



TOTALENERGIES EP NORGE AS

REPORT REGARDING TOTALENERGIES EP NORGE AS' COMPLIANCE WITH THE NORWEGIAN TRANSPARENCY ACT 2023

JUNE 2024

1. INTRODUCTION

This Human Rights Due Diligence (**HRDD**) report has been prepared in accordance with the Norwegian Transparency Act (2021) (NOR: Åpenhetsloven) regarding Responsible Business Conduct. The purpose of the regulation is to promote respect for Fundamental Human Rights and Decent Working Conditions. The purpose of this report is to describe TotalEnergies EP Norge AS' (**the Company**) efforts to identify, prevent and manage potential adverse impacts on Fundamental Human Rights and Decent Working Conditions in connection with the Company's operations.

TotalEnergies EP Norge AS understand that our responsibility to safeguard Fundamental Human Rights and Decent Working Conditions extends not only to our own operations, but also to our entire Supply chain and to our Business partners. It is important for us to take responsibility for and contribute positively to operating in accordance with all legal requirements that apply to the Company, and to promote respect for Fundamental Human Rights and Decent Working Conditions.

The report is based on section 4 of the Transparency Act and the requirements set out, and referenced to, therein.

TotalEnergies EP Gass Handel Norge AS is a fully owned subsidiary of the Company. This report includes reporting for TotalEnergies EP Gass Handel Norge AS. There has been no activity in TotalEnergies EP Gass Handel Norge AS in 2023, other than accounting and auditing of the company's accounts. There were no employees in TotalEnergies EP Gass Handel Norge AS in 2023 and no other person acting on behalf of the company, other than its board of directors.

All references to the Company will include TotalEnergies EP Gass Handel Norge AS, unless otherwise clearly stated in this report or is apparent from the context.

2. HRDD IN SIX STEPS:

Section 4 of the Transparency Act and the OECD's due diligence model for responsible business conduct are designed to help businesses identify, prevent, and manage adverse impacts resulting from their business on Fundamental Human Rights and requirements for Decent Working Conditions. The Company's efforts are based on this model.

This model includes six steps:

- (i) **Embed responsible business conduct into policies and management systems:** The enterprise must anchor accountability in its policies. The responsibility shall be anchored at management level.
- (ii) **Identify and assess adverse impacts:** The enterprise must identify risks in the operations, in supply chains and business relationships and assess the extent and likelihood of actual and potential adverse impact or damage to Fundamental Human Rights and Decent Working Conditions.
- (iii) **Cease, prevent or mitigate adverse impacts:** Based on findings identified in Step (ii), the enterprise must implement a plan to prevent and deal with adverse consequences.
- (iv) **Track implementation and results:** The enterprise must follow up and evaluate the effect of the measures taken following implementation of the plan identified in Step (iii) to ensure that they reduce the risk of adverse effects.
- (v) **Communicate how impacts are addressed:** The enterprise must communicate openly and clearly about the handling of adverse impacts.
- (vi) **Provide for or cooperate in remediation when appropriate:** If the enterprise has caused or contributed to actual adverse consequences, remediate measures must be taken.

3. DEFINITIONS

In this report the terms Fundamental Human Rights, Decent Working Conditions, Supply chain and Business partner mean:

Fundamental Human Rights: Fundamental Human Rights refers to the internationally recognized human rights pursuant to the International Covenant on Economic, Social and Cultural Rights, the International Covenant on Civil and Political Rights, and the ILO's core conventions on fundamental rights and principles at work.

Decent Working Conditions: Working conditions that are safe, healthy and dignified, and that meet international labour rights standards. This includes e.g. the right to organise, to fair wages, to safe working conditions, to freedom from discrimination and child labour.

Supply chain: Range of companies involved in the manufacturing process to produce a product or service, from raw material suppliers to retailers.

Business partner: Any party that supplies goods or services directly to the enterprise, that is not part of the Supply chain.

4. GOVERNANCE

4.1 Purpose and principles of governance

The purpose of the law is "*to promote respect for fundamental human rights and decent working conditions*". Furthermore, the purpose of the Act is to ensure that consumers, organizations, associations, and others have access to information about how Fundamental Human Rights and Decent Working Conditions are handled in businesses, in their Supply chains and with Business partners.

TotalEnergies EP Norge AS consider compliance with the Transparency act and other regulations that applies to the Company as paramount for its operations and strive to ensure that the purpose of the law is fulfilled.

TotalEnergies EP Norge AS' HRDD is carried out according to the following principles:

- Continuously improving our practices to promote respect for Fundamental Human Rights and Decent Working Conditions.
- To perform regular evaluations of our internal documents.
- To regularly communicate with and monitor our suppliers' and partners' compliance with the Transparency Act.
- To apply a risk-based approach when identifying risks.
- To be open and transparent in our reporting on our actions and HRDD activities in connection with the Transparency Act.
- To work with our Supply chain and Business partners to ensure that together we comply with the requirements and minimise adverse impacts on Fundamental Human Rights and Decent Working Conditions.
- To act independently and with integrity.

4.2 Anchoring responsibility – responsible leadership

Anchoring responsibilities both vertically and horizontally is an important part of internal governance in the organization. The Company has a framework for managing risk and complying with its obligations, including a sound management system. This includes TotalEnergies EP Gass Handel Norge AS.

TotalEnergies EP Norge AS' Board of Directors (**BOD**) is the supreme body and is ultimately responsible for ensuring that the business is run responsibly and compliant with all applicable regulations. The BOD shall ensure that the Company is aware of the social responsibility that businesses must take to ensure that Fundamental Human Rights are not violated, and to ensure that requirements for decent working conditions are met.

Responsible leadership means that management leads by example, ensuring that all employees follow the organization's values and ethical standards. In TotalEnergies EP Norge AS the company's senior management is responsible for setting clear goals and expectations and providing employees with the necessary support and resources via training, guidance, establishing and amending routines and to implement all resolutions

from the Company's BOD and the Managing Director regarding compliance with the Transparency Act.

The Board of Directors in TotalEnergies EP Gass Handel Norge AS have decided to refer the Company's HRDD report, and the Company has accepted to include TotalEnergies EP Gass Handel Norge AS in the Company's HRDD assessments.

4.3 Relevant internal guidelines

TotalEnergies EP Norge AS has the following procedures relevant for compliance with the Transparency Act:

- TotalEnergies' Code of Conduct
- Transparency Act Procedure
- Human Rights Guide
- Business Integrity Guide
- Human Rights Briefing paper
- Practical Guide to Dealing with Religious Questions
- Fundamental Principles of Purchasing
- Grievance Procedures (Collection and processing of ethical complaints)
- Questionnaire to Suppliers and Business Partners
- Offshore Norge's recommended guideline no. 148

All employees and others who work for TotalEnergies EP Norge AS shall observe these policies and contribute to a responsible corporate culture. There are several communication options available if an employee becomes aware of a matter that the Company's Ethical & Integrity Committee should address. In addition to directly contact any member¹ of the said Committee, an employee may alternatively choose to contact his or her line manager, the HR department or send an email to ethics@totalenergies.com.

TotalEnergies EP Gass Handel Norge AS has no employees. All procedures mentioned in this section 4.3 have been adopted by TotalEnergies EP Gass Handel Norge AS. As of December 2023, the company has no employees and no activities. Thus, the Company's HRDD includes TotalEnergies EP Gass Handel Norge AS.

4.4 The operations

The Company is involved in exploration, production and sale of crude oil and natural gas, offshore wind and the storage of CO₂ on the Norwegian continental shelf. The Company is a wholly owned subsidiary of TotalEnergies SE, a broad energy company with operations in more than 130 countries worldwide and with a presence in Norway for more than 50 years. The main

¹ Overview of members available at: <https://wat.totalenergies.com/en-en/entity/epnsrno-tep/ethics-and-integrity-0>

office in Norway is in Stavanger and the Company's main business is oil and gas exploration and production activities.

The Company is primarily a licensee and not an operator of production permits. The Company is the licensee of in total 54 production permits. The Company is the operator of seven production permits (006, 018C, 043CS, 043DS, 102, 102C, 102D).

At the end of 2023 the Company had a permanent staff of 86 employees, including 62 local employees and 24 impatriated staff. In addition, 26 employees were assigned abroad or to partners in Norway. At year end of 2023 no staff was employed on a part-time basis.

At the end of 2022 43,21% of the local employees were union members belonging to TEKNA or IndustriEnergi (avd. 268).

The Company is a member of Offshore Norge. The association is affiliated with the Confederation of Norwegian Enterprises (NHO).

TotalEnergies EP Gass Handel Norge AS has been dormant since January 2022 and has had no employees during 2023. TotalEnergies EP Gass Handel Norge AS business partners are included in the Company's HRDD.

4.5 Offshore Norge guidelines

As a member of the industry association Offshore Norge the Company adheres to the recommended guidelines for the Transparency Act (no. 148) provided by Offshore Norge. The guidelines have been drawn up by a working group established by the legal committee of Offshore Norge. These guidelines are a result of a joint effort in the E&P industry in Norway aimed at ensuring that the obligations under the Transparency Act are fulfilled in joint E&P projects and divides the responsibility for compliance with the Transparency Act and the boundary between the individual corporate responsibility and the main responsibility in the joint activity.

5. MAPPING OF ADVERSE CONSEQUENCES

5.1 The Company's routines for working with human rights and decent working conditions

The Company works systematically to ensure decent working conditions in the business, in the Supply chain and with its Business partners to promote and safeguard respect for Fundamental Human Rights and Decent Working Conditions. The Company's HRDD is based on the routines described in section 4.3 above.

The General Counsel of the Company is responsible for the Transparency Act Procedure, however, the responsibility for the performance of various tasks is allocated to the relevant business units. The BOD is informed about this work as needed.

5.2 THE COMPANY'S RISK ASSESSMENT AS OF 31. December 2023

5.2.1 Introduction

Following the entry into force of the Transparency Act on 1 July 2022, the Company has carried out due diligence assessments in its own operations and Supply chain, as well as for TotalEnergies EP Gass Handel Norge AS limited activities, and will continue to do so on an ongoing basis. These obligations are clearly communicated in the Company's internal guidelines, and have been adopted by TotalEnergies EP Gass Handel Norge AS.

5.2.2 Methodology

This step is about identifying the risk of adverse impacts related to human rights and decent working conditions in TotalEnergies EP Norge AS' own operations, in its Supply chains and with other Business partners.

A systematic approach has been applied in the Company's HRDD. The process consists of five steps: i) collecting information, ii) analysis, iii) identification, iv) assessment, and v) risk minimization. The aim is to identify areas that pose the highest risk of adverse impact and address these.

We apply a risk-based approach in mapping and prioritizing the risk of adverse impact. Prioritizing one area of risk over another does not mean that the other area is less important. The principle of a risk-based approach means that the areas with the highest severity and best possibility to influence are given the highest priority.

5.2.3 High level risk assessment of the Company's Supply chain and Business partners

The Company has carried out a high-level risk assessment of its own operations and the operations of the Company's Supply chain and Business partners. The aim of the assessment has been to map the risk of violations of human rights and requirements for decent working conditions for employees in the Company's operations, and people otherwise indirectly affected by the Company's operations, to enable the Company to implement counter measures where the risk of adverse impact has been identified and where the opportunity to influence is substantial.

In line with established principles for risk assessments, the Company has particularly focused on assessing Supply chain and Business partners based on factors that, by experience, are associated with a risk of violations of Fundamental Human Rights and Decent Working Conditions. These factors include any known industry specific risk, any particular risk at business level (relating to a specific supplier or Business partner), geographical risk and risk relating to product development and/or production.

The Company has no installations on fields where the Company acts in the capacity as the operator of the permit. Regarding production permits where the Company is a licensee the operations are handled by either Equinor or ConocoPhillips. Pursuant to the recommendations from Offshore Norge in relation to the Transparency Act (no. 148) section 4 it is recommended that the operating company accounts of its work with due diligence assessments according to section 5 of the Transparency Act and that assessments will be relevant for all companies that participate in the partnership. The partner forum is the appropriate forum through which the Company obtains information from the operator company and the operator company clarifies its work with actual and potential adverse consequences for Fundamental Human Rights and Decent Working Conditions. With respect to the above-mentioned Business partners the Company has separate operating agreements whereby the Business partner is responsible for obligations under the Transparency Act. Both operator companies are considered serious actors within the Norwegian oil and gas market, and both are subject to the Transparency Act. The Company therefore refers to the operators' HRDD reports for activities in respect of the licenses where the Company holds a participating interest.

Furthermore, the Company directly subcontracts to suppliers in Europe where legislation provides for far-reaching regulations relating to Fundamental Human Rights and Decent Working Conditions. European governments are increasingly enforcing laws to ensure responsible business practices. National laws require companies to monitor the impact of their

operations on people and report on their efforts. These regulations include examples like the United Kingdom Modern Slavery Act and the Swiss legislation on conflict minerals and child labour. On 23 February 2022, the European Commission presented its proposal for a law on corporate sustainability obligations ("the EU Supply Chain Act") which requires EU companies to audit their suppliers along the global Supply chain. Pursuant to the act due diligence must be integrated into company policies and management systems. Furthermore, companies must establish a procedure for complaints and ensure that everyone along the Supply chain can access it. Companies are obliged to control and monitor the effectiveness of these measures.

The Company has direct suppliers located in Europe only and the risk of violations of human rights and decent working conditions in the Supply chain would be influenced by the overall risk of such violations in the country where the Supply chain or Business partner reside. The EU has implemented regulations for the promotion of employment, improved working and living conditions, proper social protection, for dialogue between management and labour etc (e.g. EU Charter of Fundamental Rights, the Treaty of Lisbon, TFEU article 151). For this reason, the Company has not prioritized enterprises in these geographical area in its HRDD assessments now.

However, the Company is aware that in some European countries the risk of breach of Human rights is present. This includes:

- Violations of the right to establish or join unions.
- Violations of trade union activities.
- Violations of the right to collective bargaining.
- Violations of the right to strike.

In our HRDD we have not included businesses in countries ranking 1 and 2 in the ITUC Global Rights Index (i.e. the five Nordic countries, France, Austria, Germany, Italy, Ireland, Croatia, Czech Republic, Estonia, Latvia, Lithuania, Moldova, Montenegro, Netherlands, Portugal, Slovakia, Spain and Switzerland). For countries with rating 3 (Albania, Belgium, Bosnia Herzegovina, Bulgaria, North Macedonia, Poland and the UK) we collect information from suppliers and Business partners with an HRDD questionnaire and will follow up on any findings. Businesses in countries ranking 4 or 5 (Greece, Hungary, Romania, Belarus) are subjected to a higher level of scrutiny and specific measures based on a specific company related assessment of risk. The Company will communicate with any suppliers and Business partners in these countries and review policies, conduct audits where required and collect information from third parties where there is a call for more information. Where we identify adverse impacts, we will follow up such suppliers and Business partner requiring corrective measures.

Except from crude oil and natural gas, the Company does not sell physical products. Our purchasing of products is wholly related to the Company's own use, e.g., office machines and supplies, furniture, and similar products. The Company has not caused and has not contributed to adverse impacts to Fundamental Human Rights and requirements for Decent Working Conditions. However, the Company will in the future include clear expectations to all suppliers of physical goods to promote respect for Fundamental Human Rights and requirements for Decent Working Conditions and will choose suppliers that commit to this when possible or cooperate with others to mitigate adverse impacts.

5.2.4 Specific risk assessment as of 31. December 2023

The Company considers that actual and potential adverse impacts on Fundamental Human Rights and Decent Working Conditions the Company has caused, contributed to or that are directly linked with the Company's operations, products or services, may potentially occur within the following key areas:

- Within its own organization,
- In services and/or work performed by its suppliers (including sub-suppliers) and other business relations,
- In activities performed by the operator on behalf of a joint venture where the Company participates as a shareholder or licensee, and

The Company has not identified that the Company's operations have caused or contributed to a significant risk of violations of Fundamental Human Rights or Decent Working Conditions. Further, Company considers that it's business and associated risk picture, from the publication of Company's 2023 report until cut-off date for this present report (31. December 2023), remains unchanged.

5.3 MEASURES TAKEN TO PREVENT RISK OF VIOLATIONS OF HUMAN RIGHTS AND DECENT WORKING CONDITIONS

Considering the Company's risk categorization described in this document, the Company has implemented proportionate measures to prevent and manage the risk of adverse impacts on Fundamental Human Rights or Decent Working Conditions.

In addition to the functions required under the Norwegian Working Environment Act, such as the safety delegates and the Working Environment Counsel (AMU), the Company has implemented a comprehensive internal framework for ethics and integrity based on various charters, policies, directives and rules developed by TotalEnergies SE. Embedded in this framework are mechanisms to ensure that the Company identify, assess, and mitigate actual or potential adverse impacts on Fundamental Human Rights and Decent Working Conditions within its organization.

Measures adopted by TotalEnergies EP Norge AS include the following:

- Respect for Human Rights is one of the core principles to which employees must adhere as further described in the Company's Code of Conduct. Respect for Human Rights includes respect for internationally recognized Human Rights standards, such as the OECD Guidelines for Multinational Enterprises as well as the principles of the United Nations Global Compact.
- The Human Rights Guide and the Business Integrity Guide provide more detailed guidance on the matters addressed by the Code of Conduct related to human rights issues. This includes guidance on the Company's approach of integrating respect for Human Rights into risk and impact management process.
- The Company has a Practical Guide to Dealing with Religious Questions which seeks to provide practical answers to questions raised by employees on matters of religious expression at work, while promoting respect for differences and tolerance for personal beliefs.

- Suppliers are required to abide by our Fundamental Principles of Purchasing. The Fundamental Principles of Purchasing contains several key principles concerning health, safety and the environment, anti-corruption compliance and other matters, and requires our suppliers to respect human rights at work in compliance with the international standards referred to above.
- In line with the expectations of the UN Guiding Principles on Business and Human Rights, the Company has also implemented a Grievance Procedure to deal with complaints about how the Company is conducting its business.
- The Company has its own Ethics & Integrity Committee that is responsible for the general oversight of the implementation of the Code of Conduct. The Ethics & Integrity Committee meets quarterly and in addition as circumstances require.
- Employees complete training regarding human rights at work. All employees are required to be familiar with the requirements of the Code of Conduct and the policies on the respect of Fundamental Human Rights and Decent Working Conditions.
- The Company has implemented routines to facilitate the integrity due diligence of suppliers in relation to the assessment made under the Norwegian Transparency Act including establishing a supplier integrity due diligence questionnaire.
- The Company has adopted a procedure outlining the internal requirements for compliance with the Norwegian Transparency Act.

The Company is continuously monitoring the effects that the implemented measures have had or will have. However, the primary goal this year has been to increase awareness in the organization and assessments of existing and new Supply chain and Business Partners. The Company will supplement the above-mentioned measures if necessary.

6. CEASE, PREVENT OR MITIGATE ADVERSE IMPACTS

TotalEnergies EP Norge AS is continuously working to promote Fundamental Human Rights and Decent Working Conditions. This includes efforts to cease, prevent and mitigate adverse impacts caused by the Company or connected to its operations. The Company's efforts as described are based on the following principles:

- (i) The principles of the Company's Code of Conduct shall apply to all our Supply chain and Business partners. Promotion of Fundamental Human Rights and Decent Working Conditions are essential elements of this code.
- (ii) The Company uses contract regulations requiring of our suppliers and Business partners that they commit to respecting and promoting Fundamental Human Rights and Decent Working Conditions. Our contracts include provisions for audits, obligations to reporting adverse impacts to the Company and relevant termination clauses. Such obligations are included in all contracts starting as of June 2023. The Company will continue to include such provisions in any new contracts.
- (iii) The Company has a grievance reporting channel available for reporting any HRDD related grievances (<https://corporate.totalenergies.no/grievance-procedure>). All reports will be handled by the Company's Ethics Officer or Compliance Officer as appropriate.

- (iv) The Company will cooperate with its Supply chain and Business partners with corrective measures as required from any adverse finding provided that the Company may reasonably influence the consequence.
- (v) The Company will choose its partners considering the risk of adverse impacts to Fundamental Human Rights and Decent Working Conditions.

7. PREVIOUS REPORT - EXPERIENCE

Company published its first due diligence report on its local website in June 2023. Following this, two external enquiries have been received through Company's web portal. Both related to students investigating how different businesses have implemented the requirements set out in the Transparency Act. As per the date of this present report, no outstanding actions or further follow-up rest with Company in this respect.

8. SUMMARY – ASSMENT FOR 2023

As of 31. December 2023, the Company has not identified any adverse impact to Fundamental Human Rights and Decent Working Conditions.

Further, the Company has not experienced any new / subsequent events after this date that entails a change to this view up until the date of issuing this report.

This statement is signed by the Managing Director and the Board of Directors of the Company.

*****Signature page to follow*****

Stavanger, June 2024

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Agnes Marcotorchino
(Chair)

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