

Expro Norway AS' Statement on Human Rights and Decent Working Condition



Activities to prevent and mitigate negative human rights impacts

The statement has been duly considered for the financial year 2024, covering the period from January 1, 2024, to December 31, 2024

Organization and activities

Expro is a global company operating in the oil and gas industry. We are a leading expert with a diverse set of global capabilities in well construction, well flow management and production, subsea well access, well intervention and integrity. We combine innovative, future-facing technology with high-quality data and analytics to provide our customers with differentiated, value-added solutions and services to support more efficient and effective operations.

Expro Norway AS is a subsidiary of Expro Group Holdings NV, domiciled in the Netherlands and headquartered in Houston, Texas, U.S. Expro Norway AS is headquartered in Tananger and is responsible for Expro's operations in Norway.

Expro Norway AS delivers a comprehensive range of products and services to the oil and gas industry, specializing in well construction, completion, production optimization, intervention, and responsible well abandonment. Expro offers advanced, integrated solutions designed to enhance the efficiency of drilling and completion operations, optimize production performance and support effective reservoir characterization and monitoring.

Expro operates in over 60 countries, addressing the energy industry's challenges with approximately 300 operational locations, these include manufacturing, research and development, service, and training facilities. In Norway, the main base is in Tananger, with additional sales and support offices in Sandnes and Haugesund.

Globally, Expro employs around 8,800 people, of which approximately 280 are based in Norway. Among these, around 130 works in the offshore sector.

Core Values

Expro is deeply rooted in responsible governance, which is reflected in its core values. In line with our commitment to ethics, compliance, risk management, integrity and the Norwegian Transparency Act, we have implemented comprehensive policies and a robust due diligence process to address decent working conditions and potential adverse impacts on fundamental human rights and within our supply chain. This commitment starts with the board, is fostered by the leadership team, and permeates the entire organization, including Expro Norway. Our leaders set high ethical standards in the workplace and emphasize the importance of honesty and integrity in all we do. Expro provides employees with guidance and tools to support ethical decisions.

Expro is well-informed about the risks associated with its business activities and is aware of the potential negative impacts on human rights and decent working conditions.

Expro Norway AS focuses on quality, high standards for HSE (Health, Safety, and Environment), precision, and environmentally friendly and sustainable solutions. Our values commit us to operate at the highest ethical standards and conduct our business responsibly. This commitment is reflected in everything we do. This document outlines the company's efforts in carrying out due diligence related to human rights, decent working conditions, and ethical trade in accordance with the requirements of the Transparency Act.

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.

Anchoring Responsibility

It is stated in the Board's annual report for 2024 that we must ensure fundamental human rights and decent working conditions. Expro Norway AS's control system and internal routines are designed to integrate values and ethical guidelines into all processes carried out in the company's daily operations under our Supply chain code of conduct. Our Supply Chain Code of Conduct applies to all of our supply chain vendors and their subcontractors' delivering products and services to Expro Norway AS. 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.

Due Diligence Assessments

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 Code of Conduct and other contractual commitments. Collaboratively, we work with direct suppliers to develop corrective action plans and address audit findings.

The law mandates that due diligence assessments should be proportionate; therefore, we prioritize suppliers with whom we have the most trade and industries with the highest risk of human rights and decent working condition violations. As of 30.06.24, this number totals 344. Our collaboration with INANKO Procurement AS provides us with continuous risk assessments of both current and future suppliers. This partnership supports us in conducting effective due diligence assessments.

INANKO alerts us to risks associated with our supply chain, including legal and financial factors, credit risks, reputation risks, violations of laws, and other relevant matters. These alerts help us identify and address any risk factors in our supply chain. The prioritized suppliers have been asked to complete a survey with questions prepared according to OECD guidelines. Non-responses are followed up promptly. Resources have been allocated to identify and address risk factors as they are reported.

Potential Risks

- **Geographic Risk:** 65% of Expro Norway AS's suppliers are in Norway, which significantly reduces geographic risk and helps ensure compliance with the Transparency Act. Norway generally has high standards for working conditions, environmental protection, and human rights, which minimize risks within the supply chain. With a large proportion of suppliers based in Norway, Expro ensures that many suppliers already meet stringent regulatory requirements and ethical guidelines. Under the Transparency Act, businesses are required to report on how they work with transparency and human rights in their supply chains. By having a significant proportion of suppliers in a country with high standards like Norway, we can more easily monitor and verify that our suppliers comply with our expectations and guidelines.

Advantages of having 65% of suppliers in Norway concerning the Transparency Act:

1. **Reduced risk of human rights violations:** Norway has strong laws and regulations protecting workers and their rights, which reduces the risk of human rights violations in our supply chain.
2. **Higher labor standards:** Norwegian suppliers often operate under stricter labor standards and regulations, which contribute to better working conditions and safer workplaces.
3. **Better traceability and control:** With many of our suppliers in Norway, we can more easily conduct inspections and evaluations to ensure compliance with our ethical guidelines and standards.
4. **Strengthening the local economy:** By collaborating with Norwegian suppliers, we support the local economy and contribute to maintaining jobs and sustainable development in Norway.
5. **Easier compliance with the Transparency Act:** Norwegian suppliers are often well-acquainted with the requirements of the Transparency Act, making it easier for us to fulfill our reporting and transparency obligations.

By having a large proportion of suppliers in Norway, Expro demonstrates awareness of geographic risks and actively works to ensure a responsible and sustainable supply chain in line with the Transparency Act. This helps build trust among customers, investors, and other stakeholders, maintaining a positive reputation in the market. 24% of suppliers come from the United Kingdom, a country known for its strong focus on accountability and sustainability in the supply chain.

- **Industry-Level and Operational Risks:** Suppliers offering services to oil fields usually require a highly skilled workforce and a robust supply chain. To support operations, Expro also utilizes additional services and production activities, which often rely on short-term contracted labor. These may include services such as cleaning, catering, landscaping, and security at facilities. Expro considers third-party labor suppliers to carry higher risks, particularly when suppliers use local recruitment agencies, agents, and brokers to provide manual labor on our behalf. Expro recognizes that utilizing such categories of temporary labor may involve risks such as violations of decent working conditions, low wages, withheld salaries, or lack of overtime payments. Furthermore, we acknowledge that in our industry, there is an inherent risk of conflict minerals being present in our global supply chain due to the type of equipment used.

Risk Mitigation Measures

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. Expro globally has a thorough onboarding process that allows us to screen and select reliable suppliers. This ensures collaboration with suppliers who comply with standards for ethics and 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 and evaluations to assess adherence to our requirements and identify areas for improvement. Follow-up measures every 36 months for critical suppliers. To support this process digital case files are created for all identified risk conditions. The work on risk-reducing measures and supplier prioritization will be stored in this archive. Before implementing measures against the relevant supplier, information must be thoroughly verified, usually through dialogue with the supplier. All case files for high-risk conditions will be systematically followed up, and risk measures will be activated continuously. All risk incidents concerning a supplier are classified as either Red (high risk), Yellow (medium risk), or Green (low risk). All historical incidents and associated measures for a supplier are stored in the archive.

- **Procurement Professionals Training**

All employees are required to comply with our Code of Conduct and annually certify their compliance. We provide specific training in our supply chain management in 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.

- **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.

Discovered Risks

As of 31.12.24, no risks or violations have been discovered among suppliers in our first tier.

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 or the termination of the contractual relationship may be considered. Further analyses will be conducted based on a risk-based approach. This means that the scope of monitoring and follow-up will be adapted to the risk value of the condition and the company's ability to positively influence the situation.

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.

Contact

Inquiries and questions regarding Expro Norway AS's work on human rights and decent working conditions can be directed to Pal.Bjerkeim@expro.com and will be answered no later than three weeks after the inquiry is received. All inquiries will be handled confidentially.

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, Director