprehensive suite of policies, guidelines and instructions that set our standards for data privacy and ensure we protect the personal data of employees and customers. DNV's new Code of Conduct includes an emphasis on the expectations of everyone involved in the business of DNV (see the *Ethics and integrity* section). All of our documentation and processes are aligned with, and fulfil, GDPR requirements.

An important enabler for data protection is training all employees, and especially those dealing with personal data as part of their daily work.

Customer data is handled in accordance with the confidentiality obligations outlined in the terms and conditions of our customer contracts. We are also a Binding Corporate Rules (BCR) certified company, meaning that customer and employee data can be transferred within DNV Group to countries outside the European Union and European Economic Area.

OUR PEOPLE STRATEGY

4 OUR EMPLOYEES



Our ambition and objectives

Our almost 12,000 employees represent the face of DNV towards customers and other stakeholders all over the world, every day. The relationships we develop with our customers are based on trust in our technical ability and the integrity and personal conduct of our people. Our values – WE CARE, WE DARE, WE SHARE – are beliefs that shape our performance and define the behaviours expected of all of us.

Attracting, developing and retaining motivated people who are committed to our purpose, vision and are key enablers of our success and a core pillar of our 2025 strategy. We strive to be an employer where our people can grow and develop their careers, build their skill-sets and share in our success. Diversity within our workforce is a source of strength for DNV. We welcome a wide range of backgrounds and demographic diversity, including a diversity of perspectives, mindsets and experiences. Inclusion provides a culture where everyone's voice is heard and employees feel valued and respected, which creates a sense of belonging. By encouraging diversity and inclusion, we are able to attract and

retain exceptional people around the world and deliver excellence to our customers. In DNV, we believe great things happen when people come together.

In 2021, our headline people rates were:

114 nationalities represented among our employees.

88% of employees have a higher education qualification at PhD, Master or Bachelor degree level.

34% of employees are female and 37% of new hires in 2021 were women.

Progress in 2021

Employees are responsive to our new strategy

We have completed or are working on several people initiatives in response to the launch of our new strategy in January 2021. Employee Pulse surveys relating to the new strategy have shown positive results indicating that our people are engaged with the new strategy and what it means for our business.

Changing work patterns

COVID-19 continued to affect how we worked in 2021 and presented ongoing challenges for our people and business. For large parts of the year, an improved situation allowed a partial return to our offices, but we have kept a close watch on changes in local circumstances and have adapted accordingly. We have also made local arrangements to enable working from home, monitoring employee resilience through our regular Pulse surveys and providing supportive measures to maintain resilience (see the [Safety and resilience](#) section for more details).

In 2021, we also saw a slight increase in employee turnover, similar to that reported by many other businesses. The increase was somewhat expected after a lower turnover in the first year of the pandemic, but this trend is also affected by increasing workforce mobility and rising demand for talent in the wider labour market.

Future workplace

The past two years have shown us that new, hybrid ways of working can be effective. Using our experience from employee working patterns during COVID-19 and successful pilots in China, Norway and Germany, we have now launched a 'Future Workplace' model across DNV. The hybrid model offers employees the option to combine remote working with regular time in the office (depending on roles, tasks and customer needs). We recognize that it is important for our people to meet at the office to work together and share knowledge and experiences, and employees benefiting from the model are expected to work at least three days in the office on average.

Enhancing our leadership behaviours

We have launched a new set of leadership behaviours – Leadership in DNV – to align leaders with the requirements of our new strategy and ensure we demonstrate purpose-led and future-fit leadership in our company. The leadership behaviours that we encourage include putting our customers first, engaging our teams, delivering performance, and shaping the future.

To support these new leadership behaviours, while also reflecting new ways of working, we have completely redesigned our leadership training programme. The new training takes a digital-first approach. A significant number of new leadership training modules have been rolled out to enhance leaders' conversation and dialogue skills, and to support their teams while we work remotely.

Compensation and benefits

Compensation is a critical part of attracting and retaining employees. In 2021 we introduced a new and more generous profit share scheme. Under the new scheme, a fixed percentage of DNV's net profit is shared with employees.

We have also completed a compensation and benefits review, which has established a revised set of compensation principles for DNV employees. The new approach will be rolled out during 2022. As part of the compensation and benefits review we

engaged widely with our employees to understand their issues and desires regarding their compensation package. Based on this input, the new principles include increased flexibility for individuals as selected benefits can be transferred to base salary or fixed allowances (see the case study [Revising our compensation principles](#)).

Diversity and inclusion

Our new business strategy identifies diversity and inclusion as a source of strength and a key enabler to attract and retain exceptional people and provide excellent services to our customers. To benefit from the opportunities that diversity and inclusion present to DNV, we need to ensure it is part of everything we do. As a result, we enhanced our focus on diversity and inclusion across the business in 2021 and, using a wide-ranging engagement process, established a new diversity and inclusion ambition with supporting targets. More information is given in the case study.

Looking ahead

Our strategy outlines three strategic goals that relate to our people:

- Exceptional people – attract and retain the best people in a purpose-led environment
- Purpose-led and future-fit leadership
- Resilient and safe working environment.

For 2022, ongoing initiatives linked to our new strategy will continue and new initiatives will be started as we review and refine our people policies, principles and processes to ensure they are aligned with, and support, our new vision, values and strategy. The initiatives include support for talent attraction, retention, and development.

Employee experience

DNV is a values-based organization with a defined culture and we want employees to recognise and benefit from the principles DNV stands for. To support this, we have launched initiatives to explore employee experiences in order to strengthen our employer brand and ensure we are consistent in our employee communication.

In reviewing employee experiences we will identify the key 'moments that matter' for our employees across the full employment lifecycle. We will work to improve, develop and communicate the moments that build employee engagement, enhance employee retention, and support our people with their career development, ongoing learning pathways and access to self-learning tools.

To align with the new 'Leadership in DNV' behaviours (see above) and our strategy, a new set of expectations for employees will be developed for roll out in 2023.

Recruitment and onboarding

The DNV strategy is a growth strategy combining both organic and in-organic growth. This sets clear expectations relating to upcoming recruitment needs and enhanced onboarding processes. In 2022, we will review these processes to determine how we can improve their quality and efficiency. Recruiting capacity will be increased in order for DNV to achieve its growth ambitions, and particular emphasis will be given to recruitment within the digital and renewable energy sectors.

Compensation and benefits roll out

Our new compensation and benefits principles will be rolled out in 2022. In addition to flexible options already identified, we will explore further options for employees to select compensation elements that best suit their current life situation.

Career model

We will define a new DNV career framework in 2022 and prepare for its launch and implementation in 2023.

The goal of the new model is to show development opportunities for our people, support their growth, and clarify DNV's expectations towards employees. The project will also support workforce planning and cross-utilization of employees, as well as enhancing business efficiency by more efficiently and effectively utilizing global talent across DNV.

Diversity and inclusion

Throughout 2022, we will work to support our new diversity and inclusion ambition as we set targets and work towards delivering on these (see case study).

CASE STUDY

Devising a new approach to diversity and inclusion



Like many other companies, DNV is currently broadening the definition of diversity and recognizing the importance of inclusion and belonging as a way to unlock the potential and benefits of diversity in the workplace. Diversity and inclusion (D&I) have always been important to DNV, but with the launch of our new strategy in 2021, its strategic importance is clearer than ever.

Diversity relates to our collective backgrounds and characteristics, as well as our different perspectives and mindsets. Inclusion is about building a culture of belonging and ensuring all viewpoints are heard and valued. While diversity means different things to different people – from gender and ethnicity to sexual orientation or professional and personal experiences – inclusion is important to every employee. It is what unifies us and connects us across the globe. Inclusion is about everyone being respected and accepted for who they are.

Following an inclusive leadership training for our Executive Committee in early 2021, we launched an engagement exercise across DNV to understand what D&I means to our people, what DNV does well and where we can improve. We organized 24 online workshops in 16 different locations, collecting hundreds of comments, reflections and suggestions on how DNV could further strengthen D&I.

The outcome of the engagement and subsequent analysis is our new ambition for D&I, which sets the direction and focus for the company. We are aware that our goals are ambitious and will take time to deliver, but by targeting year-on-year improvements we will improve our understanding as we measure progress towards our ambition.

Our approach to diversity and inclusion at DNV includes the following principles and initiatives:

Inclusion

Feel valued and have a sense of belonging

Initiatives

- Inclusive behaviour an unconscious learning sessions for all
- Embed D&I into people and leadership development
- Inclusion deep dive

Diversity

Promote diverse backgrounds

Initiatives

- In recruitment, development and promotion actively seek diverse backgrounds, genders, preferences and perspectives
- Promote and role model D&I in communication and events

Fair access

Fair access to continuous growth

Initiatives

- Embed D&I into relevant processes
- Apply best practices

The next part of our journey is about implementation, ensuring that the action we take supports our ambition and targets. It is about embedding D&I into everything we do, every day. Our initial focus in 2022 will be on incorporating D&I into leadership and

building knowledge and awareness on D&I in DNV. We have a range of supporting initiatives in the three areas of our ambition, many of which came from employees' ideas, the Executive Committee and existing best practice.

Approach

Strategy and management system

Our Group strategy and management system, including our people policy, governs how we attract and develop employees and build our company culture. This system also underpins our values-based leadership approach.

Our people processes are designed to create a common culture within a flexible work environment and provide career and development opportunities for all.

Governance

The CEO approves policies related to our people, leadership, as well as roles and responsibilities. The Group People function establishes these policies and sets the direction for people management. It works closely with human resources (HR) teams in the business areas and Global Shared Services (GSS) to ensure an aligned approach across the company. People management is a line responsibility and line managers are supported by HR managers and a range of HR tools.

We have broad geographic employee representation on DNV's Board of Directors. Our management works constructively with employee organizations through the Global Employee Forum, regional and local works councils and unions.

Diversity and inclusion

We seek diversity at all levels of our company in terms of age, gender, nationality, experience and mindset. Diversity is a source of strength for DNV. It provides the widest access to global talent and is the best basis for delivering excellence to our customers. Managed well, diverse teams can also identify and capture more opportunities and manage more risks than homogenous teams.

To support our diversity efforts, we run mentoring programmes, including the reverse mentoring of senior leaders by 'next generation' colleagues. We also hold an annual global summit for up-and-coming talent.

DNV has published a Statement on Gender Equality for our operations in Norway as required by Norwegian legislation on equality and anti-discrimination. The Statement can be found on our website under 'Mangfold i DNV' (Diversity at DNV).

We seek diversity at all levels of our company in terms of age, gender, nationality, experience and mindset. Diversity is a source of strength for DNV.

Human rights

DNV is a signatory to the United Nations Global Compact. We are committed to adhering to its principles in the areas of human rights, labour standards, environmental protection and anti-corruption in our business strategy, day-to-day operations, organizational culture and sphere of influence.

Our Code of Conduct establishes our commitment to non-discrimination, equal opportunity, the right to join labour unions and fair employment. It provides a framework for expected behaviour at all levels in DNV and includes clear requirements related to responsibilities, behaviour, and decision making by employees and managers. All employees are introduced to the company's policies during the onboarding process and awareness of human and labour rights are part of this mandatory introduction.

DNV's Statement on [Modern Slavery and Human Trafficking](#) has been issued further to section 54 (1) of the UK's Modern Slavery Act 2015 and constitutes the DNV UK slavery and human trafficking statement for the financial year ending 31 December 2021. As part of this, we are committed to ensuring that there is no modern slavery or human trafficking taking place in any part of our business or our supply chains.

Freedom of association and collective agreements

Employees' right to freedom of association and collective bargaining is documented in DNV's management system and our commitment to the UN Global Compact. Around 44% of our employees are covered by collective agreements.

Employee training and development

Our approach to employee development and competence is detailed in internal governing documents. We follow the 70:20:10 learning model; with 70% gained from on-the-job experience, 20% through interaction with others, and 10% from e-learning and classroom training. Training provided through individual business areas ensures the right competencies are in place to deliver our different services.

In addition to a range of mandatory training, cross-DNV programmes develop leadership and technical stewardship. Mentoring is a key part of how we work, and we enable learning from colleagues around the globe through various mentoring programmes.

Our global career model facilitates employees' competence development. Competence development planning includes an individual development plan, which is a key part of our performance management process.

All employees are assessed annually based on results and behaviour through a structured performance management process. The assessment, development, and selection of new managers is based on DNV's expectations for leaders: respect and care, foresight, customer centricity, and results orientation.

Remuneration

As a knowledge-based company whose main resource is our employees, we depend on cooperation, teamwork and knowledge sharing. DNV remuneration systems are set up to support this. Our annual salary review and remuneration process is the same for all employees, including management, and is outlined in the DNV management system. Our collective agreements with employee groups do not include voting on remuneration policies.

External remuneration consultants are used to benchmark remuneration in our markets. For the largest countries in which we operate, this happens through country-specific salary and benefit databases covering thousands of people. There is no relationship between our management and the remuneration consultants.

For the Executive Committee, the review procedure differs slightly. The Board's Compensation Committee conducts a review and makes recommendations before the procedure is concluded. The final decision on remuneration for the Group President and CEO is taken by the Board of Directors, using input from the Compensation Committee.

Profit sharing

A common profit-share scheme provides the most appropriate variable pay structure to support our values.

Our new profit share scheme shares a percentage of DNV net profit with employees. All eligible employees receive a percentage of their base salary as a bonus based on DNV Group and

business area results and the employee's grade. Our career model consists of 15 grades. For employees in the highest grades (grades 10-15) employees' annual individual profit share is also determined by their individual assessment rating.

In addition to these global schemes, sales schemes are available in some business areas. No employee can be a member of more than one scheme.

Career endings

Transition assistance programmes are implemented locally to meet local legislation and requirements. In the case of significant headcount reductions, local assistance programmes are set up. At all times, we seek to retain the employees in the organization, through the following initiatives:

- All available positions are advertised internally
- External recruitment restrictions are used to facilitate internal transfers
- All employees should have a development plan which focuses on DNV's future capability needs and the employee's own career ambitions.

The DNV management system stipulates that mitigating actions are to be sought before staffing reductions are considered or executed.

Revising our compensation principles

Following an in-depth analysis conducted in 2021, we have revised DNV's compensation and benefits principles. We identified opportunities to make our approach to compensation and benefits more relevant and adaptable for DNV and our employees.

We engaged widely across DNV to gather business and employee opinions on pay and benefits. This ranged from the work undertaken while developing DNV's new 2025 strategy, which identifies compensation as a global business enabler; the needs of our individual business areas and relevant market trends; a dedicated employee survey and follow-up interviews to understand employee preferences; and results of regular employee Pulse surveys and exit interviews.

Although the majority of our existing compensation principles are relevant and up-to-date, opportunities

for improvement were identified. These mainly relate to the compensation mix - the balance between salary and benefits - and the relevance of the benefits offered. With the revised principles, we have designed increased flexibility for employees so that their total compensation mix can be aligned with individual needs. Flexibility comes in the form of increased choice in the benefits employees can select and through front-loading, where the value of benefits can be transferred into base salary. With this approach, employees can choose the compensation mix that has the highest perceived value for their circumstances.

We will implement the new principles globally in 2022, mainly by changing country-specific compensation and benefits terms and conditions. The extent of change and timeline will vary by country based on local legislation and the ability to make changes.

Workforce profile

TABLE 03 | EMPLOYEES BY EMPLOYMENT CONTRACT AND GENDER

Employment contract	Female	Male	Total
Permanent employees	34%	66%	11 595
Time-limited employees	49%	52%	200
Total	4 011	7 784	11 795

Permanent employees

	Female	Male	Total
Full-time	89%	96%	10 892
Part-time	11%	4%	703
Total	3 914	7 681	11 595

Subcontractor and temporary personnel

	Female	Male	Total
Temporary staff	14%	86%	1 445
External business support	19%	81%	1 355
Supplier	12%	88%	250
Subcontractor	19%	81%	6 794
Total	1 809	8 026	9 844

At DNV we have a broad definition of diversity and we acknowledge and support that some of our employees will have non-binary gender identities. We currently have the ability to only show male / female employee data, but we are investigating applicable legislation and limitations in our data systems to be able to address this in the future.

TABLE 04 | EMPLOYEES BY REGION

Region	Permanent employees	Time-limited employees	Total
Nordics	2 444	9	2 453
West, South and East Europe	2 365	75	2 440
North America	1 718	1	1 719
North Asia	1 209	65	1 274
Central Europe	1 180	9	1 189
UK, Ireland	980	9	989
India, Middle East and Africa	862	10	872
South Asia	585	21	606
South America	252	1	253
Grand Total	11 595	200	11 795

Permanent employee: On DNV payroll without contracted time limitation.

Temporary staff: E.g. summer temps and interns.

External business support: Hired from other companies to do work for DNV under their own management system.

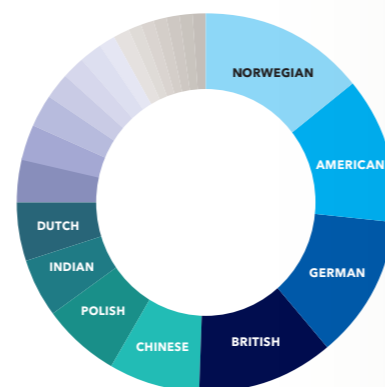
Time-limited employee: On DNV payroll with contracted time limitation.

Subcontractor: Hired from other companies to do work on behalf of DNV under DNV management system.

Supplier: External service or product supplier. Registered in order to be granted certain access.

Subcontractor: Hired from other companies to do work on behalf of DNV under DNV management system.

FIGURE 01 | EMPLOYEES BY NATIONALITY



Norwegian	1 604
American	1 285
German	1 102
British	943
Chinese	826
Polish	797
Indian	770
Dutch	514
Italian	420
Spanish	337
South Korean	329
Brazilian	253
Danish	212
Singapore	169
French	148
Japanese	130
Greek	129
Swedish	126
Malaysian	120
Mexican	120
Canadian	115
Australian	111

Nationalities > 100 shown in table
Nationalities > 500 labelled in pie chart

In total there were 114 nationalities among the permanent and time-limited employees at the end of 2021 (123 for all staff categories).

TABLE 05 | EMPLOYEES - TOP 15 COUNTRIES

Grade	Female	Male	Total
Norway	661	1 364	2 025
United States	555	927	1 482
Germany	357	830	1 187
United Kingdom	259	726	985
China	243	567	810
Poland	409	357	766
Netherlands	163	394	557
India	139	330	469

	Female	Male	Total
Italy	191	180	371
Spain	114	242	356
South Korea	86	243	329
Singapore	92	206	298
United Arab Emirates	69	162	231
Denmark	71	156	227
Brazil	89	125	214
Grand total	4 011	7 784	11 795

Employee turnover

TABLE 06 | EMPLOYEE TURNOVER AND NEW EMPLOYEE HIRES BY AGE, GENDER AND REGION

AGE

Employee turnover	<31	31-40	41-50	51-60	>60	Total
Total number ¹	135	421	295	135	138	1 124
Rate ²	16%	13%	8%	5%	14%	10%
Opening count 2021	848	3 191	3 578	2 776	959	11 368

New employee hires

	<31	31-40	41-50	51-60	>60	Total
Total number ¹	446	487	199	96	22	1 250
Percentage of hires	36%	39%	16%	8%	2%	

¹ Includes 16 employees with no age registered.

GENDER

Employee turnover	Female	Male	Total
Total number ¹	389	735	1 124
Rate ²	10%	10%	10%
Opening count 2020	3 776	7 592	11 368

New employee hires

	Female	Male	Total
Total number ¹	460	790	1 250
Percentage of hires	37%	63%	

REGIONS

Employee turnover	Nordics	Central Europe	West, South and East Europe	Great Britain	North America	South America	North Asia	South Asia	India, Middle East and Africa	Total
Total number	233	109	234	87	232	22	51	87	69	1 124
Rate ²	9%	9%	10%	9%	14%	9%	4%	14%	10%	10%
Opening count 2020	2 490	1 247	2 301	930	1 645	238	1 202	613	702	11 368

New employee hires

	Nordics	Central Europe	West, South and East Europe	Great Britain	North America	South America	North Asia	South Asia	India, Middle East and Africa	Total
Total number	212	45	250	108	277	34	53	52	219	1 250
Percentage of hires	17%	4%	20%	9%	22%	3%	4%	4%	18%	

² Turnover as a % of total employees

Only permanent employees are included, as the other employment categories by contract are intended to join/leave. Turnover is based on number of employees leaving the company in the year divided by the opening count (1 January).

Employee training and development

TABLE 07 | AVERAGE HOURS OF TRAINING* PER EMPLOYEE BY EMPLOYEE GRADE AND GENDER

Employee grade	HOURS / EMPLOYEE		Employee grade	HOURS / EMPLOYEE		Employee grade	HOURS / EMPLOYEE	
	Female	Male		Female	Male		Female	Male
1		12.6	6	16.5	21.5	11	27.9	19.1
2	7.5		7	16.3	19.5	12	39.5	18.7
3	4.9	1.7	8	24.2	21.1	13	29.5	28.4
4	5.7	9.0	9	22.6	21.0	14	45.2	26.4
5	16.7	14.6	10	25.5	20.7	15	40.0	12.0
			Total	19.9	20.3			

*Basis of reporting employee training:
Only internal training is included. External training is not consistently tracked. 7.5 hours per day is used. Only permanent and time-limited employees are included. Subcontractors and temporary staff are excluded as their inclusion is not relevant for internal competence development activities.

TABLE 08 | PERCENTAGE OF EMPLOYEES RECEIVING REGULAR PERFORMANCE AND CAREER DEVELOPMENT REVIEWS BY EMPLOYMENT CONTRACT AND GENDER

		Rated performance		Unrated performance	
Female	Permanent employees	99.95%	0.05%		
	Time-limited employees	100%	0%		
Male	Permanent employees	99.96%	0.04%		
	Time-limited employees	100%	0%		
Total, male and female		99.96%	0.04%		

TABLE 09 | EMPLOYEE EDUCATION LEVEL IN OUR TEN BIGGEST COUNTRIES AND GLOBALLY PERMANENT EMPLOYEES

Country	Basic education level	Professional / Technical 0-3 years	2-year college level	Bachelor level	Master level	Doctorate level
Norway	5%	2%	3%	18%	64%	9%
United States	9%	1%	4%	44%	35%	7%
Germany	6%	15%	1%	11%	62%	4%
United Kingdom	5%	3%	4%	32%	41%	15%
China	2%	1%	6%	56%	33%	3%
Poland	4%	1%	0%	19%	75%	1%
Netherlands	6%	6%	2%	39%	40%	7%
India	2%	2%	0%	50%	45%	1%
Italy	23%	2%	6%	31%	32%	6%
Spain	6%	3%	1%	17%	70%	3%
Global workforce	659	365	299	3 744	5 186	624
Global workforce (%)	6%	3%	3%	34%	48%	6%

Diversity and equal opportunity

TABLE 10 | GENDER AND AGE PROFILE OF EMPLOYEES BY EMPLOYEE GRADE

Grade	GENDER			AGE GROUPS					TOTAL
	Female	Male	% female	< 31	31-40	41-50	51-60	> 60	
1		1	0%	1					1
2	4	1	80%		1		1	3	5
3	31	18	63%	14	12	13	8	2	49
4	187	69	73%	48	85	68	44	11	256
5	481	214	69%	213	210	165	79	28	695
6	844	618	58%	523	472	255	158	54	1 462
7	692	804	46%	210	728	335	166	57	1 496
8	628	1116	36%	27	871	489	287	70	1 744
9	463	1550	23%	6	598	837	448	124	2 013
10	346	1541	18%		207	872	622	186	1 887
11	188	1015	16%		30	432	556	185	1 203
12	101	514	16%		3	143	339	130	615
13	29	193	13%			32	132	58	222
14	11	89	11%			8	47	45	100
15	6	41	13%				25	22	47
Total	4 011	7 784	34%	1 042	3 217	3 649	2 912	975	11 795

TABLE 11 | BOARD OF DIRECTORS BY AGE, GENDER AND NATIONALITY

Nationality	GENDER		AGE	
	Female	Male	< 50 years	> 50 years
Scottish		10%		10%
Danish	10%	10%		20%
German		10%		10%
Norwegian	30%	30%	10%	50%
Total	40%	60%	10%	90%

Salary comparison between genders

Employees at a similar level in the organization are provided with the same grade, allowing peer comparison of salaries. Comparison of salary differences by gender within a grade is achieved by reviewing the weighted average base salary of employees per grade and gender in each country (grades with minimum five employees from each of the genders are included). This provides country averages, as shown in the base salary comparison by gender for our largest 15 countries below.

TABLE 12 | AVERAGE BASE SALARY DIFFERENCE BY GENDER FOR THE 15 LARGEST COUNTRIES

Grade	Average female-to-male salary	Grade	Average female-to-male salary
Norway	98.8%	Italy	97.1%
United States	97.6%	Spain	103.7%
Germany	99.9%	South Korea	94.6%
United Kingdom	101.4%	Singapore	93.7%
China	95.2%	United Arab Emirates	98.8%
Poland	89.0%	Denmark	95.2%
Netherlands	94.7%	Brazil	90.4%
India	107.9%	15 largest countries	98.0%

OUR PEOPLE STRATEGY

5 SAFETY AND RESILIENCE



Our ambition and objectives

Our ultimate goal is zero harm to anyone working for, or on behalf of DNV, and safeguarding our people is as much about maintaining a healthy and resilient workforce as it is about preventing work-related injuries and illness. One of our guiding principles is that no work is so urgent or important that it cannot be conducted in a safe and healthy way.

For DNV, resilience is what helps us to tackle day-to-day challenges and thrive in the face of change and uncertainty. We have been monitoring physical and mental health risks that may affect colleagues arising from extended periods of working from home because of the pandemic. Despite the continuing effect of the pandemic on our work environment, our occupational health and safety performance in 2021 continued the positive trend seen over recent years.

Our headline safety rates in 2021 were:

0.5	Injury rate was reduced to 0.5 (2020: 0.7)
2.3%	Absence rate 2.3% (2020: 2.0%)
7.95	Resilience index improved to 7.95 (2020: 7.8)

Progress in 2021

Safeguarding our people

With COVID-19 restrictions in place in many countries during 2021, we have travelled less and provided more remote services. The reduction in the lost time injury rate may be attributed to this.

We maintained our essential-travel-only policy throughout the year, continuing our commitment to protect the health of our employees and customers. Employees traveling for business-critical reasons were required to conduct a COVID-19 travel risk assessment with formal approval by both their line manager and regional manager.

In general, employees in DNV report low overall sickness. However, the global trend is that workforce mental health is a growing concern and we continuously monitor how our employees are impacted by the volatility and uncertainty of the pandemic. We are initiating dialogues within DNV about mental health to enhance our understanding of the fundamental factors contributing to our people's mental wellbeing. Full details of our performance, are provided in the [Metrics and data](#) pages in this section.

Developing resilience

For DNV, employee resilience is as much about our ability to cope with change as it is about thriving and becoming the best version of oneself. Resilience starts with ourselves; taking care of ourselves is what puts us in the best position to support our customers and make a difference together.

Managing the COVID-19 pandemic

Across the organization, local crisis management teams led by our country chairs have continued to support our people through these unprecedented times as the pandemic is evolving from a global crisis to one of local flare-ups.

We hold weekly meetings to share updates about the pandemic and best practices for keeping our employees safe and healthy. Supported by the Group COVID-19 crisis team, local crisis teams continuously provide employees in their countries with science-based information on what is and is not known about the virus, about measures to reduce the spread of infection and on how to offer psychological support to maintain resilience.

Together with biomedicine and social science experts, our crisis team has knowledge sessions and guidance on COVID-19 and vaccinations. The sessions focused on preventing infection and keeping employees motivated to uphold with safe behaviours relating to COVID-19.

Tragically, we have lost one employee and two subcontractors to COVID-19. Many colleagues have also lost family members due to the virus, and we have followed-up with them to ensure they receive the support needed to work through these traumatic times. Our crisis management teams have also supported colleagues affected by 'long COVID' and helped employees prepare for how to tackle COVID-19 in their households and personal lives by sharing learning experiences.

In home office environments

With an increasing number of employees working from home, we recorded 35 cases of ill-health related to ergonomics in the home environment and local initiatives to mitigate these cases were initiated. In light of changes to working patterns associated with our new flexible and hybrid working routines

(see the [Our employees](#) section for more details), ergonomics initiatives are part of our transition projects towards our future workplaces.

Employee resilience and mental health

Building on the resources that were launched in 2020, we continued to help all DNV employees develop their resilience in these challenging times. We focus on increasing awareness of what employees can do to improve wellbeing and motivation as they cope with uncertainty. Some of our initiatives included:

- Launching a revamped global DNV Resilience Gateway (see case study underneath).
- Webinars to help maintain and strengthen employee resilience, with a focus on mental health and transitioning to a hybrid work environment.
- A 'Mystery Coffee' initiative was launched globally in March 2021 to connect DNV people online, build new networks, and socialize, relax, and prevent loneliness and isolation.

- Maritime also continued its #staysafe campaign to encourage our surveyors to take extra precautions at work.
- Depending on local conditions and legislation, local management has initiated measures to mitigate the impact of the pandemic on their employees. Examples include: recruiting and training 30 mental health first aiders in UK and Ireland; a mental health helpline offering professional psychological support in Poland; workshops on remote leadership in Norway; digital mental and physical exercise breaks, and efforts to improve ergonomic working conditions in Germany and the US. Our Pulse surveys show that these initiatives to ensure employee wellbeing have been well received.

Measuring resilience

We use a resilience index to monitor employee resilience across the whole company. The index is based on our employee engagement Pulse survey and enables managers to follow-up issues in local business units in a timely manner. Scored out of 10, our target is to achieve a resilience index score of 8 by 2025. The survey includes the following specific questions:

- I'm satisfied with the amount of flexibility I have in my work schedule
- My manager cares about me as a person
- DNV really cares about my health and wellbeing
- The demands of my workload are manageable.

Responses to questions related to resilience have been positive and steadily improving across the organization during the COVID-19 crisis.

Incident reporting and learning from incidents

In 2021, we continued to focus on identifying and reporting hazards, risks, and incidents including near misses. Significant near misses with potential for high consequences were shared with top management and are made available to all employees on the intranet. To further encourage sharing of lessons learned, we host network meetings for health, safety and environment (HSE) representatives from our business areas and Global Shared Services (GSS). Reported incidents and potential risks feed into our overall risk management system.

CASE STUDY

Global DNV Resilience Gateway

Coinciding with World Mental Health Day on 10 October, we launched our revamped DNV Global Resilience Gateway for employees on the DNV intranet. With the new Gateway, our goal is to make the support that DNV offers on resilience more visible, unified and accessible to our employees. We believe that the more accessible our resources are, the easier it is for our employees to reach out and get the support they need.

The Resilience Gateway offers curated content, such as podcasts, articles and videos in each of the six pillars of our resilience framework - physical, mental and social health, and autonomy, growth and purpose. It showcases the plethora of local and regional wellbeing and resilience initiatives that DNV has to offer, as well as specific content on relevant topics such as grief and chronic illness in relation to the pandemic.

Our aim is for the content to be dynamic and to respond to the needs of our employees. We have created slides with trigger questions or statements that can be used to kick-start team or one-to-one discussions on potentially difficult or sensitive resilience topics, such as mental health or psychological safety.

We use monthly highlights on our internal social media channel, Yammer, to encourage employees to use the gateway and its resources. So far, feedback has been positive and suggestions for maximizing the benefit of the gateway show that employees are engaged with the platform. Examples of suggestions include making the gateway accessible to our sub-contractors, making presentations to show users around the gateway, and sharing one-pagers to inspire safety moments and team building meetings.

CASE STUDY

Reviewing our data on employee resilience

In March 2021, we conducted a deep-dive into our resilience data to help understand the current mental health status and resilience of our employees and identify improvement areas for the remainder of 2021.

We studied quantitative and qualitative data sources, including Pulse survey scores and comments; data from our health and safety software, Synergi Life; employee absence and sick leave data; COVID-19 task force feedback; country chair surveys; and feedback from resilience webinars, our future workplace pilot in China as well as external studies.

The findings showed some positive trends in employee resilience across DNV. Compared to industry benchmarks, our Pulse survey results show that DNV's improvements in employee resilience have outpaced improvements in the benchmark scores. The DNV Resilience Index increased from 7.83 to 7.88 between the end of 2020 and May 2021, while the industry benchmark stayed constant at 7.85.

Areas for improvement include an indication that excess workload is contributing to heightened employee stress

and anxiety, and that some employees have experienced loneliness as a result of working from home during the pandemic. Remote working has also put pressure on employee-manager relationships, an area that was already challenging before the pandemic. The impact of excess workload, in particular, has been noted as a concern and our business areas are working to implement mitigating actions, including support on time management in home working situations.

We have translated the findings from the deep dive into focus areas that target all levels in DNV: As a company, we will work to remove stigma and fear of repercussions around employee mental health; as leaders, we will improve communication and establish expectations; as teams, we will support each other in meeting resilience needs; and, as DNV employees, we will identify our own resilience needs and reach out for support. These focus areas inspired measures taken in 2021 and we will continue to refer to these areas as learning opportunities during our transition to flexible work schemes and hybrid working environments.



Looking ahead

Safety and resilience resources and support structure

In 2022, we will continue to improve our safety and resilience resources and support structure to ensure we safeguard our people as we navigate through the pandemic and shift to a hybrid work environment.

Resilience

We expect that the persistence of the COVID-19 pandemic, coupled with the transition to a hybrid office-home work environment, will continue to put our employees' resilience to the test. There are many opinions about the return to working from the office and the shift to hybrid working following the pandemic. While many employees look forward to returning to the office, there are also indications that some feel anxious about returning. Others appreciate the flexibility that comes with the option to work from home.

In addition to improving our resilience support structure, we will continue to build our resilience resources, including updating our Resilience Gateway and further developing employee awareness and knowledge so that they can champion resilience and support others in developing theirs.

We will also:

- Analyse our resilience data and implement relevant support measures
- Increase awareness of our resources on resilience
- Conduct webinars on psychological safety to reduce stigma around mental health
- Identify specific employee resilience needs linked to hybrid working
- Identify factors that lead to excess workload and discuss opportunities for improving workflows.

Incident reporting and learning from incidents

We will continue to focus on hazard, risk and incident reporting in 2022, including near misses. This is an essential part of our journey to create a safety culture characterized by learning and improvement. Part of this work will be encouraging employees who report an incident in Synergi Life, our proprietary risk management tool, to analyse the root causes of the incident, and to support the business areas in offering training on risk analysis. Cases with the potential for high consequences will continue to be shared with top management and learnings will be made available to all employees on the intranet.



Approach

Safety and resilience management

Safety and resilience are fully embedded in our purpose, vision and values, and our commitment to safeguarding people extends to everyone who is linked to our business. Our approach is to empower our people to make the right decisions about their own safety, health and wellbeing every day and to equip them with the knowledge and skills to thrive and perform at their best. We invest in a safe, healthy and future-fit working environment, focusing on employee wellbeing (physical, mental, and social health) and motivation (autonomy, mastery, and purpose) to contribute to their resilience.

Our safety and resilience policy and management system complies with all laws and regulations in countries where we operate and is certified to the ISO 45001:2018 standard. In areas where legislation is weak or does not exist, we adhere to our Group requirements, which comply with Norwegian regulations.

The right to say 'no' if you encounter inappropriate behaviour or unacceptable conditions that can pose a risk to your safety or harm your health and resilience while at work for DNV, is embedded in our safety and resilience policy.

Governance

Within DNV, safety and resilience are structured across two lines of responsibility - by geography and by business area. At the highest level, the Group CEO and Executive Committee are responsible for all matters concerning safety and resilience. Quarterly safety and resilience reports are made available to all employees on the intranet.

Line managers are responsible for ensuring safe and healthy working conditions that protect our employees and contractors and support them in developing their resilience. They are also responsible for promoting open communication and a culture where incidents and feedback are treated as learning opportunities.

All our safety and resilience support resources are internal; we do not outsource any responsibilities related to safety and resilience. We conduct a management system review process annually. This is a bottom-up process and ensures continual improvement of our safety, occupational health and resilience performance. The review has a fixed agenda with elements such as risk management (including safety, resilience and quality) and information related to performance and effectiveness of the management system.

Risk assessment

DNV has defined clear principles, processes and key responsibilities for hazard identification and risk assessment relating to office working, travelling, driving, conducting field work, and operations at laboratories and test sites. Occupational health

and safety risks, including those related to field and laboratory work, are periodically identified, assessed and reviewed by business areas or through the global risk register.

We are actively using risk assessments to guide our decision making on how to operate during the pandemic. Assessments are being used to support decisions on whether to conduct work in person or through remote services and also to mitigate the risk of infection during field work, laboratory and test site activities, and travel. We have also used risk assessments to support decisions on closing or restricting access to offices and managing their reopening in a controlled way. In line with our purpose, vision and values, we take pride in our forward leaning and relatively precautionary approach in comparison to local requirements.

A record of common risks across DNV is maintained at the Group and regional level. These generally relate to office-related work, travel and driving. Business areas identify and manage the significant risks associated with field work, laboratory, test site activities and events.

Work-related hazards

The main hazards associated with DNV activities that increase the risk of a high-consequence injury include:

- Line of fire hazards, in particular objects dropped or falling from height, high pressure/tension releases, contact with moving vehicles, moving parts of machinery and work equipment
- Driving and travelling
- Places at height or at ground level from which a person could fall from height, including transfers at sea with a risk of drowning and/or crushing
- Entry into confined spaces where an oxygen deficient or toxic atmosphere may be present
- Working in hot work environments and high temperature environments.

Safety and resilience are fully embedded in our purpose, vision and values, and our commitment to safeguarding people extends to everyone linked to our business.

High-consequence risks are considered those where the most probable outcome is death or significant disability or impairment, including the following:

- Serious multiple fractures
- All amputations
- Permanent loss of sight or reduction of sight in one or both eyes
- Crush injuries leading to internal organ damage
- Serious burns (covering more than 10% of body; third-degree burns; internal electrical burns; or damage to the eyes, respiratory system, or other vital organs)
- Nervous system injuries with loss of function
- Unconsciousness caused by head injury, asphyxia, heat, electric shock or chemical exposure
- The person cannot, does not or is not expected to recover to pre-incident health status within six months.

We determined these hazards and risks by several means, including operational risk assessments, audit findings and incident analysis. The risks are recorded in health and safety risk registers, which include:

- A description of the risk - the associated main hazards, as well as causes and contributory factors to the risk
- The risk control measures and monitoring/assurance process
- An evaluation of the risk, with a risk rating based on the likelihood and severity of harm
- Actions to reduce the residual risks to an acceptable level and ongoing monitoring activities.

Metrics and data

Occupational diseases with lost time

In 2021, 21 cases of work-related ill-health resulting in lost time were reported (2020: 17). Eleven of these identified stress and workload as the sole or contributing factor. The other cases were mainly due to working conditions in the home environment and field-work. All employees are expected to make a full recovery.

Absence rate

Our absence rate due to sickness has remained low at 2.3% (2020: 2%; 2019: 2.3%). Our reporting system does not currently capture absence by region.

Incident reporting

We manage and report incidents and hazards, including near misses, using Synergi Life, our commercial software platform that has been developed in-house by DNV. Our approach complies with Norwegian regulations and is aligned with the ILO code of practice on recording and notification of occupational accidents and diseases.

Employees involved in, or observing, a work-related incident or safety and health related risk are required to report it through Synergi Life. Employees concerned about revealing their identity can anonymously report incidents and hazards (including near misses).

All reported cases with the potential for high-consequence injury are investigated and corrective actions implemented. Any cases with the potential for high-consequence injury are reviewed in the next risk assessment covering safety and health.

Learning from incidents

A significant objective of incident and hazard reporting is to share experiences across the business and learn from them. Learnings are shared regularly through presentations on incidents with medium- or high-consequence injury potential in several levels of the organization, including top management. We also maintain an open-access incident and hazard database.

Involving employees

We share information and consult with elected representatives of employee works councils and unions in accordance with our collective agreements and local legislation.

Incident and hazard reporting

During the year, 1,341 incidents, hazards and near misses related to occupational health, safety and the environment were reported (2020: 1,252). 294 cases were registered in Synergi Life as near misses, and of these 3.4% (10 cases) were reported as potential high risk.

TABLE 13 | HEALTH AND SAFETY PERFORMANCE

	2021	2020	2019
Work-related fatal accidents	0	0	0
High-consequence injuries, employees	0	0	0
High-consequence injuries, other workers	0	1	1
High-consequence injury rate, employees	0	0	0
High-consequence injury rate, other workers	0	0.3	0.4
Recordable injuries, employees	21	22	36
Recordable injuries, other workers	7	3	3
Recordable injury rate, employees	1	1.1	1.6
Recordable injury rate, other workers	2.14	1.0	1.1
Injuries with lost time, employees	10	14	19
Injuries with lost time, other workers	3	1	3
Occupational diseases with lost time, employees	20	18 ¹	13
Occupational diseases with lost time, other workers	1	0	2
Near misses with the potential for high consequences	9	19	21
Lost time injury rate, employees	0.5	0.7	0.9
Lost time injury rate, other workers	0.9	0.3	1.1
Absence rate (%)	2.30 ²	2.0	2.3

¹ Occupational diseases with lost time reported for 2020 has been corrected from 17 to 18 due to one new case registered after the deadline for external reporting in 2020. The case has been investigated and corrective actions have been implemented.

² The number is extrapolated from data covering 80% of DNV employees.

DEFINITIONS

Absentee rate (%): Total hours of absence due to sickness / worked hours x 100.

Hazard: Unsafe act or unsafe condition with the potential to cause an incident.

Lost time injury rate: Number of injuries with lost days per million hours worked.

Injuries with lost time: Any work-related injury which prevents an injured employee or other workers from doing any work on any day (or shift) after the day (or shift) on which the injury occurred, including weekends and holidays.

Injuries with high consequence: Injuries that result in a fatality or an injury from which the worker cannot, does not, or is not expected to recover fully to pre-injury health status within six months.

Near-misses: An event or exposure(s) which did not result in injury, ill health or environmental impact, but where, given a slight shift in time or position, easily could have.

Occupational diseases with lost days: A harmful effect on a person caused by prolonged or repeated exposure(s) with lost days (not back to work the next day).

Recordable injuries: Work-related injury or ill-health that results in any of the following: death; days away from work; restricted work or transfer to another job; medical treatment beyond first aid; loss of consciousness; significant injury or ill health diagnosed by a physician or other licensed healthcare professional, even if it does not result in death, days away from work, restricted work or job transfer, medical treatment beyond first aid.

OUR SUSTAINABILITY STRATEGY

6 ENVIRONMENT AND CLIMATE

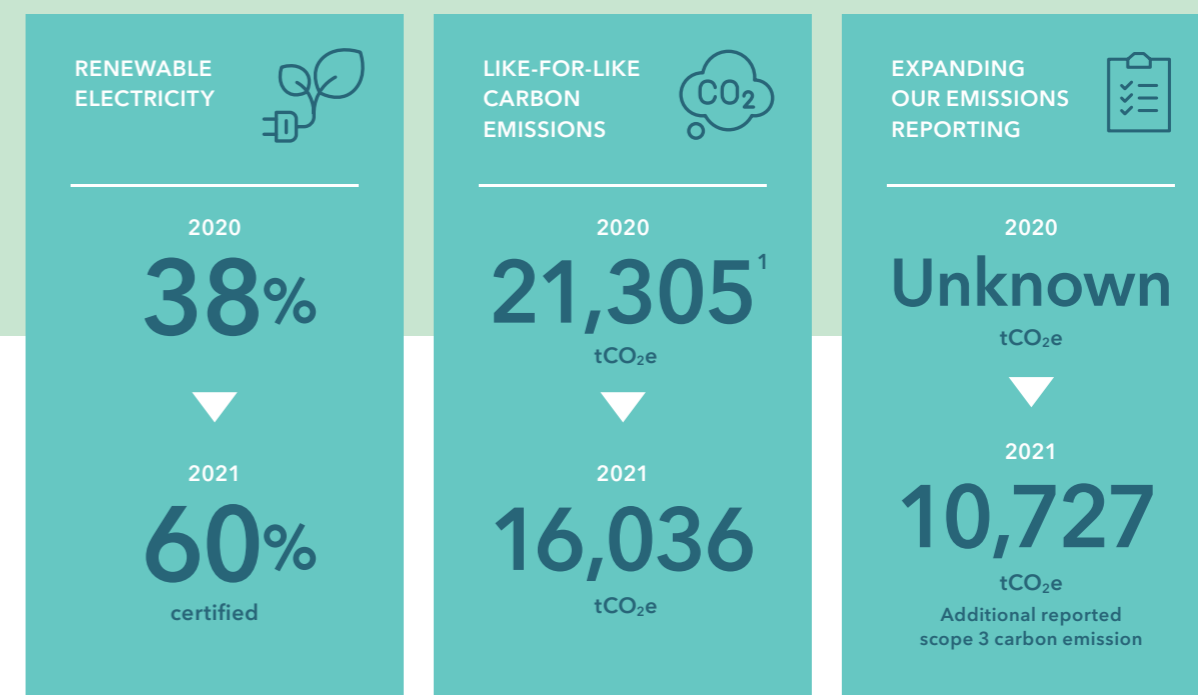


Our ambition and objectives

To avert the climate crisis, action is needed from all parts of society including governments, companies and individuals. At DNV, we take our responsibility to minimize our environmental impact very seriously and environmental protection is embodied in our purpose to protect life, property and the environment. Our sustainability and climate strategy focuses on reducing the environmental footprint of our business.

emissions across the business by 50%, sourcing 100% renewable electricity, focusing on lower-carbon business travel and becoming carbon positive by 2025. We have also committed to setting a science-based target to reduce our carbon emissions in line with the 1.5°C pathway of the Paris Climate Agreement. Beyond our own impact, we use our technical expertise to accelerate the energy transition, working with customers to support them in achieving their sustainability objectives (see [Sustainable innovations](#) and [Markets](#) sections).

Although our operations have been carbon neutral for two years, we are committed to reducing carbon



Progress in 2021

Enhancing our commitments

In 2021, DNV strengthened its commitments to tackling climate change. We have committed to the Science Based Targets initiative to reduce our carbon emissions by 2025 in line with the 1.5°C pathway of the Paris Climate Agreement by setting a science-based target during the first half of 2022. We have also pledged to achieve net zero well before 2050. Last year we participated in the UN Global Compact Climate Ambition Accelerator to get us started on this journey.

GHG emissions

On a like-for-like basis, DNV carbon emissions reduced by 24.7% to 16,036 tonnes of CO₂ equivalent (tCO₂e) emissions in 2021 (2020: 21,305 tonnes¹ CO₂e). This is mainly due to switching to renewable electricity sources and less business travel during the year.

During 2021, we also expanded our reporting on indirect (scope 3) emissions from our value chain, adding several new emissions sources to our reporting. (See [Measuring our scope 3 emissions](#) below).

These newly reported scope 3 emissions have added 10,727 tonnes CO₂e to our overall carbon footprint and in 2021, our total carbon emissions were 26,736 tonnes² of CO₂e. The table below shows our like-for-like emissions in 2021 and emissions from the newly reported scope 3 emissions sources. For a full breakdown of our scope 1, 2 and 3 emissions, see the metrics and data section below.

TABLE 14 | GREENHOUSE GAS EMISSIONS (tCO₂e)

	2021	2020
Like for like (same emissions sources as 2020)	16 036	21 305
Additional scope 3 emissions sources	10 727	N/A
Total	26 763	21 305

With reduced business travel, emissions from air travel, one of our biggest emissions sources, fell by 33% compared to 2020. Since 2019 and the COVID-19 pandemic, emissions from air travel have fallen 83%.

Energy use

In 2021, we used 59.7 gigawatt hours (GWh) of energy in our operations, up 7% from 2020 (55.8 GWh³). Major users of energy in DNV are our facilities in Høvik, Hamburg and Groningen.

60% of our total electricity was purchased with green certificates in 2021, accounting for 47% of our total energy use. 7% was renewable energy generated onsite at DNV facilities and 31% came from grid electricity or district heating. 15% of our total energy consumption came from burning fuels. Our slight increase in energy consumption in 2021 is mainly due to the soft opening of some of our office facilities following COVID-19 lockdowns.

Measuring our scope 3 emissions

In 2021, DNV joined an initiative organized by Skift to expand reported sources of emissions among member companies. From 2021 onwards, we have started mapping and reporting more emissions and creating an inventory of emission sources that we will expand in the coming years. For the first time, we are also reporting emissions from purchasing IT equipment, smartphones, office furniture, cloud usage and employee commuting. The inventory will become a roadmap that guides us in reducing our biggest sources of emissions and implementing effective sustainability initiatives.

Renewable electricity

We exceeded our interim 2021 target of 50% certified renewable electricity in 2021, moving us one step closer to our 2025 target of 100% renewable electricity. In working towards this goal, we used expertise in our Energy Systems business area to create a purchasing strategy that is credible, transparent and impactful.

We chose to acquire certified renewable electricity from sources that have the potential to support underdeveloped renewable electricity markets. The chosen registries on which the certificates are issued, traded, and retired are robust tracking mechanisms designed to prevent double counting; for every MWh of energy produced and issued on a registry, a specific ID number issued to that MWh and is tracked all the way to retirement where it appears on retirement certificates.

Business travel

During pre-pandemic times, air travel was DNV’s biggest source of emissions. It has also been an area in which DNV has had significant focus on emission reduction. We have launched an initiative to reduce emissions from business travel by 30% in 2022 from pre-pandemic levels. Although this goal is challenging, the COVID-19 pandemic has shown that business as usual can continue with less air travel and higher adoption of digital technology.

Company cars

DNV has a company car fleet of approximately 1,500 vehicles globally, of which 76% run on petrol or diesel. To reduce the climate impact of our fleet, we are working to accelerate the switch from petrol and diesel engines to electric vehicles and plug-in-hybrids. Our new company car guideline stipulates electric or plug-in hybrid cars where local infrastructure is mature enough.

Plastics

We are also targeting a reduction in single use plastics with the ultimate goal of having zero single-use plastics in our offices. The [Sustainable supply chain](#) section gives updates on our progress in this area.

Carbon neutral operations

DNV remained carbon neutral for 2021. We offset our 2021 carbon emissions with carbon credits aiming to protect two major forest areas in Peru. The projects improve the livelihood of indigenous people in these regions by supporting sustainable agroforestry and protecting endangered species. Both projects are gold-standard certified REDD+ (reducing emissions from deforestation and forest degradation) projects. The offsets are provided by Climate Partner, a provider of carbon credits.

Incidents and compliance

We had no environmental incidents in 2021 and no non-compliances or fines related to environmental regulations.

Understanding our employees’ commuting patterns

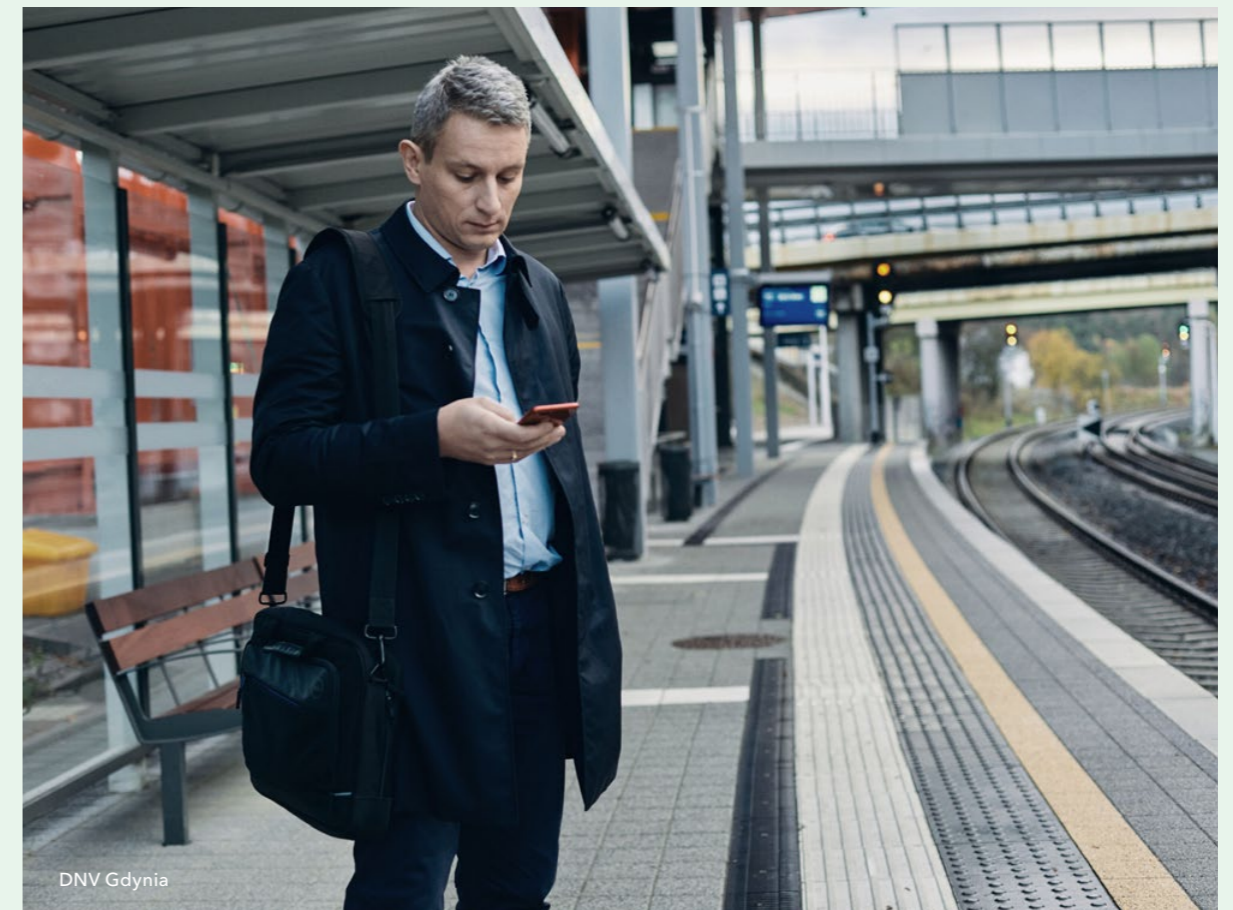
To get an accurate view of our indirect emissions for 2021, we needed to understand how our employees commute to work and to calculate the emissions from travel. But with COVID-19 disrupting normal working patterns and imposing varying degrees of home-working in countries around the world, gathering information on our employees’ commuting patterns was a challenge.

To overcome this issue, we constructed a commuting survey identifying the number of days per week employees were working in the office while also mapping the different means of transportation our people were using to commute to our offices. The survey was run in Norway, Germany, China and North America, countries that account for 48% of our employees. Norway had the highest response rate with 57% of employees respond-

ing and overall we received sufficient responses from the rest of the countries to make a solid estimation of emissions from employee commuting.

We have calculated emissions from commuting to be 5,165 tCO₂e, around 20% of our total greenhouse gas emissions. To continue improving our understanding and identify changes in commuting patterns (especially post-COVID), we will run the survey every year.

The survey also included an open response question to which factors would influence employees to choose more environmentally-friendly transport for their commute. The response rate was impressively high and has given us valuable insights that can feed into future initiatives. It has also increased awareness and engagement among employees when it comes to sustainable travel.



DNV Gdynia

1 2020 total CO₂e emissions figure has been corrected from that published in our 2020 Annual Report (23,383 tonnes) due to replacing estimated data with final measurements.
 2 3% of emissions reporting comes from estimated energy use. This is mainly done by estimating average office size.

3 The 2020 energy consumption figure has been corrected from that published in our 2020 Annual Report (57.3 GWh) due to replacing estimated data with final measurements.

Looking ahead

Our 2025 strategy includes ambitious plans to reduce our greenhouse gas emissions, switch to renewable electricity and work towards being climate positive by 2025. In 2022 we aim to:

- Design a roadmap to reach 100% renewable electricity by 2025 in the most effective and transparent manner.
- Reduce emissions from business travel by 30%. All business areas are actively working to limit air travel and consider alternative travel options.
- Expand our monitoring and reporting of value chain emissions, including emissions from vendors, contractors and our supply chain.
- Continue to develop a methodology for measuring and demonstrating the impact of our work on our selected SDGs.
- Engage and involve employees in our sustainability initiatives.
- Continue reducing single-use plastic waste across all our offices through campaigns and by engaging with our service providers.
- We will continue to work on projects that support our goal of becoming climate net positive by 2025, meaning that we will absorb and store more carbon than we emit.



DNV Høvik

Approach

Our purpose directs us to safeguard the environment. Our aim is to continuously reduce the environmental footprint of our own operations and help customers do the same. We aim to use our expertise to make a positive contribution to the SDGs and the 1.5°C pathway of the Paris Climate Agreement (see also the [Sustainable innovations](#) section).

As signatories to the UN Global Compact, we take a precautionary approach to managing our environmental and climate impacts. Our Code of Conduct (see the [Ethics and integrity](#) section) also commits us to reduce the environmental impact of our operations, procurement, investments, and property management.

Environmental management system

Since 2008, DNV Group has been independently certified according to the ISO 14001 environmental management system standard. Periodic audits take place to maintain our certification, which is key to identifying and reducing our environmental impacts on an ongoing basis. In November 2021, we had a successful recertification audit.

Environmental management reporting system and tool

We measure and monitor our key environmental aspects and any environmental incidents using DNV's Synergi Life software, which was developed in-house. We measure greenhouse gas emissions from air and rail travel with reporting tools from our travel agencies (see more on our greenhouse gas reporting in the [Metrics and data](#) pages).

Green supply chains

As part of our approach to creating a sustainable supply chain (see the [Sustainable supply chain](#) section), all suppliers are required to adhere to our Supplier Code of Conduct, including our environmental policies and standards.

Our aim is to continuously reduce the environmental footprint of our own operations and help customers do the same.

Climate and environmental governance

Our approach, processes and systems for managing environmental risks and performance is a Group-level responsibility. Our CEO is responsible for sustainability performance within DNV. He receives regular reports on environmental matters and performance, and monitors the implementation of the strategy to ensure that we meet our ambitious targets. Our Board of Directors has formal oversight of DNV's sustainability performance, including environment and climate.

How we calculate our greenhouse gas emissions

We calculate our greenhouse gas emissions in line with the GHG Protocol. We use the financial and operational control approach, with the operational control criteria defining the boundary for consolidating the greenhouse gas emissions. Location-based emissions are reported globally.

We use Defra CO₂ emission factors with radiative forcing index factor for calculating air travel.

Indirect emissions from electricity and district heating have been calculated using country-specific grid average emission factors published in the IEA 2022 revision.

We do not report on the greenhouse gases CH₄, N₂O, HFCs, PFCs, NF₃ or SF₆. We do not report on NO_x and SO_x emissions. We are not aware that we have any emissions of ozone depleting substances.

Our 2025 strategy includes ambitious plans to reduce our greenhouse gas emissions, switch to renewable electricity and work towards being climate positive.

Metrics and data

TABLE 15 | ENERGY CONSUMPTION (GWH)

	2021	2020	2019	2018
Energy consumption	59.7	55.8	94.8	109

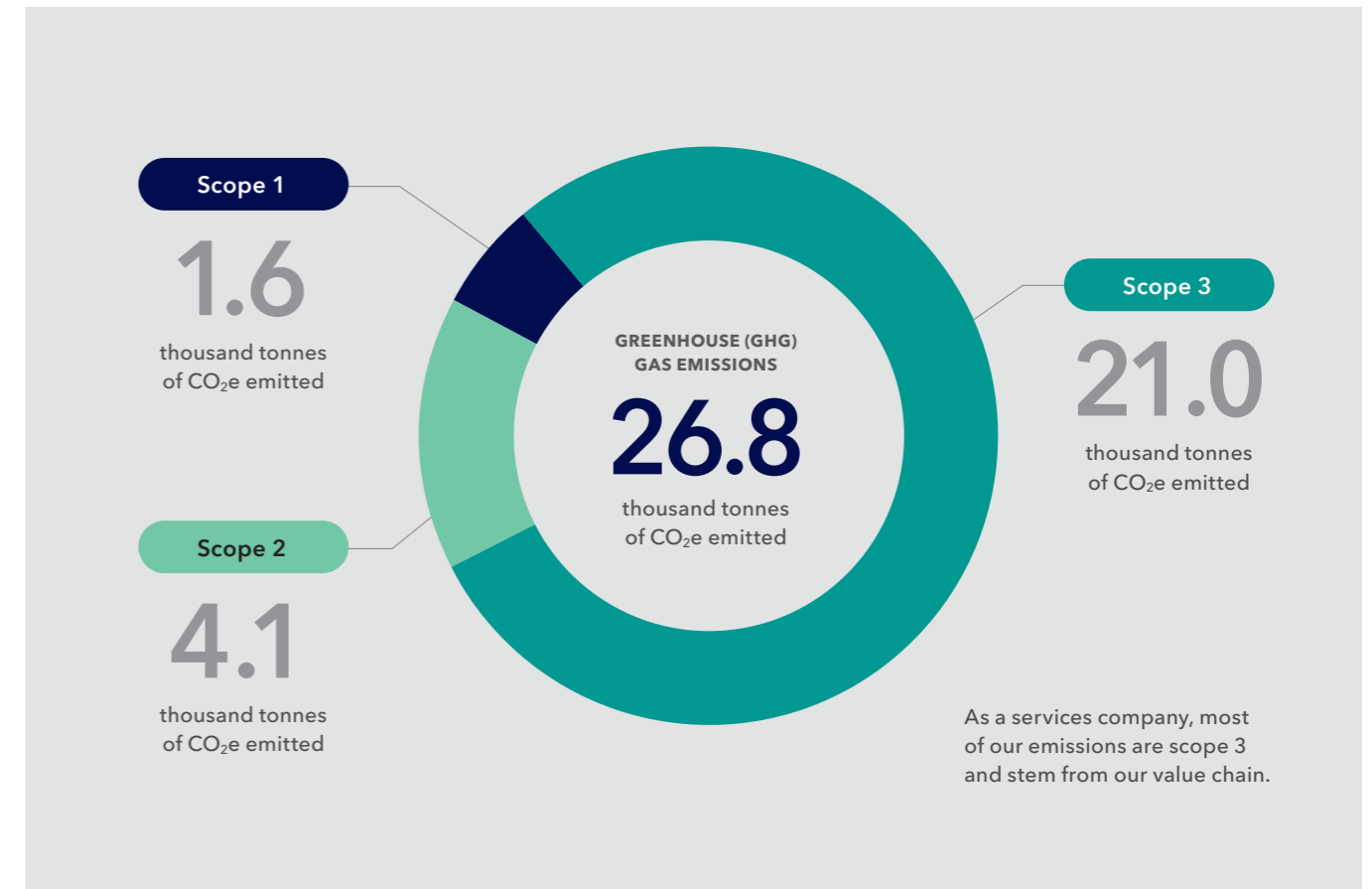
TABLE 16 | GREENHOUSE (GHG) GAS EMISSIONS (THOUSAND tCO₂e)

	2021	2020	2019	2018
Scope 1 Direct GHG emissions from operations	1.6	1.5	25.6 ¹	5.7
Natural gas on-site	1.6	1.5	2.4	2.3
Oil on-site	0.03	-	-	0.01
SF6	-	-	23.2	3.4

Scope 2 Indirect GHG emissions from purchased electricity and heat	4.1	7.4 ²	13.9	17.2
Electricity off-site	2.9	6.6	12.6	15.8
District heating	1.0	0.8	1.1	1.2
Purchased renewable electricity	0.3	0.05	0.2	0.2

Scope 3 Indirect GHG emissions	21.0	12.3	38.4	41.9	
Business travel	Air travel	5.8	8.7	33.8	36.4
	Car travel	4.4	3.6	4.6	5.5
	Rail travel	0.01	Not previously reported		
	Hotel stays	0.2	Not previously reported		
Waste generated in operations ⁴	All waste	0.008	0.005	0.005	0.005
Employee commuting	Employee commuting	5.2	Not previously reported		
Purchased goods and services	IT	2.0	Not previously reported		
	Cloud usage ⁵	0.8	Not previously reported		
	Smartphones ⁴	0.04	Not previously reported		
	Furniture ⁴	0.2	Not previously reported		
Leased assets ^{3,4}	Buildings (offices, laboratories, storage & parking spaces)	2.3	Not previously reported		

Total GHG emissions	26.8	21.3⁶	77.9	64.8
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carbon neutral

100% of our emissions in 2021 were offset through verified schemes.

2.27
tCO₂e per person

Scope 1, 2 and 3 greenhouse gas emissions from DNV operations.

When comparing like for like:
2021: **1.36**, 2020: **1.87**

1 23.2 tCO₂e came from chemicals (SF₆) used in laboratories that are no longer owned by DNV.
 2 2020 scope 2 emissions figure has been corrected from that published in our 2020 Annual Report (8.4 thousand tonnes) due to replacing estimated data with final measurements.
 3 DNV AS is the lessee for some of the assets that belong to DNV Eiendom, we are reporting on their emissions as a lessee not as an owner.
 4 Reporting only for Norway, emissions from more locations will be added in next year's report.
 5 Estimated amount as there is uncertainty in the data received from our supplier - the issue is being resolved.
 6 2020 total CO₂e emissions figure has been corrected from that published in our 2020 Annual Report (23.4 thousand tonnes) due to replacing estimated data with final measurements.

OUR SUSTAINABILITY STRATEGY

7 SUSTAINABLE SUPPLY CHAIN



Our ambition and objectives

Our approach to sustainability extends beyond our own operations and into our supply chain. It is important for us to build a sustainable supply chain to ensure smooth and efficient business operations globally, and to support our commitment to business ethics and the environment.

All suppliers are expected to adhere to our Supplier Code of Conduct and to ensure that their operations are in line with DNV's sustainability objectives. We regularly audit suppliers for compliance against the environmental, social and human rights requirements of our Code.


We work closely with the DNV environment team to ensure our procurement processes and facilities management support and deliver our environmental goals, especially relating to energy usage in our offices and our carbon footprint.

Headline performance in 2021:

-32% Reduced average floor space per employee from 25m² in 2017 to 17m² in 2021.

34% of our offices are in green-certified buildings, increased from 25% in 2019.

11 suppliers were audited in 2021 with no significant infringements on our Supplier Code of Conduct.

 Initiative to reduce or remove plastics from our supplies, starting with a plastic-free July campaign.

Progress in 2021

Energy use and greenhouse gas emissions

We use our procurement process to help reduce our energy use and greenhouse gas emissions. This includes purchasing renewable electricity, running low-emission company cars and renting environmentally-sound offices. For more details on renewable electricity and company cars, and our overall approach to reducing our environmental and climate impact, see the [Environment and climate](#) section.

Efficient, green and future-fit workplaces

With the ongoing COVID-19 pandemic, most DNV employees continued to work from home for large parts of 2021. Despite the disruption to traditional working patterns, we have continued to deliver high quality services to customers. This inspired us to consider future ways of working and we launched the 'Future Workplace Project' in August 2020 looking into hybrid home-office working possibilities.

Following successful pilots, our Group CEO, Remi Eriksen, announced in June 2021 that all DNV employees now have the

option to work partly in the office and partly remotely, depending on individual roles, tasks and customer needs. Not only does hybrid working balance the advantages of office and home working, it also delivers some environmental benefits from reduced daily commuting by employees globally.

To support a reduction in energy consumption and CO₂ emissions, we are also targeting reduced floor space per employee in our offices without impacting on the quality of the work environment. For office leases signed in 2021, we have successfully reduced floor space per employee to an average of 17m². This compares to an average of 25m² in 2017.

DNV has increased the percentage of green certified office space (measured by floor area) during the past few years. By the end of 2021, 34% of our offices are in green-certified buildings, up from 25% in 2019. A green-certified office, through its design, construction or operation, reduces or eliminates negative impacts on our climate and natural environment, including in the areas of energy consumption and waste management.

Improving procurement processes

In 2021, we continued working on sustainable procurement projects. Following a successful pilot in Poland during the year, we selected Basware's cloud-based purchase-to-pay software to support our procurement and payment processes.

Assessing suppliers

All DNV supplier contracts refer to our Supplier Code of Conduct. We continued our programme of auditing randomly-selected suppliers against the Code and audited 11 of our indirect suppliers in 2021. The supplier audits were carried out by DNV procurement experts and the results showed no significant infringements.

To improve our contract and supplier management, we are automating the process using our proprietary Synergi Life health, safety and environment (HSE) software. This will enable us to manage supplier risk assessments more efficiently, increase the frequency and ensure risks are identified more easily.

Human rights

Our Supplier Code of Conduct outlines our expectation that suppliers are not complicit in human rights abuses. Human rights are part of our supplier audits and we have not identified any human rights breaches in audits performed in 2021.

Reducing plastic use

We launched a Global Plastic Reduction project in May 2021, which focuses on reducing single-use plastics by avoiding their use entirely within DNV or using alternatives, such as degradable materials. All employees were invited to take part in our Plastic-free July campaign to contribute to reducing plastic consumption at work and at home. The project has been well received across the company with positive local initiatives contributing to plastic reduction. Examples include our offices in the Netherlands which replaced plastic cutlery, cling film and waste bags with 100% biodegradable alternatives in the canteen and Global Shared Services Poland which replaced the annual plastic gift card with electronic ones to eliminate the use of single-use plastics.

Looking ahead

We will continue the procurement lighthouse project to standardize the procurement process and clarify roles and responsibilities for indirect procurement. Our focus on making sustainability an important factor in selecting suppliers will also continue. We will start the global roll out of our new cloud-based purchase-to-pay software in 2022, to increase governance, transparency and compliance throughout the procurement process.

Our suppliers must adhere to our Supplier Code of Conduct and consider how they can support our sustainability goals in their own operations.

Assessing suppliers

We will update our Supplier Code of Conduct in 2022, strengthening sustainability requirements. Our audit programme for indirect suppliers will also continue with a minimum of 10 supplier audits globally. We select the suppliers to be audited based on how critical they are to our business.

Reducing plastic use

In 2022, we will develop and communicate requirements for key suppliers with the aim to remove or reduce plastics in our office supplies. Internally, we will use digital posters, intranet articles and other communication channels to raise awareness and engage our people so that we can all be mindful about plastic reduction both at the office and at home.

Approach

Our suppliers must adhere to our Supplier Code of Conduct and consider how they can support our sustainability goals in their own operations. We work closely with our suppliers and monitor their progress towards more sustainable operations through our global procurement programme, which includes systematic and standardized procurement policies and processes across the company.

Setting high standards

Our expectations for suppliers are outlined in our Supplier Code of Conduct. All suppliers must either sign their acceptance of the Code or accept it as a mandatory attachment to the contract. The Code is aligned with the UN Global Compact's ten principles on human rights, labour standards, environmental performance and anti-corruption.

Global governance, local purchasing

Although we procure most of our products and services locally, our procurement strategy, policy and processes are managed centrally by our Global Shared Services (GSS) unit, which also manages global procurement projects.

Our suppliers are divided into two groups: direct suppliers that contribute to our service to customers, for example, sub-contractors providing technical expertise or working on customer projects. Individual business areas are responsible for direct procurement. Indirect suppliers provide goods and services that support our overall business activities but are unrelated to our service to customers. Examples include offices and facilities management, travel, ICT hardware and software, financial services, insurance and office supplies.

Indirect procurement is managed by GSS. Our large supplier categories include subcontractors, office and real estate expenses, ICT, travel and car fleet.

Risk management

To manage risk and deliver cost savings and transparency, we are working to consolidate our suppliers globally; selecting trustworthy suppliers whose values and service quality meet our requirements. The new contract and supplier management module within our Synergi Life software will help us to better manage supplier risk, and we will promote this module within procurement and GSS functions in 2022.



OUR SUSTAINABILITY STRATEGY

8 ETHICS AND INTEGRITY



Our ambition and objectives

Trust is a critical building block for our business and we recognise this in our vision 'to be a trusted voice to tackle global transformations'. Trust in our brand, our products and services, and our knowledge and technical expertise is vital, as is trust that we run our business in the correct way.

Ethical conduct, legal compliance, and business and personal integrity are essential ingredients for building trust with customers and stakeholders. Alongside our purpose, vision and values, our Code of Conduct defines what we consider ethical, responsible and sustainable behaviour. It applies to everyone involved in DNV's business and we strictly adhere to its standards. Our approach to ethics and compliance is not simply to impose a set of rules, but to raise DNV's collective awareness of the practical implications of ethical behaviour and compliance.

Our headlines in 2021 were:

We support and adhere to the principles of the UN Global Compact to support a better, more sustainable world.

We launched our fully revised Code of Conduct and new mandatory training on the Code.

New guideline developed for high-risk countries that we operate in with a particular focus on anti-corruption measures.

Progress in 2021

Our focus in 2021 was on maintaining high levels of employee awareness on ethics and compliance-related topics. This included publishing our fully revised Code of Conduct and providing web-based and virtual classroom ethics and compliance training. Our Code of Conduct and global compliance programme protects against the diverse landscape of compliance and ethical risks we face as a Group operating in more than 100 countries across multiple sectors.

Code of Conduct

Our Code of Conduct has been restructured and the content has been fully updated, including new chapters on human rights and diversity to emphasize the importance we place on these topics. It provides a framework for expected behaviour at all levels in DNV and includes clear requirements related to responsibilities, behaviour and decision making by employees, sub-contractors and managers.

To help our employees familiarize themselves with the new Code of Conduct, its launch was accompanied by a new Group-wide mandatory training. The training explains the Code's main principles and expectations, and how to apply DNV's ethical standards and decision-making process. As part of the training, every employee needs to sign a personal commitment

to follow the Code of Conduct. 96% of DNV employees completed the training. The new Code of Conduct can be [downloaded here](#).

To evaluate the effectiveness and impact of the Code of Conduct training we conducted a feedback survey, which was completed by around 2,800 employees. The survey showed that, overall, employees were satisfied with the content. We will continue to explore the impact of the new Code in 2022 with an awareness survey covering a representative group of employees.

Anti-corruption

We updated and simplified our anti-corruption guidelines and instructions in 2022 to align with the new Code of Conduct. We also amended our gift guidelines in China to reflect new laws.

The US compliance programme was further strengthened through regular web-based network meetings where actions and experiences were shared, and network members were updated on anti-corruption and other compliance topics in the Americas region.

CASE STUDY

Focus on measures in high-risk countries

Our compliance team worked with Global Shared Services in Pune, India, to develop an 'ethical employee journey' to reinforce the high expectations as to ethics and integrity that DNV expects from all employees. The training is adapted different phases of employment, including pre-onboarding, onboarding, continuous employee engagement and exit from DNV. Based on this concept, Group compliance defined actions, including declaring conflicts of interest in the pre-onboarding-

phase and a train-the-trainer approach, to improve local training initiatives.

These new initiatives include a stronger focus on cultural differences and on areas of concern, such as conflicts of interest and personal data protection. This approach will be extended to all countries identified as high-risk in 2022.

Training and awareness

DNV places a strong emphasis on continuous training for employees, and this is particularly important to reinforce our high ethical standards. We monitor completion rates related to on the available trainings for employees and subcontractors and have achieved completion rates above 90% for mandatory trainings.

A training on personal data handling for line managers, rolled out in Q4 2020, was completed by 90%, and a training on unstructured personal data was completed by 93%. We continued to deliver integrity training as part the leadership essentials programme for line managers throughout the year.

We also developed a guideline for line managers in high-risk countries on handling misconduct reported by employees. Supporting the guideline, new line manager training has been prepared focusing on ethical practices to achieve a culture of integrity. Line managers will also receive materials enabling them to provide integrity training to their teams. Completing the e-learning and delivering team training will be mandatory for line managers in high-risk countries as of Q1 2022.

We also developed a new concept for an 'ethical employee journey' to help us communicate the standards we expect from DNV employees. (see case study above).

High-risk countries

DNV identifies countries that are considered high-risk for potential breaches of our business ethics and applies increased anti-fraud and anti-corruption actions. In 2021, a new network of employees responsible for compliance in high-risk countries was set up to discuss, promote and coordinate awareness measures, and to support initiatives and activities in high-risk countries. The network met four times in 2021 to discuss

anti-corruption measures. They received supporting material to conduct local training. Completion of mandatory trainings was followed-up and local challenges were discussed.

The network were also informed about internal audit findings and the new 'Enterprise Compliance Model (ECM)' initiative launched by Group finance. The ECM initiative involves a gap analysis to identify local legal requirements relating to Legal, HR and Finance functions within DNV companies in high-risk countries.

Export control laws and sanctions

In 2021, we focused on the interpretation of sanctions and increasing awareness of export control laws and sanctions. We took actions to identify export control law risks in Netherlands and UK and prepared new local processes and guidelines for transparency on legal requirements as well as roles and responsibilities. We continued monitoring sanctions' developments to determine any impact on DNV's business. Internal guidelines were continually updated, and we held frequent web-meetings with internal stakeholders.

We are introducing a tool designed to improve our due diligence checks for screening potential business partners, including scanning adverse media reports.

Legal actions

No critical integrity concerns leading to legal actions or disclosure to authorities were registered in 2021. This is in line with the trend seen in previous years. No legal actions related to anti-competitive behaviour or antitrust and monopoly legislation were pending or completed during the year. There have been no significant fines or non-monetary sanctions for non-compliance with laws and/or regulations relating to environmental, social or economic issues. In a few cases, we have taken disciplinary action at the employee level.

Looking ahead

Awareness

To continue to maintain high levels of awareness on all topics in the compliance programme, we will focus on new initiatives identified for the 'ethical journey' using a new approach to training and awareness measures including pre-surveys and tests. We will use learnings from compliance cases and questions directed to the Group compliance unit to guide our approach.

To measure awareness within DNV on the topics covered by our revised Code of Conduct, we will complete a survey on compliance in 2022 with a representative group of employees.

Whistleblowing

We will strengthen DNV's process for reporting misconduct by introducing a new web-based system, available 24/7.

Data protection

Personal data protection will remain in focus in 2022. We will improve our organizational setup for data protection with formalized roles and responsibilities, follow up on 'Schrems-2' ruling (including risk assessments) and implementation of new standard contractual clauses, and update and improve DNV's Binding Corporate Rules and internal instructions, such as access to email accounts and employee files.

Improvements are also planned for our process on handling third parties and the approach for mapping and documenting record of processing activities. We will also support the setup of our internal governance for digital channels (see the [Data privacy](#) section).

Export control and sanctions

We will continue to monitor sanctions and their interpretation in 2022 and will develop new processes in countries where export control-relevant services are provided. We will also continue discussions with DNV's business areas to identify the need for local export control processes and implement them where necessary.

Norwegian Transparency Act

As of July 2022, the Norwegian "Transparency Act" will come into force. The act requires Norwegian companies to carry out due diligence activities, in line with the OECD Guidelines for Multinational Enterprises, to ensure responsible operations, respecting both human rights and decent working conditions. We have initiated a review of our current procedures to ensure that we comply with new act.

Approach

As a global company operating in over 100 countries across multiple sectors, we work within a wide range of legislative, business and cultural environments. This results in a diverse landscape of compliance and ethical risks. Based on our Code of Conduct, our global compliance programme protects against these risks. Our approach is not simply to impose a set of rules, but to raise DNV's collective awareness through communication and training explaining the background and practical implications of ethical behaviour and compliance.

Code of Conduct

The DNV Code of Conduct outlines our requirements and expectations for ethical conduct. It clearly expresses what is expected from DNV as a business and from every individual working for, or on behalf of, DNV. The Code of Conduct can be [downloaded here](#).

The Code is firmly linked to DNV's Values and clearly sets out the expected behaviour and responsibilities of employees and managers in each chapter and gives guidance on ethical decision making. Separate instructions and guidelines for employees are in place for all issues covered in the Code of Conduct.

Zero tolerance

We do not tolerate any violation of applicable laws, including those on anti-corruption, privacy and export control, nor of our Code of Conduct or internal instructions. Violations can result in disciplinary procedures, including termination of employment or contract, as well as potential legal proceedings.

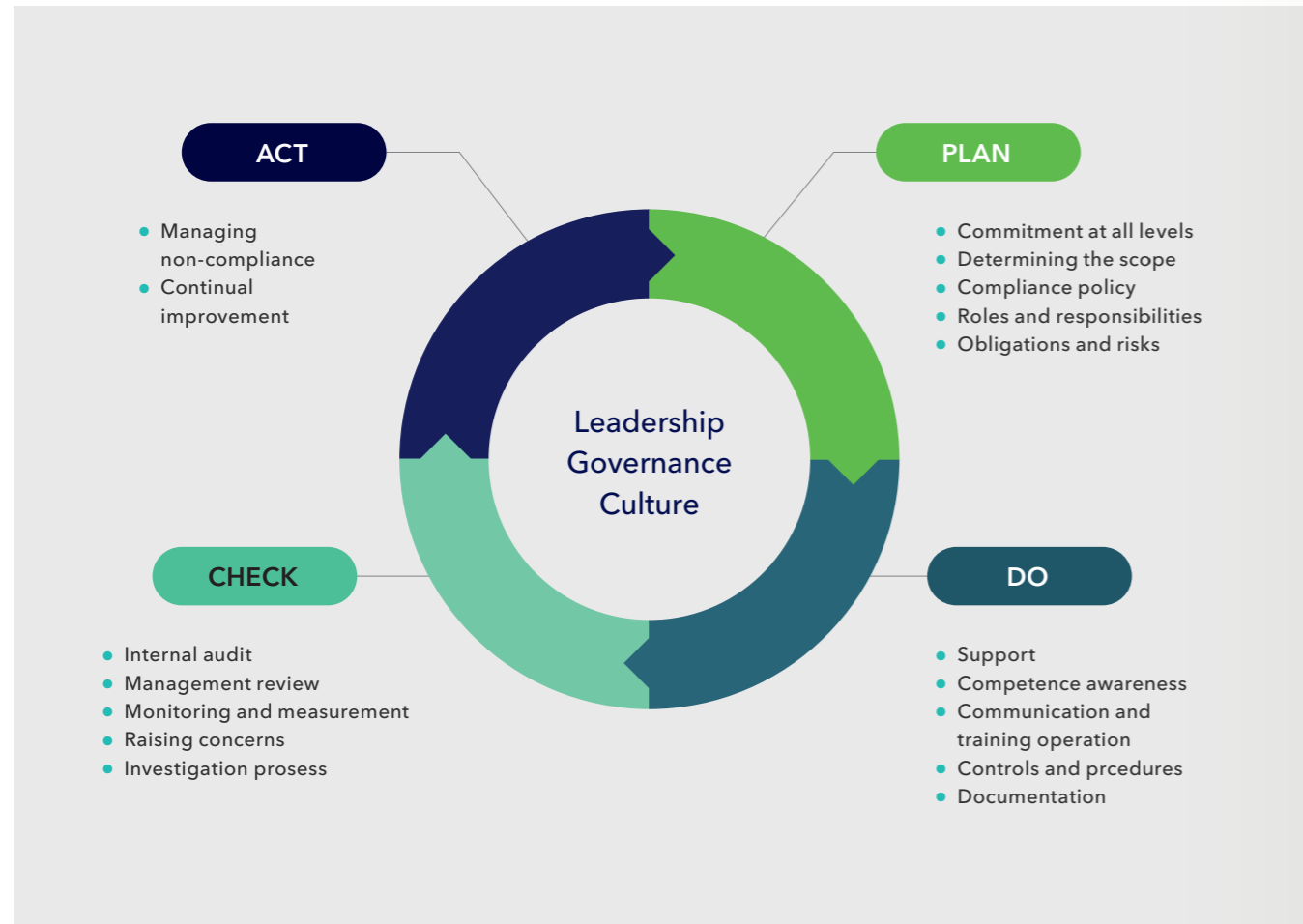
Compliance programme

Our compliance programme is based on the Code of Conduct which is owned by the Board of Directors. All focus areas - anti-corruption, antitrust, export control law and sanctions, and personal data protection - are based on the ISO standard 37301 for compliance management (see above). This creates an integrated and tailor-made approach to compliance. Lessons learned are used to build competence and resilience, enabling our employees to understand the structure and requirements of the compliance management system and meet customer requirements.

Training

Training and raising awareness are at the core of our approach. Awareness is key to reducing compliance risks and we continually invest in new and updated training on a number of compliance topics (see the [Progress in 2021](#) earlier in this section).

FIGURE 02 | COMPLIANCE PROGRAMME ACCORDING TO ISO 37301



Governance

Effective compliance is based on the global governance of our compliance programme and clear reporting lines. The Group Compliance Officer reports directly to the Board of Directors Audit Committee and to the Group CEO, with both receiving quarterly updates on compliance cases and the latest initiatives. The Board of Directors of DNV Group AS and Control Committee of Stifelsen Det Norske Veritas receive annual updates.

The compliance programme is governed and managed at Group level. It involves close cooperation through a global compliance network incorporating our Group compliance function, all business areas and Global Shared Services. The global compliance network communicates on the compliance programme and raises awareness of compliance issues in the countries where we operate.

Anti-corruption

We manage corruption and fraud risks through our Group risk management process and the Group compliance officer is a member of DNV's Group risk forum. All business areas conduct an annual risk assessment using the DNV risk management tool, which includes identified and active fraud and corruption risks.

In addition, we review risks reported by high-risk countries through a separate risk reporting process.

The risks are evaluated and discussed annually in the Group risk forum. Actions to mitigate identified risks are developed based on these discussions.

For employees, anti-corruption is part of our mandatory training programme, our leadership essentials training and, for targeted groups, we provide webinars.

Antitrust

Commercial policy and pricing are set independently and never agreed with competitors or other non-related parties. Competing vigorously and fairly, and in full compliance with all applicable antitrust and competition laws, is a fundamental corporate principle of DNV Group AS and its subsidiaries. Any obstruction of free and open competition is strictly prohibited.

For employees, antitrust is part of our mandatory training programme and our antitrust instructions are supplemented by a guideline on the 'dos and don'ts for competition law'.

Supply chain

We expect our suppliers and subcontractors to uphold the same standard of business ethics as we do and we have a Supplier Code of Conduct outlining our requirements ([available here](#)). Training is available for suppliers, emphasizing the ethical and sustainability standards that extend to our relationships with suppliers.

We continue to advise on and actively monitor implementation of our Group-wide instruction on subcontractors and intermediaries, as well as conducting risk-based due diligence checks in all business areas. The *Sustainable supply chain* section provides more details on how we work with suppliers.

Reporting misconduct

Our employees, customers and suppliers are encouraged to report actual or suspected misconduct and all employees are required to complete an e-learning on reporting misconduct. Reports could include concerns related to bribery, fraud, labour grievances, discrimination or other ethical issues or breaches

The DNV Code of Conduct outlines our requirements and expectations for ethical conduct.

of our Code of Conduct concerning colleagues, suppliers, subcontractors or agents working on behalf of DNV.

We have an ethical helpline available to employees and an anonymous channel for reporting concerns. These and other channels to contact DNV are set out in our instruction on reporting misconduct, the Code of Conduct, the DNV intranet and on our website.

Metrics and data

The number of financial misconduct cases remained steady in 2021. An increase in reported breaches of data protection was observed in 2021. We attribute the rise in the number of

reported data protection breaches to an increased awareness among employees following internal campaigns.

TABLE 17 | REPORTED NEW POTENTIAL COMPLIANCE CASES

Case type		2021	2020	2019
Labour	Suspicion of harassment, discrimination or breach of other labour-related instructions	6	2	10
Financial	Suspicion of financial misconduct	8	8	6
Data Protection	Suspicion of breach of data protection laws	24	16	20
Ethical Behaviour	Suspicion of unfair treatment	14	21	16
Other	All other suspicions of breach of law or internal instructions	14	17	15
Total		66	64	67

9 ECONOMIC VALUE CREATION



Our ambition and objectives

Economic performance is part of how DNV views sustainability. Through strong financial performance, we are able to deliver our strategic ambitions in line with our purpose, develop our people by building their skills and competence, and invest in research and innovation to ensure that we remain relevant to our customers. By creating opportunities for direct and indirect employment, investing in upskilling and life-long learning, and by paying tax where we operate, we contribute to local communities.

We have always focused on maintaining a strong financial foundation so that our company can stay

resilient, remain independent and take a long-term view on delivering on our purpose “to safeguard life, property and the environment”. This was never more evident as during the ongoing pandemic. By working hard to deliver a profit, we generate value for society.

We also add value by advancing safety and contributing to research and development in strategic areas such as the energy transition, digital assurance, and ocean industries. We support our globally-funded research by reinvesting five percent of our global revenue in research, development and innovation.

Activity in 2021

Financial performance

Revenue for the year was NOK 21,464 million (2020: NOK 20,911 million) with an operating profit of NOK 2,646 million (2020: NOK 2,406 million). EBITDA was NOK 3,673 million (2020: 3,481).

We continue to commit five percent of our annual revenues to research and innovation programmes, which helps us fulfil our purpose to safeguard life, property and the environment. See our [Financial performance](#) section for more details.

Looking ahead

We launched our new five-year Group strategy at the start of 2021. The strategy runs until 2025 and sets out our goal for customer-centric growth and an ambition to shape the future of assurance within our core industries. For more information on the new strategy, see the [How we make an impact](#) section.

Our strategy sets out our goal for customer-centric growth and an ambition to shape the future of assurance within our core industries.

Approach

We are solely owned by Stiftelsen Det Norske Veritas, an independent Norwegian foundation with the long-standing purpose to safeguard life, property and the environment. This purpose is realized mainly through the 100% ownership of DNV Group AS.

Our owner requires DNV to run profitable operations so that society at large benefits from the employment, taxes and other economic activity we create. In addition, our stakeholders, including employees, suppliers and subcontractors, and customers, rely on DNV to remain financially robust.

Robust financial performance is a central tenet of our success. All business areas are expected to meet or exceed their annual revenue targets, but growth must not take place at the expense of sustainability, profitability, quality or the integrity of our operations.

Tax policy

DNV's tax policy is part of how we view corporate responsibility. Our tax policy provides the direction and framework for our fiscal affairs, and most importantly, provides a foundation for the development and maintenance of common culture for our operations across our organization. We actively work to update our approach and align with organisations that we consider leading, such as Norges Bank Investment Management.

Our global tax policy establishes the following principles:

- DNV is dependent upon society's trust
- DNV shall not participate in tax planning or financial transactions which can damage this trust
- DNV is to comply with the letter and spirit of tax law in all countries in which we operate
- All group company transactions are to be made on an arm's length basis as set out under the OECD Guidelines
- Tax cost and risk assessments are to be integrated in all core business considerations, both strategic and in day-to-day operations
- DNV is committed to being fully compliant and will provide sufficient information and economic context when reporting to and negotiating with tax authorities.

More information on our tax liabilities in 2021 is available in the [Financial statements](#) section.



Performance

TABLE 18 | VALUE GENERATED AND DISTRIBUTED GLOBALLY

AMOUNTS IN NOK MILLION

	Nordics	Central Europe	West, South and East Europe	Great Britain	North America	South America	North Asia	South Asia	India, Middle East and Africa	Total
Revenues ¹	6 014	1 366	2 911	1 467	4 299	313	2 952	1 058	1 129	21 509
Operating costs ²	1 953	-29	778	369	1 540	109	943	251	420	6334
Employee wages and benefits	3 408	1 263	1 801	982	2 139	133	1 125	585	663	12 099
Payments to providers of capital ³	21	29	3	-4	0	4	1	1	11	66
Corporate income taxes	204	25	86	15	149	14	234	48	49	824
Community investments	4	-	-	-	-	-	-	-	-	4
Economic value retained	428	77	245	105	471	54	649	173	-14	2 188

¹ External revenue and interest income

² Operating costs excluding employee wages and benefits, amortizations and impairment

³ External interest expenses

