



Transparency Act Statement, OMV Norge AS – Annual Report

1. Introduction and Scope

This statement is issued pursuant to the Norwegian Transparency Act (“Åpenhetsloven”) and describes how OMV Norge AS addresses actual and potential adverse impacts on fundamental human rights and decent working conditions in its own operations and supply chains.

OMV Norge AS operates as a license partner and operator on the Norwegian Continental Shelf. The company's activities are primarily offshore and carried out in close cooperation with joint venture partners, suppliers, and contractors subject to Norwegian regulatory oversight.

This statement covers the reporting period **2025** and applies to OMV Norge AS and its relevant business relationships.

2. Governance and Policy Framework

OMV Norge AS is part of the OMV Group and is governed by group-wide policies and requirements. The company's efforts to respect human rights and decent working conditions are anchored in:

- OMV Group Code of Conduct
- OMV Group Human Rights Policy Statement
- Supplier Code of Conduct
- HSSE and procurement governance frameworks

These policies are aligned with the **UN Guiding Principles on Business and Human Rights**, **OECD Guidelines for Multinational Enterprises**, and the **ILO Core Conventions**.

Overall responsibility for compliance with the Transparency Act rests with the **General Manager** of OMV Norge AS. Implementation is supported through line management, procurement, and HSSE functions, with escalation to management where required.

3. Human Rights Due Diligence Process (OECD-aligned)

OMV Norge AS conducts human rights due diligence in accordance with the six-step OECD framework:

3.1 Embedding Responsible Business Conduct

Human rights and working conditions are integrated into internal policies, supplier requirements, contractual frameworks, and management systems. Suppliers and contractors are required to comply with the OMV Code of Conduct or its own (Supplier Code of Conduct).

3.2 Identification and Assessment of Impacts

Potential human rights risks are identified through:

- Supplier qualification systems (e.g. Magnet JQS, facilitated through Offshore Qualific)
- Shared industry audits and assessments
- HSSE risk management processes
- Contractual risk evaluations

Given the nature of offshore petroleum activities, the most relevant potential risks relate to:

- Working conditions and safety-critical roles offshore
- Use of subcontractors in drilling and marine operations
- Temporary and project-based workforce arrangements
- Certain upstream supply chain activities (e.g. manufacturing and seismic services)

3.3 Prevention and Mitigation Measures

Identified risks are addressed through:

- Mandatory supplier qualification and documentation requirements
- Contractual clauses on working conditions, safety, and ethics
- Use of shared audits and follow-up of corrective actions
- Ongoing HSSE supervision of offshore activities



3.4 Tracking and Follow-Up

OMV Norge AS monitors the effectiveness of its measures through:

- Review of supplier audit findings available via qualification systems
- Follow-up of corrective action plans where needed
- Internal management review of HSSE and supplier performance

During the reporting period, no material adverse human rights impacts were identified in OMV Norge AS' operations. Minor improvement areas identified through shared audits were addressed through standard follow-up processes.

3.5 Communication

This statement forms part of OMV Norge AS' annual reporting and is published in accordance with the Transparency Act. Relevant information is also communicated internally through management processes and HSSE/Procurement procedures.

3.6 Remediation and Grievance Mechanisms

OMV Norge AS relies on OMV Group grievance mechanisms, internal reporting channels, and contractual remedies. Workers and business partners may raise concerns through established ethics and compliance channels, including anonymous reporting where applicable.

4. Risk Prioritisation and Proportionality

OMV Norge AS operates primarily in Norway, where strong regulatory frameworks, collective bargaining arrangements, and industry standards significantly mitigate human rights risks. Due diligence efforts are therefore proportionate to the company's size, nature, and risk exposure, with particular focus on offshore operations and contractor management.

5. Continuous Improvement

OMV Norge AS continuously evaluates its due diligence processes and supplier engagement practices. The company will further enhance its alignment with evolving regulatory expectations, including closer integration with group-level sustainability initiatives and supply chain risk management tools.

6. Right to Information under the Transparency Act

In accordance with the Norwegian Transparency Act, any person has the right to request information from OMV Norge AS regarding how the company addresses actual and potential adverse impacts on fundamental human rights and decent working conditions.

Requests for information may be submitted to:

OMVNorge@omv.com

OMV Norge AS will respond to such requests within the timeframes set out in the Act.

Approved by:

Board of Directors, OMV Norge AS

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Date: 26.05.2026