

# 2024 Norwegian Transparency Act Statement

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## 1. About this account

This statement of due diligence has been prepared according to Section 5 of the Norwegian Transparency Act and relates to the financial year ending on 31 December 2024. It is published by Harbour Energy Norge AS (hereafter referred to as HBRN). This year's account includes information on our efforts to promote respect for fundamental human rights and decent working conditions<sup>1</sup>.

Harbour Energy is one of the world's largest and most geographically diverse independent oil and gas companies, well positioned for the energy transition with a leading CO<sub>2</sub> storage position in Europe. In Norway the company is the largest international independent, with a daily production of around 180,000 barrels of oil equivalent, and a portfolio of further near-field development projects in the pipeline, including three prospects for CO<sub>2</sub> storage.

## 2. Harbour Energy Norge's organisation and area of operations

As a result of the Wintershall Dea transaction that completed on 3 September 2024, Harbour Energy acquired a significant asset base in Norway and became the largest international independent oil and gas company in the country. Our production in Norway is gas weighted and diversified across several key fields and export hubs, providing multiple routes into the European gas markets.

HBRN has been active on the Norwegian Continental Shelf for more than 50 years and is involved in exploration for oil and gas, appraisal and development of discovered resources as well as production and sale of hydrocarbons. We also have an active CO<sub>2</sub> storage position in Norway.

More information about HBRN's activities can be found here: [Norway | Harbour Energy](#)

HBRN has around 380 employees and direct contractors, mainly working in Stavanger.

HBRN has more than 150 suppliers. While most of our direct suppliers are in Norway, many of our tier two and three suppliers are located worldwide. Our suppliers provide goods and services in the following main areas:

- Drilling rigs and related services
- Exploration and production software geological and geophysical studies, information technology
- Oil country tubular goods and wellheads
- Transport and logistics services
- Well construction, completion services and related equipment
- Consumables e.g. chemicals, personal safety and protection equipment, food
- Consultancy, HR, communication, and business services
- Engineering services and infrastructure
- Maintenance, modification and related equipment
- Subsea production

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<sup>1</sup> As recommended by KPMG's 2024 [impact assessment](#) of the Norwegian Transparency Act.

### 3. Our policies and procedures

HBRN has group-level policies and Codes of Conduct, as well as local procedures and structures that promote respect for fundamental human rights and decent working conditions.

Harbour Energy is committed to respecting human rights (as set out in the United Nations Universal Declaration of Human Rights) by preventing modern slavery and upholding worker welfare standards (as defined by the ILO Core Labour Standards) in our operations and supply chain. We expect our suppliers and partners to do the same.

#### 3.1 Corporate policies and Codes of Conduct

HBRN's commitment to respecting fundamental human rights and decent working conditions in our operations and supply chain is set out in our group-wide policies:

The [Group Code of Conduct](#)

The [Group Business Partner Code of Conduct](#)

The Group [People Policy](#)

The Group [Supply Chain Policy](#)

The Group [Sustainability Policy](#)

Harbour Energy has a group-wide whistleblowing mechanism, provided by an independent company, Safecall ([www.safecall.co.uk/clients/harbour-energy](http://www.safecall.co.uk/clients/harbour-energy)). We expect our employees and contractors to speak up if they identify or hear about any instance of human rights, modern slavery or worker welfare violation in our operations or supply chain. Concerns are treated confidentially and can be raised in writing or by email via Safecall's website or by telephone. The dial-in number for Norway is 00800 7233 2255.

A dedicated email address is available to anyone requiring information on HBRN's work to respect human rights and decent working conditions: [info-apenhetsloven@harbourenergy.com](mailto:info-apenhetsloven@harbourenergy.com).

#### 3.2 Local procedures and structures

HBRN has developed a Transparency Act Governance procedure, that forms part of our business management system. As part of this, we have established a Transparency Act Committee (TAC) to ensure leadership support and compliance with the Transparency Act across the business. This committee consists of four members of the HBRN leadership team and a cross-functional team, including the HBRN Human Rights Coordinator along with representatives from the Procurement team, Legal & Compliance team, Human Resources team, and the group Corporate Sustainability Lead. The committee is responsible for enabling and directing human rights due diligence and ensuring HBRN compliance with the Transparency Act. To ensure continuous monitoring and improvement, the work of the committee is supported by a working group which meets bi-weekly to monitor and track risks and remedies as applicable.

In 2024, HBRN joined Magnet JQS, Offshore Norge's project to develop a supplier qualification portal. HBRN participates in this organisation along with other relevant oil and gas operators on the Norwegian Continental Shelf (NCS). The cross-industry initiative is coordinated by Offshore Qualific. Through this initiative, we gain access to shared supplier data and human rights audits results. This portal enables the operators to continuously manage supply chain risk, including human rights and decent working condition risks, and to register and monitor suppliers. This allows us to further develop our own knowledge and skills in identifying material human rights and decent working conditions risks and acting to mitigate such risks.

### 3.3 Due diligence process and risk assessment

The activity of HBRN has not changed materially from 2023 to 2024, as the operations and contractor group has not changed significantly the last year. For that reason, HBRN considers the due diligence performed in 2023 relevant and representative for the 2024 due diligence. It is our assessment that the risk for breaches of human rights and decent working conditions in our own organisation and our supply chain remained mainly unchanged from 2023 to 2024.

Against this background, we prioritised the following salient risks in 2024:

- Human rights and decent working conditions risks in our supply chain.
- Inadequate health and safety standards - occupational safety and work-related health hazards including excessive working hours affecting workers in our supply chain.
- Unequal treatment in employment in our supply chain (discrimination, harassment, and bullying, discriminating recruitment practices).
- Environmental damage that impacts our own workforce and communities.

### 3.4 Due diligence and risk assessment in the HBRN organisation

Our due diligence for the HBRN organisation concluded that there are no major risks in relation to the Transparency Act. However, through the Administrative Committee (Norw. Arbeidsmiljøutvalget) the company has focused on ensuring good working conditions for its employees, particularly preventing the risk of excessive working hours. The average sick leave rate improved, decreasing from 3.01% in 2023 to 2.57% in 2024.

### 3.5 Due diligence and risk assessment in the supply chain

We set out our expectations to our suppliers via our Supplier Code of Conduct and follow-up through the following processes:

- **Supplier due diligence:** the process for qualification of suppliers includes an assessment of human rights risks. Suppliers that are identified as medium and high risk are subject to audits conducted on a risk-based and proportional basis.
- **Contractual commitment:** suppliers' commitment to our Business Partner Code of Conduct and ESG principles are included in our standard contract templates.
- Procedures relating to **marine assurance and verification:** these include verification of ships' compliance against the Maritime Labour Convention.
- **Human rights assessments:** through the industry collaboration tool, Magnet JQS, assessments are conducted using a risk-based approach.
- **Management systems:** human rights and decent working conditions are part of HBRN's business management system and included in our risk registry.

Risk assessments in Magnet JQS are conducted by categorising suppliers as high, medium or low risk, based on an evaluation of country risk, the procurement category e.g. drilling rigs and related services, and annual spend. These factors determine the need for audits and follow-up. HBRN has identified certain suppliers with potential medium risk. In 2024 none of HBRN's suppliers have been identified as posing potential high risk.

For suppliers identified as potential medium risk, we have established a process for further analysis and risk assessments by using a supplier self-assessment form, to help us to explore the related risks and identify possible measures to prevent or mitigate the risks. In cases where we have not considered the answers sufficient, we have performed desktop or on-site audits of the supplier.

HBRN believes our policies, guidelines and the measures we have undertaken provide a good basis for continuous risk management relating to human rights and decent working conditions. We understand the human rights due diligence process as a continuous learning process that will lead to further improvements.

#### **4. Actual adverse impacts and significant risks of adverse impacts that the enterprise has identified through its due diligence**

Based on our internal risk assessment, we focused our efforts on areas where we identified potentially material negative impacts and a leverage to effectively cease, prevent or mitigate identified risks.

In 2024, this led to an on-site audit of a contractor at one of their production sites, which was conducted by an independent consultancy specialising in third-party audits of and human rights, in collaboration with our supply chain managers.

Overall, the audit found that the contractor had robust systems in place to manage working conditions and employed an entirely local workforce, reducing the risk of human rights violations. However, the audit also identified gaps in subcontractor due diligence, leading to issues remaining undetected at the subcontractor level.

Our supply chain managers worked with the contractor to agree on a rectification programme including actions to cease, prevent and mitigate adverse impacts, both during the contract period and afterwards. Agreed follow-up measures are being tracked and results evaluated.

#### **5. Looking ahead – measures to promote respect for human rights and decent working conditions**

In 2025 we plan to commission an independent review of human rights risks in our business and supply chain, by using an external company. This review will assess our human rights due diligence processes in order to ensure compliance with the EU's Corporate Sustainability Due Diligence Directive (CSDDD). In addition, we will conduct desktop audits on three of our suppliers, and issue human rights questionnaires to fifteen suppliers. Based on their self-assessment, we will evaluate the need to proceed with a human rights audit (desktop or on-site).

HBRN will continue to promote respect for human rights and decent working conditions by organising training for relevant employees in HBRN, including training on human rights and decent working condition, as well as on general principles for conducting human rights due diligence.

We will deepen our collaboration with other industry partners in the Offshore Norge working group on human rights, by co-developing the human rights audit procedure in the Magnet JQS platform.

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June 2025

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