

Transparency Act Statement

REPORTING FOR FISCAL YEAR 2022

Norway

The 2022 Transparency Act (the Act) requires companies fulfilling certain requirements and operating in Norway to establish and report steps taken and controls in place to address fundamental human rights and decent working conditions in connection with the production of goods and the provision of services. It also ensures public access to information regarding how the enterprise addresses adverse impacts on fundamental human rights and decent working conditions. The Halliburton entities signing below approve and release this statement in compliance with the Act for fiscal year ending 31 December 2022. This statement describes the business structure, relevant policies, and ongoing efforts of Halliburton to ensure respect for fundamental human rights and decent working conditions in its operations and global supply chain.

ABOUT HALLIBURTON

Halliburton is one of the world's leading providers of products and services to the energy industry. Founded in 1919, we create innovative technologies, products, and services that help our customers maximize their value throughout the life cycle of an asset and advance a sustainable energy future.

Our experts collaborate and engineer solutions to help customers maximize value throughout the lifecycle of the reservoir. We combine technology, services, and execution expertise to assist our customers with hydrocarbons location, geological data management, and drilling.

Halliburton values are fundamental to how our employees relate to each other and to all those with whom they interact. Three of these critical values include:

- » **Integrity:** Ethics and integrity are the foundation of our brand and the guiding principles for all we do.
 - » **Safety:** Safety is our top priority. We focus on both the safety of our personnel and those with whom we work.
 - » **Respect:** We value diversity and equality. It makes us stronger, more innovative, and better positioned for success. We are committed to inclusion across race, gender, nationality, religion, identity, experience, and any other unique attribute. We are honest with ourselves, welcome different viewpoints, and empower each other to be authentic.
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ABOUT HALLIBURTON AS AND LANDMARK GRAPHICS AS

STRUCTURE

This statement relates to Halliburton AS (968 967 983) and Landmark Graphics AS (971 106 514).

Halliburton AS is a company incorporated in Norway with Company Number 968 967 983 and its registered office is at Eldfiskveien 1, 4056 Tananger. Established in Norway in 1971, it employs 1,953 employees to provide a full range of well services to Norway-based clients.

Landmark Graphics AS is a company incorporated in Norway with Company Number 971 106 514 and its registered office is at Eldfiskveien 1, 4056 Tananger. Established in Norway in 1994, it employs 57 employees provides supply of software and consultancy services related to information technology to Norway-based clients.

OPERATIONS AND SUPPLY CHAIN

Halliburton AS and Landmark Graphics AS provides oil and gas services to energy companies in Norway. The following examples illustrate the scope of Halliburton's work in Norway.

- » **Cementing:** involves bonding the well and well casing while isolating fluid zones and maximizing wellbore stability. Our cementing product service line also provides casing equipment.
- » **Sperry Drilling:** provides drilling systems and services that offer directional control for precise wellbore placement while providing important measurements about the characteristics of the drill string and geological formations while drilling wells. These services include directional and horizontal drilling, measurement-while-drilling, logging-while-drilling, surface data logging, and rig site information systems.
- » **Production Solutions:** provides customized well intervention solutions to increase well performance, which includes coiled tubing, hydraulic workover units, downhole tools, pumping services, and nitrogen services.
- » **Production Enhancement:** includes stimulation services and sand control services. Stimulation services optimize oil and natural gas reservoir production through a variety of pressure pumping services and chemical processes, commonly known as hydraulic fracturing and acidizing. Sand control services include fluid and chemical systems for the prevention of formation sand production.
- » **Pipeline and Process Services:** provides a complete range of pre-commissioning, commissioning, maintenance, and decommissioning services to the onshore and offshore pipeline and process plant construction commissioning and maintenance industries.
- » **Testing and Subsea:** provides acquisition and analysis of dynamic reservoir information and reservoir optimization solutions to the oil and natural gas industry through a broad portfolio of test tools, data acquisition services, fluid sampling, surface well testing, subsea safety systems, and underbalanced applications.
- » **Drill Bits and Services:** provides roller cone rock bits, fixed cutter bits, hole enlargement and related downhole tools and services used in drilling oil and natural gas wells. In addition, coring equipment and services are provided to acquire cores of the formation drilled for evaluation.
- » **Baroid:** provides drilling fluid systems, performance additives, completion fluids, solids control, specialized testing equipment, and waste management services for oil and natural gas drilling, completion, and workover operations. It also provides customized specialty oilfield completion, production, and downstream water and process treatment chemicals and services.
- » **Wireline & Perforating:** provides open-hole logging services that supply information on formation evaluation and reservoir fluid analysis, including formation lithology, rock properties, and reservoir fluid properties. Also offered are cased-hole and slickline services, including perforating, pipe recovery services, through-casing formation evaluation and reservoir monitoring, casing and cement integrity measurements, and well intervention services.
- » **Completion Tools:** provides downhole solutions and services to our customers to complete their wells, including well completion products and services, intelligent well completions, liner hanger systems, sand control systems, multilateral systems, and service tools.
- » **Landmark Software and Services:** provides cloud based digital services and artificial intelligence solutions on an open architecture for subsurface insights, integrated well construction, and reservoir and production management.

Halliburton AS supply chain encompasses procurement, materials, and logistics, and operates within the larger global Halliburton supply chain, which spans nearly every country in which Halliburton conducts business.

Halliburton AS mobilizes goods and services to support Norway operations, including, but not limited to, proprietary oilfield tools (such as downhole tools required for wireline and slickline operations); specialty and commodity chemicals (such as cement and proppant); rolling equipment; maintenance, repair and operational (MRO) supplies and equipment; machinery; third-party inspection and testing; safety equipment; contingent labor; transport services and customs brokerage; construction and facilities; and IT and business services.

By using the global Halliburton supply chain and manufacturing network, Halliburton AS can source special oilfield resources from various Halliburton manufacturing centers and field plants across the world. Halliburton AS prefers to source locally, exploring local and indigenous suppliers, to provide faster lead times and lower freight costs, ensure that products and services meet local compliance standards, and maximize the positive economic and social impacts of its local value chain while minimizing environmental impacts. When necessary, Halliburton AS imports qualified goods and services to provide the best solution price to its customers.

ACTIONS TAKEN TO ASSESS AND ADDRESS POTENTIAL HUMAN RIGHTS RISKS

As a wholly owned subsidiary within a consolidated global supply chain, Halliburton Norway entities operate in accordance with Halliburton Company policies and procedures with which assess and address human rights on a global scale.

POLICIES

Halliburton is committed to complying with the requirements of all applicable employment, labor and human rights laws to ensure fair and ethical employment practices. This includes Halliburton's policies regarding non-discrimination, minimum employment age, collective bargaining and freedom of association, and fair compensation, as well as its policies on health, safety, and security for employees. As part of its commitment to fair and ethical employment practices, Halliburton has created a [Code of Business Conduct \(COBC\)](#).

The COBC requires that all employees, directors, officers, and third parties who conduct business with us act with fairness, integrity, and high standards of personal and business ethics. All Halliburton employees are required to acknowledge the COBC when they join the company and must complete COBC training every two years. All employees are accountable to uphold the COBC and to report any potential COBC or other violations to the Global Ethics & Compliance group through methods like the Ethics Helpline. The Ethics Helpline is

operated by a third-party agency and is available 24/7 in multiple languages. Reports can be made anonymously, and Halliburton's policies strictly prohibit retaliation for reporting potential violations.

Halliburton upholds universal human rights as defined by the United Nations (UN) Universal Declaration of Human Rights, and we support the UN Guiding Principles on Business and Human Rights. Halliburton adopted an internal [Human Rights Policy](#) to further demonstrate our commitment to, and respect for, human rights. This policy defines Halliburton's standards and principles with respect to human rights. It also provides guidance to employees regarding their human rights responsibilities and explains how Halliburton will enforce the policy.

DUE DILIGENCE PROCESS

Halliburton continuously conducts due diligence on its own operations through the Law Department's Global Ethics and Compliance group, the COBC, and the Ethics Helpline. Additionally, the Internal Assurance Services (IAS) group conducts regular audits of the global supply chain function. Our due diligence process is specific to the identified potential risk of our business operations and supply chain.

Halliburton is committed to ensuring respect for fundamental human rights and working conditions in its supply chain. The company implements a comprehensive due diligence methodology that considers global Human Rights legislation and international standards such as the Organization for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Business Conduct, the UN Guiding Principles for Business and Human Rights, and applicable import and trade restrictions.

Halliburton recognizes the importance of responsible supply chain management in promoting Human Rights. Halliburton's has a comprehensive supply chain due diligence methodology that prioritizes communication and training, risk assessment and mitigation, collaboration, and monitoring for continuous improvement.



COMMUNICATION & TRAINING

Halliburton communicates its expectations of suppliers regarding human rights through the [Halliburton Human Rights Statement](#), [Supplier Ethics Statement](#), and [Supplier Ethics Letter](#), which outline Halliburton's commitment to corporate social responsibility and global citizenship. Businesses and individuals conducting business with Halliburton are expected to uphold the same ethical standards and are required to:

- contractually commit to protect and uphold the fundamental human rights of their employees as stated in the Universal Declaration of Human Rights, and
- comply with all applicable employment, labor, and human rights laws to ensure that fair and ethical employment practices are followed in the countries in which they operate.

The Supplier Ethics Letter, available in 10 languages, is provided to all suppliers during both the tendering and onboarding processes.

The [Halliburton Human Rights Statement](#), [Supplier Ethics Statement](#), and [Supplier Ethics Letter](#) are always available on Halliburton's external website.

Halliburton also utilizes meetings, workshops, training sessions, and digital ESG platforms (such as IntegrityNext, a digital platform that collects and documents sustainability data from suppliers) to facilitate communication, collaboration, and feedback on important matters such as human rights compliance.

To further advance social responsibility, Halliburton monitors global legislation on human rights and performs due diligence to enhance its organizational capacity and knowledge to promote human rights awareness in its supply chain. The company introduced an internal training on Supply Chain Sustainability Awareness in 2022 for its Supply Chain employees. The training covers sustainability topics relevant to its supply chain, including the UN Sustainable Development Goals, UN Guiding Principles on Business and Human Rights, and other relevant

social topics such as modern slavery and related legislation, supply chain risk mapping, supplier diversity, and local content. This training has also been completed by Norway Country Managers, Business Development Managers and key Health, Safety & Environment employees. In addition, a global sustainability training was introduced for all Halliburton employees covering relevant corporate sustainability topics beyond Human Rights and Supply Chain.

RISK ASSESSMENT

Halliburton conducts dynamic, supplier-specific risk assessments to evaluate compliance with the Act and to identify high-risk suppliers, while also segmenting suppliers by risk level. Halliburton uses an internal human rights assessment tool, as well as its new Supply Chain ESG Platform, IntegrityNext, to assess inherent risk in its supply chain. This approach helps the company to prioritize areas for risk mitigation and detailed follow-up. In the last 3 years, 99% of Halliburton's Tier 1 suppliers have been assessed for human rights risks.

To determine the appropriate risk level for each supplier, Halliburton analyzes various data points based on commercial relationship (procurement spend), category (industry/products/services/materials), and geography.

For category risk factors, Halliburton considers the competitiveness of the category, the likelihood of 3D (dirty, dangerous, difficult) jobs, potential for migrant workers, seasonal or project-related categories, level of worker recruitment, level of offshoring, supply chain complexity, and the presence of vulnerable workers.

In assessing geographical risks, Halliburton considers various data points, including the Global Slavery Index and additional geographical data from

IntegrityNext, to assess inherent Human Rights risks in the supply chain. These data points include World Bank's World Development indicators on child labor, food insecurity, and income level, Freedom House global freedom score, International Trade Union Confederation global rights index, World Bank poverty indicators, International Labor Organization wages and working time statistics, and occupational health and safety statistics.

RISK MITIGATION, COLLABORATION & REMEDIATION

Halliburton incorporates supplier human rights due diligence within its supply chain processes, including onboarding and supplier performance evaluation. The company collaborates proactively with its diverse mix of global and local suppliers to mitigate human rights risks, improve social impact, and remediate, where necessary, through Supplier Social Responsibility Assessments and Human Rights Audits. Our mitigating measures are enforced based on and adjusted to identified risks in alignment with the principle of a risk-based approach.

During onboarding, potential suppliers undergo a risk-evaluation process that covers export controls and sanctions screening, insurance verifications, and safety training for onsite vendors. To comply with Section 1502 of the U.S. Dodd-Frank Act and Halliburton's commitment to the Responsible Minerals Initiative, suppliers are required to supply Democratic Republic of Congo (DRC) conflict-free materials, furnish information to help determine that work provided to Halliburton is DRC conflict-free, and respond to requests for information on sources of supply. All international non-commercial agents, such as customs brokers, freight forwarders, immigration, and visa agents, undergo due diligence checks.

In 2022, Halliburton started using IntegrityNext to support supplier evaluations on sustainability topics. The self-assessment questionnaires cover key social responsibility topics, including human rights, supplier diversity, supply chain responsibility, and conflict minerals. These questionnaires cover equal rights and treatment of employees, forced labour, child labour, working hours and wages, collective bargaining, freedom of association, impact on local communities, sustainability policies, governance, due diligence, compliance in the supply chain, sustainable procurement policies, supplier diversity, and conflict minerals compliance. In 2022, evaluations commenced for 1,337 suppliers, comprising over 50% of global spend, to expand due diligence for suppliers identified in the Company's initial inherent risk assessment.

In 2022, Halliburton commissioned a third-party human rights auditor and began onsite human rights audits of suppliers to enhance the Company's high-risk supply chain due diligence. To determine the scope and form of the audit conducted, the Company considers the scale and type of goods or services being provided. The audit may be a workplace conditions assessment, labor provider audit, or service provider audit.

Finally, Halliburton evaluates its critical suppliers annually on risks related to safety, quality, environment, social responsibility, economics, and corporate governance. The standard Halliburton supplier performance review and evaluation process for critical suppliers includes a

questionnaire on each supplier's compliance with Halliburton's standards, such as:

- COBC, safety standards, and requirements
- regulations, terms, and conditions
- policies and procedures that prohibit forced labour and human trafficking
- policies and procedures that prohibit wage deductions or payments by workers in return for such things as employment, transportation, accommodations, and food
- policies and procedures that enforce timely and accurate payments of wages for all workers.

Non-compliance with Halliburton's standards can lead to appropriate response actions up to and including termination.

MONITORING FOR CONTINUOUS IMPROVEMENT

Halliburton is committed to uphold human rights in its business operations and supply chains. Halliburton works with its suppliers to improve their social performance using IntegrityNext. This tool provides insights into opportunities for continuous improvement, which Halliburton uses to help its suppliers enhance their policies and procedures related to social performance. The company reviews its suppliers' policies and procedures during on-site quality audits and provides training and development activities to proactively support its suppliers in their improvement efforts.

A 'CONTINUOUS IMPROVEMENT' APPROACH TO ADDRESS FUNDAMENTAL HUMAN RIGHTS

To address and ensure respect for fundamental human rights and decent working conditions, Halliburton adopts a 'continuous improvement' approach. This approach ensures the company is compliant with relevant laws and regulations and takes proactive measures to ensure respect for fundamental human rights and decent working conditions in its business operations and supply chains. By prioritizing continuous improvement, Halliburton demonstrates its commitment to uphold human rights.

Actions Completed 2020 -2022	<p>Developed a methodology and internal tool to conduct supplier-specific human rights risk assessments.</p> <p>Implemented a new Supply Chain ESG Platform, IntegrityNext, to enhance risk assessment in the supply chain.</p> <p>Conducted supplier evaluations on Supply Chain Responsibility and Human Rights for 1,337 (50% global spend) suppliers in 2022.</p>
	<p>Conducted human rights assessment for 99% of Tier 1 suppliers.</p>
	<p>Participated in the International Petroleum Industry Environmental Conservation Association (IPIECA) pilot of Forced Labour Training across Halliburton's Supply Chain, Legal, and Human Resources personnel.</p>
	<p>Commissioned a third-party human rights auditor and initiated onsite human rights audits of suppliers.</p> <p>Rolled out an internal training on Supply Chain sustainability and human rights to Supply Chain employees, Norway country managers, Norway business development managers and key Health, Safety & Environment employees. Implemented a global sustainability training for all employees.</p>
Next Focus Areas	<p>Further embed human rights and social responsibility into Supply Chain processes and policies.</p> <p>Initiate mapping of critical supply chains up to Tier 3.</p> <p>Expand employee and supplier training on forced labour and human rights.</p>

This statement was reviewed and approved by the directors of Halliburton AS and Landmark Graphics AS in their role as the entity's principal governing body on 20th of June 2023.

DocuSigned by:

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 Rune Hoberstad,
 Chairman of the Board
 Halliburton AS
 20 June 2023

DocuSigned by:

D4D9BEB4E3FB4BA...
 Aage Andreassen
 Chairman of the Board
 Landmark Graphics AS
 20 June 2023

DocuSigned by:

ED486CC616A647C...
 Nina Runestad
 Board Member
 Landmark Graphics AS & Halliburton AS
 20 June 2023

HALLIBURTON

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Reporting for fiscal year 2022

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