

Norwegian Transparency Act Statement 2024

BW OFFSHORE

2024 ANNUAL ACCOUNT REGARDING BW OFFSHORE'S WORK TO PROMOTE FUNDAMENTAL HUMAN RIGHTS AND DECENT WORKING CONDITIONS

1. BACKGROUND AND INTRODUCTION

BW Offshore Norway AS ("BW Offshore") is a member of the BW Offshore Ltd. group ("BW Offshore Group") of companies. BW Offshore Group's core business is the design and operation of floating production, storage, and offloading units ("FPSOs"), which provide a platform for exploring new opportunities in energy security and transition. People are essential to BW Offshore Group's success, and culture is central to the business.

BW Offshore Group is publicly listed on the Oslo stock exchange and has offices, operations, and legal entities world-wide, as described in its Annual Report. On 31 December 2024, BW Offshore had approximately 1100 employees globally, of which 144 were in its offices in Oslo and Arendal in Norway.

BW Offshore Group's work to promote fundamental human rights and decent working conditions forms part of its Ethics and Business Conduct Compliance Programme, which is centrally administrated and executed by the Company's Corporate Integrity function with mandate from and regular review by BW Offshore Group's CEO and the Board of Directors of BW Offshore Ltd. (Board). The Ethics and Business Conduct Compliance Programme is based on five pillars: commitment and expectations; respect for the individual; no tolerance for corruption; protection of information and assets; and other compliance areas. Work related to human rights and decent working conditions belongs to the pillar "Respect for the Individual" and applies equally across BW Offshore Group, including to BW Offshore. Although BW Offshore does not administer an independent compliance or sustainability programme, the statements contained herein about BW Offshore Group apply equally to BW Offshore. The Ethics and Business Conduct Compliance Programme applies to all personnel, representatives, and legal entities of BW Offshore Group. Accordingly, this Annual Account covers policies, procedures, risk assessment, risk management, due diligence, goals and commitments for all BW Offshore Group companies, including BW Offshore.

In 2022, BW Offshore Group conducted a risk assessment in preparation for the introduction of the Norwegian Transparency Act, which entered in to force 1 July 2022 (the "Transparency Act"). In 2023, BW Offshore Group conducted a double materiality assessment that included human rights factors in preparation for fulfilling reporting obligations under the EU's Corporate Sustainability Reporting Directive (CSRD). In 2024, BW Offshore Group validated the results of the 2023 double materiality assessment, including human rights.

2. POLICIES AND PROCEDURES

BW Offshore Group supports internationally recognised human rights, including the International Bill of Human Rights and other relevant human rights conventions, and the International Labour Organisation's core conventions on fundamental principles and rights at work. With regard to human rights and decent working conditions, BW Offshore Group consults applicable OECD guidelines for Multinational Enterprises, e.g., Due Diligence Guidance for Responsible Business Conduct, and supports the objectives of the UN Global Compact. The OECD guidelines, which recognise and promote the positive contribution companies can make to economic, environmental, and social development, also recognise that businesses can have a negative impact on human rights and working conditions. BW

Offshore Group strives to reinforce its positive impact and cease, prevent, or mitigate adverse negative impact.

3. RESPONSIBLE BUSINESS CONDUCT

3.1 Shareholders, the Board of Directors and executive management

The Board is involved in promoting basic human rights and decent working conditions. The Human Capital, Supply Chain, Operations and Corporate Integrity functions collaborate to administer policies and processes designed to fulfil corporate social responsibility and sustainability objectives. The Board received updates on and discussed human rights, including Transparency Act obligations, during meetings in 2024.

3.2 General principles and procedures

BW Offshore Group's Code of Ethics and Business Conduct sets out its commitment to respect human rights and standards advised by the International Labour Organisation. BW Offshore Group has adopted a [Human Rights and Decent Working Conditions Policy](#) which sets out the principles and standards to respect human rights and decent working conditions. BW Offshore Group also maintains a [Supplier Code of Ethics and Business Conduct](#) and [Supplier Ethical Employment Practice Guidelines](#) that reflect the strong commitment to human rights and decent working conditions and expectations on suppliers. BW Offshore Group has adopted and implemented specific guidelines for responsible business conduct that describe in more detail the implementation of the due diligence process. These procedures are hereinafter collectively referred to as the “BW Offshore Human Rights Procedures”.

BW Offshore Group's Human Rights Procedures set out the commitment to respect internationally recognised standards for human rights and decent working conditions and comply with applicable laws and regulations in countries where it operates.

3.3 Internal accountability and operationalisation

The Board has oversight of BW Offshore's response to human rights. Operational management of human rights risks is within the responsibility BW Offshore Group's CEO and the general manager for BW Offshore. BW Offshore Group's Corporate Integrity function, with mandate from and regular review by the BW Offshore Group's CEO and Board, leads and coordinates internal work.

The Corporate Integrity function reports quarterly the status of the due diligence process, including the status of implemented risk measures, to the CEO and the Board.

3.4 Internal information and training

Information about the Transparency Act is available to all employees on BW Offshore Group's Intranet. All BW Offshore Group employees receive online training during onboarding that includes a module on modern slavery and human rights. The course includes the main principles on fundamental human rights and decent working conditions and information about the Company's Speak Up process. The 2024 completion rate for the modern slavery e-learning was 94%.

In addition, the following guidance was published for staff on how to identify unethical labour practice red flags:

Identify the Red Flags of Unethical Labour Practices

Unethical labour practices can occur anytime we work with another company such as a contractor, subcontractor, or supplier and can be found anywhere in the world.

Be on the lookout for these red flags and **report them** when observed to help eliminate unethical labour practices of any form.



The Company:



operates in a high-risk country or industry (refer to U.S. Trafficking in Persons Report)



limits or prohibits inspections of their worksites



offers us significantly better terms than their competitors



will not allow their workers to be interviewed



retains workers' documents (e.g. passports and visas)



The Workers:



are paid late or their wages are withheld



must pay to get the job



are below the legal age



are required to live in substandard employee-provided housing



have no access to or control over their bank accounts



get little or no time off



are threatened or abused



If you have a reasonable belief that any of these are occurring — even if you don't have all the details — immediately report the situation to Corporate Integrity.



Local numbers available at
www.speakup.bwoffshore.com



compliance@bwoffshore.com



www.speakup.bwoffshore.com

3.5 Speak Up and grievance mechanism

There are several methods available for raising questions or concerns about ethical or other matters. BW Offshore's externally supported Speak Up Channel is available to anyone, whether internal or external, who has a question or concern. The Speak Up Channel allows for anonymous reporting or questions and is available at www.speakup.bwoffshore.com.

In 2024, BW Offshore Group received two reports alleging human rights or unethical working conditions; neither case was substantiated.

3.6 Suppliers and business partners

BW Offshore expects its suppliers and business partners, including clients, to apply equivalent high standards of ethics and business conduct when conducting business for or with it. Due diligence on suppliers and business partners is risk-based and may include questionnaires, site visits, and/or audits. Suppliers are vetted through a Vendor Qualification Programme. BW Offshore will not engage with a supplier or business partner if the compliance risk is deemed too high and cannot be sufficiently mitigated.

4. HUMAN RIGHTS DUE DILIGENCE PROCESS

4.1 The human rights' due diligence process

As part of the due diligence process, the following overall goals have been set in alignment with the Transparency Act:

- Ensure that the business or operation does not have an unmitigable potential or actual negative impact on basic human rights or decent working conditions in connection with BW Offshore's business and operation.
- Inform the public through an annual report.
- Provide information upon request.

The main principles behind the due diligence assessments are:

- Preventive
- Risk-based
- Based on priorities with a focus on severity and probability
- Dynamic processes and ongoing follow-up
- Involvement of stakeholders
- Communication and dialogue

4.2 Information regarding actual adverse impacts and significant risks of adverse impacts

BW Offshore has performed an overall risk mapping of human rights and decent working conditions. The assessment of negative impact was initiated by a broad risk scoping exercise and supplemented by the double-materiality assessment and subsequent validation. The purpose of these exercises was to enable BW Offshore to prioritise risks based on industry, geography, company and type of services to identify areas where the risk of negative impact on human rights and decent employment is most likely and most significant.

The following departments were involved in the mapping and risk assessment processes:

- Supply Chain
- Operations
- Legal
- Compliance
- Human Capital
- Operational Integrity

Based on the results, the following priorities have been made:

Industrial risk

The offshore industry has several challenges related to human rights and decent working conditions. The risk of adverse impact on health and safety and forced labour are highlighted by several industry organisations as the most challenging and are topics that, therefore, are prioritised in due diligence and ongoing monitoring.

Other potential areas of industrial risk include:

- Living wage
- Working hours
- Poor working and/or living conditions for hired workers and/or immigrant workers
- Immigrant labour
- Respecting customary and indigenous rights

Geographical risk

BW Offshore Group is represented in major oil and gas regions world-wide with its main offices in Singapore and Norway and further offices in Africa, the Americas, Asia and Europe. All locations and activities were considered when conducting the risk assessment.

BW Offshore Group used "[The Rule of Law Index](#) and [The Global Rights Index](#) as references when assessing risks in question.

"The Rule of Law Index" measures countries' rule of law using eight factors: (1) Limits on government power, (2) Absence of corruption, (3) Open government, (4) Basic rights, (5) Order and security, (6) Regulatory enforcement, (7) Civil administration and (8) Criminal law. The index is a good indication of the level of protection of human rights in a country.

The International Trade Union Confederation (ITUC) has developed the Global Rights Index. ITUC's primary task is to promote and defend workers' rights and interests, through international cooperation between trade unions, global campaigns, and advocacy within the major global institutions. The main areas of activity include organising and human rights; economy, society, and workplace; equality and non-discrimination; and international solidarity. The ITUC Global Rights Index provides relevant information on the general protection of workers' rights in a country.

In 2024, BW Offshore Group had offices in the following countries that had "no guarantee of rights", the second to worst rating, in the 2024 Global Rights Index:

- Nigeria
- South Korea
- United Arab Emirates

BW Offshore Group's wound down its activities in Nigeria and South Korea in 2024.

In 2024, BW Offshore Group qualified vendors or had spend in the following countries that had "no guarantee of rights" in the 2024 Global Rights Index:

- China
- Hong Kong
- India
- Indonesia
- Korea, Republic of (South Korea)
- Malaysia
- Nigeria
- Philippines
- Thailand
- Türkiye
- United Arab Emirates

In these countries, the risk of material adverse impact on human rights and decent work conditions is considered high and will be monitored closely.

Company risk

No particularly high company risk has been identified. Work continues to map company risk for suppliers and business partners based on the type of relationship and geography.

Services

BW Offshore Group's services include engineering, procurement, construction, installation, and operation services for FPSOs.

Suppliers are categorised in three main categories: fleet operations, material management, and contract management. Within fleet operations, the sub-categories offshore mobilisation and logistics are considered medium risk due to the use of manning agencies or other subcontracted labour for the units. Material management is considered low risk, whilst the following sub-categories within contract management are considered high risk:

- Construction (Conversion / Integration)
- Fabrication (Hull, Topside, Turret)
- Maintenance and modification projects

In connection with these activities, the risk of adverse impact on human rights and decent work conditions is considered high and will be prioritised in further risk analysis and implementation of relevant measures, including on-site audits.

Risks identified as significant during this initial prioritisation are subject to more detailed analysis. The enterprise risk management system includes these risks and reporting of controls, planned actions, dedicated responsible persons, and deadlines, when applicable.

In 2024, there were no identified actual breaches in the due diligence assessment. Efforts to cease, prevent and mitigate significant risks of adverse impacts will continue in 2025.

4.3 Information regarding measures implemented or planned to be implemented to cease actual adverse impact or mitigate significant risks of adverse impact

There are implemented measures to cease, prevent and mitigate significant risks, including its up- and down-stream due diligence processes. In 2024, BW Offshore Group conducted an ethical labour audit in an integration yard in Singapore. After labour audits, relevant recommendations were made to the yard and work continues to monitor progress and improvements, as needed.

5. EXTERNAL ENGAGEMENT

In 2024, BW Offshore joined Building Responsibly to demonstrate its commitment to eliminating unethical employment practices in the built environment. Through its active participation and collective action, BW Offshore will develop best practices for risk assessment, due diligence, remediation, mitigation, and monitoring throughout its supply chain.

6. SUMMARY AND WAY FORWARD

We will continue our robust due diligence process for human rights and decent working conditions to cooperate and communicate with relevant stakeholders about adverse impacts.

This annual account is made pursuant to the Norwegian Transparency Act section 5. The report covers the period 1 January 2024 to 31 December 2024. The account was approved by the Board of Directors of BW Offshore Norway AS on 28 May 2025.

Signature

On behalf of BW Offshore Norway AS:

Anders S. Platou, General Manager