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**Transparency Act Statement**



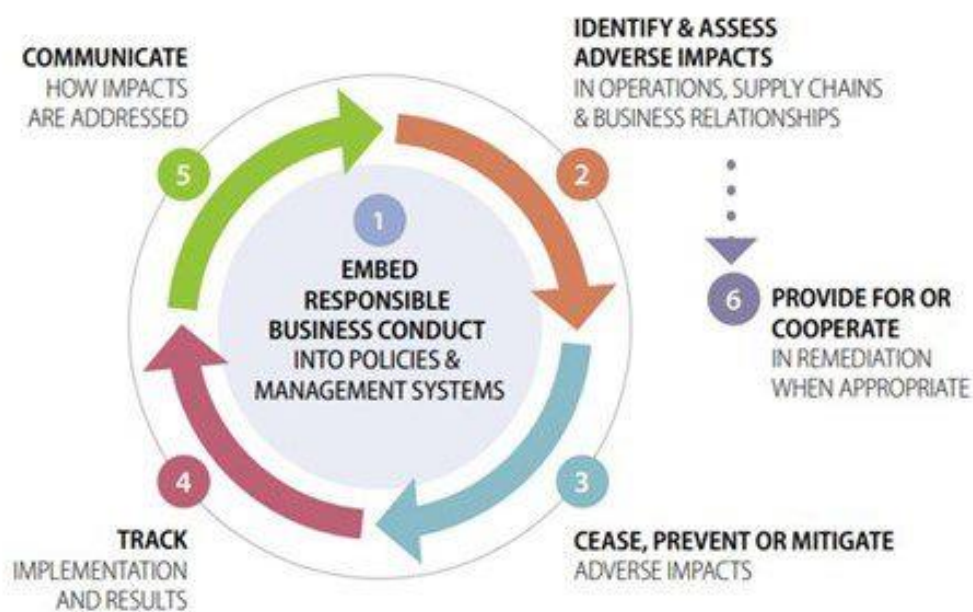
*This report has been prepared in accordance with the Norwegian Transparency Act (the "Transparency Act") section 5 and summarises the policies and procedures in WellPartner AS with respect to safeguarding of human rights and decent working conditions and provides information on the implementation and results of WellPartners due diligence.*

## NORWEGIAN TRANSPARENCY ACT - WELLPARTNER STATEMENT FOR 2023

Based on sales revenue and balance sheet numbers for 2023 WellPartner AS shall comply with the Norwegian Transparency Act and are committed to work on human rights and decent working conditions.

WellPartner AS have carried out due diligence in accordance with the OECD Guidelines for Multinational Enterprises and considered the 30 articles of the Universal Declaration of Human Rights.

**FIGURE 1. DUE DILIGENCE PROCESS & SUPPORTING MEASURES**



Our Code of Conduct (including human rights), as adopted from HitecVision, form the basis for all work within the company. The code is based on 10 principles to ensure that all our activities are performed in an ethical manner and in compliance with sound business practice:

1. We behave and comply with laws
2. We respect our colleagues
3. We ensure healthy and safe working conditions
4. We protect our assets and confidential information
5. We respect fundamental human rights
6. We never make unlawful payments
7. We choose our business partners carefully
8. We avoid conflicts of interest
9. We compete fairly
10. We operate in an environmentally responsible manner

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## GENERAL DESCRIPTION OF WELLPARTNER AND ITS STRUCTURE

WellPartner delivers technical expertise and high-quality equipment rental and services within offshore drilling, completion and intervention operations. The company operates in Norway with clients including E&P companies, drilling rig contractors and other service companies. WellPartner's services include operational planning, analysis, safety advice, mobilisation before installation and rig services.

- Headquarter: Energivegen 22, Tananger, Norway
- Website: [www.wellpartner.no](http://www.wellpartner.no)
- Contact: Eivind Håvarstein, CEO
- Shareholders:
  - Circle Group Well Services AS 100%
  - Circle Group AS, Fund VII (HitecVision) 79,93%
  - Wellpartner Invest 20,07%
- Number of employees (FTEs, 2023): 42
- Sales Revenues (2023): NOK 134 million
- Balance sheet total (2023): NOK 145 million
- Management system certifications:
  - ISO 9001: 2015
  - ISO 14001: 2015
  - ISO 45001: 2018

## AREA OF OPERATIONS

WellPartner operational geography is Norway and the Norwegian continental shelf



## RELEVANT GUIDELINES AND PROCEDURES

Wellpartner have established and implemented set of guidelines and procedures for potential adverse impacts on fundamental human rights and decent working conditions:

### ***Mission, Vision and Policies***

- Mission, vision and values
- Health and Safety policy
- Business hospitality policy
- Intellectual property policy
- Code of conduct
- Environmental policy
- Anti-corruption policy
- IT/Cyber security policy
- Quality policy
- Whistleblower policy
- Sanctions compliance policy
- Data protection policy (GDPR)

### ***Manuals and Procedures***

- HSEQ manual
- Emergency Preparedness
- Procurement procedure
- Employee handbook
- Tenders and Contracts
- Supplier Evaluation and Approval
- Compliance register
- Audits
- Suppliers Code of conduct / HSE requirements

### ***Risk & Opportunity assessments***

- Context and interested parties
- Workshop and operation
- IT Security
- General – WellPartner AS
- Health and safety (WE)
- Security
- Human Rights
- Environmental
- Suppliers

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## IDENTIFIED ADVERSE IMPACTS AND IMPLEMENTED AND PLANNED MEASURES

As mentioned, the company have carried out due diligence in accordance with the OECD Guidelines for Multinational Enterprises and considered the 30 articles of the Universal Declaration of Human Rights.

Based on our risk analysis, we have not identified any significant adverse impacts on fundamental human rights and decent working conditions linked to our operations

Our suppliers are mainly local Norwegian companies. We have assessed that there are no significant risks of any adverse impacts related to our supply chain.

However, we have revealed some minor risks of adverse impacts towards the following:

<b>Article of the UDHR</b>	<b>Description</b>	<b>Risk for adverse impacts</b>	<b>Implemented / Planned measure</b>
Article 3 Right to life	<p><i>Everyone has the right to life and to live in freedom and safety.</i></p> <p>Everyone has the right to life, liberty and security of person.</p>	Mismatch between the management's right to govern and the duty of care can end up having a negative effect on the working environment.	<p>Employee handbook has been updated and communicated to all employees.</p> <p>Ensure that there are match between the management's right to govern and the duty of care</p>
Article 23 Right to work	<p><i>Everyone has the right to work in just and favourable conditions and be free to choose your work with a salary that allows you to live and support family. Everyone should receive equal pay for equal work.</i></p> <p>1 - Everyone has the right to work, to free choice of employment, to just and favourable conditions of work and to protection against unemployment.</p> <p>2 - Everyone, without any discrimination, has the right to equal pay for equal work.</p> <p>3 - Everyone who works has the right to just and favourable remuneration ensuring for himself and his family an existence worthy of human dignity, and supplemented, if necessary, by other means of social protection.</p> <p>4 - Everyone has the right to form and to join trade unions for the protection of his interests.</p>	Employees, partners or suppliers can be discriminated against equal salary for equal work.	<p>Employee handbook has been updated and communicated to all employees.</p> <p>Salaries are competitive, not discriminating and in line with recognised guidelines.</p>
Article 24	<p><i>Each workday should not be too long and everyone has the right to rest and take regular paid holidays.</i></p>	Employees, partners or suppliers are not properly taken care of with the respect to	Employee handbook has been updated and communicated to all employees.

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<i>Right to leisure and rest</i>	Everyone has the right to rest and leisure, including reasonable limitation of working hours and periodic holidays with pay.	holiday, overtime and time off.	Monitor and adjust number of employees to avoid long working days and to ensure sufficient rest and holidays.
<i>General</i>	Suppliers' compliance with Human Rights	Lack of compliance with Human Rights that may have adverse impact	<p>Criteria for supplier evaluation and approval has been updated.</p> <p>Ref.:</p> <ul style="list-style-type: none"> <li>- Supplier evaluation and approval</li> <li>- Supplier Code of Conduct</li> <li>- Supplier HSE requirements</li> </ul>


### INFORMATION UPON REQUEST


Any person has the right to and can contact WellPartner for information regarding how WellPartner addresses actual and potential adverse impacts uncovered by the due diligence. WellPartner intends to comply with this and can be contacted by use of the Get In Touch information at our website [wellpartner.no/contact/](http://wellpartner.no/contact/).

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 This report has been reviewed and recognised by the Board of Directors and CEO.

Stavanger, 12.06.2024

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 Chairman  
 Rolf Mikal Leknes

DocuSigned by:  
  
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 Director  
 Gunnar Halvorsen

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 Director  
 Jone Skaara

DocuSigned by:  
  
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 CEO  
 Eivind Håvarstein