

2025 Norwegian Transparency Act Statement

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1. Executive summary

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 2025. The statement sets out how Harbour Energy Norge AS (HBRN) identifies, prevents, mitigates, and accounts for adverse impacts on fundamental human rights and decent working conditions across our operations and supply chain.

Highlights in 2025:

- Harbour Energy continues to apply a risk-based due diligence approach aligned with OECD Guidelines. As part of this, it commissioned an independent third party to conduct a Human Rights Due Diligence (HRDD) assessment across Harbour Energy, including its subsidiary HBRN, evaluating current policies, practices, and governance against the UN Guiding Principles on Business and Human Rights (UNGPs).
- Five desktop human rights audits and internal risk assessment of a shorter-term contract completed; no on-site audits in 2025.
- Ongoing follow-up on a corrective action plan arising from a 2024 strategic contractor audit.
- Targeted training delivered to Procurement, Legal, HSES, Asset Management and the local HBRN sustainability network on identifying red flags and handling human rights risks.
- Strengthened use of a collaborative platform with operators on the Norwegian Continental Shelf, Magnet JQS, to monitor supplier risk; ~70% of tier one suppliers registered (102 monitored).

Salient human rights risk we focus on are:

- Worker welfare in the supply chain (recruitment fees, contract clarity, migrant worker protection).
- Health, safety and wellbeing (excessive working hours, fatigue, mental health).
- Unequal treatment in employment (discrimination, harassment, bullying).
- Environmental impacts affecting workers and communities.
- Risks related to licence partners' activities in partner-operated assets.

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

HBRN has been active on the Norwegian Continental Shelf for more than 50 years across exploration, appraisal, development, and sale of hydrocarbons. We also have an active CO₂ storage position in Norway.

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

As of 6 November 2025, HBRN has a workforce of 375 in total, consisting of 335 permanent (89%) employees and 40 direct contractors (11%). Our workplace is in Stavanger. Most of our workforce work onshore, with 1% working offshore on temporary assignments.

HBRN has approximately 145 suppliers. While most of our direct suppliers are in Norway, many of our tier two and three suppliers are located worldwide. Higher risk categories include construction, offshore/subsea operations, logistics and transport, industrial services and maintenance, IT/data, well engineering and drilling.

3. Salient human rights and decent working conditions risks

Our salient risks remain the same as in 2024, but we have deepened our understanding of these risks in 2025:

- **Worker welfare and recruitment practices:** risks of recruitment fees and unclear contracts; potential discrimination of migrant workers.
- **Health, safety and wellbeing:** occupational hazards, excessive working hours, fatigue, mental health, emergency preparedness. Excessive working hours persists as the most important risk for our own organisation.
- **Unequal treatment in employment:** discrimination, harassment, bullying.
- **Environmental impacts:** potential effects on workers and communities.
- **Partner-operated assets:** indirect exposure, including operations in higher-risk geographies.

4. Governance and accountability

The Managing Director is accountable for enabling and directing human rights due diligence and ensuring compliance with the Transparency Act. The Transparency Act Committee (TAC), consisting of four HBRN leadership members supported by a cross-functional team, monitors risks and implements improvements and remedies as required. The annual Transparency Act Statement is approved by the HBRN Board. Human rights and decent working conditions are integrated into daily operations via the business management system and risk registry.

5. Policies and commitments

We respect individual human rights as set out in the International Bill of Human Rights and the core conventions of the International Labour Organization. We also have a clear expectation of our suppliers and partners to do the same. 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](#)

6. Human Rights Due Diligence

Harbour Energy applies a risk-based, proportional and ongoing due diligence process consistent with international standards such as the OECD Guidelines and the UNGPs. In 2025, the company commissioned an independent Human Rights Due Diligence (HRDD) assessment across Harbour Energy, including its Norwegian subsidiary HBRN.

The assessment reviewed Harbour Energy's policies, practices, and governance against the UNGPs, while also considering legal requirements like the UK Modern Slavery Act, the Norwegian Transparency Act, and upcoming EU regulation. It also examined how Harbour Energy manages human rights risks in areas such as supply chains, mergers and acquisitions, and joint ventures.

The review provided both Harbour Energy and HBRN with a roadmap for further strengthening the human rights due diligence across its operations and value chain, highlighting both areas of progress and opportunities for improvement.

7. Continuous improvement

Harbour Energy will continue strengthening its risk-based, proportional and continuous human rights and decent working conditions due diligence across the company, including HBRN.

Building on the independent assessment completed in 2025, and HBRN’s continuous assessment, the plan for 2026-2027 focuses on embedding human rights into governance, risk management and operations.

Completed in 2025:

- Function-specific training on human rights risk identification and management (to Procurement, Legal, HSES, Asset Management and the local HRBN sustainability network).
- Expanded Magnet JQS monitoring and supplier engagement.
- Strengthened governance via TAC and bi-weekly working group.

Planned for 2026-2027:

- Further clarification of governance, adopting forward-looking risk assessments, and deepening supplier and stakeholder engagement.
- Enhancement of performance oversight and improving transparency.
- Formalisation of a robust remediation framework aligned with international standards.

8. Stakeholder engagement and transparency

HBRN engages with internal and external stakeholders through structured dialogue, supplier assessments, and collaboration initiatives. We commit to transparent reporting and to providing information on how we address adverse impacts on human rights and decent working conditions upon request.

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May 2026

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