

## **Statement 2022**

### **Norwegian Transparency Act (the “Act”)**

#### **1. Introduction**

This Statement has been prepared in line with the requirements of the Act relating to enterprises' transparency and work on human rights and decent working conditions.

The registered office of Tampnet AS ("Tampnet") is Hinna Park, Stadionblokk C, Jåttåvågveien 7, 4020 Stavanger, Norway.

Tampnet is a privately owned international telecommunications provider operating in the North Sea and takes part of the larger Tampnet Group which has similar operations in Europe and in the US.

Tampnet shall be, and is, a promoter of a culture which has respect for fundamental human rights and decent working conditions. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard these values in our own business as well as within our supply chain and towards our clients. The Tampnet group recognizes its responsibility to contribute in the global efforts to obtain the Sustainable Development Goals of the United Nations and the culture of our group is anchored and starts with our owners, our Board of Directors and our top management.

#### **2. Structure**

Tampnet's ultimate owners are the Danish pension fund ATP and the private equity firm 3i, the latter being listed at the London Stock Exchange. The policies, procedures, and systems described in this Statement have been adopted by Tampnet and the Tampnet Groups Ethical and Compliance Framework is reviewed and approved annually by the Board of Directors.

#### **3. Operations**

Tampnet was founded in 2001 in Stavanger, Norway and the Tampnet Group now operates the world's largest offshore high-capacity communication network, serving customers within oil & gas, wind energy, maritime and carrier sectors with telecommunications services.

Tampnet connects offshore installations to redundant and reliable terrestrial networks with high capacity and low latency (high speed). Tampnet also installs and operates offshore 4G LTE coverage networks enabling roaming and the digital transformation and internet of things (IoT) on offshore oil and gas platforms, offshore windfarms and service vessels and other commercial vessels.

#### **4. Standards, procedures and processes**

Tampnet is certified based on the ISO9001 standard and thus having a management system, and way of working, which is risk based and focused on continuous improvement.

In relation to the human rights the primary procedures and policies which guides and supports our approach in relation to these right are:

##### **4.1 Code of Conduct**

As stated in the Tampnet Group's code of conduct, we are committed to respect all internationally recognized human rights and we will conduct our business consistent with the United Nations Guiding Principles on Business and Human Rights. The general expectation is for suppliers and business partners to comply with applicable laws, respect internationally recognized human rights, including the right to freedom from slavery, human trafficking, servitude, or forced labour, and to be compliant with the Tampnet group's ethical requirements, when working for or together with us.

##### **4.2 Tampnet's Whistle Blowing Procedure**

Secures a mechanism where concerns about Tampnet's accounting, auditing, internal controls, ethical matters or breach of statutory provisions (violation of the law) can be raised to the highest level of Tampnet and that such concerns, if desired, may be submitted anonymously.

##### **4.3 Tampnet's Supplier Approval and Evaluation Procedure**

Tampnet operates a supply chain policy, pursuant to which we conduct an evaluation of all suppliers before allowing them to become an approved supplier. Where appropriate, we also conduct on-site audits which include a review of the supplier's working conditions. Our internal processes and governing documents have as a requirement that our suppliers shall respect and commit to implement Tampnet's Code of Conduct or alternatively an internationally recognized standard within the areas of human rights, anti-corruption, environment and labour, such as, but not limited to, the United Nations Global Compact Principals. The Supplier shall require the Supplier Group and all sub-suppliers and sub-contractors to implement similar rules and as appropriate pass on such requirements to their sub-suppliers and sub-contractors and so on.

##### **4.4 Training**

All Tampnet employees are on a yearly basis required to undergo training and testing in Tampnet's Ethical and Compliance framework.

## **5. Human rights risks**

For the purposes of preparing this statement, an analysis was undertaken of human rights risks in our operations and supply chains.

### **5.1 Assessment and description of the human rights risk in own operations**

In our operations, we do not utilize forced or compulsory labour. All of our employees are above the legal employment age in Norway and are recruited and provided with working conditions and the payment of wages and benefits that comply with applicable laws and regulations.

Our operations require deep technical skills and the majority of our employees are higher-skilled professionals and trained labour with technical degrees, including from scientific and engineering disciplines.

### **5.2 Assessment and description of the human rights risk in supply chain**

As per the Supplier Approval and Evaluation Procedure as described earlier in this statement, all suppliers are evaluated before becoming an approved supplier and the approved suppliers are further evaluated on a yearly basis. Tampnet demand the same level of standards from our suppliers as we do from ourselves. As a default we also include obligations in our client and supplier contracts that all parties working for or with Tampnet shall comply with all applicable laws and regulations and prohibit conduct that conflict with human rights.

### **5.3 Actions taken to address human rights risks**

We maintain a commitment to safeguarding the health and security of our employees and the public, responsibly managing our social impacts, and upholding respect for human rights in our operations. It is our policy to comply with all applicable laws and regulations, including those related to employment, safety, security, health and the environment.

We are committed to respecting human rights as a fundamental principle in our operations, reinforced through training and integrated into our policies and practices.

**Stavanger 30.June.2023**

*Elin Hanna*

**Chairman Board of Directors  
Tampnet AS**