

VÅR ENERGI COMPLIANCE DECLARATION FORM

It is expected that all Enterprises (Contractors and subcontractors) that perform any Work for Vår Energi are acquainted with and represents that;

- a. it gives its consent for processing of personal data in compliance with applicable legislation, in particular it has reviewed Vår Energi's Privacy Notice about personal data processing under Regulation (EU) 2016/679 ("GDPR"), available on the website of Company, and gives its consent for processing for the purposes and with the methods indicated in the information notice, including the communication;
- b. it undertakes to comply with all the provisions in force regarding the protection of personal data, where applicable, with regard to the personal data of its own staff and those of any subcontractors and to indemnify and hold harmless the Company from any liability, expense or consequence that may arise in case of non-observance of these provisions;
- c. it is aware of the legislation in force regarding administrative liability of legal entities and it is acquainted with (i) the Vår Energi Code of Ethics that establishes the ethical principles to be complied with by Company's staff and (ii) the Vår Energi Sustainability Policy and (iii) United Nations Guiding Principles on Business and Human Rights (2011) and Enterprise undertakes to comply with the principles contained therein (the documents under (i) and (ii) above are available on the website of Company);
- d. it undertakes to comply with and to cause that its shareholders, directors, employees and collaborators comply with the laws and regulations regarding handling of inside information.
- e. it undertakes to cause all contractors and its subcontractors performing work for the Company to take Company's training programs and webinars with regards to compliance with laws and regulations and our Code of ethics as requested, including, but not limited to Digital security training received via Company e-mail and the Inside Information webinar posted on Varenergi.no/Our Business/Supply Terms.
- f. it accepts that any remuneration to be paid will be exclusively commensurate with the activities to be performed under the contract, and that the payments will be made exclusively to the contractual counterpart, in the countries where the parties are incorporated or in the country where the contract is performed;
- g. it undertakes to comply and to cause its shareholders, directors, employees and collaborators to comply with the principles contained in the above indicated (i) Vår Energi Code of Ethics and (ii) United Nations Guiding Principles on Business and Human Rights (2011) with regard to all contractual relationships that exist or may exist in the future between the Enterprise and the Company;
- h. it undertakes to comply and to cause its shareholders, directors, employees and collaborators to comply with the laws and regulations in force regarding anti-corruption, meaning such as; (i) the anti-corruption provisions contained in any applicable national laws, (ii) UK Bribery Act, (iii) the Foreign Corrupt Practices Act (FCPA) and (iv) other public and commercial laws against corruption which are in force around the world and international anti-corruption treaties and, in particular, to refrain and to cause its directors, employees and collaborators to refrain from (a) offering, promising, giving, paying or authorizing anyone to give or pay, directly or indirectly, material, financial or other advantage to a Public Official¹ or private party in breach of any above mentioned anti-corruption laws, and (b) accepting or authorizing anyone to accept, directly or

¹ Public Official means: means an employee of a Governmental Authority, a member of a political party, a political candidate, an officer of a public international organisation, or an officer or employee of a state-owned enterprise, including a partly state-owned enterprise.

- indirectly, material, financial or other advantage or a request or solicitation from a Public Official or private party of material, financial or other advantage in breach of any of the above mentioned anti-corruption laws;
- i. in particular, it undertakes to refrain from (i) offering commissions, fees and other benefits to directors, employees or collaborators of the Company and its affiliates and (ii) concluding commercial agreements with directors, employees and collaborators of the Company and its affiliates which are likely to detrimentally affect, or conflict with, Company's best interests and (iii) undertaking commercial activities or signing agreements with third parties in breach of the principles of the Vår Energi Code of Ethics which are likely to adversely affect the existing or potential contractual relationships between the Enterprise and the Company and (iv) favoring directors, employees or collaborators of the Company and its affiliates with non-monetary favors including gifts, means of transport and entertainment, exceeding the limits of commonly accepted ethical business standards;
 - j. that none of the shareholders, of the members of the board of directors, nor Operations Manager² of the Enterprise, nor any Family Members³ of such persons are or have been Public Officials who worked, currently work, or are likely to work in the future, as part of their role, in the performance of activities in which Company and its affiliates have an interest;
 - k. that no conflict of interest, even a potential one, exists between the Enterprise- and/or between its controlling companies or subsidiaries - and Company and/or its affiliates
 - l. that no Trust Company is present in the control chain of the Enterprise. If this is not the case the Company need to be notified about any Trust Company(ies) that is/are present in the control chain of the Enterprise, and that disclosure of the ultimate beneficiaries shall be provided to Company.
 - m. the Enterprise has not committed serious infringements of regulations regarding safety or any other obligation deriving from labor relations, including regulations concerning the right to work of disabled persons;
 - n. the Enterprise has not been found to be seriously negligent or acting in bad faith in execution of services for Company and its affiliates, nor made a serious error in the exercise of its professional activities;
 - o. the Enterprise fulfils its obligations relating to the payment of duties and taxes, in accordance with the applicable local legislation which it is established;
 - p. the Enterprise fulfils its obligations relating to the payment of social security contributions in accordance with the applicable local legislation which it is established;
 - q. that no sanction or prohibition has been imposed on the above Enterprise nor other sanctions which entail prohibition from contracting for the public administration;
 - r. the Enterprise is not in a state of bankruptcy, enforced liquidation nor it is the subject of any insolvency procedure.

² Operations Manager means: any operations, general or equivalent manager

³ Family Members means:

(i) Spouse or person with whom the staff member is living in a marriage-like relationship (such as cohabitant, registered partner), (ii) Dependent children of the staff member, and dependent children of a person as mentioned in (i)