

Statement Transparency Act

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

June 2026





General Statement on Human Rights and Decent Working Conditions

ConocoPhillips 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 and the International Labor Organization Declaration on Fundamental Principles and Rights at Work. Our approach is informed by the UN guiding Principles on Business and Human Rights. ConocoPhillips expects suppliers and contractors working on its behalf to comply with 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 NUF.

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, ConocoPhillips Norge NUF, 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 NUF.

The company is the operator of the fields in the Greater Ekofisk Area, where current production comes from Ekofisk, Eldfisk and Embla fields with a 35.112 % license interest, Tor field with 30.658 % and Tommeliten A with 28.1385 %. The company also has ownership in several partner-operated assets, including Heidrun, Visund, Oseberg, Troll, Grane, Aasta Hansteen, Bredablikk and Alvheim. The net production in Norway for 2025 was about 121,000 barrels of oil equivalent per day (oe/d), including production from fields operated by others.

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

With a head office in Tananger outside Stavanger, ConocoPhillips Norway has approximately 1450 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 670 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 United States, the European Union, 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 a strong commitment to upholding fundamental human rights and ensuring decent working conditions across its Norwegian-based operations and supply chain. The company has implemented a comprehensive due diligence framework, which includes both completed actions and ongoing initiatives:

- **Contractual Clarity:** Standard requirements have been embedded in new and extended contracts to clearly communicate expectations regarding human rights and working conditions to suppliers.
- **Industry Collaboration:** Active participation continues in the Offshore Qualific Human Rights (HuRi) work group, which offers audit services and maintains a supplier database focused on human rights. This collaboration fosters a unified industry approach and facilitates knowledge sharing.
- **Enhanced Risk Monitoring:** A new corporate-level tool has been used to strengthen third-party risk management and monitor supply chain vendors for human rights concerns.
- **Supplier Risk Assessment:** The due diligence process now includes human rights assessments for potential new suppliers from high-risk countries. These assessments involve management reviews conducted by reputable independent international consultants.
- **Ethics and Reporting Mechanisms:** The company ensures that its ethics reporting helpline and Code of Business Ethics and Conduct are accessible, enabling confidential reporting of grievances without fear of reprisal.
- **Training and Awareness:** Company offers training sessions focusing on human rights and modern slavery, and highlighting emerging global legal requirements.

To date, these due diligence efforts have not identified any adverse impacts or significant risks within the supply chain. Most suppliers are in low-risk regions, and ConocoPhillips Norway has taken steps to ensure that suppliers maintain robust governance processes addressing human rights and working conditions.