

Account of Due Diligence Subject to the Norwegian Transparency Act

Expro is a global company operating in the oil and gas industry with a diverse supply chain including specialist equipment and machining providers. Our supply chain spans across regions, with a significant portion of our material, goods and services sourced from North America and Europe.

In line with our commitment to ethics, integrity and the Norwegian Transparency Act, we have implemented a robust due diligence process to address decent working conditions and potential adverse impacts on fundamental human rights within our supply chain. Our approach includes the following:



Due Diligence

Risk Assessment

We conduct risk assessments through mapping our supply chain, identifying high-risk areas, and assessing supplier practices with the objective of proactively addressing potential risks associated with modern slavery and human trafficking.

Supply Chain Code of Conduct

Our Supply Chain Code of Conduct applies to all of our supply chain vendors. It explicitly prohibits practices such as child labor, slavery, servitude, forced or compulsory labor, human trafficking or any acts that would constitute offenses under applicable laws, including the UK Modern Slavery Act 2015.

Supplier Agreements

Our Master Purchase Agreements and Purchase Order terms and conditions require suppliers to comply with international standards, laws and regulations. We have instructed our supply chain to follow our Supplier Code of Conduct, which strictly prohibits forced labor and child labor.

Supplier Due Diligence

Expro performs due diligence on potential and existing suppliers. This includes an assessment and screening process to evaluate human rights and human trafficking risk events. If necessary, we conduct internal and onsite supplier audits to verify compliance with the terms of our Supplier Compliance Declaration and other contractual commitments. Collaboratively, we work with direct suppliers to develop corrective action plans and address audit findings.

Procurement Professionals Training

All employees are required to comply with our Code of Conduct and annually certify their compliance. We provide specific training to our supply chain management on identifying and responding to potential or actual supply chain issues. Additionally, we are planning to conduct awareness programs to educate our staff about the risks of modern slavery and human trafficking.





Measures implemented or planned to cease actual adverse impacts or mitigate significant risks:

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To address actual adverse impacts and mitigate significant risks identified through our due diligence we have implemented or are planning to implement the following measures:

Supplier Engagement and Education

Where required, and in addition to our regular efforts to promote ethical behavior in our supply chain, we may actively engage with suppliers through additional communication to educate them about our ethical standards and to foster awareness of human rights and decent working conditions.

Enhanced Monitoring and Auditing

We will consider strengthening our monitoring and auditing processes to ensure compliance with our human rights commitments. Where deemed necessary, and based on potential risks identified, this may include conducting regular supplier audits to assess adherence to our requirements and identify areas for improvement.

Remediation

In cases where actual adverse impacts are identified we take corrective measures including, where reasonably possible, working with suppliers to develop remediation action plans.

We are committed to continuous improvement in our due diligence efforts. This involves ongoing review and enhancement of our policies, procedures and guidelines based on emerging best practices, stakeholder feedback and changes in laws and regulations.

By implementing these measures, we demonstrate our commitment to combating modern slavery and human trafficking within our supply chain. We strive for transparency, accountability and the protection of fundamental human rights and decent working conditions. We will continue to evolve our practices, collaborate with stakeholders and promote responsible business conduct as part of our ongoing efforts to eradicate these issues from our operations and supply chain.

Director, Expro Norway

John McAlister