# WEATHERFORD NORGE AS' NORWAY TRANSPARENCY ACT STATEMENT ON HUMAN RIGHTS AND DECENT WORKING CONDITIONS

This report is prepared by Weatherford Norge AS and outlines the main features of its due diligence assessments in line with the requirements pursuant to Section 5 of the Norwegian Transparency Act ("the Transparency Act").

The Transparency Act requires companies covered by the law to conduct due diligence regarding risks of actual or potential adverse impacts on fundamental human rights and decent working conditions that the companies have either caused or contributed towards, or that are directly linked with the companies' operations, products, or services via their supply chains or business partners. The due diligence entails identifying and managing such actual or potential adverse impacts based on a risk-based and proportionate approach. The companies shall account for this due diligence and respond to information requests from third parties related to the same.<sup>1</sup>

This statement is made available on the Weatherford International website and referred to in Weatherford Norge AS's annual report.

#### 1. ABOUT WEATHERFORD

#### Organisation and activities.

Weatherford Norge AS ("Weatherford Norge") is a wholly owned indirect subsidiary of Weatherford International Public Limited Company, an Irish public limited company registered at 70 Sir John Rogerson's Quay, Dublin 2, Ireland (hereinafter "Weatherford," the "Company", "we" "us" and "our"). Weatherford's principal address is 2000 St. James Place, Houston, Texas 77056. Weatherford Norge follows and benefits from the global policies and processes of Weatherford. Where information in this statement is relevant to Weatherford in Norway specifically, Weatherford Norge will be referenced.

Weatherford is a leading global energy services company providing equipment and services used in the drilling, evaluation, well construction, completion, production, intervention, and responsible abandonment of wells across the broad spectrum of energy sources.

In Norway, we provide equipment and services used in well construction, intervention, and responsible abandonment of wells. Our key product lines in 2024 were tubular running services, completions, liner hangers, ISDT, and cementation products.

We conduct operations in approximately 75 countries, answering the challenges of the energy industry with 330 operating locations including manufacturing, research and development, service, and training facilities. In Norway, our main operating base is located in Sandnes, and we also have a sales and support office in Bergen.

Globally, we have approximately 19,000 employees, including around 260 in Norway. Approximately 100 of those employees work in the offshore sector.

Our Mission, Vision, and Core Values

**MISSION:** 

<sup>&</sup>lt;sup>1</sup> Information requests under the Transparency Act can be sent to Listen Up at <u>www.listenupwfrd.com</u> or via phone, the dialling details of which are available here: <u>Listen Up</u>

Producing energy for today and tomorrow.

#### **OUR VISION:**

As a global leader in energy services, operators trust Weatherford to drive maximum value, streamline operations, and enhance safety. In partnership with our customers, we are committed to producing innovative energy solutions that are environmentally and economically sustainable to drive our industry forward.

## **OUR VALUES**



Our Core Values are grounded in our foundation of safety, quality, and integrity. Our commitment to responsible governance starts with our Board of Directors, is championed by our Executive Leadership Team, and extends throughout our organisation, including Weatherford Norge. Our leaders establish clear ethical standards in the workplace, emphasizing the importance of honesty and integrity in all that we do. We provide employees with guidance and tools to support ethical decision-making. To ensure a responsible Weatherford, we have implemented robust policies and processes for ethics, compliance, and risk management across our entire organisation, including Weatherford Norge.

As a participant in the UN Global Compact, we have made a commitment to support the UN's Ten Principles on human rights, labour, environment, and anti-corruption by incorporating these principles into our strategy, culture, and day-to-day operations of our Company.



excellence

### 2. HUMAN RIGHTS AND DECENT WORKING CONDITIONS IN WEATHERFORD

At Weatherford Norge, we are committed to increasing awareness of human rights not only because we care about our compliance obligations, but also because it is the right thing to do.

This begins within our own organisation.

We believe our people are vital to our long-term success. In line with our Core Values and our obligations under the Transparency Act, our policies and procedures are designed to support employee wellbeing, raise awareness of human rights and foster decent working conditions across the Company and our supply chain.

Our workforce spans the globe, and we strive to create an environment where everyone feels welcome and can perform at their best. We are an Equal Opportunity Employer making employment decisions without regard to race, colour, religion, national or ethnic origin, gender, sexual orientation, age, disability, protected veteran status, or other characteristics protected by law. This commitment aligns with Norwegian legislation, including the Equality and Anti-Discrimination Act (Likestillings- og diskrimineringsloven).

In Norway, we also maintain active collaboration with employee representatives within the unions and comply with national labour laws and collective agreements where applicable. We respect and facilitate employee involvement through established structures, such as working environment committees (AMU), in accordance with the Norwegian Working Environment Act.

**Employee performance and progression.** Weatherford is committed to creating a work environment where every team member can feel safe, included, and supported in their efforts to grow and contribute. Our talent management strategy is designed to align with our commitment to the success of every team member:

- Attracting and retaining the best talent in the industry
- Investing in professional and personal development
- Engaging team members through listening, collaboration, and recognition
- Offering fair compensation and holistic benefits
- Providing a safe and healthy work environment

**Employee engagement**. At Weatherford, we celebrate different perspectives, encourage open dialogue, and value the unique insights of our world-class team. We support meaningful connections across our teams through interactive channels like videos, podcasts, and the One Weatherford App. These platforms enable knowledge-sharing on vital topics, such as corporate strategy, sustainability, financial achievements, safety initiatives, development opportunities, and Company culture. Employees can also share their insights and experiences in the channels.

Our Executive Leadership Team prioritises direct engagement with employees by hosting regular town halls, podcasts, visiting field locations, and maintaining an open-door policy. We are committed to listening to employee concerns and implementing improvements to enhance areas such as safety and operational procedures.

**Pay equity.** Our compensation philosophy of pay-for-performance is the foundation of our approach to rewarding employees. We have designed compensation programs and structures to pay our employees competitively and equitably based on their skills, years of experience, qualifications, roles, and performance. We also have processes to monitor and support the approval of compensation decisions across our various geographies. At Weatherford, we believe our pay-for-performance

approach will continue to drive the advancement and representation of all dimensions of a diverse workforce, including, but not limited to, race, ethnicity, and gender. In Norway, compensation practices are managed in accordance with both internal processes and national legal standards for fairness, transparency, and non-discrimination.

**Freedom of association.** We adhere to the principle of freedom of association as outlined in the International Labor Organization (ILO) Convention: Freedom of Association and Protection of the Right to Organize (No. 87 of 1948) and local labour laws wherever applicable, including the relevant provincial labour relations legislation in each province or territory where we operate. Moreover, we may engage in negotiations and/or form agreements with Workers' Councils in certain regions, such as Europe, and employee forums in areas including Latin America and Australia. In Norway, we support the right of employees to organise, elect representatives, and engage in dialogue with management through structured cooperation.

**Health and safety.** We maintain several programs to educate and reinforce our expectations for health and safety competency, consistency, and reliability across our operations worldwide. Weatherford's Code of Business Conduct reminds all our employees to comply with all applicable health and safety policies and laws in the locations where we operate. Quality, health, safety, and environmental controls are detailed within our Weatherford Operational Excellence and Performance System ("**OEPS**") management system with the intent of meeting all applicable regulatory, legal, and customer requirements, as well as incorporating global leading practices.

**Our Human Capital Management System**. Weatherford launched an improved human capital management platform in 2024 that spans 54 countries and 11 languages. This initiative streamlines talent management processes and unifies the One Weatherford employee experience. The platform encompasses the complete "Hire to Retire" experience and includes our contingent workers. We continually expand the system's capabilities through scope enhancements and by leveraging improved data for deeper analysis and application.

## 3. GOVERNANCE: OUR KEY POLICIES TO SAFEGUARD HUMAN RIGHTS

**Code of Business Conduct**. Our Code of Business Conduct ("Code") serves as the foundation for building an ethical and accountable workplace. Any employment or business with Weatherford is subject to compliance with this Code. It drives the way we do business in Norway and around the globe. We adhere to our Code and ensure that our employees, along with third parties acting on our behalf, are accountable for following it. You can view our Code here: <u>Weatherford Code of Business</u> <u>Conduct</u>.

Weatherford's Compliance department works alongside our business to manage risks, including modern slavery and human rights violations. We are committed to acting ethically and with integrity in all our business dealings and relationships.

We are also committed to conducting our business in a manner that respects the Universal Declaration of Human Rights and the International Labor Organization's core standards.

Under our Code, our employees are expected to:

- respect people, and treat others fairly, consistently, and with dignity and respect for the protection of their rights and obligations
- understand the human rights issues where they work and follow Weatherford's commitment and policies

- comply with all labour and immigration laws and follow applicable wage and hour requirements relating to overtime, meal periods and rest breaks
- not do business with anyone who engages in forced labour, human trafficking, or the exploitation of any person, including children
- ensure a culture that promotes internationally recognised standards for human rights and zero tolerance for human rights abuses and
- remind suppliers of their obligation to comply with our Supplier Code of Conduct including its human rights provisions

**Human Rights Standard.** Weatherford believes that everyone deserves to be treated with dignity and respect, regardless of their gender, race, nationality, place of residence, sexual orientation, national or ethnic origin, religion, language, physical ability, or any other status or characteristic. We do not tolerate discrimination. We believe that failing to honour the human rights of our employees and those with whom we conduct business can create an unfavourable work or social environment that leads to low morale, high employee turnover, a disengaged workforce, and can erode our stakeholder relationships and compliance with community obligations.

Our Human Rights Standard, coupled with our Code, reinforces our culture of internationally recognised standards for human rights. Our Human Rights Standard is guided by international human rights principles found in the Universal Declaration of Human Rights, the Voluntary Principles on Security and Human Rights, and the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises and is available in English here: <u>Human Rights Standard</u> and in Norwegian <u>here</u>.

We do not condone the use of prohibited sources of labour such as forced, compulsory, or prohibited child labour, and we operate in compliance with all legally mandated work hours in accordance with local laws or applicable collective bargaining agreements. All work must be completed voluntarily, meaning the employee is free to quit, strike, or otherwise cease work in a safe manner compliant with applicable law.

We also comply with applicable anti-human trafficking, anti-modern slavery, human rights, and labour laws and regulations in the locations of our operations and require that third parties in our supply chain share and follow this commitment.

**Supplier Code of Conduct.** We know that the strength of Weatherford's reputation is based not only on our own conduct, but also on the behaviour of those with whom we do business. Our Supplier Code of Conduct (available here: <u>Weatherford Supplier Code of Conduct</u>) outlines our expectations for our supply chain, including those related to human rights, environmental responsibility, and conflict minerals. Weatherford Norge's suppliers are requested to accept our Supplier Code of Conduct during the supplier onboarding process, and we reserve the right to terminate a supplier relationship at any time for failure to adhere to the principles in our Supplier Code of Conduct.

Specifically in relation to human rights, Weatherford expects its suppliers to share our commitment to human rights principles as guided by the Universal Declaration of Human Rights, the Voluntary Principles on Security and Human Rights, and the Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises. Among these obligations, suppliers are expected to never employ forced labour (work done against a person's will), prison labour, indentured labour, exploited bonded labour, or other prohibited labour, nor engage in any form of modern slavery, including human trafficking. Additionally, suppliers are expected to comply with local minimum age laws and never employ prohibited child labour.

**Sustainability Report.** At Weatherford, sustainability is not just an initiative—it is an integral part of who we are and what we do. Weatherford is committed to the sustainable, long-term success of our Company, employees, communities, and planet. Our sustainability program aims to achieve this by delivering on three core principles: lowering impacts on the natural world, investing in social interests, and acting with integrity and transparency. Visit <u>Sustainability | Weatherford International</u> to view our current Sustainability Report, which highlights our strides in further embedding environmental, social, and governance (ESG) considerations across our operations and beyond.

**Conflict Minerals Policy**. Weatherford's policies and practices support responsibly sourcing materials from companies. As a result, we have implemented a <u>Conflict Minerals Policy</u> that includes materials like coltan, cassiterite, gold, and wolframite, as well as their derivatives, such as tantalum, tin, and tungsten. The policy is included in our <u>Supplier Code of Conduct</u> and agreed upon by suppliers at the time of onboarding.

Our due diligence procedures are consistent with the OECD guidelines. We require chain of custody declarations from suppliers of necessary conflict minerals incorporated into Weatherford-manufactured products in accordance with our related obligations under the Dodd-Frank Act and Securities and Exchange Commission (SEC) rules and regulations.

For additional details, please refer to our Conflict Minerals Report for the year ended December 31, 2023, as filed with the SEC.

## 4. GOVERNANCE: OUR KEY PROCESSES TO SAFEGUARD HUMAN RIGHTS

Our global Legal and Compliance Department works alongside our leaders to manage human rights risks, including the implementation of the abovementioned policies. We recognise the value of a multi-faceted approach when it comes to implementing our policies on human rights within the Company and throughout our supply chain.

**Training and communication.** Education and awareness are key to ensuring issues of modern slavery are effectively communicated. Currently, all Weatherford employees are required to acknowledge the Code of Business Conduct and the Human Rights Standard, participate in Code of Business Conduct training, and complete specific training on Canadian human rights and modern slavery legislation requirements.

Since 2019, we have conducted a modern slavery risks online training for the segments of our workforce we consider most key to identifying, deterring, and protecting against modern slavery in our Company and our supply chain. This includes employees and management in our Supply Chain function, who are directly responsible for supply chain management. We provide ongoing education, training, and development for our employees, offering a variety of learning opportunities to enhance technical, leadership, and interpersonal skills. These are delivered to our workforce through our GROW Employee Development Program; our NextGen training program for new field engineers and various technical training, as well as policy acknowledgement through the Weatherford Competency Assurance Program ("**WCAP**").

In 2024, we launched a new online training platform that provides more robust content and local language offerings, integrating with Weatherford's new Human Capital Management system. This training platform offers targeted training on a range of compliance topics, including our Code of Business Conduct, conflicts of interest, modern slavery, and human rights.

## As in past years, Weatherford recognised International Anti-Corruption Day and Human Rights Day in December 2024 by posting content to our social media channels that underscored Weatherford's commitment to anti-corruption and human rights initiatives.

**Encouraging stakeholders to speak up / Organisational justice.** Providing our stakeholders with a means to raise grievances is essential for us to be able to address any adverse human rights impacts across our operations and supply chain. We recognise the importance of fostering a culture that encourages disclosure of concerns, along with accountability for any breaches and protection of those who reported the concerns in the first place.

Our existing grievance mechanisms provide a means to track reports of human rights violations, and our internal accountability standards include documented remediation, including disciplinary actions, that can be taken against any employee or supplier who breaches our policies or contractual requirements.

In addition to promoting open and honest communication lines with management, our confidential reporting tool, Listen Up (available at <u>www.listenupwfrd.com</u>) is a resource for employees, customers, suppliers, and all other stakeholders to report conduct that is, or may be, illegal, unethical, or otherwise violates our Code, Human Rights Standard, Supplier Code of Conduct or other Company policies or procedures. Concerns may be reported to the hotline via telephone or the internet in multiple languages, including English and Norwegian, 24 hours a day, 7 days a week, and may be reported anonymously if desired. Listen Up specifically includes a Human Rights category for reporting.

Our Compliance department monitors and reports human rights concerns to our management team and, depending on severity, to our Board of Directors. If applicable, remediation efforts regarding substantiated concerns are also reported to management and the Board of Directors to ensure adequate oversight and accountability.

We believe that everyone at every level of our Company, inclusive of our external stakeholders, should be able to raise concerns without fear. To support this, we do not tolerate retaliation against anyone who has raised a concern in good faith.

During 2024, we did not receive any allegations via Listen Up of any potential human rights violations related to Weatherford Norge.

**Internal assurance.** To ensure effective oversight of our key processes, Weatherford's global internal Assurance group provides risk-based and objective assurance, advice, and insight regarding the effectiveness of enterprise risk management, controls, and governance processes on behalf of management, the Board of Directors, and other stakeholders.

The Assurance group works closely with the Compliance department. However, to maintain independence, Assurance reports directly to the Audit Committee of the Board of Directors. Any internal audit findings are communicated to local management, the Executive Leadership Team, and the Audit Committee and all findings are monitored to ensure proper remediation occurs.

**Supply chain due diligence.** In addition to our internal safeguards, our enterprise Global Procurement Policy requires that suppliers providing goods and/or services to Weatherford are reviewed, approved and managed in accordance with Weatherford's internal procurement policies.

Our new Supplier Risk Management Program will automate the supplier management process in Norway, from information gathering and onboarding to continuous monitoring, tiering, risk assessment, compliance, control, and mitigation.

Under our new Supplier Risk Management Program, new suppliers in Norway will be requested to complete human rights self-assessment questions, which include information on modern slavery concerns. Responses to these questions, which indicate a higher level of human rights risk, will be reviewed by the Compliance department as part of the onboarding process.

We further enhanced our supply chain management systems in 2024 by deploying a new third-party Supply Chain Risk Management software, which monitors, identifies, assesses, and mitigates supply chain risks and disruptions. This software provides dynamic insights, offering early risk detection and risk scorecards that include multiple risk indicators, including human rights. Suppliers are reviewed for multiple environmental, financial, and geopolitical risks. Strategic suppliers are reviewed quarterly using appropriate risk methods, and operational suppliers are reviewed annually. New suppliers are screened for environmental and regulatory compliance using a variety of tools to ensure adherence to relevant standards. Currently, suppliers are being added to this software platform in stages, based on their criticality, with partial coverage in Norway.

We acknowledge that challenges remain in obtaining full visibility into certain tiers of our supply chain, particularly in relation to upstream suppliers. We are committed to continually improving our due diligence processes and supplier engagement to better detect and address risks of modern slavery across our global operations.

**Screening.** New suppliers of Weatherford Norge are screened prior to onboarding. This process, conducted by our Compliance function, utilises both internal and third-party platforms to verify that the supplier is not a restricted party based on international trade regulatory lists issued by government regulatory agencies worldwide.

Certain higher-risk suppliers are also screened by the Compliance department for sustainability, ethics and governance risks, which can include human rights violations. While not currently standard practice for all new suppliers, this additional screening can also be used when responses indicate a higher risk during the onboarding process above.

After review by the procurement team, with input from the Legal and Compliance departments as required, suppliers are approved by local and category managers.

**Supplier commitment.** By signing up to Weatherford's standard terms and conditions, suppliers agree to comply with our Supplier Code of Conduct and applicable anti-slavery and human trafficking laws. For our Norwegian suppliers, this includes the Transparency Act.

**Audit.** Our Tier 1 suppliers, considered our most critical direct suppliers, are subject to our internal audit policy, which includes regular audits to verify the adequacy and effectiveness of quality management systems, compliance with our policies and procedures, and their ability to continue to provide high-quality products and services. These existing audit criteria are currently under review.

## 5. OUR RISK ASSESSMENT AS OF MAY 31, 2025

**Overall risk assessment.** We understand that our operations could have adverse impacts on human rights and decent working conditions. Using publicly available resources and indices<sup>2</sup>, we have

<sup>&</sup>lt;sup>2</sup> Including the Global Rights Index, the Corruptions Perceptions Index and the Global Slavery Index

reviewed Weatherford Norge's operational footprint, including our supply chain, for geographical and industry/enterprise-level risk.

**Geographical risk.** In fiscal year 2024, Weatherford Norge purchased over 25 million USD worth of goods and services in Norway from approximately 250 external suppliers. We prioritise the use of local suppliers, with over 95% of those external purchases having been procured from suppliers located in Norway. Our main supplier in Norway is a Norwegian-based machine shop company, from which we procure component parts, and with whom we utilise to manufacture and assemble our goods.

We believe the close proximity of our suppliers in Norway gives us more visibility over our supply chain. We also know that Norway has a strong record of protecting human rights<sup>3</sup>, with an extensive regulatory framework and active enforcement from authorities with respect to HSE and labour rights. Utilising local suppliers, many who are also subject to the Transparency Act, means that we consider the risk of human rights violations for these suppliers to be lower.

Weatherford Norge also procured approximately 12 million USD worth of goods and services on an intercompany basis from our other entities and locations. Whilst the above-referenced policies and processes are implemented across our global locations, we recognise that procuring items outside of Norway may increase the potential for adverse human rights impact further down the supply chain, even with such processes and policies in place.

**Industry and enterprise-level risk.** Oilfield services providers generally require a highly trained workforce and supply chain. However, we also use ancillary services and manufacturing activities to support our business, and these sectors typically employ short-term outsourced labour, such as contracted cleaning, catering or landscaping services, and onsite security guards.

We consider these third-party contingent labour suppliers to be of heightened risk, particularly when our suppliers may utilise local recruitment agencies, agents, and brokers to source labour personnel for manual work on our behalf. We recognise that utilising these categories of contingent labour comes with risk of adverse impacts, such as breach of decent working conditions, including low wages, withholding of wages or lack of overtime pay.

We also recognise 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 involved.

**Risk mitigation.** In addition to the measures described in items 3, 4 and 5 of this statement, and as part of our Transparency Act due diligence work in 2024, our Company has taken the following actions with the objective of addressing these potential adverse impacts to human rights and decent working conditions:

- Launched an enhanced Human Capital Management System
- Launched a new global training platform for employees, which includes local language offerings and a module on modern slavery
- Deployed our new supplier onboarding portal, which includes the automation of mandatory human rights questions for new suppliers, to launch in 2025
- Deployed a new third-party Supply Chain Risk Management software for monitoring, identifying, assessing, and mitigating supply chain risk and disruption, including human rights factors

<sup>&</sup>lt;sup>3</sup> See UN Human Development Index and the Norwegian Human Rights Institution, along with the indices above as examples.

- Engaged with third-party consultants to review our existing program and consider next steps for 2025
- Identified the need for a Human Rights Steering Committee, for launch in 2025

#### 6. SUMMARY

At Weatherford, we understand the importance of safeguarding human rights, not only through our own policies and processes but throughout our supply chain. We also recognise the need to review our existing mechanisms to assess the effectiveness of our current policies and processes and are taking steps every year to enhance and improve our knowledge of our organisational impact on human rights, including modern slavery risks.

Looking forward, we are considering the following measures to help us safeguard human rights and decent working conditions in Norway and beyond:

- Engaging a third party to conduct a global Human Rights Saliency/Impact Assessment across our value chain
- Increasing the number of suppliers being monitored by our new third-party Supply Chain Risk Management software
- Establishing a Human Rights Steering Committee
- Continuing to raise awareness of human rights, including modern slavery, with our workforce through training and policy engagement

This statement is signed by Weatherford Norge's board and Chairman of the Board. The statement will be updated annually and in the event of significant changes to the information presented here.

Revised and reviewed by the board of directors of Weatherford Norge:

| Signature:<br>Name:<br>Title: | DocuSigned by:<br>Mr.a. Haland Norhuim<br>E5BE3A558D52472<br>Nina Håland Norheim<br>Chairman of the Board | Signature:<br>Name:<br>Title: | DocuSigned by:<br>DOMA THOMPSON<br>JUD6134024829479<br>Donna Thompson<br>Board Member            |
|-------------------------------|---|-------------------------------|--|
| Signature:<br>Name:<br>Title: | Benut Tore Lillung<br>Bernt Tore Lillung<br>Bernt Tore Lilleeng<br>Board Member                           | Signature:<br>Name:<br>Title: | Terje Nysted<br>Board Member   |
| Signature:<br>Name:<br>Title: | DocuSigned by:<br>Swin Egil Visturyo<br>103B36D17D0F4BD<br>Svein Egil Vestersjø<br>Board Member           | Signature:<br>Name:<br>Title: | Signed by:<br>David Bolger<br>CERATICED74AB430<br>David Nicolas Bolger<br>Board Member           |
| Signature:<br>Name:<br>Title: | Signed by:<br>Junifer Falkham<br>   | Signature:<br>Name:<br>Title: | DocuSigned by:<br>Adde An. Anduscon<br>7571802FE1F041F<br>Aadne Aasheim Andersen<br>Board Member |

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