

# TRANSPARANCY ACT ACCOUNT

2023



ENHANCED  
DRILLING

## ENHANCED DRILLING: **COMMITTED TO DOING BUSINESS TRANSPARENTLY**

We have specialize in delivering cutting-edge drilling technology and services to the offshore energy industry for more than 35 years. Our offerings range from technologies that reduce operational risks to systems that yield environmental benefits, crafting cost effective solutions that address some of the industry's most significant challenges responsibly. Our track record is extensive, having successfully enhanced over 1000 wells with RMR®, EC-Drill®, and CTS.

Globally, our solutions empower some of the most renowned operators to drill with confidence, explore new opportunities, and maintain schedules in a resource-efficient manner. Looking to the future, Enhanced Drilling continuously innovates to lead the next wave of drilling technologies. We develop solutions that enhance safety, reliability, cost efficiency, and environmental protection. In addition to our Norwegian main office at Straume Norway, we have operational hubs in Perth Australia and Houston USA and a registered a branch office in Baku Azerbaijan. Our workforce include around 175 employees located in Norway, USA and Australia.



*Enhanced Drilling is founded on a deep respect for our employees and environment.*

*Conducting our business responsibly and with the utmost integrity is one of our core principles.*

A handwritten signature in blue ink, appearing to read 'Kjetil Lunde'.

Kjetil Lunde,  
Chief Executive Officer

**LEADING WITH INTEGRITY:**

# **OUR COMMITMENT TO TRANSPARENCY AND HUMAN RIGHTS**

At Enhanced Drilling, we are committed to conducting our business in line with the United Nations Guiding Principles for Business and Human Rights. Integrity and teamwork are core values that drive us, with transparency and responsible practices firmly embedded in our operations.

Transparency has been a fundamental value at Enhanced Drilling for decades. In line with the Norwegian Transparency Act (effective from 2022), we publish this transparency statement.

We continually expand our Environmental, Social, and Corporate Governance (ESG) KPIs, focusing on environmental and social responsibility. Our framework aims to manage and enhance ESG performance, demonstrating our commitment to improving our impact on the planet and people.

We respect all internationally recognized human rights, including those in the Universal Declaration of Human Rights, the UN Conventions on Civil, Political, Economic, Social, and Cultural Rights, and applicable international humanitarian standards.



# GOVERNANCE

## EMPHASIZING ETHICAL CONDUCT THROUGHOUT OUR VALUE CHAIN

### CODE OF CONDUCT

Enhanced Drilling's Code of Conduct ([Link to Code of Conduct](#)) is a comprehensive guide detailing our commitment to ethical business practices and personal conduct. It covers ethical decision-making, compliance with laws, conflict of interest, and maintaining a respectful and inclusive workplace. This crucial document is easily accessible for all employees, published both externally and internally. The Code of Conduct emphasizes accountability and transparency in our operations. It sets expectations for behavior and guides corporate actions to maintain high standards of integrity. Regular training and updates reinforce these principles, ensuring ethical considerations are central to our decision-making processes.

### RESPONSIBILITY AND AUTHORITY

The Board of Directors and leadership team govern this policy. Our SCM organization ensure that due diligence assessments are conducted across all business areas. They are responsible for overseeing the implementation of our ethical standards and ensuring compliance with the Code of Conduct.

## POLICIES AND COMPLIANCE

Our due diligence assessments follow the OECD's model for responsible business and the UN's Guiding Principles for Business and Human Rights. We have established multiple policies and procedures, including the Code of Conduct, Whistleblowing, Anti-Bribery, Anti-Slavery, Diversity & Inclusion, and the Supplier Declaration, to govern our practices effectively. Our complaint mechanism designed to uncover negative consequences is published on our webpage and made available to all: ([Link to form](#)).

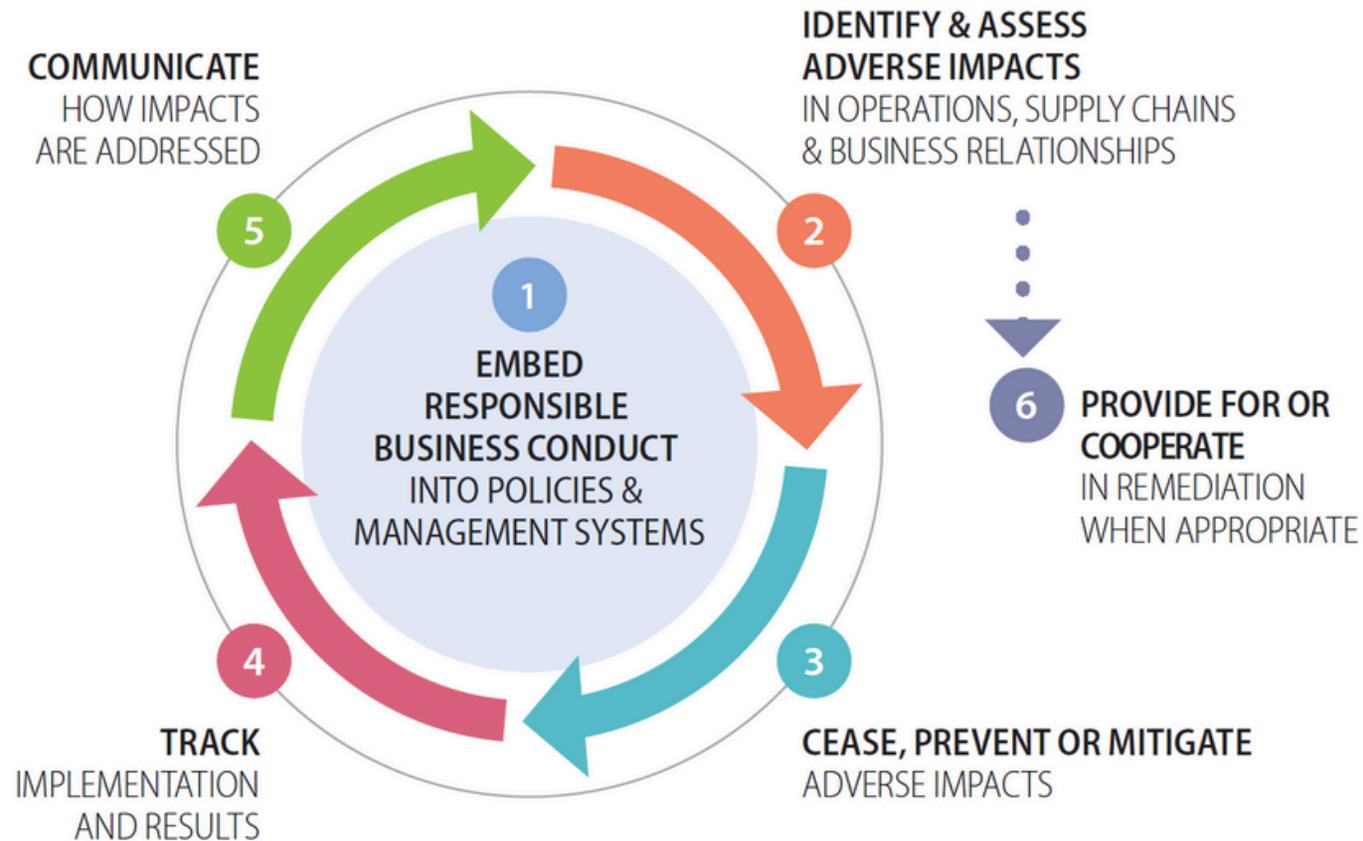
For general enquiries about our work with and about transparency, contact: [Responsible.Business@enhanced-drilling.com](mailto:Responsible.Business@enhanced-drilling.com)

### SUPPLIER DECLARATION

Our Supplier Declaration ([Link to Supplier Declaration](#)) outlines the standards we expect from all suppliers, covering human rights, labor conditions, environmental impact, and anti-corruption measures. Suppliers must adhere to these standards and encourage their partners to do the same. This helps maintain a transparent, responsible, and sustainable supply chain, reinforcing our commitment to ethical practices and the Transparency Act. Integrating this declaration ensures consistent supplier evaluation and supports our Environmental, Social, and Corporate Governance (ESG) goals.

# GOVERNANCE

We embed responsible business conduct into our policies, identify and address adverse impacts, and ensure remediation. We track and communicate our actions to maintain transparency and accountability in all operations.



# RISK ASSESSMENT

We conduct annual risk assessments of suppliers and the countries we trade with, forming the basis for our due diligence. Each supplier is reevaluated every three years. Our risk map categorizes all suppliers by country. Assessing conditions crucial to the Transparency Act, including basic human rights, decent working conditions, environmental risks. We developed a self-assessment form for suppliers; based on their answers and our analysis, we establish a risk level. Documentation requirements vary by risk level, industry, and country.

## HUMAN RIGHTS AT RISK

We have found the following human rights potentially being at risk:

- **Right to Freedom from Slavery and Forced Labor**
- **Right to Security and Protection from Abuse**
- **Right to Education**
- **Right to Freedom of Movement**
- **Right to Work in Just and Favorable Conditions**

## GLOBAL SLAVERY INDEX

Tools such as the international Global Slavery Index is continuously taken into consideration when assessing suppliers for the risk assessment.

## DUE DILIGENCE FINDINGS

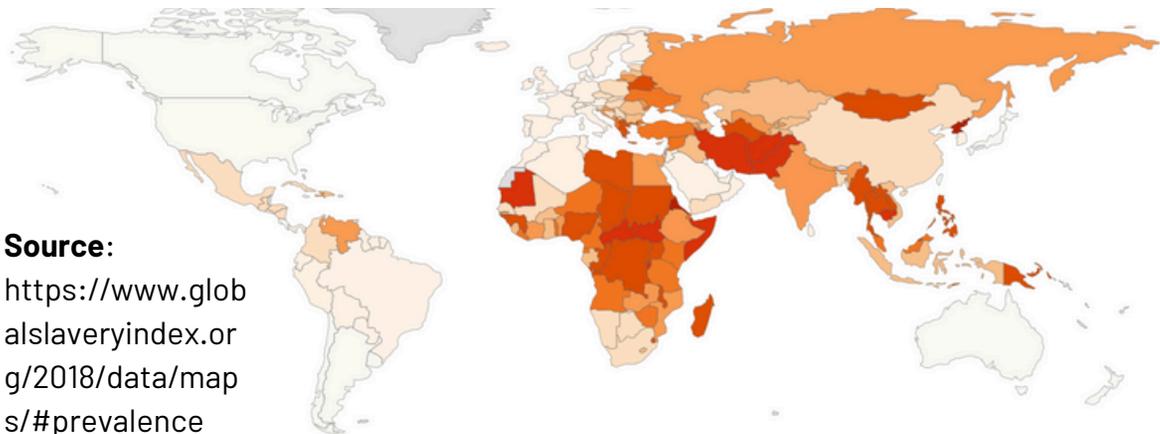
We conduct ongoing reviews of our suppliers overall sustainability and compliance. The 2023 reviews showed:

- **Zero registered incoming inquiries**
- **Zero breaches in suppliers compliance to supplier declaration**

## EVALUATING SUPPLIERS THOROUGHLY

To ensure the quality of suppliers and compliance with our supplier declaration, we perform site visits to selected suppliers critical to our operations and business conduct. Additionally, we encourage our suppliers to implement our supplier declaration principles with their business partners, agents, and suppliers.

This ensures responsible business conduct and ethical values are upheld throughout the value chain.



**Source:**  
<https://www.global-slavery-index.org/2018/data/maps/#prevalence>

# RISK MANAGEMENT

Based on existing risk assessments, we commit to closely monitor and prioritize overall quality and responsibility of our suppliers. We recognize that our suppliers play a crucial role in our success, and therefore, we place great importance on their adherence to high standards of responsibility and ethics.

## CHANGES

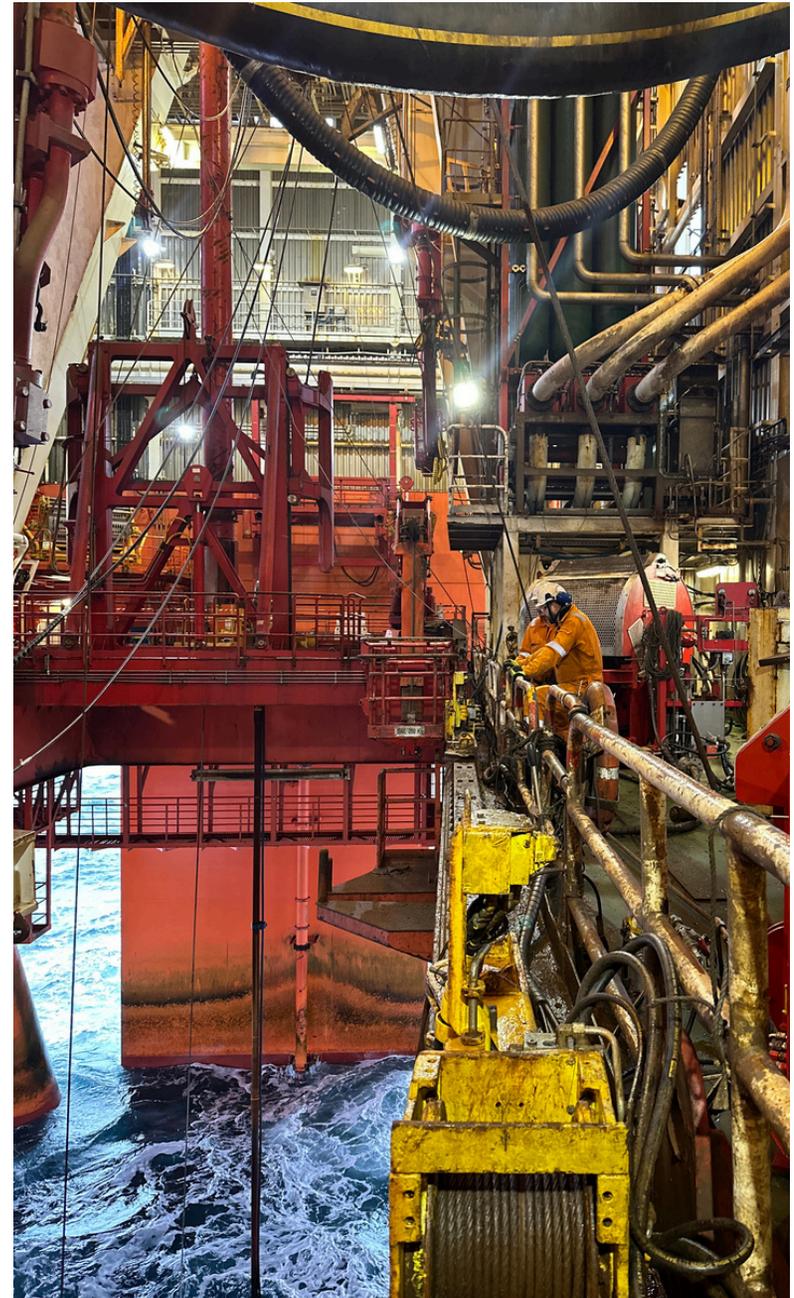
If significant changes in supply chains are identified within a purchasing area, the responsible person will follow up and, if necessary, revise due diligence assessments, documenting these changes in a written statement.

## FOLLOW-UP AND EFFECTIVENESS

Supply chain reviews, referencing the due diligence assessments, ensure the follow-up and evaluation of measures. The Approved Supplier List (ASL) is used for mapping and monitoring suppliers according to our Supplier Selection, Evaluation, and Monitoring Procedure.

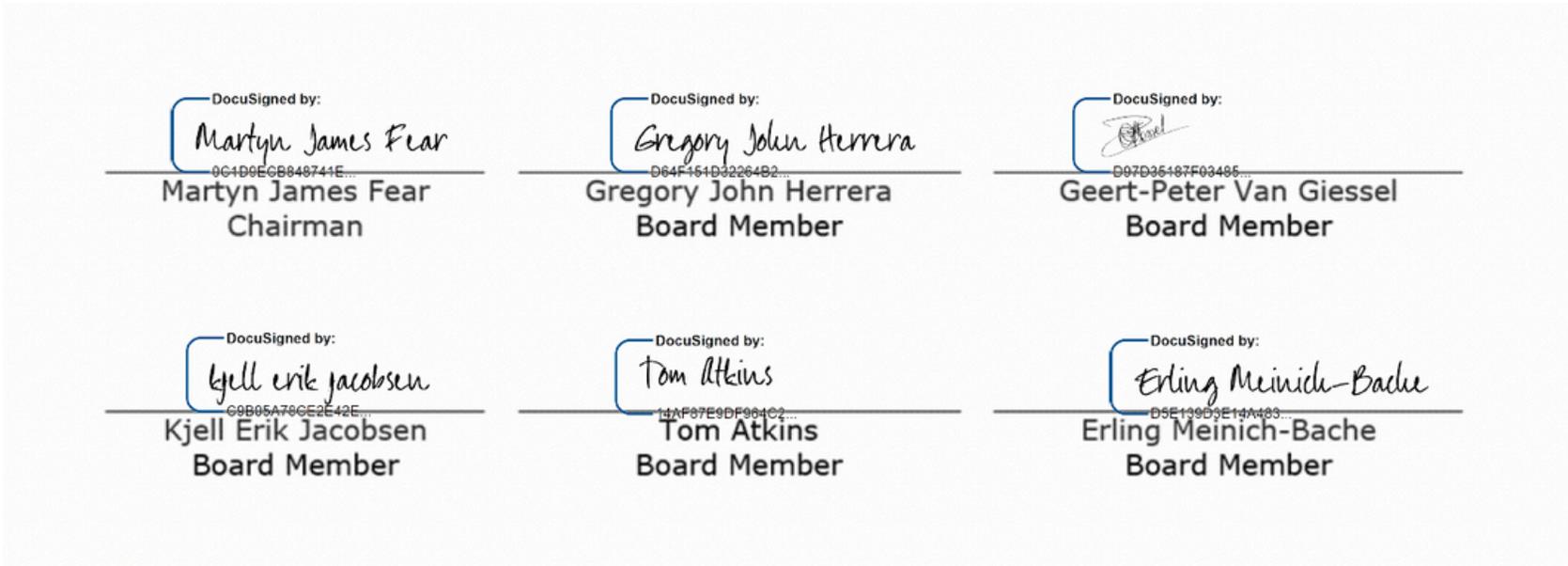
## NON-CONFORMITY

If a breach of contractual obligations related to the Transparency Act is suspected, the non-conformity is reported and followed up in our operational risk and performance management system, Synergi. This ensures that all issues are promptly addressed and corrective actions are implemented to prevent future occurrences.



# Signatures to the Norwegian Transparency Act Account for the year 2023

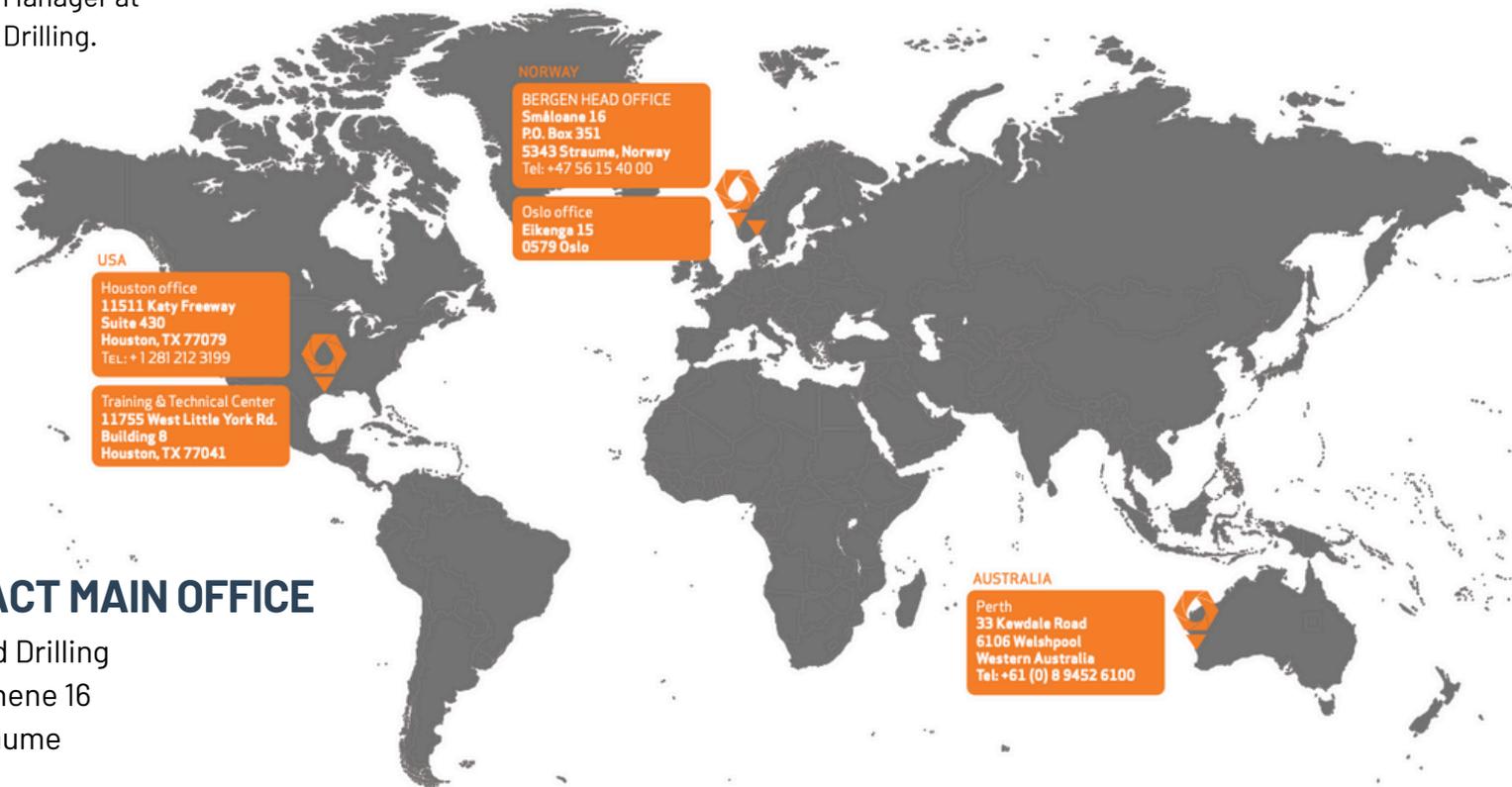
Straume, Norway, 27.06.2024



# ACKNOWLEDGEMENTS

We sincerely appreciate the dedication and support of everyone working at and with Enhanced Drilling. Your efforts are vital in helping us do business responsibly, transparently and aligned with the Human Rights.

Report designed and created  
by Pernille Fjørtoft Grøsvik,  
Marketing Manager at  
Enhanced Drilling.



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