

<b>Location and process</b>	Ramco Norway AS / Organization,management / Policy	<b>Document category</b>	IMP
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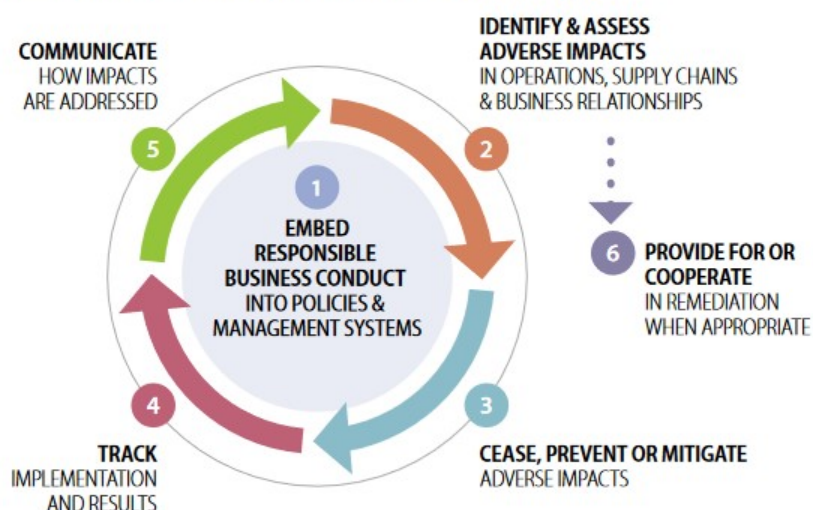
## Due diligence report for Ramco Norway AS

In its operations, Ramco commits to transparency and work with basic human rights and good working conditions in accordance with the Working Environment and Transparency Act. In our review of the Openness Act, we have made assessments to ensure that there are no negative consequences in relation to human rights and working conditions in our own company or with our suppliers.

The report is available on our website [www.ramco.no](http://www.ramco.no)

We use the OECD's Due Diligence Wheel for our approach and due diligence assessment. This is a continuous process and until now in 2023 we have mainly worked with steps 1 to 3:

**FIGURE 1. DUE DILIGENCE PROCESS & SUPPORTING MEASURES**



### Accountability

Ramco Norway AS consists of four Operations that perform OCTG services onshore for the offshore operations on the Norwegian continental shelf. Our largest facility is in Florø where the administration is located. We have two plants in Stavanger and one in Sandnessjøen. The company currently consists of approximately 115 employees.

Our ethical guidelines are in line with the UN's principles and objectives in the Global Compact. Our Policy applies to human rights and decent conditions in our own business, and our impact on the supply chain and other partners.

The obligation to respect basic human rights and decent working conditions is rooted in the management. The report will be included as part of the annual report.

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The following internal documents relevant to Ramco Norway are:

TQM: 10. IMS POL 07 Human Rights Policy

TQM:8 IMS 02 Transparency Policy

TQM: 11, IMS POL 08 ESG Policy (Environmental, Social and Governance)

## Guidelines and routines

Ramco Norway AS follows Norwegian legislation for health, environment, and safety in the workplace. We carry out regular risk assessments to uncover negative consequences and risks for people linked to our business.

All departments in the company must work actively and in a targeted manner to promote equality and prevent discrimination. All employees and others affected by the businesses must be treated with respect and dignity.

Ramco has worked intensively on the implementation of a new management system. In our management system, policy and routines are available to all employees. Ramco Norway AS also has a robust onboarding process in our HR system. All new employees will receive, through their own routine, a thorough introduction to systems and a review of our guidelines. Ramco Norway plans to conduct an annual HSE day where all employees participate and get a review of our policies and HSE plans.

We regularly carry out working environment surveys to maintain and further develop a good working environment. Employee interviews are also carried out, and there is close dialogue with trade unions. Agreements and salary routines have been created that promote equal treatment.

## Suppliers

Our suppliers have been assessed in connection with the due diligence process. We have not uncovered any actual negative consequences.

We only work with suppliers who act with seriousness and diligence to avoid damage and negative consequences for people. We expect the same from our suppliers and customers as we demand from ourselves – that all employees and others affected by the business are treated with respect and dignity. All our suppliers must live up to international human rights standards. When entering new contracts, suppliers must deliver a declaration to this effect as part of the approval criteria. Existing suppliers have been assessed, and those that we consider having a risk have been followed up with a corresponding declaration form and contractual terms.

## Internally

Our operational risk assessment related to HSE has revealed that the most critical potential consequences are the risk of crushing injuries, abrasion injuries and collisions. Other relevant risks

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are hearing damage and chemical exposure. All risk factors in our operations are mapped by external partners such as the company health service to ensure that we have control over the working environment and implemented measures to protect the individual employee.

We work systematically in collaboration with employees, the shop stewards and external expertise, to prevent injuries and accidents from occurring. Our HSE procedures and guidelines are regularly updated, and we have regular HSE meetings by department to provide status and updates to our employees. Continuous improvement is important for companies where a central tool is a system for reporting and following up on deviations, as well as a system for notification of objectionable conditions.

We carry out annual internal audits and ensure that our internal control system complies with the authorities', customers', and own requirements. We report monthly and annually on HSE status.

## External

In the spring of 2023, we intensified our due diligence assessment by reviewing all our suppliers who are significantly related to our activity and assessed the risk of disruption in their supply chain. We use DFØ's High Risk List for procurement as a guide for developing and implementing our due diligence assessments and measures.

### [Høyrisikolisten | Anskaffelser.no](#)

In general, we consider the risk of breakage to be low. We have a clear supply chain with few suppliers outside Norway. We know most of our suppliers well through established agreements and over a long period.

## Measures

We have assessed that some suppliers who manufacture equipment in Europe will undergo company visits and audits in the spring of 2024. This is set out in our audit plans.

In cases where we are unsure of how the supplier affects the outside world, we demand an explanation and documentation. If a supplier cannot document satisfactory safeguarding of basic human rights and decent working conditions, this will have consequences for the contractual relationship with Ramco Norway AS. We will first seek to influence the supplier to minimize the risk and to repair any violations committed.

Ramco Norway AS' goal is that people who supply inputs to our businesses should have good lives, working conditions and wages that are sustainable and fair.