

# Statement Transparency Act

Norwegian Act on Enterprises' Transparency and Work  
on Fundamental Human Rights and Decent Working  
Conditions (Transparency Act)

June 2023





## General Statement on Human Rights and Decent Working Conditions

ConocoPhillips supports and is committed to conducting its business in a way which is consistent with the human rights philosophy expressed in the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights and the International Labor Organization Declaration on Fundamental Principles and Rights at Work. ConocoPhillips expects suppliers and contractors working on its behalf to comply by these principles.

For further information about ConocoPhillips' responsible business practices, refer to the [ConocoPhillips Code of Business Ethics and Conduct](#).

## Company Structure and Operations

This statement addresses the requirements set out in the Norwegian Transparency Act (Åpenhetsloven), effective since July 1, 2022, in relation to ConocoPhillips Skandinavia AS and ConocoPhillips Norge.

ConocoPhillips Norge is incorporated under the laws of the state of Delaware in the United States and is an indirect subsidiary of the publicly listed company ConocoPhillips, traded on the New York Stock Exchange under the symbol "COP." ConocoPhillips Norge has a branch registered in Norway with the same name, which conducts all ConocoPhillips Norge's activities in Norway.

ConocoPhillips Skandinavia AS is a wholly owned subsidiary of ConocoPhillips Norge and explores for, produces, transports and sells oil and gas from the Norwegian Continental Shelf. The operations of the company are conducted by employees from the Norwegian branch of ConocoPhillips Norge. The company is the operator of the fields in the Greater Ekofisk Area, where current production comes from Ekofisk, Eldfisk and Embla fields with 35.112 % interest and Tor field with 30.658 %. The company also has ownership in several partner-operated assets, including Heidrun, Visund, Oseberg, Troll, Grane, Aasta Hansteen and Alvheim. The net production in Norway for 2022 was about 125,000 barrels of oil equivalent per day (oe/d), including production from fields operated by others.

ConocoPhillips Norge and ConocoPhillips Skandinavia AS are separately or jointly referred to as ConocoPhillips Norway in this statement.

Headquartered in Tananger outside Stavanger, ConocoPhillips Norway has approximately 1800 employees.

## Supply Chain Overview

Supply chain management is integral to the operation of operated facilities. ConocoPhillips Norway has an unwavering focus on safety, quality and sustainability in the selection and management of suppliers and contractors. ConocoPhillips Norway strives for continuous improvement by developing rigorous sourcing and contracting strategies, having consistent and reliable supply chain standards, and developing mutually beneficial partnerships with suppliers and contractors. ConocoPhillips Norway regularly engages with its suppliers through business reviews, supplier relationship management and supplier audits.

The types of goods and services sourced by ConocoPhillips Norway include:

- Engineering equipment and services
- Services and supplies for projects, maintenance and well operations
- Cleaning and catering services



- Rig, marine vessel, and helicopter operations
- Freight forwarding
- Utilities and waste management services
- IT equipment, software, and services
- Temporary labor and corporate services

ConocoPhillips Norway has approximately 650 active contracts, and over 80% of total annual spend on goods and services is with Norwegian-based suppliers or contractors. The remaining suppliers and contractors are primarily located in the U.S., the EU, or the United Kingdom. Some suppliers have manufacturing facilities located outside Europe and North America, and some suppliers source materials and services from sub-suppliers located in such areas.

## Due Diligence

ConocoPhillips Norway has increased its attention to fundamental human rights and decent working conditions for Norwegian-based operations and supply chain. The following due diligence actions have been completed:

- Issued notices to suppliers regarding requirements addressed in the Transparency Act, requesting a formal response stating their compliance with such requirements. In reviewing responses, we assure ourselves that suppliers with international reach have adequate governance processes in place.
- Updated working procedures and implemented new standard contract requirements to provide more clarity to suppliers regarding the company's expectations.
- Continued membership in the Offshore Qualific Human Rights (HuRi) work group that provides audit services focused on human rights, and knowledge sharing between partner companies to align on a common approach towards the supplier community.
- Established working practices to nominate selected suppliers for human rights reviews through membership in the Offshore Qualific HuRi work group, considered audit report follow up actions with suppliers, and conducted regular reviews of the Offshore Qualific HuRi database when new information has become available.
- Extended our due diligence process to include a human rights assessment for any potential new supplier from any country deemed to be associated with a relatively high prevalence of human rights abuses. This includes thorough management reviews with the supplier, conducted by a reputable independent international consultant.
- Ensured that ethics reporting framework and policies are accessible, and that ethics issues and grievances can be reported confidentially and without fear of reprisal.

The due diligence actions have not identified any indications of adverse impacts or significant risks of adverse impacts in the enterprise or supply chain. Risk management related to human rights and decent working conditions will continue to be embedded in ConocoPhillips Norway's overall risk management and sustainable development assurance procedures, today and in the future.

In conclusion, ConocoPhillips Norway considers the risk of adverse impacts related to fundamental human rights and decent working conditions in its operations and its supply chain to be low. The majority of ConocoPhillips Norway's suppliers are based in geographical locations with relatively low risk. Whilst many suppliers procure goods and services internationally, ConocoPhillips Norway has taken steps to ensure that



suppliers have satisfactory governance processes established in their enterprise and supply chains that address fundamental human rights and decent working conditions.

### **Plans for Continued Due Diligence**

ConocoPhillips Norway recognizes the responsibility to continue to assess and mitigate actual and potential adverse impacts on fundamental human rights and decent working conditions in its operations and supply chain. Ongoing activities include the following:

- Continue with due diligence reviews of potential new suppliers to identify risks related to fundamental human rights and decent working conditions. Particular attention will be paid to international suppliers whose global supply chains extend beyond Norway, EU, United Kingdom and U.S.
- Continued membership in the Offshore Qualific HuRi network to stay engaged with other oil & gas operators, keeping up to date with latest assessments in supply chain risks, and seeking and reviewing input from independent consultants on the matter.
- Annual nomination of suppliers for human rights assessments through the Offshore Qualific HuRi work group.
- Repeat audits to track improvements in human rights assessments for selected suppliers.
- Follow up of any relevant human rights audit findings with suppliers to remedy concerns.