

TRANSPARENCY POLICY

Rev. 1

TRANSPARENCY POLICY

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Approved by: NR

Handwritten signatures in blue ink. The first signature is 'H. St. John' and the second is 'NR'.

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1. INTRODUCTION

The purpose of this document is to promote respect for fundamental human rights and decent working conditions in connection with production of goods and the provision of services. Further, ensure the general public access to information regarding how Tomax AS addresses adverse impacts on fundamental human rights and decent working conditions.

2. APPLICABLE CONVENTIONS

Internationally recognized human rights are set forth in the Universal Declaration of Human Rights, further enshrined in the International Covenant on Economic, Social and Cultural Rights of 1966, the International Covenant on Civil and Political Rights of 1966 and the ILO's core conventions on fundamental principles and rights at work.

Decent working conditions means that fundamental human rights and Health, Safety and Environment in the workplace are safe guarded, and that the work provides a living wage.

3. REFERENCES IN THE TOMAX MANAGEMENT SYSTEM

The Tomax Management System addresses human rights, fundamental rights at work and decent working conditions for Tomax employees and counterparties, as agents, vendors and subcontractors.

3.1 Tomax employees

The HSE system and the Code of Business Conduct define the framework of decent working conditions and protection of human rights.

3.2 Counterparties

The Anti-Corruption Compliance Program states that counterparties to Tomax shall adhere to the ethical standards consistent with Tomax's requirements.

- Agents: This requirement is part of the contractual terms with agents.
- Vendors: The vendors of Tomax AS are located in Western European countries where respect for human rights and decent working conditions are not at risk.

4. RISK ASSESSMENT

See Appendix A.

Perform this risk assessment once a year.

Identify all important vendors and sub-contractors that Tomax procure products or services from and categorize them as low, medium or high risk.

Perform Due Diligence on those companies that pose a medium risk and perform Comprehensive Due Diligence on those companies that pose a high risk.

Evaluate the response and determine if adverse conditions exist or may exist. Determine mitigating actions to cease the real or potential adverse conditions.

5. REQUESTS FROM PUBLIC

Upon written request, any person may have the right to information on how Tomax AS addresses actual and potential adverse impact on fundamental human rights and decent working conditions. Section 6 of "Åpenhetsloven" provides criteria that may be used to deny such requests. If the request is not denied, then information shall be provided within a reasonable time frame and no later than three weeks. If the request is disproportionately burdensome, then the information may be provided within two months, however, a response shall be given within three weeks informing the requestor of the extension of time to provide the information, the reason for the extension and when the information can be expected (see Section 7 of "Åpenhetsloven").

APPENDIX A – ASSESSMENT OF VENDORS

1. Identify the key vendors of products or services that Tomax AS use
2. Categorize Companies according to risk

Risk Criteria

Low risk	Company registered in and activity conducted in a country where working conditions are decent and human rights are respected.
Medium risk	Company registered in country where working conditions are decent and human rights are respected, but activity conducted in a country where that may not be the case.
High risk	Company registered and activity conducted in a country where working conditions may not be decent and human rights may not be respected.

3. Maintain lists of each category
See form "Categorization of vendors"
4. Perform level of Due Diligence according to the risk level

Level of Due Diligence based on risk level

Low risk	No further action
Medium risk	Perform Due Diligence
High risk	Perform Comprehensive Due Diligence

See forms "Risk Assessment FORM" and "Due Diligence Questionnaire"

5. Describe real or potential adverse conditions that the due diligence has revealed
6. Determine mitigating actions to rectify the adverse conditions

Categorization of vendors

Vendors that score "Low Risk" and require No Further Action

Company	Service / Product	Country of registration	Country of operation	Risk
Årdal Maskinering	Machining	Norway	Norway	Low
WellConnection	Inspection	Norway	Norway	Low
Trelleborg Seal Solution	Seals	Norway	Denmark, Italy, England	Low
Seal Engineering	Seals	Norway	Norway	Low
Christian Bauer	Springs	Germany	Germany	Low
Mubea	Springs	Germany	Germany	Low
Trio AF Teknikk	Metal coating	Norway	Norway	Low
Allrent	Cleaning	Norway	Norway	Low
BDO	Accounting	Norway	Norway	Low
Uphead	IT	Norway	Norway	Low

Vendors that score "Medium Risk" and require Due Diligence

Company	Service / Product	Country of registration	Country of operation
None			

Vendors that score "High Risk" and require Comprehensive Due Diligence

Company	Service / Product	Country of registration	Country of operation
None			

Date:

Risk assessor # 1

Risk assessor # 2

Risk Assessment FORM - Human Rights / ILO's Fundamental Principles and Rights at Work

This form is used to assess the risk after due diligence of those companies that are considered Medium or High Risk.

Company name	
Risk Level	Medium / High
Participants in risk assessment	

Gather information:

Medium Risk	Send Due Diligence Questionnaire to company and ensure that a completed form is received from company.
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or

High Risk	Send Due Diligence Questionnaire to company and ensure that a completed form is received from company.
	Ask for documents to prove details of registration and proof that systems related to human rights and principles and rights at work are implemented
	Perform searches on the internet related to breaches of human rights, working conditions, principles and rights at work

Evaluate the response:

Have adverse conditions been revealed?	
Describe such adverse conditions.	
What mitigating actions can be taken to rectify the situation?	

Date:

Risk assessor # 1

Risk assessor # 2

Due Diligence Questionnaire – Human Rights / ILO's Fundamental Principles and Rights at Work

General Information:

INFORMATION REQUIRED	DETAILS
1. Company / Entity name:	
2. Registration number	
3. Country of Registration	
4. Registered business address and telephone number:	

QUESTIONNAIRE – Part 1	YES / NO
1. Does your company comply with ILO's fundamental principles and Rights at work?	
2. Does your company ensure that internationally recognized human rights are adhered to?	
3. Has your company ever been under investigation for breach of universal human rights?	
4. Has your company ever been under investigation for breach of ILO's fundamental principles and rights at work?	
5. Have any of your subcontractors ever been under investigation for breach of either ILO's fundamental principles and rights at work or universal human rights?	

QUESTIONNAIRE – Part 2
1. Describe the service / product provided to Tomax.
2. In which country / countries does the activity in conjunction with providing a service / product to Tomax take place?
3. List any sub-contractors involved in the service / product provision, including their country of operation and country of registration.