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Annual Report – Transparency Act (TA) Compliance OMV (Norge)

The obligations and responsibilities described in the Transparency Act (TA) are recognized and integrated in OMVs governing policies and procedures and reflected throughout the entire organization. Consequently, a mandatory training program on the principles of human rights was rolled out in 2023 for all employees including leased personnel in OMV.

OMV personnel affected by TA are regularly going through compliance training (yearly), human rights, GDPR, basic legal training & procurement essentials (this year "Source-to-Contract") training in order to be attentive to TA topics.

The overall responsibility for ensuring adherence with the TA rests with the General Manager of OMV Norge (AS). However, both Procurement and HSSE departments have important roles and responsibilities during the supplier screening, monitoring and follow-up activities.

The OMV group business ethics and HSSE requirements are described in the Code of Conduct document. All suppliers in pursuit of business opportunities with OMV are expected to comply with the Code of Conduct and to ensure that the same principles will be applied throughout supplier's organization as well as for sub-suppliers. As verification, OMV may request the supplier to conduct a self-assessment by responding to an OMV developed questionnaire on the above principles. Suppliers failing to comply with the above, or not compliant will not be qualified for doing business with OMV.

OMV Norge (AS) is an Exploration and Production company with ownership in exploration and production licenses both as an operator and as a partner on the Norwegian Continental Shelf (NCS). The type of suppliers used by OMV are companies with experience from the Norwegian offshore industry and accustomed to industry requirements within HSSE. Most of the suppliers perform services to other E&P companies in Norway as well. The industry has developed the Magnet JQS (Joint Qualification System) as a tool (software) for supplier screening and pre-qualification, which all companies including OMV uses for supplier pre-qualification. This year 250 suppliers are expected to be audited through the joint qualification program.

OMV is part of the human rights network managed by Offshore Qualific (Offshore Norge subsidiary), whereby Offshore Qualific facilitates self-assessments and audits of suppliers related to human rights compliance. The data gathered is made available to the members of the network. This, in combination with measures described above, provides OMV with access to information from a large portion of its supplier base. The membership includes access to all such records of performed assessments as well as audits with findings. It is

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likely that the Human rights service will be made part of the Magnet JQS in order to increase efficiency and avoid unnecessary duplicate processes.

Due to the nature of the OMV (Norge) activity on NCS, most of our suppliers are providers of services offshore. Particularly in the drilling area. In addition, OMV have key suppliers related to seismic acquisition of proprietary and non-proprietary data, including interpretation, processing, and studies of such. All these suppliers have a skilled in-country work force. In the Berling project (currently under execution) the key supplier is TFMC delivering the complete subsea system, including seabed “infrastructure” (SURF). This supplier is subjected to separate follow up activities ensuring compliance with TA.

Key supplier risks are managed through OMV (Norge) annual supplier audit program, as well as the Magnet JQS shared audit program.

On a group level OMV has set an ambitious target of having sustainability evaluation of >80% of all suppliers covering >80% of Procurement spend by 2025. This will include Norwegian suppliers. All suppliers will be subjected to mandatory “Sustainability” evaluation as part of a tender.

In Norway, OMV Norge (AS) works together with the industry to develop an appropriate tool for verification of suppliers’ adherence to TA and to establish a common database for storing and accessing data obtained from such evaluations.

OMV Norge (AS) will during 2025 continue to strengthen the process of follow-up on TA by designating roles and responsibilities in the organization for screening, monitoring, evaluating and follow-up on supplier’s adherence to human rights. The objective is to include human rights evaluations as an integral part of day-to-day business activities and to ensure consistency and alignment throughout the entire process.

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