



Wintershall Dea Norge AS Human Rights Risk Annual Account according to the Norwegian Transparency Act § 5

1 INTRODUCTION

Wintershall Dea Norge AS ("WDNO") is subject to the Norwegian Transparency Act.

The Transparency Act shall promote enterprises' respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services. Further, the act aims to ensure the general public access to information regarding how the enterprises address adverse impacts on fundamental human rights and decent working conditions.

By way of due diligence in accordance with the OECD guidelines for multinational enterprises, WDNO identifies risks for adverse impact, implements measures, monitors, and communicates with stakeholders to ensure respect for human rights and decent working conditions.

2 WDNO'S ORGANISATION AND AREA OF OPERATIONS

WDNO is part of the Wintershall Dea Group, which is transforming from the leading European independent gas and oil company to become a leading European independent gas and carbon management company. WDNO carries out gas and oil activities on the Norwegian Continental Shelf including the search for gas and oil, appraisal and development of discovered resources as well as production and sale of hydrocarbons.

WDNO is amongst the leading oil and gas companies in Norway in terms of daily production. We operate around one third of our 93 production licenses, including the producing fields Maria, Nova, Vega, and Dvalin. We are also an active license partner in licenses such as Aasta Hansteen, Bauge, Edvard Grieg, Gjøa, Irpa, Njord, Skarv, Snorre and Snøhvit. In November 2022, we closed the sale of the own-operated Brage oil field.

In 2022, we reached a milestone in realising WDNO's ambitions in carbon management and hydrogen when we applied for and were awarded WDNO's first CO₂ storage license in the Norwegian North Sea. We now hold two carbon storage licences on the NCS.

Following the sale of Brage, WDNO has approximately 400 employees, mainly working onshore out of Stavanger.

WDNO has more than 1000 suppliers. Whilst our direct suppliers are pre-dominantly located in Norway, the next tiers of sub-suppliers are located worldwide. The suppliers provide goods and services within the following main areas:

- Offshore drilling rigs and associated services
- Well construction and completion services, OCTG (Oil country tubular goods) and wellheads
- Offshore transportation and logistics services
- Subsea and production systems
- Offshore maintenance and modification services and equipment
- Other: Consumables (chemicals, lubricants, fuel), engineering and infrastructure, consultancy, HR, IT, communication, and business services

More information about WDNO's activities can be found here: <https://wintershalldea.no/en/where-we-are>

3 GUIDELINES AND PROCEDURES

WDNO, as part of the Wintershall Dea Group, has in place policies, guidelines or procedures setting out requirements for fundamental human rights and decent working conditions. They shall ensure that WDNO respects fundamental human rights



and decent working conditions in connection with all business activities and that responsible business conduct is anchored in WDNO's governing documents.

For instance, the Wintershall Dea Group has implemented a Code of Conduct, an ESG principle and a Supplier Code of Conduct, defining that the company respects internationally recognised human rights, as well as key labour and social standards. Further, WDNO's Health, Safety, Environment and Quality procedures set out processes and requirements for the company's health and safety management. This includes the "Synergi Life" incident module for incidents, near misses and observations, where all employees have access.

For processes and procedures addressing WDNO's supply chain, see Section 4.2 below. Further information about the Wintershall Dea Group's work with responsibility in the supply chain is available here: <https://wintershalldea.com/en/supply-chain#supply-chain-activities>

To ensure that the responsibility for compliance with the Transparency Act is clearly defined in the organisation, WDNO has implemented a Transparency Act Governance procedure in its business management system and a "Transparency Act Committee" to co-ordinate WDNO's compliance with the Transparency Act across various departments, functions and roles. The responsibility of the committee is to facilitate and oversee that the human rights due diligence in WDNO is carried out in accordance with the Transparency Act.

The Wintershall Dea Group has a group-wide grievance mechanism ("Speak Up") in place which gives opportunity to report potential compliance violations. The arrangement is also accessible to third parties, such as suppliers, sub-suppliers and their employees, and is available here: https://www.speakupfeedback.eu/web/pha6ek_SpeakUp_How_the_process_works.pdf (wintershalldea.com)

Read more about Wintershall Dea Group's work with social responsibility and sustainability, including our sustainability report, here: <https://wintershalldea.com/en/what-we-believe/sustainability>.

4 RISKS ASSESSMENT, FINDINGS AND MEASURES

4.1 Risk assessment

Introduction

WDNO carries out risk assessments in accordance with the Transparency Act section 4 b), by identifying and assessing actual and potential adverse impacts on fundamental human rights and decent working conditions that the enterprise has either caused or contributed towards, or that are directly linked with the enterprise's operations, products or services via the supply chain or business partners.

The risk assessment is conducted for (i) WDNO own operated activities, (ii) WDNO's supply chain and (iii) Other Business Partners (Partner Operated Licenses).

Salient risks

Through our ESG principles, the Wintershall Dea Group has a longstanding commitment to address its most salient human risks. This includes areas such as occupational health and safety, forced and child labour, non-discrimination & equal opportunity, freedom of association, human rights and security and local & indigenous people's rights. Wintershall Dea Groups ESG principles can be found here: [Agenda \(wintershalldea.com\)](https://wintershalldea.com).

Based on Wintershall Dea Groups salient risks and the activity conducted by WDNO, the following salient risks have been identified for WDNO:

- Human rights violations in our business relationships (supply chain)
- Unsafe or unhealthy working conditions (office/offshore)
- Excessive working hours
- Discrimination and unequal opportunities



- Harassment at the workplace
- Poor recruitment practices
- Inability to voice concerns and retribution, inadequate grievance procedures
- Lack of disciplinary procedures

Own activity

Based on the country risk for Norway and risks associated with the oil and gas industry, we have considered the risk level for adverse impacts for WDNO own activity. Information is gathered through dialogue with internal WDNO departments, dialogue with employee representatives, the working environment committee and safety delegates. Information from grievance mechanisms, incident report systems (Synergi), surveys and inspection reports have been analysed.

Supply Chain

In addition, for supply chain, a risk assessment is conducted by categorising suppliers as high, medium, or low risk based on an evaluation of country risk and procurement category. A mapping of both have been determinative for the depth of the follow-up analysis and assessments. WDNO has identified a certain number of suppliers with potential medium risk. No suppliers have been identified as posing potential high risk.

For the suppliers identified as potential medium risk, WDNO has carried out further analysis and risk assessments through supplier self-assessments, to identify the related risks more concrete and the measures put in place by the supplier to prevent or mitigate the relevant risks.

Other Business Partners (Partner Operated Licenses)

In partner operated licenses, WDNO follows the general recommendations set out in Offshore Norge's guidelines for compliance with the Norwegian Transparency Act ([1.2.2.8 Offshore Norge guideline 148](#)). According to the guideline, it is the operator that in the first place conducts due diligence of the license activity and the partners can, as a starting point, use operator's evaluations as basis for its own risk assessments.

WDNO has included human rights risks as a risk factor to consider as part of the process for follow up of license partners in its business management system.

4.2 Findings and measures

General

WDNO has not identified any actual adverse impacts in connection with the risk mapping and assessments for 2022/2023.

Own Activity

For WDNO's own activity, the risk assessment shows that there are no significant risks for adverse impact, taking into account the preventive actions such as policies, guidelines and measures implemented throughout the organisation. In case a negative impact would occur despite the existing procedures, there are mechanisms to raise complaints or report incidents such as Speak Up or Sinergy Life in place.

Supply Chain

It is acknowledged that inherent risks exist in the supply chains of the oil and gas industry. Although we have not identified any actual adverse impact caused by the suppliers of WDNO through our risk assessment, it cannot be fully ruled out that through WDNO's approximately 1000 suppliers there is a potential for negative impact.

We have specifically addressed such risk through the expectations we set to our suppliers via the Supplier Code of Conduct. In addition, the following processes address human rights risks in the supply chain:

- Contractual commitment: commitment to our Supplier code of Conduct and ESG principles is included in our standard contract templates for suppliers



- Process for qualification of suppliers includes a separate section for human rights risks (as further described in section 4.1 above)
- Procedures relating to marine assurance and verification: The procedures include verification of ships compliance against the Maritime Labour Convention and is an important element of the human rights due diligence process
- Through the industry collaboration tool Magnet JQS, human rights assessments are conducted on a risk-based approach
- Human rights are implemented as a criterion to be considered as part of WDNO's business management system

WDNO expects that the policies, guidelines, and measures implemented provide a good basis for a continuous risk management relating to human rights and decent working conditions and understands the Human rights due diligence process as a continuous learning process which will lead to further improvements of the process itself.

30 June 2023

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