

NOV Inc.

# 2023 Norwegian Transparency Act Report

The NOV logo is located in the bottom right corner of the page. It consists of the letters 'NOV' in a bold, white, sans-serif font, with a stylized white circle to the right of the 'V' that partially overlaps it. The logo is set against the background of the yellow industrial structure and the blue water.







# 2023 Norwegian Transparency Act Report

NOV recognizes the need to ensure fundamental human rights and decent working conditions for the people supporting our supply chain. This Report is provided pursuant to our obligations under the “Lov om virksomheters åpenhet og arbeid med grunnleggende menneskerettigheter og anstendige arbeidsforhold (åpenhetsloven)” (“Act relating to enterprises’ transparency and work on fundamental human rights and decent working conditions (Transparency Act)”), in a way which is consistent with the human rights philosophy expressed in the United Nations Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights and the International Labor Organization Declaration on Fundamental Principles and Rights to Work. This Report applies to Tuboscope Norge AS, NOV Wellbore Technologies LLC NUF, National Oilwell Varco Norway AS, APL Norway AS, Intelliserv Norway AS, Hellenes AS and NOV Process & Flow Technologies AS (collectively called “NOV”).

For further information about NOV’s responsible business practices, our Company Overview, Corporate Structure and our Policies and Programs refer to the [NOV Code of Business Conduct and Ethics](#) and the [2023 NOV Modern Slavery Act Statement](#).

## DUE DILIGENCE

Our initial review process involves screening the supplier through our enterprise review platform to determine whether the supplier is a restricted/sanctioned party and if the supplier is a known risk for forced labor or modern slavery violations. NOV does not conduct business with any suppliers identified as a sanctioned party or that NOV believes will engage in human rights, forced labor or modern slavery violations in connection with NOV’s supply chain.

Next, by using a risk-based analysis consisting of data points including NOV spend and the reputational risk for modern slavery violations associated with the geographic location of our suppliers, NOV identifies suppliers that NOV will subject to enhanced diligence. In 2022, NOV began testing an automated system for collecting data and conducting supplier risk assessments. In 2023, a web-based workflow was implemented that will enable our modern slavery reviews to be performed more efficiently and with greater consistency across our supplier base.

Our Ethics & Compliance program requires certain key new suppliers and third parties to be reviewed and approved prior to engaging them for the provision of goods and/or services.

Suppliers that NOV has identified as being subject to enhanced diligence will be required to meet additional requirements including, but not limited to, completing questionnaires to further identify compliance risks. NOV’s due diligence compliance questionnaire for suppliers subject to enhanced diligence asks questions regarding:

- Any violations of or investigations into suspected violations of any law pertaining to human rights, trafficking, modern slavery or forced labor;
- Any investigations, or findings for conduct arising under anti-bribery and corruption laws;
- The supplier’s commitment to operate its business in accordance with UN Human Rights Council’s Principles for Business and Human Rights as well as the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work; and-
- Sources of their labor and goods

The questionnaire also requires these suppliers to agree to comply with NOV policies set forth in NOV’s Code of Business Conduct and Ethics. Suppliers are further required to confirm in the questionnaire that they will follow the NOV Anti-Forced Labor Policy, which includes our commitment to universal human rights, including the prohibitions against the use of child, forced, indentured or involuntary labor. Suppliers who fail to return the questionnaire risk non-payment or NOV severing the business relationship.

Certain suppliers are subject to targeted audits designed to identify environmental risk factors that may expose a forced labor or modern slavery risk that should be reported to the Ethics & Compliance Group for further investigation.

In addition to questionnaires and audits, we work to ensure that our Suppliers Agreements and Terms & Conditions include an obligation for our suppliers to comply with their obligations under applicable anti-slavery or forced labor laws and regulations.

Should we confirm that there has been a violation of applicable laws, NOV will take appropriate action and actively participate in taking appropriate steps to attempt to remediate any potential damage that is caused by the production of our products.

To date, NOV's due diligence actions have not identified any immediate evidence of adverse impacts or significant risks of adverse impacts in the enterprise or supply chain. NOV recognizes our responsibility to continue to assess and mitigate actual and potential adverse impacts on fundamental human rights and decent working conditions in its operations and supply chain. Ongoing activities include:

- Continuing to conduct due diligence reviews of potential new suppliers to identify risks related to human rights and decent working conditions.
- Conducting on-site risk assessments for selected suppliers.
- Documenting and reporting actual adverse impacts and significant risks of adverse impacts identified through the due diligence process.
- Working with or removing suppliers in order to resolve any relevant audit findings relating to human rights and decent working conditions.
- Submitting an annual report in accordance with the Transparency Act.


In conclusion, NOV remains committed to addressing the root causes of violations of fundamental human rights and decent working conditions by empowering workers and protecting vulnerable groups, addressing business impact, and engaging on policy and legislation. We are committed to ensuring that there are no unremedied cases of violations of fundamental human rights and decent working conditions in our supply chain or operations.



## Tuboscope Norge AS:

- **Trevor Brian Martin** – Chairman

- Signature: \_\_\_\_\_

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- **Kjell Håkon Kleppe** – Director

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## NOV Wellbore Technologies LLC NUF

- **Trevor Brian Martin** – Chairman

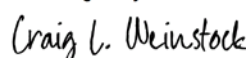
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- **Craig Louis Weinstock** – Director


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- **William Lamb** – Director

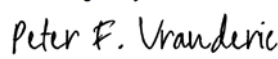
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- **Peter Vranderic** – Director

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- **Jose Bayardo** – Director

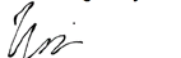
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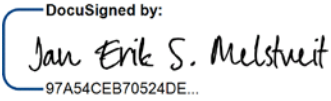
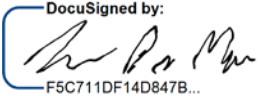
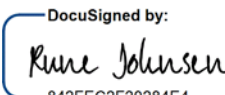
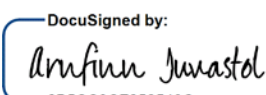
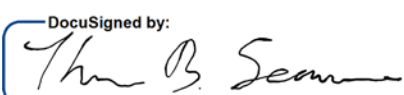
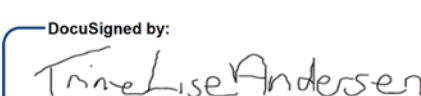
- **Vincent Gillespie** – Director

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# National Oilwell Varco Norway AS

- **Jan Erik Stork Melstveit** – Chairman  
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- **Trevor Brain Martin** - Director  
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- **Frode Jensen** – Director  
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- **Rune Johnny Johnsen** – Director  
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- **Arnfinn Juvastøl** – Director  
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- **Thom Sannes** – Director  
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- **Trine Lise Andersen** – Director  
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- **Stine N. Andersen** – Director  
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## APL Norway AS

- **Jan Erik Stork Melsveit** – Chairman

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- **Trevor Brian Martin** – Director

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- **Frank Staberg Jensen** – Director

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- **Bjørn Magne Grut** – Director

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## Intelliserv Norway AS

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- **Cock Admiraal** – Director

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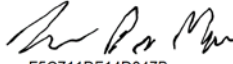
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## Hellenes AS

- **Trevor Brian Martin** – Chairman

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- **Alastair James Fleming** – Director

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## NOV Process and Flow Technologies AS

- **Trevor Brian Martin** – Chairman


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- **Svein Erik Hjortland** – Director


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- **Erling Olav Sollund** – Director

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- **Hanne Younger** – Director

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