



ÅRSREGNSKAPET FOR REGNSKAPSÅRET 2022 - GENERELL INFORMASJON

Enheten

Organisasjonsnummer: 984 308 736
Organisasjonsform: Aksjeselskap
Foretaksnavn: DNO YEMEN AS
Forretningsadresse: Dokkveien 1
0250 OSLO

Regnskapsår

Årsregnskapets periode: 01.01.2022 - 31.12.2022

Konsern

Morselskap i konsern: Nei

Regnskapsregler

Regler for små foretak benyttet: Ja
Benyttet ved utarbeidelsen av årsregnskapet til selskapet: Regnskapslovens alminnelige regler

Årsregnskapet fastsatt av kompetent organ

Bekreftet av representant for selskapet: Hallgeir Uren
Dato for fastsettelse av årsregnskapet: 20.06.2023

Grunnlag for avgivelse

År 2022: Årsregnskapet er elektronisk innlevert
År 2021: Tall er hentet fra elektronisk innlevert årsregnskap fra 2022

Det er ikke krav til at årsregnskapet m.v. som sendes til Regnskapsregisteret er undertegnet. Kontrollen på at dette er utført ligger hos revisor/enhetens øverste organ. Sikkerheten ivaretas ved at innsender har rolle/rettighet for innsending av årsregnskapet via Altinn, og ved at det bekreftes at årsregnskapet er fastsatt av kompetent organ.

Brønnøysundregistrene, 17.07.2024



Resultatregnskap

Beløp i: USD	Note	2022	2021
RESULTATREGNSKAP			
Kostnader			
Other operating expenses	2	9 881 000	2 621 000
Sum kostnader		9 881 000	2 621 000
Driftsresultat		-9 881 000	-2 621 000
Finansinntekter og finanskostnader			
Annen renteinntekt		1 000	2 000
Sum finansinntekter		1 000	2 000
Loss on foreign exchange		5 000	2 000
Sum finanskostnader		5 000	2 000
Netto finans		-4 000	
Ordinært resultat før skattekostnad		-9 885 000	-2 621 000
Tax income/-expense	3	0	0
Ordinært resultat etter skattekostnad		-9 885 000	-2 621 000
Årsresultat		-9 885 000	-2 621 000
Overføringer og disponeringer			
Udekket tap	4	-9 885 000	-2 621 000
Sum overføringer og disponeringer		-9 885 000	-2 621 000



Balanse

Beløp i: USD	Note	2022	2021
BALANSE - EIENDELER			
Anleggsmidler			
Immaterielle eiendeler			
Sum anleggsmidler		0	0
Omløpsmidler			
Varer			
Bankinnskudd, kontanter og lignende			
Cash and cash equivalents		52 000	57 000
Sum bankinnskudd, kontanter og lignende		52 000	57 000
Sum omløpsmidler		52 000	57 000
SUM EIENDELER		52 000	57 000
BALANSE - EGENKAPITAL OG GJELD			
Egenkapital			
Innskutt egenkapital			
Share capital	4	45 544 000	45 544 000
Sum innskutt egenkapital		45 544 000	45 544 000
Opptjent egenkapital			
Udekket tap	4	108 149 000	98 264 000
Sum opptjent egenkapital	4	-108 149 000	-98 264 000
Sum egenkapital	4	-62 605 000	-52 720 000
Gjeld			
Langsiktig gjeld			
Annen langsiktig gjeld			
Langsiktig konserngjeld	5	30 286 000	26 616 000
Sum annen langsiktig gjeld		30 286 000	26 616 000



Balanse

Beløp i: USD	Note	2022	2021
Sum langsiktig gjeld		30 286 000	26 616 000
Kortsiktig gjeld			
Betalbar skatt	3	0	0
Kortsiktig konserngjeld	5	1 266 000	1 277 000
Other short-term liabilities	5,6	31 105 000	24 884 000
Sum kortsiktig gjeld		32 371 000	26 161 000
Sum gjeld		62 657 000	52 777 000
SUM EGENKAPITAL OG GJELD		52 000	57 000



Brønnøysundregistrene

ÅRSREGNSKAP FOR REGNSKAPSÅRET 2022 - GENERELL INFORMASJON

Journalnummer: 2023 595453

Enheten

Organisasjonsnummer: 984 308 736
Organisasjonsform: Aksjeselskap
Foretaksnavn: DNO YEMEN AS
Forretningsadresse: Dokkveien 1
0250 OSLO

Regnskapsår

Årsregnskapets periode: 01.01.2022 - 31.12.2022

Konsern

Morselskap i konsern: Nei

Regnskapsregler

Regler for små foretak benyttet: Ja
Benyttet ved utarbeidelsen av
årsregnskapet til selskapet: Regnskapslovens alminnelige regler

Årsregnskapet fastsatt av kompetent organ

Bekreftet av representant for selskapet: Hallgeir Uren
Dato for fastsettelse av årsregnskapet: 20.06.2023

Grunnlag for avgivelse

År 2022: Årsregnskap er elektronisk innlevert.
År 2021: Tall er hentet fra elektronisk innlevert årsregnskap fra 2022.

Det er ikke krav til at årsregnskapet m.v. som sendes til Regnskapsregisteret er undertegnet. Kontrollen på at dette er utført ligger hos revisor/enhetens øverste organ. Sikkerheten ivaretas ved at innsender har rolle/rettighet for innsending av årsregnskapet via Altinn, og ved at det bekreftes at årsregnskapet er fastsatt av kompetent organ.

Brønnøysundregistrene, 20.07.2023



Organisasjonsnr: 984 308 736
DNO YEMEN AS

RESULTATREGNSKAP

Beløp i: USD	Note	2022	2021
RESULTATREGNSKAP			
Kostnader			
Other operating expenses	2	9 881 000	2 621 000
Sum kostnader		9 881 000	2 621 000
Driftsresultat		-9 881 000	-2 621 000
Finansinntekter og finanskostnader			
Annen renteinntekt		1 000	2 000
Sum finansinntekter		1 000	2 000
Loss on foreign exchange		5 000	2 000
Sum finanskostnader		5 000	2 000
Netto finans		-4 000	
Ordinært resultat før skattekostnad		-9 885 000	-2 621 000
Tax income/-expense	3	0	0
Ordinært resultat etter skattekostnad		-9 885 000	-2 621 000
Årsresultat		-9 885 000	-2 621 000
Overføringer og disponeringer			
Udekket tap	4	-9 885 000	-2 621 000
Sum overføringer og disponeringer		-9 885 000	-2 621 000



Organisasjonsnr: 984 308 736
DNO YEMEN AS

BALANSE

Beløp i: USD Note 2022 2021

BALANSE - EIENDELER

Anleggsmidler
Immaterielle eiendeler

Sum anleggsmidler 0 0

Omløpsmidler
Varer

Bankinnskudd, kontanter
og lignende

Cash and cash equivalents 52 000 57 000

Sum bankinnskudd,
kontanter og lignende 52 000 57 000

Sum omløpsmidler 52 000 57 000

SUM EIENDELER 52 000 57 000

BALANSE - EGENKAPITAL OG GJELD

Egenkapital

Innskutt egenkapital

Share capital 4 45 544 000 45 544 000

Sum innskutt egenkapital 45 544 000 45 544 000

Opptjent egenkapital

Udekket tap 4 108 149 000 98 264 000

Sum opptjent egenkapital 4 -108 149 000 -98 264 000

Sum egenkapital 4 -62 605 000 -52 720 000

Gjeld

Langsiktig gjeld

Annen langsiktig gjeld

Langsiktig konserngjeld 5 30 286 000 26 616 000

Sum annen langsiktig gjeld 30 286 000 26 616 000

Sum langsiktig gjeld 30 286 000 26 616 000

Kortsiktig gjeld

Betalbar skatt 3 0 0

Kortsiktig konserngjeld 5 1 266 000 1 277 000

Other short-term

liabilities 5,6 31 105 000 24 884 000

Sum kortsiktig gjeld 32 371 000 26 161 000



Sum gjeld	62 657 000	52 777 000
SUM EGENKAPITAL OG GJELD	52 000	57 000



Organisasjonsnr: 984 308 736
DNO YEMEN AS

NOTEOPPLYSNINGER - SELSKAP

- alle poster oppgitt i hele tall

Note
1

Regnskapsprinsipper
Se vedlagt filvedlegg.

Note
1

Er det usikkerhet om fortsatt drift?: Ja

Se vedlagt filvedlegg, note 1, 4 og 6.

Note
2

Antall årsverk i regnskapsåret
0.00

Note
2

Spesifisering av resultatregnskapet

Lønnskostnader

<u>Lønn</u>	<u>Årets</u>	<u>Fjorårets</u>
	0.00	0.00
<u>Folketrygdavgift</u>	<u>Årets</u>	<u>Fjorårets</u>
	0.00	0.00
<u>Pensjonskostnader</u>	<u>Årets</u>	<u>Fjorårets</u>
	0.00	0.00
<u>Andre ytelser</u>	<u>Årets</u>	<u>Fjorårets</u>
	0.00	0.00
<u>Sum lønnskostnader</u>	<u>Årets</u>	<u>Fjorårets</u>
	0.00	0.00

Note

Ekstraordinære inntekter og kostnader



Sum Beløp

Balanseført verdi 31.12. Varige driftsmidler Immaterielle eiend.

Konsernregnskap

Virksomheten inngår i konsolideringen til morselskapets konsernregnsk.: Ja

Morselskapet sitt navn

DNO ASA

Forretningskontor for morselskapet

Dokkveien 1, 0250 Oslo

Begrunnelse for at datterselskap er utelatt fra konsolideringen

Samlet beløp - tilknyttet selskap Årets Fjorårets

Annen langsiktig gjeld

Samlet beløp - foretak i samme konsern Årets Fjorårets
30286000.00 26616000.00

Kortsiktig gjeld

Samlet beløp - foretak i samme konsern Årets Fjorårets
1266000.00 1277000.00

Samlet beløp - felles kontrollert virksomhet Årets Fjorårets

Pantstillelse Beløp

Note

Fordringer

Fordringer som forfaller senere enn ett år etter regnskapsårets slutt

Mer om fordringer

Beholdning av egne aksjer Antall Pålydende Andel av aksjek.



Annual Report 2022 DNO Yemen AS

- Income statement
- Balance sheet
- Notes

Org.no.: 984308736



DNO Yemen AS

Income statement (USD thousand)

	1 January - 31 December		
	Note	2022	2021
OPERATING EXPENSES			
Other operating expenses	2	9,881.2	2,620.6
Total operating expenses		9,881.2	2,620.6
OPERATING PROFIT/-LOSS			
		-9,881.2	-2,620.6
FINANCIAL INCOME AND EXPENSES			
Other interest income		0.7	1.5
Net gain/-loss on foreign exchange transactions		-4.9	-2.2
Net financial income/-expenses		-4.2	-0.7
PROFIT/-LOSS BEFORE TAX			
		-9,885.3	-2,621.4
Tax income/-expense	3	-	-
NET PROFIT/-LOSS		-9,885.3	-2,621.4

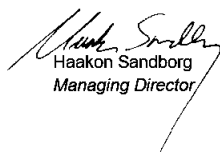


DNO Yemen AS

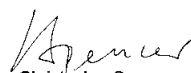
Balance sheet (USD thousand)

<u>Assets</u>	<u>Note</u>	Years ended 31 December	
		<u>2022</u>	<u>2021</u>
CURRENT ASSETS			
Cash and cash equivalents		51.5	56.8
Total current assets		51.5	56.8
TOTAL ASSETS			
		51.5	56.8
Equity and liabilities			
	<u>Note</u>	<u>2022</u>	<u>2021</u>
EQUITY			
Paid-in capital			
Share capital		45,544.3	45,544.3
Total paid-in capital		45,544.3	45,544.3
Other equity			
Uncovered loss		-108,149.5	-98,264.2
Total retained earnings		-108,149.5	-98,264.2
Total equity	4	-62,605.2	-52,719.9
LIABILITIES			
Non-current liabilities			
Long-term intercompany liabilities	5	30,286.4	26,615.5
Total other long-term liabilities		30,286.4	26,615.5
Current liabilities			
Intercompany liabilities	5	1,265.8	1,277.1
Other short-term liabilities	5,6	31,104.5	24,884.1
Total current liabilities		32,370.3	26,161.2
Total liabilities		62,656.7	52,776.7
TOTAL EQUITY AND LIABILITIES			
		51.5	56.8

Oslo, 20 June 2023


Haakon Sandborg
Managing Director


Geir Arne Skau
Board member


Christopher Spencer
Chairman



DNO Yemen AS
Notes to the accounts 2022

Note 1 Accounting principles

Basis for preparation

The financial statements of DNO Yemen AS have been prepared in accordance with the Norwegian Accounting Act and generally accepted accounting principles for small companies.

The company is part of the consolidated financial statements of DNO ASA. The consolidated financial statements of DNO ASA can be retrieved from www.dno.no or printed copies can be ordered by an inquiry to DNO ASA.

Going concern

As of 31 December 2022, production start-up at the Yaalen field at Block 47 in Yemen remains on hold due to suspension of operations caused by the civil war. At yearend 2022, gross contingent (2C) resources at Block 47 stood at 6.2 MMbbls (4.8 MMbbls net to the company), unchanged from yearend 2021. The company's book equity at yearend 2022 is otherwise negative. Currently the company is mainly financed through parent company debt and the parent company intends to continue to provide financial support in the manner it has already done to date and in such a way that the company is able to meet its financial obligations. The board expects the company to continue the business over the next 12 months, but emphasizes that there is material uncertainty related to the going concern assumption. In accordance with the Accounting Act section 3-3, the financial statements have been prepared on a going concern assumption.

Use of estimates

The management has used estimates and assumptions that have affected assets, liabilities, incomes, expenses and information on potential liabilities in accordance with generally accepted accounting principles in Norway.

Foreign currency

The company's financial statements are presented in USD which also is the company's functional currency. Foreign currency transactions are translated at the exchange rate on the date of the transaction. Monetary items denominated in foreign currencies are translated to USD using the balance sheet date exchange rates. Realized and unrealized currency gains and losses, including translation differences, are recognized as financial items in the income statement.

Balance sheet classification

Current assets and short term liabilities consist of receivables and payables due within one year, and items related to the inventory cycle. Other balance sheet items are classified as fixed assets / long term liabilities.

Current assets are valued at the lower of cost and fair value. Short term liabilities are recognized at nominal value.

Provisions and contingent liabilities

A provision is recognized when the company has a present obligation (legal or constructive) as a result of a past event, it is likely that an outflow of resources will be required to settle the obligation and a reliable estimate can be made of the obligation amount. When the company expects some or all of a provision to be reimbursed, for example under an insurance contract, the reimbursement is recognized as a separate asset, but only if the reimbursement is certain. The expense related to any provision is presented in profit or loss, net of any reimbursement. Provisions are reviewed at each balance sheet date and adjusted to reflect the current best estimate. The amount of the provision is the present value of the risk-adjusted expenditures expected to be required to settle the obligation, determined using the estimated risk-free interest rate and a credit premium as the discount rate. Where discounting is used, the carrying amount of provision increases in each period to reflect the unwinding of the discount by the passage of time. This increase is recognized as other financial expenses. Contingent liabilities are not recognized but are disclosed unless the possibility of an outflow of resources is remote.

Taxes

Deferred tax is determined on the basis of existing temporary differences between accounting net income and tax net income, including yearend loss carry-forwards, calculated at tax rates applicable at the balance sheet date. Temporary differences, both positive and negative, which will or are likely to reverse in the same period, are recorded as a net amount. Deferred tax assets are recognized only to the extent that it is probable that the company will have future taxable income, against which the asset can be utilized.

The income tax expense is comprised of both tax payable for the period, and changes in deferred tax.

From 2013, operating income and operating expenses from Petroleum activities outside Norway are not taxable or deductible in accordance with The Norwegian General Tax Act section 2-39. In general financial items are not exempt from the above mentioned section 2-39, and are therefore taxable or deductible. Interest expenses are deductible in accordance with section 6-91.



DNO Yemen AS
Notes to the accounts 2022

Note 2 Other operating expenses

The company had a workforce of two people engaged in the operations in Yemen at yearend 2022, both working in Yemen.

Other operating expenses

Other operating expenses in 2022 relate mainly to a provision for an arbitration case and legal costs.

No salaries or fees have been paid to Managing Director or to the Board in 2022. No loans or guarantees have been made to senior management in the parent company, shareholders, members of the Board or related parties to these.

Note 3 Taxes

Tax income/-expense

USD thousand	1 January - 31 December	
	2022	2021
Taxes payable	-	-
Change in deferred taxes	-	-
Change in tax expense from prior years	-	-
Tax income/-expense	-	-

Tax effects on temporary differences relate to the following items:

USD thousand	Years ended 31 December	
	2022	2021
Tax losses carried forward	1,610.1	373.5
Total deferred tax assets/-liabilities	1,610.1	373.5
Deferred tax asset allowance	-1,610.1	-373.5
Recognized deferred tax assets	-	-
Recognized deferred tax liabilities	-	-

The tax rate in Norway in 2022 and 2021 was 22 percent. The tax rate has been used to calculate deferred taxes, if applicable.

Profits/-losses by Norwegian companies from foreign upstream activities outside of Norway are not taxable/deductible in Norway in accordance with the General Tax Act, section 2-39. Under these rules only certain financial income and expenses are taxable in Norway.

Income tax payable/-receivable

USD thousand	Years ended 31 December	
	2022	2021
Income tax payable	-	-
Tax effect group contribution	-	-
Taxes payable from previous year(s)	-	-
Net tax payable/-receivable	-	-

Note 4 Shareholders' equity

Movement in shareholders' equity:

USD thousand	Share capital	Uncovered losses	Total
Shareholders' equity on 1 January 2022	45,544.3	-98,264.2	-52,719.9
Profit/-loss for the year	-	-9,885.3	-9,885.3
Shareholders' equity on 31 December 2022	45,544.3	-108,149.4	-62,605.2

Share capital as of 31 December:

	2022
Share capital, NOK	291,000,000
Number of shares	291,000
Par value, NOK	1,000



DNO Yemen AS
Notes to the accounts 2022

Note 4 Shareholders' equity (continued)

The company do not owns own shares and the company is fully owned by DNO ASA.

As of 31 December 2022, production start-up at the Yaalen field at Block 47 in Yemen remains on hold due to suspension of operations caused by the civil war. At yearend 2022, gross contingent (2C) resources at Block 47 stood at 6.2 MMbbls (4.8 MMbbls net to the company), unchanged from yearend 2021. The company's book equity at yearend 2022 is otherwise negative. Currently the company is mainly financed through parent company debt and the parent company intends to continue to provide financial support in the manner it has already done to date and in such a way that the company is able to meet its financial obligations. The board expects the company to continue the business over the next 12 months, but emphasizes that there is material uncertainty related to the going concern assumption. In accordance with the Accounting Act section 3-3, the financial statements have been prepared on a going concern assumption.

Note 5 Intercompany, short-term receivables and liabilities

The company has a loan from the parent company. The loan is not interest bearing as the licence operated by the company is in the exploration phase.

Long-term intercompany liabilities at yearend 2022 of USD 30.3 million (USD 26.6 million at yearend 2021) are mainly with parent company DNO ASA.

Short term liabilities to group companies amount to USD 1.3 million at yearend 2022 (USD 1.3 million at yearend 2021).

Other short-term liabilities comprise mainly of a provision related to the Block 53 (USD 20.8 million) and Block 32 (USD 1.4 million) arbitration awards, and working capital in the licenses including license accruals.

All of the company's short term liabilities are due within one year.

Note 6 Guarantees and commitments

Contractual obligations/license commitments

At yearend 2022, the company has no contractual obligations in Block 47 while in suspension. All commitment wells have been drilled to date.

Contingent liabilities and contingent assets

Disputes with Ministry of Oil and Minerals of Yemen (MOM) – Block 53, Block 43 and Block 32

The Ministry of Oil and Minerals (MOM) of Yemen filed an arbitration claim against operator Dove Energy Limited and the other partners (including DNO Yemen AS) for allegedly wrongful withdrawal from Block 53. An arbitral award was rendered in July 2019 partially in the Ministry's favor in the amount of USD 29 million (out of a USD 171 million claim). The Contractor (including DNO Yemen AS), filed for annulment proceedings in the Paris Court d'Appel which was dismissed in 2022 but is currently on appeal at the Supreme Court. A provision of USD 20.8 million was recognized at yearend 2022 related to this arbitration award (USD 14 million at yearend 2021).

DNO Yemen AS (DNO Yemen) was involved in a dispute with MOM with respect to DNO Yemen's relinquishment of Block 32 in 2016. An arbitral award was rendered on 7 April 2021 in the Ministry's favor in the amount of USD 8.1 million (out of a USD 151 million counterclaim) while the Contractor of the license was awarded USD 5 million (out of a USD 14 million claim). A provision for liability of USD 1.4 million (net to DNO Yemen AS) was recognized in 2021 related to this arbitration award (unchanged at yearend 2022).

DNO Yemen was involved in a dispute with MOM with respect to DNO Yemen' relinquishment of Block 43 in 2016. An arbitral award was rendered on 18 February 2020 in DNO Yemen' favor in the amount of USD 6.8 million (almost entirely dismissing the USD 131 million counterclaim of the MOM). The asset related to this arbitration award was not recognized in the balance sheet as of 31 December 2022.

As part of the Block 43 arbitral award in 2020 (above), a cost recovery audit was mandated for the years 2014 and 2015. In 2021, MOM filed an arbitration claim against DNO Yemen AS for allegedly over-recovered costs of USD 17.2 million from the Ministry in 2014 and 2015. The company does not provide further information with respect to this arbitration dispute and the associated risk for the company, especially with regards to the measures taken in this context, in order not to impair the outcome of the proceedings. No provision for a liability was made at yearend 2022 related to this dispute.



DNO Yemen AS
Notes to the accounts 2022

Note 6 Guarantees and commitments (continued)

On 8 December 2022, the Oslo District Court ruled that previously rendered arbitration awards regarding Blocks 53 and 32 are enforceable against DNO Yemen in Norway. DNO Yemen has appealed this decision. The Oslo District Court also ruled that the previously rendered arbitration award regarding Block 43 in favor of DNO Yemen is enforceable against the MOM in Norway. The MOM has not contested this decision. A parallel enforcement case regarding the same subject matter but filed against DNO ASA remains suspended pending a final ruling in the DNO Yemen case.



Statsautoriserte revisorer
Ernst & Young AS
Stortorvet 7, 0155 Oslo
Postboks 1156 Sentrum, 0107 Oslo

Foretaksregisteret: NO 976 389 387 MVA
Tlf: +47 24 00 24 00
www.ey.no
Medlemmer av Den norske Revisorforening

INDEPENDENT AUDITOR'S REPORT

To the Annual Shareholders' Meeting of DNO Yemen AS

Opinion

We have audited the financial statements of DNO Yemen AS (the Company), which comprise the balance sheet as at 31 December 2022, the income statement for the year then ended, and notes to the financial statements, including a summary of significant accounting policies.

In our opinion the financial statements comply with applicable legal requirements and give a true and fair view of the financial position of the Company as at 31 December 2022 and its financial performance for the year then ended in accordance with the Norwegian Accounting Act and accounting standards and practices generally accepted in Norway.

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (ISAs). Our responsibilities under those standards are further described in the *Auditor's responsibilities for the audit of the financial statements* section of our report. We are independent of the Company in accordance with the requirements of the relevant laws and regulations in Norway and the International Ethics Standards Board for Accountants' *International Code of Ethics for Professional Accountants (including International Independence Standards)* (IESBA Code), and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Material uncertainty related to going concern

We draw attention to notes 1, 4 and 6 which describe that the Company's operations in Yemen are in force majeure and there is no certainty as to when this will be lifted. As of 31.12.2022, the Company has a negative equity of USD 62,6 million and is dependent on financial support from its parent company DNO ASA. These events or conditions, along with other matters as set forth in notes 1, 4 and 6, indicate that a material uncertainty exists that may cast significant doubt on the Company's ability to continue as a going concern. Our opinion is not modified in respect of this matter.

Responsibilities of management for the financial statements

Management (the Board of Directors and the Managing Director) is responsible for the preparation and fair presentation of the financial statements in accordance with the Norwegian Accounting Act and accounting standards and practices generally accepted in Norway, and for such internal control as management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is responsible for assessing the Company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless management either intends to liquidate the Company or to cease operations, or has no realistic alternative but to do so.

Auditor's responsibilities for the audit of the financial statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that



Building a better
working world

includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs will always detect a material misstatement when it exists.

Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

As part of an audit in accordance with ISAs, we exercise professional judgment and maintain professional scepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Company's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Company's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Company to cease to continue as a going concern.
- Evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

We communicate with the board of directors regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

Oslo, 20 June 2023
ERNST & YOUNG AS

The auditor's report is signed electronically

Jon-Michael Grefsrød
State Authorised Public Accountant (Norway)



PENNEO

Signaturene i dette dokumentet er juridisk bindende. Dokument signert med "Penneo"™ - sikker digital signatur.
De signerende parter sin identitet er registrert, og er listet nedenfor.

"Med min signatur bekrefter jeg alle datoer og innholdet i dette dokument."

Jon-Michael Grefsrød

Statsautorisert revisor

På vegne av: EY

Serienummer: UN:NO-9578-5992-4-3016511

IP: 213.52.xxx.xxx

2023-06-20 09:00:34 UTC



Penneo Dokumentnøkkel: XIVIO-CV083-FBVHC-60LAD-DHGAF-J4YOS

Dokumentet er signert digitalt, med **Penneo.com**. Alle digitale signatur-data i dokumentet er sikret og validert av den datamaskin-utregnede hash-verdien av det opprinnelige dokument. Dokumentet er låst og tids-stemplet med et sertifikat fra en betrodd tredjepart. All kryptografisk bevis er integrert i denne PDF, for fremtidig validering (hvis nødvendig).

Hvordan bekrefter at dette dokumentet er originalen?

Dokumentet er beskyttet av ett Adobe CDS sertifikat. Når du åpner dokumentet i

Adobe Reader, skal du kunne se at dokumentet er sertifisert av **Penneo e-signature service <penneo@penneo.com>**. Dette garanterer at innholdet i dokumentet ikke har blitt endret.

Det er lett å kontrollere de kryptografiske beviser som er lokalisert inne i dokumentet, med Penneo validator - <https://penneo.com/validator>



Skattedirektoratet

Saksbehandler
Jan Hoelstad

Deres dato
24.11.2010

Vår dato
14.12.2010

Telefon
22077325

Deres referanse
Cathrine Manum

Vår referanse
2010/1198508

DNO International ASA
Postboks 1345 Vika
0113 OSLO

Dispensasjon fra kravet om utarbeidelse av årsregnskap og årsberetning på norsk

Det vises til deres brev av 24. november 2010 hvor det søkes om dispensasjon fra kravet til å utarbeide årsregnskap og årsberetning på norsk språk for følgende heleide datterselskap av DNO International ASA:

- DNO Iraq AS Og. nr: 988 714 526
- DNO Yemen AS Org. nr: 984 308 736
- DNO Mozambique AS Org. nr: 995 739 879

Bakgrunn:

Fra deres brev gjengis:

"DNO International ASA er notert på Oslo Børs og fikk 28. mai 2010 dispensasjon fra regnskapslovens § 3-4 om å utarbeide årsregnskap og årsberetning på engelsk. Datterselskapenes virksomhet drives i sin helhet i henholdsvis Irak, Jemen og Mozambique. Selskapene har ingen ekstern finansiering, kun en lånefasilitet fra morselskapet. Selskapene har heller ingen ansatte. All kommunikasjon og alle avtaler blir gjort på engelsk.

De norske regnskapene utarbeides kun for å oppfylle språkkravene i regnskapsloven og foretaksregisteret. Årsregnskapene til datterselskapene publiseres heller ikke. Brukerne av regnskapene har i hovedsak vært ansatte i konsernet, slik at norsk oversettelse er følgelig et rent ekstraarbeid som påfører selskapene unødvendige kostnader og merarbeid."

Skattedirektoratets vurdering og konklusjon

Etter regnskapsloven § 3-4 tredje ledd skal "årsregnskapet og årsberetningen ... være på norsk. Departementet kan ved ... enkeltvedtak bestemme at årsregnskapet og/eller årsberetningen kan være på et annet språk."

I Ot. prp. nr. 42 (1997-1998) Om lov om årsregnskap m.v., er det uttalt følgende om regnskapslovens formål, jf. pkt. 1.1:

"Regjeringen har som siktemål at regnskapsloven skal bidra til informative regnskaper for ulike grupper av regnskapsbrukere. Regnskapsbrukerne er dels investorer og kreditorer som tilfører kapital til foretakene, og dels andre grupper som har interesse av å vite hvordan foretaket drives, f.eks. de ansatte og lokalsamfunnet. Informasjonen til kapitalmarkedet skal gi grunnlag for riktig prising av finansielle objekter. Riktig prisdannelse på aksjer er en forutsetning for at

Postadresse

Postboks 9200 Grønland
0134 Oslo

Besøksadresse

Fredrik Selmers vei 4
Org. nr: 974761076

Sentralbord

800 80 000
Telefaks
22 17 08 60

skattedirektoratet@skatteetaten.no



ressursbruken i samfunnsøkonomien skal bli best mulig. Gode regnskaper vil også gjøre det vanskeligere for markedsdeltakere å ta ut spekulasjonsgevinster med basis i skjevt fordelt informasjon.

Det fremgår således at et av hovedformålene med regnskapsloven er å bidra til *"informative regnskaper for ulike grupper av regnskapsbrukere"*. Regnskapsbrukere vil omfatte, jf. uttalelsen i proposisjonen, blant andre investorer, kreditorer, ansatte og lokalsamfunnet. Offentlige myndigheter må også anses som en sentral regnskapsbruker, idet ulike myndigheter, som lignings- og tilsynsmyndigheter, benytter regnskapene som et verktøy i sin kontrollvirksomhet.

Det er etter Skattedirektoratets vurdering derfor avgjørende ved vurdering av om dispensasjon fra kravet til å utarbeide årsregnskap og/eller årsberetning på norsk, at det ikke foreligger mulige brukere av regnskapsinformasjon som blir negativt berørt ved en eventuell dispensasjon.

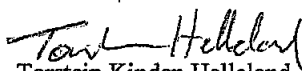
Som nevnt ovenfor er det særlig hensynet til brukerne av regnskapsinformasjonen som skal vurderes ved en dispensasjonssøknad. Selskapenes virksomhet skjer i sin helhet i utlandet, og de har ikke egne ansatte. Selskapenes eier er allerede innvilget tilsvarende dispensasjon.

Skattedirektoratet gir på bakgrunn av en helhetsvurdering de ovenfor nevnte selskapene dispensasjon fra kravet til å utarbeide årsregnskap og årsberetning på norsk språk, jf. regnskapsloven § 3-4 tredje ledd.

Dispensasjonen forutsetter at engelsk språk benyttes i stedet ved utarbeidelsen, og at øvrige opplysninger som vedtaket baserer seg på, heller ikke endres vesentlig.

Vennligst oppgi vår referanse ved henvendelser i anledning saken.

Med hilsen


Torstein Kinden Helleland
seniorrådgiver
Rettsavdelingen, foretaksskatt
Skattedirektoratet


Jan Hoelstad