tampnet

ESG-report 2024

SIMON GRAPES

GROUP QHSE & SUSTAINABILITY MANAGER

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CEO Reflections

At Tampnet, we have always operated with a pioneering spirit. From deploying the world's largest offshore high-capacity network to enabling critical communications in some of the most remote and demanding environments on earth, we thrive where others hesitate. Yet with that reach and capability comes a deep sense of responsibility — to our planet, our people, and the communities and industries we serve.

This ESG report outlines our progress on that responsibility. It is not just a reflection of our current standing, but a declaration of where we are headed — and how we intend to lead.

Integrating ESG into the Core of Our Business

In 2024, we made deliberate strides to embed ESG principles into our strategic and operational direction. These efforts were not isolated initiatives, but to further embed our transformation of how Tampnet defines performance and long-term value creation. ESG is no longer a side conversation; it is a central pillar of how we build trust, attract talent, manage risk, and deliver innovation in a changing world.

On the **environmental front**, we have accelerated our path toward lower-carbon operations. We continue to enhance the energy efficiency of our network infrastructure and explore hybrid power solutions for our offshore platforms. We have invested in smarter design principles, aiming to minimize our operational footprint without compromising on quality or resilience. These are the first steps in a longer journey toward aligning Tampnet with a low carbon economy — and we know the pace must continue to increase.

The **social dimension** of our work remains one of our greatest responsibilities. In a knowledge- and safety-critical business like ours, people are our greatest asset. This year, we've reinforced our culture of safety, learning, and inclusion — with renewed investment in employee development, wellbeing, and DEI initiatives across our footprint. We've also strengthened our relationships with the communities in which we operate, particularly in the North Sea, Gulf of America (Mexico), and the Nordics — ensuring that our impact is positive, responsible and aligned with local expectations.

On **governance**, we maintain our unwavering commitment to transparency, accountability, and ethical leadership. In 2024, we continued to enhance our cybersecurity efforts, data protection protocols, and ESG-related risk management frameworks. These are not just compliance measures — they are foundational to the confidence our customers, investors, and regulators place in us every day.

ESG as a Competitive Advantage

We firmly believe that strong ESG performance is a competitive differentiator. It helps us win the trust of world-class partners, attract purpose-driven talent, and operate in a way that anticipates — rather than reacts to — global trends. For a company at the intersection of digital infrastructure and energy, this is not optional. Tampnet's ability to lead in this space depends on our ability to align profitability with purpose, and innovation with integrity.

Our ownership model — backed by 3i and ATP — has provided the platform and strategic clarity needed to pursue this agenda decisively. We are proud to have private equity sponsors that recognize the value of sustainable growth and support the integration of ESG into value creation plans.

Looking Forward

We are proud of the progress outlined in this report, but we are not complacent. The expectations for responsible business are developing, and so are we. As we enter a new phase of growth — including digital expansion, strategic partnerships, and technological upgrades — we will continue to align our operations and ambitions with a more sustainable future.

Our ESG strategy will remain dynamic, data-driven, and rooted in stakeholder dialogue. It will evolve in step with our business and in line with global standards. And most importantly, it will continue to be shaped by the passion, professionalism, and purpose of our extraordinary team.

I want to thank our employees, customers, investors, and partners for their continued support and belief in Tampnet. Together, we are building a company that not only connects the world — but does so responsibly, resiliently, and with an eye firmly on the future.

CEO Elie Hanna

About us

Tampnet was founded in 2001 in Norway and operates the world's largest offshore high-capacity communication network in the North Sea and the Gulf of America (Gulf of Mexico), serving customers within oil & gas, wind energy, maritime and carrier sectors with first class telecommunications. The company employs 170 people, is headquartered in Stavanger, Norway and has offices in the UK, the Netherlands, USA, Brazil, Mexico and Trinidad and Tobago.

Tampnet connects offshore installations to redundant and reliable terrestrial networks with high capacity and low latency (high speed). Tampnet also installs and operates offshore 4G and 5G coverage networks enabling roaming and the digital transformation and internet of things (IoT) on offshore oil & gas platforms, offshore windfarms, service vessels and other commercial vessels. We now also provide connectivity to a line travelling across the North Sea, through the European Aviation Network.

Tampnet Carrier is Tampnet's European and transatlantic fibre infrastructure network, passing through 8 selected countries. Tampnet Carrier is all about connectivity, capacity, speed and milliseconds – data transfer with minimum delay - without compromising quality and reliability. Our unique network routes connect 40 vital data centres in 12 European and American cities and central hubs.

Our Vision

Tampnet's vision is to deliver first-class connectivity to offshore and global industries, enabling digitalisation and sustainability.

Our Mission

Tampnet owns and operates the world's largest offshore network, incorporating the latest technology to provide our customers with the most reliable and complete connectivity solutions.

From site to shore, our low-latency, high-capacity network enables our customers to achieve more through improved sustainability and efficient, safe, and digitalised operations.

Our Values

Our core values describe the attitudes and behaviours which shall characterise us – we call it the Tampnet DRIVE!

The Tampnet DRIVE!

In line with Tampnet's continuous commitment to sustainability and transparency, our 2024 ESG report has been prepared in full disclosure to showcase our efforts within environmental management, social aspects and corporate governance. For 2024, Tampnet has prepared the report in accordance with the Comprehensive Module of the European Financial Advisory Group (EFRAG) Voluntary Sustainability Standard for non-listed Micro-, Small- and Medium-sized Undertakings (VSME). The VSME standard is a voluntary framework designed to help small and medium-sized enterprises report sustainability information in a proportional and manageable way.

THE TAMPNET
DRIVE

D EDICATED

CA **R** ING

I NTEGRITY

INNO **V** ATIVE

R **E** LIABLE

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Environmental, Social and Governance (ESG)

Environmental

As one of the world's leading providers of high-capacity communication, Tampnet utilizes both onshore locations and the marine environment to bring our specialist services to the market. We understand the necessity of preserving and protecting ecosystems, and strive to minimize our company's impact on the environment. Tampnet believes our approach to environmental management serves as a competitive advantage in providing services for our client base which shows great sustainable ambitions.

Tampnet is aligning its carbon reporting with the recommendations of the Task Force on Climate–Related Financial Disclosures (TCFD). A carbon footprint measures the total greenhouse gas emissions caused directly and indirectly by a person, organisation, event or product. The TCFD Task Force has 31 members from across the G20 countries and aims to develop recommendations for voluntary climate-related financial disclosures that are consistent, comparable, reliable, clear, and efficient, and provide decision-useful information to lenders, insurers, and investors. The TCFD has developed a framework to help public companies and other organizations more effectively disclose climate-related risks and opportunities through their existing reporting processes.

Double Materiality Assessment

A vital step in identifying the sustainability aspects affecting companies, is the execution of a Double Materiality Assessment (DMA). Tampnet completed a DMA in 2024, following a number of sessions chaired by environmental specialist company Emisoft. The DMA was completed in accordance with the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS). The purpose of the process was to identify the material sustainability aspects affecting Tampnet from environmental, social, and governance perspectives, as well as to map out the financial opportunities and risks associated with these aspects.

A DMA, as defined within the framework of the CSRD and ESRS, is a comprehensive process that evaluates how a company affects and is affected by sustainability matters from two perspectives:

i) Assessment of the company's direct and indirect effects on sustainability aspects such as environment, social welfare, and corporate governance.

ii) Assessment of how sustainability aspects influence the company's financial performance, either as risks or opportunities. This helps clarify how sustainability is integrated into the company's strategy, operations, and risk management.

A DMA therefore requires companies to engage broadly with their stakeholders, including investors, customers, employees, and local communities, to identify and prioritize material sustainability matters. This process supports companies in developing more targeted sustainability strategies.

DMA thereby becomes a critical tool for companies wishing to stay ahead of sustainability challenges and opportunities, and to meet the increasing demands from legislators, investors, and other key stakeholders.
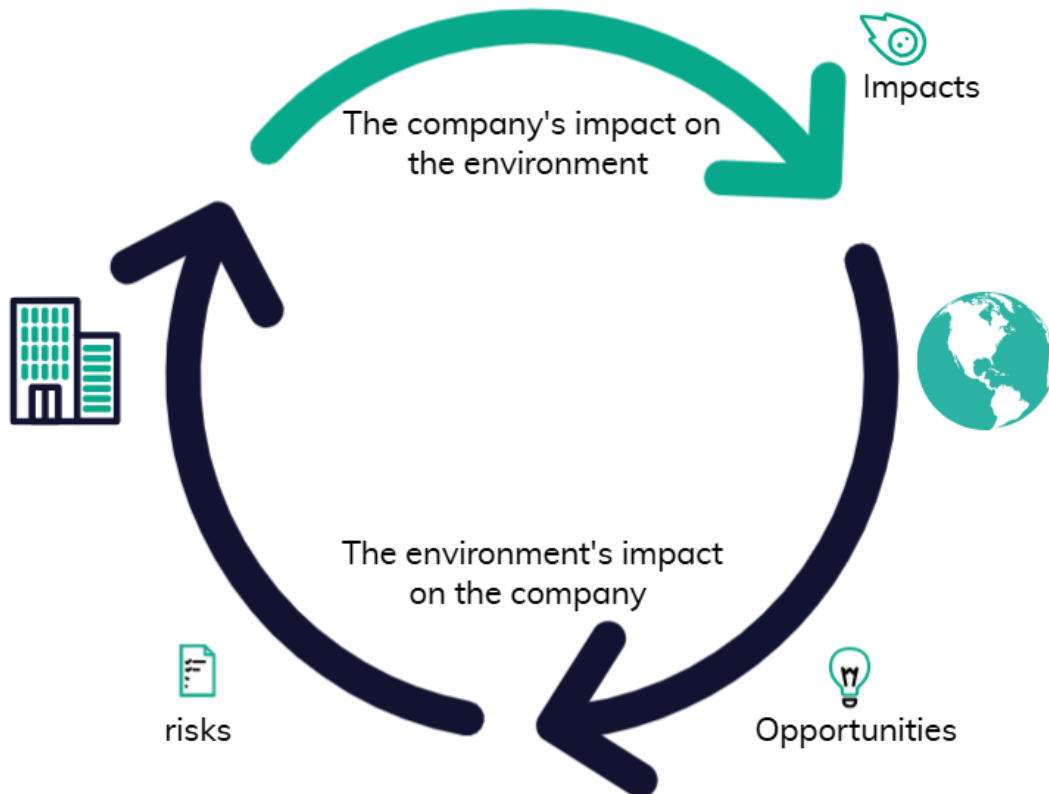
FIGURE 1. DOUBLE MATERIALITY ASSESSMENT VISUALIZATION

Impacts, Risks and Opportunities (IRO) framework

The IRO (Impact, Risk and Opportunities) framework is a part of the CSRD requirements, in which companies are expected to assess and report on the environmental and social impacts of their operations. Additionally, it mandates the evaluation of financial risks and opportunities posed by sustainability issues. This dual focus ensures a holistic view of the company's sustainability performance, aligning with the principle of double materiality in the CSRD requirements. Tampnet started on the IRO process in 2024, with the aim of finalizing the assessment in 2025. As part of this framework, Tampnet has defined and visualized its value chain:
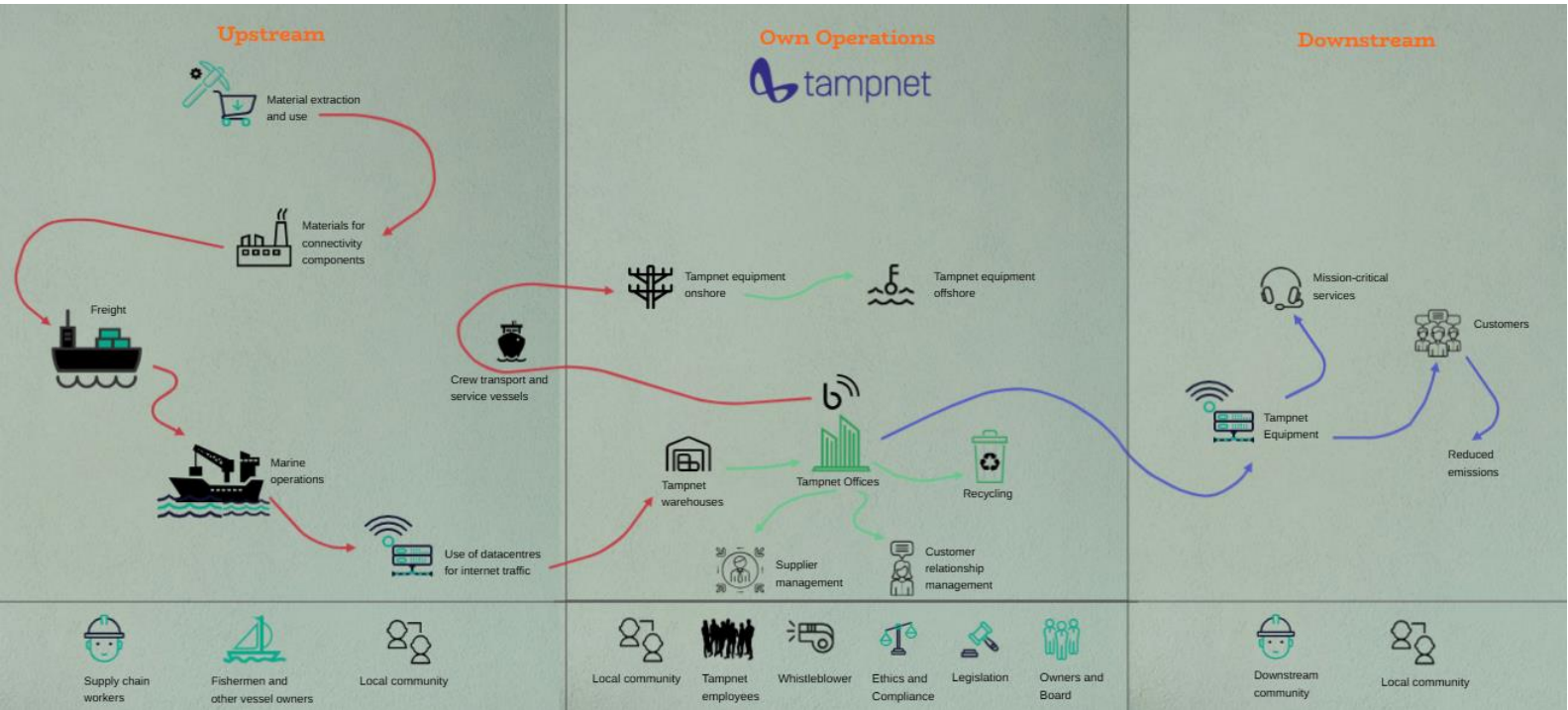
Social

At Tampnet, our commitment to fostering a diverse and inclusive workforce is firmly rooted in our core values. We strive to create an environment where all individuals feel recognized, respected, and empowered. This commitment not only benefits our employees but also strengthens our relationships with customers and contributes positively to society. We believe that collaboration and the sharing of diverse experiences are key drivers of innovation—critical for our continued growth and success.

Tampnet on the Move

We prioritize employee health and well-being through global initiatives that enable our people to thrive at work. Tampnet continues to sponsor gym memberships and routine health checks at company expense, underscoring our commitment to physical and mental wellness.

To promote wellness and celebrate active lifestyles, we completed a virtual Mount Everest challenge, inspired by our CEO's own personal journey to Mount Everest. Employees were encouraged to participate during flexible work hours or in their free time. The initiative concluded with gift card rewards for eight participants and a team dinner for the winning group.

Tampnet also took part in community-building sports events, including the Energy Relay and Fibercupen.

To further promote health and team spirit, the Americas team participated in the Houston Hess 5k Run/Walk, a premier corporate wellness event held annually at Memorial Park in Houston. Representing Tampnet among thousands of local professionals, the team embraced the opportunity to build camaraderie, support local charities, and champion active lifestyles. Proceeds from the event benefited the Memorial Park Conservancy, supporting the restoration, preservation, and enhancement of one of Houston's most treasured green spaces. Their participation underscores our ongoing commitment to employee well-being and community engagement.

Employee Engagement

Twice a year, we measure employee satisfaction through the Glint platform, providing valuable insights and highlighting areas for continuous improvement.

In 2024, Tampnet achieved an Employee Net Promoter Score (eNPS) of 81. The survey revealed that one of our greatest strengths is our leadership. Employees feel trusted by their managers, who are seen as supportive and genuinely invested in their well-being. Areas for improvement include enhancing cross-team collaboration, which we will prioritize going forward.

Welfare Events

Across all Tampnet locations, dedicated welfare committees consisting of 3–5 members are responsible for organizing social and community events. These include social gatherings, family days, and employee sponsorship activities.

This year, highlights included padel tournaments, a family day at Fangene på Fortet, an arcade game night, bowling, a traditional crawfish boil, and various summer events. These initiatives foster a strong sense of community and belonging within our organization.

Our social responsibility extends beyond the workplace. Through employee-driven initiatives such as Movember and Football Shirt Friday, we raised awareness and funds for charitable organizations, reinforcing our commitment to giving back to the community.

Women in Tech

This year Tampnet have decided to honor International Women's Day by supporting Plan International's efforts to end child marriage and empower girls through education, vocational training, and protection during times of crisis. Tampnet showed our support for their meaningful work by purchasing over 100 shopping bags, which were subsequently gifted to our employees.

Women
in_Tech

Choose to Challenge

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Mission:

To close the gender gap and promote equality; to contribute to a sustainable future for business and society.

But, how?

→

By implementing it in our values:

Dedicated to elevate women in tech and promote inclusiveness in our company.

Showing **integrity** by building trust through transparency and openness.

Being **innovative**: we don't just listen to ideas - we actively ask for them.

We **care**. Investing in benefits that support work flexibility and well-being to succeed in both work and home life.

We do what we say - and prioritise this to be **reliable**.

And, why?

→

The purpose

Ensure women's full and effective participation and equal opportunities for technology and leadership in Tampnet.

So, let's hear views from the women working in Tampnet today

→

> "Tampnet aims to be an inclusive company with a diverse team; therefore, we started the Women in Tech initiative, to focus on aspects of culture and diversity that help the company grow.

Hilde Mattingsdal
CPO

> "Growing up, I didn't see myself working in the tech industry until I saw other women holding those positions and being recognized for their work.

Haley Trebus
IT Operations Engineer

> "Tech companies should be recruit, train, develop and retain the talents out there - and amongst those talents, there are many women. Be open to that!

Vanesa López González
Network Engineer

> "Telecoms remains a male-dominated sector; however, we are seeking to positively change this - something that will benefit both Tampnet and the wider tech sector.

Kirsty Lawrence
Head of Group Business Control

The job isn't done yet.
What's next?

The future

We have a way to go - but we are raising awareness, taking responsibility and staying focused.

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Women in__Tech

Raising the Standard

Internship

This year, Tampnet proudly offered international internship opportunities to two part-time employees—Lan Anh Tran and Hermund Johannessen—who both work as Operations Technicians in Stavanger while studying at the University of Stavanger (UiS).

They participated in a 4-week summer internship at our Network Operations Center (NOC) in Houston, USA. The experience was mutually beneficial, promoting knowledge-sharing and strengthening collaboration between our teams in Norway and the United States.

"*From the beginning, I was welcomed with great hospitality. It was a once-in-a-lifetime opportunity that helped me grow professionally and personally*," shared Lan Anh.

Hermund added, "*The generosity of the US team was incredible. I've learned so much and built strong relationships that now make daily collaboration more effective between our NOCs.*"

The internship program is designed to foster global teamwork, enhance technical skills, engage with customers in the Americas, and strengthen cross-cultural understanding. Operations Manager Shaun served as their mentor throughout the internship.

Images show Lan and Hermund being welcomed by the US teams for their internships

The World of Esport

Tampnet proudly joined the world of corporate e-sports by participating in the Haven Corporate League, a Counter-Strike tournament specifically designed for businesses. Representing Tampnet were Lan Anh Tran, Simon Østebø, Erlend Eiring, Daniel Wiken, Jan Erik Jensen, and Markus Granli—with enthusiastic support from Ruben Hundseid.

Demonstrating the same team spirit and dedication that define our workplace culture, the Tampnet e-sports team committed to regular training sessions to refine their skills and develop strategic gameplay. This initiative not only fostered companionship and engagement across departments but also highlighted the value of teamwork, discipline, and innovation in a digital environment.

DEI

What does DEI mean in Tampnet?

Diversity refers to the presence of a variety of different assets, such as people, cultures, perspectives, or characteristics, within a specific group, organization, or community. It encompasses the recognition and inclusion of differences, promoting a richer and more inclusive environment that can foster and enhance creativity, innovation, engagement, and a broader range of experiences and viewpoints.

Equity means ensuring that all individuals have equal access to opportunities and resources, regardless of their background, characteristics, or circumstances. It focuses on addressing historical and systemic disparities to create a level playing field and promote fairness, enabling each person to reach their full potential within a diverse environment.

Inclusion refers to the practice of actively involving and embracing individuals from various backgrounds, demographics, and perspectives within a group, organization, or community. It goes beyond mere representation and ensures that all individuals feel valued, respected, and empowered to contribute their unique talents and insights, creating a more equitable and welcoming environment.

Our Commitments

We are committed to building and fostering a diverse, equitable, and inclusive workforce where all individuals are recognized. We do this for our people, our customers, and for society. We truly believe that by collaborating with people from different backgrounds and with different experiences, we drive the innovation which is essential for our future growth.

Our Ambitions

We recognize that diversity encompasses a broad range of characteristics, including cognitive perspectives, education, work experiences, personal life experiences, race, gender, ethnicity, sexual orientation as well as many more. Employees with diverse backgrounds will inevitably bring a wider range of perspectives, ideas, and experiences to an organization and bring great value.

We work systematically with this initiative, and we take responsibility for the goals we have set. We strive to make active and positive changes in all these areas and have identified crucial areas where we can impact major change: nationalities, gender and generations.

Pride

June 2024 marked Pride Month - a time to celebrate the LGBTQ+ community, recognize their accomplishments, and honour those who continue to champion equal rights around the world. As part of our ongoing DEI commitment, Tampnet once again showed its support by highlighting the importance of inclusion and belonging in the workplace.

We continued our tradition of supporting Amnesty International and their work for

equal rights by making rainbow bracelets available for employees. These bracelets, a symbol that love is a fundamental human right, were distributed across offices for employees to take and wear proudly.

To foster a sense of community and celebration, we also shared Pride-themed cupcakes across our office locations, giving teams an opportunity to come together, reflect, and enjoy a treat in the spirit of inclusivity.

We remain committed to visibility and awareness through meaningful gestures that reflect our values and continued support for the LGBTQ+ community.

Culture Training

As part of our ongoing DEI program, we launched dedicated training to further promote awareness, understanding, and inclusive behaviours across the organization. Topics included an introduction to DEI, understanding bias and stereotypes, cultural competence, and inclusive leadership. This training was made available to all employees and is also incorporated into our new hire onboarding program to ensure a consistent and inclusive foundation from day one.

What we measure

42% | of our Workforce is Norwegian

35% | of our Workforce is American

9% | of our Workforce is British

5% | of our Workforce is Dutch

5% | of our Workforce is from Various Countries
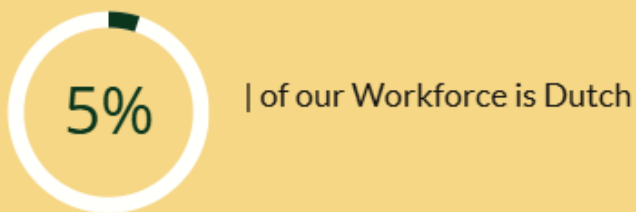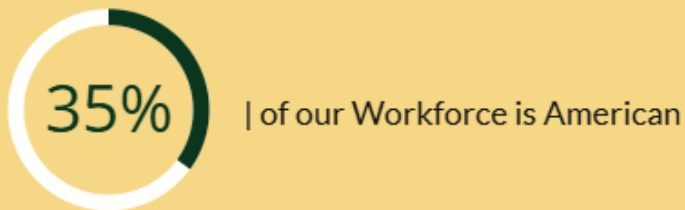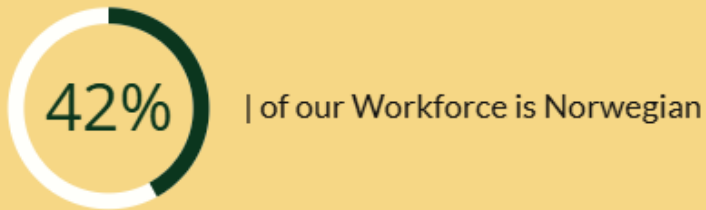
Nationalities

Gender

Generations

19% Women
82% Men

Generations In Tampnet

Boomers · Gen X · Millenials · Gen Z
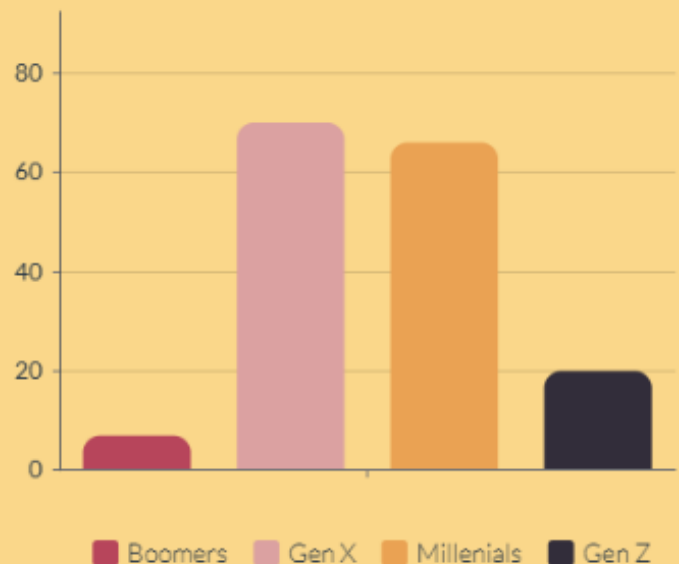
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Governance

Long-term value creation and sustainable business conduct are a result of strong corporate governance. This is recognized by the Board of Directors, which ensures that Tampnet is committed to the highest standards of corporate governance.

Tampnet's ***Corporate Governance Statement*** sets out the Corporate Governance structure of Tampnet which ensures that:

➢ The company has the understanding and prerequisites to fulfil promises and commitments to our customers, shareholders and employees
➢ Operational results correspond to decisions made and are structured to encourage all employees to strive, within set boundaries, towards the same goals
➢ There is a common, clear understanding of the company's purpose, values, roles, responsibilities and authority to act

The complete Statement is provided as **Attachment 1** to this ESG report.

VSME report

In line with Tampnet's continuous commitment to sustainability and transparency, our 2024 sustainability report has been prepared in accordance with the Comprehensive Module of the Voluntary Standard for non-listed Micro-, Small- and Medium-sized Undertakings (VSME). By selecting the Comprehensive Module, we aim to address the information needs of our various stakeholders, including customers, financial institutions, and other partners, in a more thorough manner.

This report will strive to provide a detailed overview of our initiatives, policies, and performance in environmental, social, and business conduct matters.

Basic Module

B1 – Basis for preparation

Tampnet has developed this ESG report in accordance with **OPTION B: Basic Module and Comprehensive Module** of the Voluntary Standard for non-listed Micro-, Small- and Medium-sized Undertakings (VSME).

No disclosures have been omitted as classified or sensitive information.

The ESG report has been prepared on an **individual basis** as the report is limited to the undertaking's information only.

The following information is provided in accordance with the VSME requirements:

      i. The undertaking's legal form: **Private company**

      ii. NACE sector classification code(s): **61:10**

      iii. Size of the balance sheet (in Euro): **920 864 608**

      iv. Turnover (in Euro): **135 923 422**

      v. Number of employees in headcount or full-time equivalents: **170**

      vi. Country of primary operations and location of significant asset(s): **Norway** (headquarters in Stavanger) with significant network infrastructure in the **North Sea** and **Gulf of America** (Gulf of Mexico).

      vii. Geolocation of sites owned, leased, or managed: **Stavanger, Norway; UK; the Netherlands; USA; Canada; Brazil; Mexico; and Trinidad and Tobago** and offshore network locations in the **North Sea** and **Gulf of America**.

Sites	Address	Postal Code	City	Country	Coordinates
Tampnet AS (office)	Hinna Park, Stadionblokk C, Jåttåvågveien 7	4020	Stavanger	Norway	58.914831765861095, 5.729672138565768
Tampnet Canada	130 Water street,		St. John's	Canada	47.566604353312194, -52.704825244108186
Tampnet Mexico	El Refugio Anillo Vial II Edificio Plaza Ubika Fray Junipero Sierra NO 9200	QRO 76146 Piso 7 Int 712 CP	Querétaro	Mexico	20.647861433488284, -100.34458620267425
Tampnet INC	24275, Katy Freeway, Suite 525	TX 77494	Houston	United States	29.784611676666056, -95.78969235183403
Tampnet Netherlands B.V	Neptunesstraat 29	2132 JA	Amsterdam	Netherlands	52.29540719029487, 4.703323542560678
Tampnet Sweden	Norra Sparvstyckevägen 5 B	CV72+R4	Skanör	Sweden	55.414672993841975, 12.850303427329871
Tampnet Telecom Do Brasil	Rua Lauro Muller, No. 116		Rio de Janeiro	Brasil	22.95698903188725, -43.176267276326264
Tampnet Trinidad & Tobago LTD	Biljah Road		Chaguanus	Trinidad & Tobago	10.533832234002002, -61.41238163515014
Tampnet UK LTD	1 Park Row		Leeds	United Kingdom	53.79726392608089, -1.5468188147909783
Tampnet Germany	Neulehenstrasse 8a	33790	Halle	Germany	52.04773803952252, 8.375006913716154
Tampnet Oceania	29 Station street	WA 6008	Subaico	Australia	-31.943720782963737, 115.82379723825277

B2 – Practices, policies and future initiatives for transitioning towards a more sustainable economy

2024	Do you have existing sustainability practices/ policies/ future initiatives that address any of the following sustainability issues? [YES / NO]	Are they publicly available? [YES / NO]	Do the policies have any targets? [YES / NO]
Climate change	YES	YES	YES
Pollution	YES	YES	YES
Water and Marine Resources	YES	NO	NO
Biodiversity and Ecosystems	YES	NO	NO
Circular Economy	Yes	NO	NO
Own Workforce	YES	NO	YES
Workers in the Value Chain	YES	YES	NO
Affected Communities	YES	NO	NO
Consumers and end-users	YES	NO	NO
Business Conduct	YES	YES	NO

Scope 3	2023 [tCO2e]	2024 [tCO2e]
Purchased goods and services	0.02	
Fuel- and energy related activities	49.57	43.18
Upstream transportation and distribution	10,302.94	658.13
Waste generated in operations	1.25	0.52
Business travel	231	38.66
Use of sold products	733.78	566.13
TOTAL	11,318.57 [tCO2e]	1,306.65 [tCO2e]

GHG-Emissions
(tCO2e)

	Purchased goods and services	Fuel- and energy-related activities	Upstream transportation and distribution	Waste generated in operations	Business travel	Use of sold products
2023	0	50	10,303	1	231	734
2024		43	658	1	39	566

■ 2023 ■ 2024
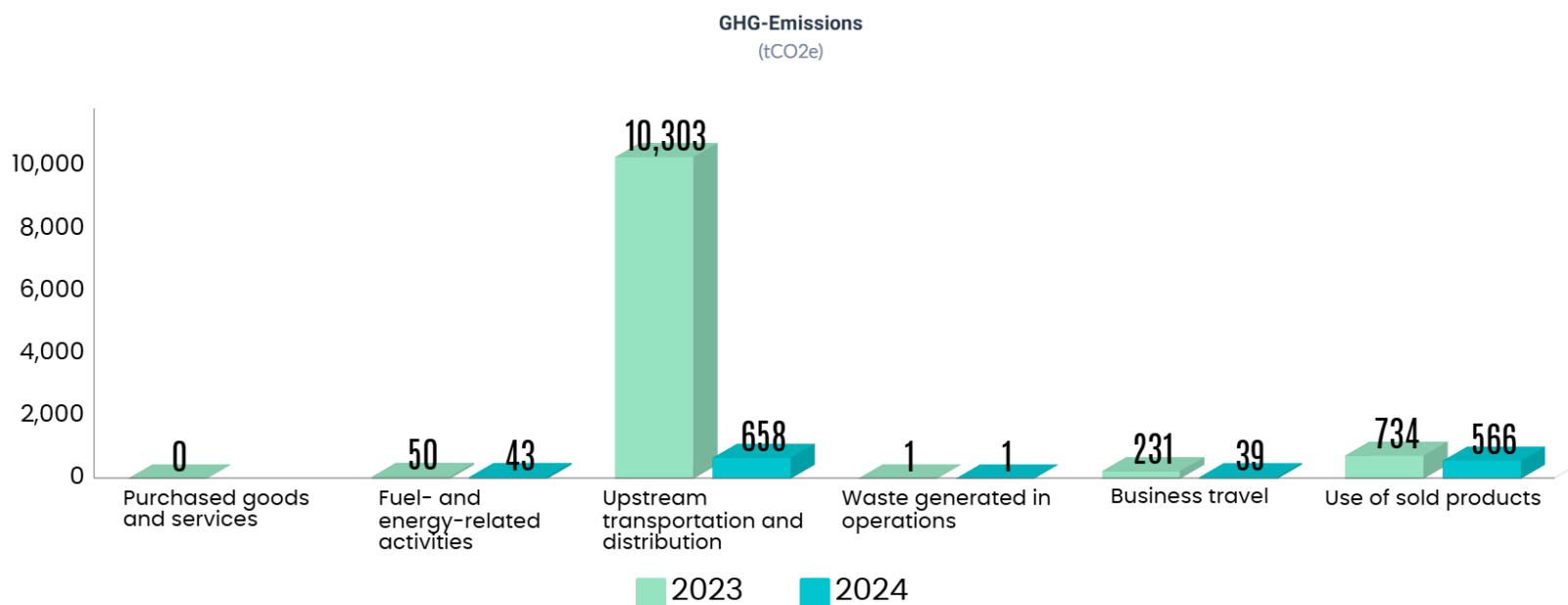
Reduce Emissions: Tampnet aims to reduce its own emissions and help clients reduce theirs by providing more efficient solutions, streamlined business processes, and improved sensor technology to reduce power consumption. Tampnet has a long-term vision of "giving back more than we take from the environment".

The large drop in emissions in Scope 3 "Upstream transportation and distribution" is related to the Norfest project, executed in 2023.

Focus on renewable energy and CCUS: Tampnet is capitalizing on new opportunities within aquaculture and the renewables landscape, including segments such as carbon capture utilization and storage (CCUS) and offshore wind. Solar panels have been installed at several landing stations to reduce the carbon footprint.

Technological advancements for efficiency and reduced impact: Tampnet is exploring the benefits of artificial intelligence (AI) for efficiency, economy, and innovation. The company also continues to reduce offshore travel and human exposure through autonomous operations, predictive maintenance, and increased use of digital use cases like robotics. The use of the Nexans Capjet system for the Norfest project ensured minimal disruption to the ocean's ecosystem.

Employee education and engagement: Tampnet has developed online introduction courses on ESG and Sustainability to educate employees. A sustainability competition is also being developed to encourage environmentally conscious behavior.

Sustainable procurement: When procuring cable ship services, emissions and the eco-friendliness of the vessel are part of the evaluation criteria.

Targets: A Double Materiality Assessment (DMA) was performed in 2024 in order to map ESG topics and set revised sustainability targets.

B3 – Energy and greenhouse gas emissions

2024	Renewable energy consumption (MWh)	Non-renewable energy consumption (MWh)	Total Energy Consumption (MWh)
Electricity (as reflected in utility	235.72	469.62	705.34
Fuels	1.45	93.31	94.76
Nuclear		59.07	59.07
Total	237.17	622	859.17

2024	GHG Emissions [tCO$_2$e]
Scope 1	**24.097**
Gasoline/petrol	18.855
Diesel	5.242
Scope 2	**111.133**
Electricity	73.221
District heating	37.912
Total	**135.23**

$$GHG\ intensity = \frac{gross\ greenhouse\ gas\ (GHG)\ emissions}{Turnover\ (in\ Euro)} = 0.0000009948984362680333$$

B4 – Pollution of air, water and soil

Pollutant	Emissions (kg)	Medium of release (air, water, soil)
CO2	416.964	Air

Tampnet's core business activities are not typically associated with high levels of direct environmental pollution. As a provider of offshore connectivity infrastructure and telecom services, Tampnet does not operate industrial production facilities or engage in processes that discharge significant volumes of pollutants into the air, water, or soil. Nonetheless, the company acknowledges that some of its operations—particularly the use of marine vessels for

subsea cable installation and maintenance—can contribute indirectly to pollution through fuel combustion and associated emissions, including particulate matter (PM), NO_x, and SO_2.

In alignment with its commitment to sustainability and regulatory compliance, Tampnet actively evaluates environmental impacts across its operations. Vessel contractors are selected not only on commercial and operational criteria but also based on environmental performance, including emissions profiles and fuel efficiency. While the company's emissions are largely captured under climate reporting frameworks (GHG Scopes), efforts are being made to integrate pollution-related data points where applicable.

Tampnet does not currently report quantified pollutant emissions into air, water, or soil as part of an Environmental Management System (EMS) or through legal requirements under the Industrial Emissions Directive (IED), as the nature of its operations do not fall within typical industrial emission categories. We do however include the CO2 equivalents in our Scope 3 reporting, under the category "Upstream transportation and distribution".

Tampnet is a member of the Atlantic Cable Maintenance Agreement (ACMA), an organization that is jointly run by a number of submarine fibre cable owners in and around the Atlantic Ocean. For 2024, Tampnet cables accounted for about 2,5% of all of the cables protected by ACMA and Tampnet pays a corresponding share of the costs of running and maintaining 2.5 cable ships (two permanent, one ship on a 6 month charter) in the Atlantic Ocean which are contracted by ACMA on a 24/7/365 basis. For our ESG reporting, we have assumed a similar 2.5% share of the ACMA emissions.

B5 – Biodiversity

Tampnet conducts environmental impact assessments before infrastructure deployment in ecologically sensitive offshore areas. Our subsea cable routing avoids protected habitats and migration corridors. In 2024, no reported incidents of negative biodiversity impact were recorded.

Given Tampnet's offshore operations, biodiversity considerations are primarily related to subsea environments. The deployment of subsea cables may intersect with marine habitats, although such installations are typically non-invasive and subject to regulatory approvals. Tampnet is committed to minimizing disturbance to marine ecosystems and adheres to local and international environmental guidelines during the planning and execution of subsea projects.

The company conducts environmental impact assessments (EIAs) as part of large infrastructure projects and engages proactively with relevant authorities to secure all necessary permits.

Projects like Norfest have demonstrated Tampnet's ability to balance commercial objectives with environmental stewardship, installing over 750 km of cable without any recorded material ecological disruption. Approvals were sought from 21 local government agencies, 6 central ministries, 5 non-governmental organizations and 5 national parks.

Tampnet understands that preserving biodiversity is essential not only for ecosystem health but also for long-term business continuity in sensitive regions such as the North Sea and the Gulf of America.

B6 – Water

Tampnet's business model involves limited direct water consumption, as its core operations are digital and offshore connectivity services. Water use primarily arises from administrative office activities and operational support vessels used for subsea cable installation. The company does not operate in water-intensive industries nor in regions currently classified as high water-stress zones. Nonetheless, Tampnet recognizes that responsible water stewardship is part of its broader sustainability commitment. Awareness initiatives targeting water-saving behaviors in offices are encouraged, and the company complies with all local regulations concerning water use and discharge from maritime operations. Total estimated consumption in 2024 was below 5,000 m³ with no environmentally harmful discharges.

B7 – Resource use, circular economy and waste management

Location	Total waste (T)	Recycling rate	Hazardous
Tampnet Inc	39,08	9%	0%
Warehouse US	35,38	2,47%	0%
Tampnet AS	3,16	67%	0%
Warehouse NO	4,14	40%	0%
Total	**81,76**	**14%**	**0%**

Tampnet is committed to supporting a circular economy by promoting efficient use of materials and responsible waste management practices. While the company's material footprint is relatively small compared to traditional manufacturing sectors, Tampnet integrates sustainability considerations into procurement and project design, especially when selecting equipment and vessels.

Where possible, Tampnet promotes the reuse and refurbishment of telecom components and

responsibly disposes of electronic waste. Furthermore, suppliers are evaluated not only on technical and financial criteria but also on environmental policies and circular economy alignment. Our main supplier of telecom equipment is compliant with the EU WEEE Directive (Waste Electronic and Electrical Equipment). In line with the principles of circular economy, end-of-life determination by our customers does not necessarily reflect a true end-of-life situation, where the product may still be able to be re-used, re-purposed or re-sold, through partners.

Tampnet also maintain employee initiatives and internal awareness programs which emphasize recycling, digitalization to reduce paper use, and sustainable office practices.

A comprehensive waste report with full breakdown of waste categories is maintained for relevant locations.

B8 – Workforce – General characteristics

Type of contract	Number of employees (headcount or full-time equivalents)
Temporary contract	1
Permanent contract	169
Total employees	170

Gender	Number of employees (headcount or full-time equivalents)
Male	138
Female	32
Other	-
Not reported	-
Total employees	170

| Country (of employment contract)	Number of employees (headcount or full-time equivalents)
Norway	87
United Kingdom	14
Netherlands	16
Sweden	1
Germany	1
USA	50
Canada	-
Brazil	-
Mexico	-
Trinidad and Tobago	1
Total employees	170

Employee turnover rate	9.1%

Tampnet has a total of 170 employees, with employment contracts being almost exclusively permanent – only one temporary position was held in 2024 to cover for paternity leave. Women represent 19% of the workforce and 11% of management roles. Employment contracts span across offices in Norway, the UK, the Netherlands, the USA, Sweden, Germany, and Trinidad and Tobago.

B9 – Workforce – Health and safety

2024	Work-related accidents
Number of work related accidents in the reporting year	0
Total number of hours worked in a year by all employees	325 210
Rate of recordable work-related accidents	**0**

The health and safety of employees is critical to Tampnet and an integrated element of all company planning and operations.
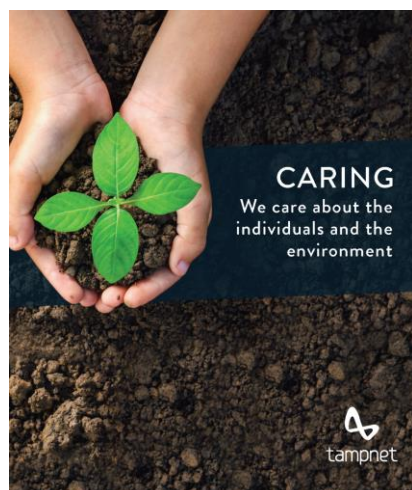
One of our core values is CARING- we care about the individuals and the environment. This value is expressed through the work we do every day to keep employees safe and healthy. All offshore projects were completed with a focus on safety and with zero injuries to personnel. Tampnet emphasizes a healthy working environment through global initiatives, offering yearly health screenings and gym memberships. Low-threshold company competitions like "Tampnet on the move" encourage daily activity.

Tampnet has a management system with internal control measures and risk assessments to identify hazards and environmental risks. A new reporting system is being implemented for early identification and follow-up of non-conformances and safety observations.

Our overriding target of Zero- 0 injuries to personnel and 0 environmental accidents or spills- was once again achieved for 2024. Over 300 000 manhours own manhours were spent without incidents.

B10 – Workforce – Remuneration, collective bargaining and training

Tampnet operates in an industry with highly qualified and competent personnel. Renumeration is provided according to current market trends which will always be well above minimum wage levels. Yearly salary adjustments ensure competitive and fair wages. The tech industry in general and specifically the offshore technology sector has a challenge related to gender, as the sector struggles to attract competent and motivated female employees. Tampnet's commitment to gender equality is evident through initiatives like the Women in Tech program and the goal of 25% women in management by end of 2025. Specific goals exist for recruitment, where female candidates are encouraged for all positions. Currently, 19% of Tampnet employees identify as female and the unadjusted pay gap in the company is at 27,9%.

Tampnet acknowledges the importance of established labor conditions, social welfare systems and established collective negotiation structures. Tampnet encourages personal development and training in the workplace and has developed a comprehensive competence management process. The intention is to facilitate innovation and growth, empower employees to capitalize on their unique strengths and skills and enhance efficiency and performance. The process includes setting specific KPI's for all employees which include targets for training, upskilling and career development. Tampnet has developed a series of Basic Training in all technical verticals, but also for non-technical topics such as Quality and Health & Safety. Internal webinars have been developed which include annual courses on a number of critical topics such as ESG, sustainability, business ethics and cybersecurity. All employees are covered by an individual training plan, which includes a competence analysis to identify the employee's possibilities of enhancing abilities and understanding in specific areas. Tampnet allocates a specific part of the budget every year to training and upskilling, where each individual role is provided with a dedicated annual amount.

B11 – Convictions and fines for corruption and bribery

Tampnet's dedication to fair and lawful business execution is expressed through our core value of "Integrity".
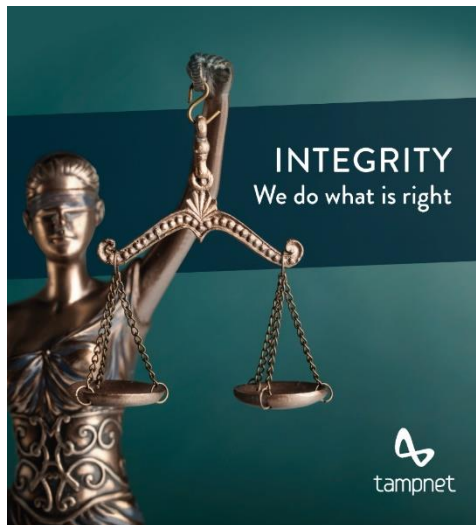
The company has developed a Corporate Governance Statement to ensure that promises and commitments are fulfilled. Furthermore, we have a zero-tolerance policy for corruption and bribery, guided by a robust Code of Conduct, with annual anti-corruption training and whistleblower mechanisms in place. A new, digital reporting solution for whistleblowing cases was introduced in 2024 as part of our continuous improvement efforts.

Comprehensive Module
Prepared in accordance with the VSME Comprehensive Module (C1–C13)

C1 – Strategy: Business Model and Sustainability – Related Initiatives:
Business Model and Strategy

Tampnet operates the world's largest offshore high-capacity communication network, providing low-latency and resilient connectivity to offshore and remote operations. Our business model is built on delivering critical telecommunications infrastructure and services to the energy, maritime, and offshore sectors, enabling real-time data flow, safety, and operational efficiency. The company leverages its infrastructure to support digitalization and automation across offshore industries, creating value through secure and reliable connectivity.

Our customers are mainly found in the energy industries, and Oil & Gas producers are still the largest client base. However, Tampnet has a strategic objective of diversifying its client base and are actively pursuing opportunities within more sustainable industries such as Carbon Capture, Utilization and Storage (CCUS), wind energy and offshore fisheries.

Tampnet operates in a number of geographies and maintains a comprehensive database of approved suppliers. The suppliers offer a diverse set of goods and services, ranging from off-the- shelf items to tailored products and manpower services. Over 2000 companies are currently approved as suppliers to Tampnet, with a large majority of these being low-risk providers of products and services. Over 90% are found in our core markets of the US, Norway and the UK. Suppliers of critical products and all offshore manpower providers are subject to a stringent approval regime, involving scrutiny by corporate functions such as legal, quality, HSE, cyber security and finance. These suppliers are also followed up more closely, by an internal owner responsible for the suppliers' performance on a number of parameters.

Tampnet recognizes its pivotal role in enabling the energy transition. We actively support sustainability by enabling offshore wind, CCUS, and greener oil and gas operations through enhanced digital monitoring and control capabilities. Our initiatives include reducing our own operational carbon footprint, increasing energy efficiency in our network operations, and collaborating with industry partners to drive innovation in sustainable offshore connectivity. Sustainability is integrated into our long-term strategy, aiming to support our clients in achieving their environmental and climate goals through technological empowerment.

Tampnet has a long-term ambition of "giving back more than we take from the environment". Our main contribution to this ambition is to provide our oil & gas customers with high speed, reliable and redundant communications, which in turn enables them to reduce their emissions

and environmental footprint. In addition, we focus on our own emissions and take active steps in reducing all aspects of our environmental footprint.

Tampnet is actively contributing to a more sustainable and low-carbon economy through internal improvements and by enabling green transformation in offshore industries. Sustainability is embedded into both operations and long-term strategy.

Current Practices and Policies

	Existing practices/ policies/ future initiatives	Future initiatives
Climate Change	**Energy efficiency:** Upgrading network infrastructure to low-consumption equipment, optimizing traffic management, and integrating renewable power sources. **Sustainable procurement** Suppliers are evaluated and prioritized based on environmental performance. **Infrastructure design** New infrastructure projects are assessed using sustainability criteria, including emissions.	**GHG accounting** Emissions tracking and reporting in accordance with GHG protocol standards **Materiality analysis** Identification of areas for emissions reductions in own operations and in the value chain. **Service provision** Supporting offshore wind and CCUS projects with robust, low-latency communications infrastructure. **AI-driven energy optimization** Investing in artificial intelligence to optimize network operations and reduce overall energy intensity
Pollution	N/A	N/A

Water and Marine Resources	N/A	N/A
Biodiversity and Ecosystems	N/A	N/A
Circular Economy	**Sustainable procurement** Suppliers are evaluated and prioritized based on resource use. **Circular economy implementation** Applying repair, reuse and recycling principles of network equipment to extend lifespan and reduce waste.	
Own Workforce		
Workers in the Value Chain	**Sustainable procurement** Suppliers are evaluated and prioritized based on social responsibility.	
Affected Communities	N/A	N/A
Consumers and end-users	N/A	N/A
Business conduct	N/A	N/A

C3 – GHG Reduction targets and climate transition:

As a project-driven organization, Tampnet's emissions will always be directly linked to project execution and magnitude, which will fluctuate year-by-year. Recognizing this, it has been challenging to confidently set a base year to represent our emissions rate, with an aim to reduce emissions annually. To include the volatile nature of project activities, Tampnet decided to define our emissions base year as the <u>average</u> of our first 3 years of emissions calculations: 2022-2024. This approach will allow us to include both a project-intense activity year (2023) and more "normal" years (2022 & 2024). This will more accurately reflect the activity level- and accompanying emissions- in a long-term perspective.

To minimize our own Scope 1 and 2 emissions we will seek to obtain efficiency gains through digital and predictive tools. We are continuously working to increase the share of renewables, both for electronic equipment offshore and for office and workshop electricity consumption. Tampnet is currently working on committing to a comprehensive emissions reduction plan, where the company will set measurable and aggressive targets in both a short-term and long-term perspective.

C4 – Climate risks:

Recognizing geopolitical and climate risks, Tampnet integrates sustainability into risk management frameworks. The company strengthens redundancy, digital infrastructure, and AI integration to manage operational disruptions and environmental impacts.

Tampnet has performed climate risk assessments with scenario analysis related to physical climate risks to ascertain the areas where Tampnet could potentially be more exposed in the future. The climate risk assessment was performed in compliance with UK's Financial Conduct Authority (FCA), which adopts the recommendations from the TCFD. Measures were identified to proactively mitigate potential consequences. A summary of the main findings is presented below.

| Type	Category	Sub-segment	Description	Short term		Medium/ long term		Potential impact
				Proba-bility	Value impact	Proba-bility	Value impact	
Risk	Physical	Acute	Antennas are exposed due to extreme weather conditions. Falling objects risk on offshore assets	Low	Low	Low	Low	Estimated 1MNOK per incident due to repair/ replacement (dropped antenna) Risk of reputational damage in case of incident (e.g if lack of routines, poor mounting, equipment failure)
Risk	Transition	Market	Decline in oil and gas exploration and production due to climate change	Very low	High	Medium	High	Loss of market and revenue
Risk	Transition	Market	Increased cost of raw materials/ telecom equipment	Low	Low	Medium	Medium	Increased cost of Tampnet services. Some leverage in transferring additional cost to customers, depending on contract T's & C's.
Risk	Transition	Policy & Legal	Enhanced reporting requirements and obligations	Low	Medium	Low	Low	Uncertainty on the volume of administrative burden and cost of financing due to taxonomy

							regulations and other possible regulations
Opportunity	Market	Increase our presence in the Renewable energy market by providing connectivity to Windfarms and CCUS	High	Medium	High	Medium	Assumption is 1MNOK in revenue per windfarm per year from windfarm operator and 2.5MNOK in revenue per carbon capture field + revenue generated by increased coverage area such as roaming, vessel/rig revenue and IOT opportunities
Opportunity	Products & Services	Ability to diversify business activities and development of new products or services through R&D and innovation: 1) Enabling digitalization for our customers by providing robust networks for remote operations; and 2) by providing sensor technologies 3) Exploring AI opportunities	High	Medium	High	Medium	Revenue is hard to assume since there will be many use-cases related to this. Inherent non-material value in developing new business streams and diversifying portfolio. Potentially also create new market opportunities outside traditional O&G customers

An extensive action list has been created, based on the assumptions and findings from the climate risk assessment. One example is the containment action related to the falling objects risk- this led to development of an *Antenna Maintenance Programme*. It is assumed that more extreme weather conditions will become more frequent, which can impact the physical equipment which Tampnet has positioned offshore- specifically antennas on offshore installations. Because of the increased risk of falling objects due to more extreme weather conditions, Tampnet developed the *Antenna Maintenance Programme,* where all relevant equipment is subject to a more rigorous inspection scheme. Antennas are scrutinized for wear and tear, corrosion and effects of weather conditions at regular, planned intervals.
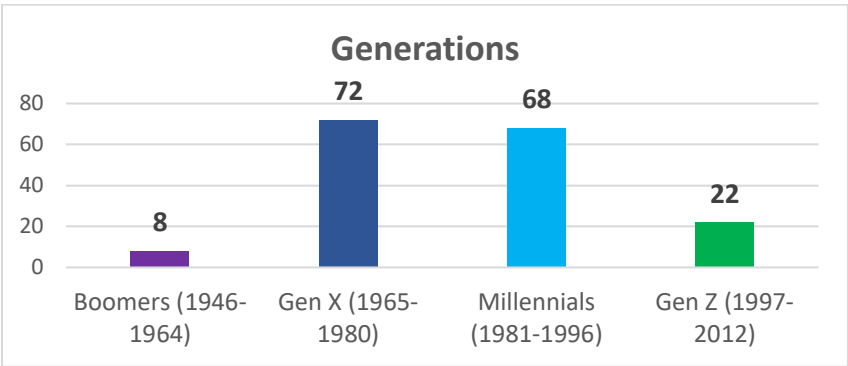
Tampnet is committed to fostering a diverse and inclusive workplace with a strong focus on gender equality. Through several Diversity, Equity and Inclusion (DEI) initiatives, Tampnet seek to promote an organizational framework to ensure the just treatment and full participation of everyone. Through active promotion of the "Women in Tech" programme, we strive to ensure women's full and active participation, along with equal opportunities for leadership and contributions in technology. Achieving gender equality is integral to creating a balanced and thriving professional environment, and Tampnet maintain specific goals related to gender equality – both for management positions and for the company in general.

Company gender balance & targets:
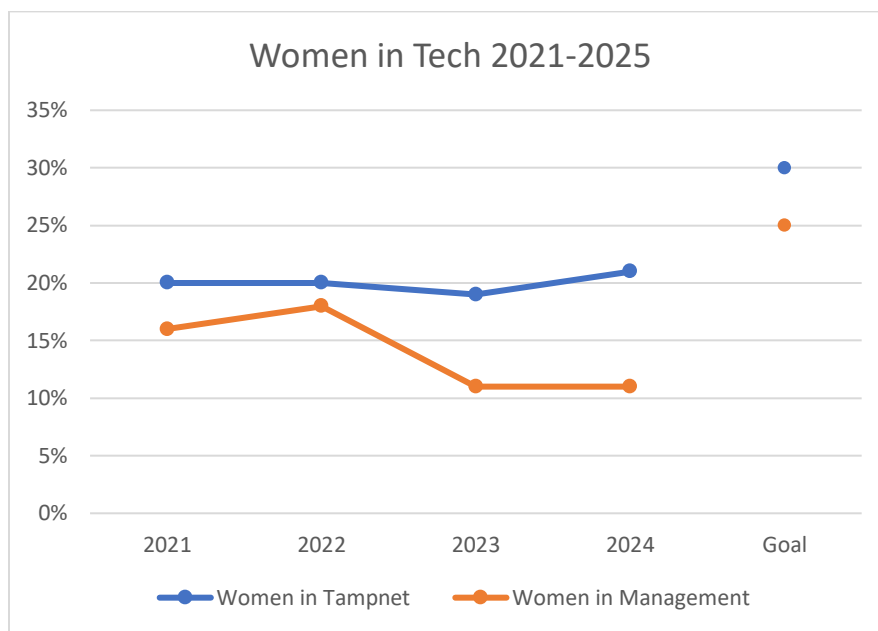
Tampnet also track and monitor the age composition of the company. Age diversity can ensure the collaboration of talented people across age groups and may also boost creativity among employees. Perspectives diversity is also more common and there are benefits from mutual learning and understanding.

Company generations overview:

Generations

80	
60	72 68
40	
20	8 22
0	

Boomers (1946-1964) Gen X (1965-1980) Millennials (1981-1996) Gen Z (1997-2012)

Employees at Tampnet are almost exclusively full-time staff, with some exceptions made to cover for parent leaves. There are 30 nationalities working for Tampnet, and employees are given a large degree of flexibility in working arrangements – some employees work from their home, whilst others enjoy a mixture of office and home office.

C6 – Additional own workforce information – Human rights policies and processes

Tampnet respects human dignity and supports the principles of the Universal Declaration of Human Rights. The company operates clear policies for anti-corruption, bribery, human rights, diversity, and discrimination. Tampnet also has an Ethical and Compliance Framework that is reviewed annually by the Board. We view child labor as unacceptable and avoid suppliers who allow this.

Tampnet will not accept any discrimination based on sex, race, religion, sexual orientation, age, ethnicity, or political opinion, the company also has a diversity policy.

Tampnet has systems and processes in place to ensure all employees can execute their work in a safe and healthy working environment. A risk management framework is maintained to keep exposure and risk as low as reasonably practicable (ALARP). A "zero" mindset is implemented in all employees, and there have been zero employee injuries for several years.

Tampnet has a human rights policy covering child labor, forced labor, human trafficking, discrimination and accident prevention. Tampnet also has a complaints-handling mechanism for its own workforce.

As part of our commitment to DEI and employee well-being, we are proud to see a strong, supportive community at Tampnet that promotes a culture of respect and strives to create a bully-free environment. In 2024, we established a process for the reporting, investigation, and resolution of bullying and harassment cases. Pulse surveys, executed twice every year, are an

anonymous arena for employees to speak freely about their experiences in the workplace. A new reporting system for quality- and safety cases was also introduced in 2024.

C7 – Severe human rights incidents

Tampnet experienced zero incidents related to child labor, forced labor, human trafficking or discrimination in 2024.

Tampnet maintains a comprehensive supplier process to ensure human rights alignment in the companies which are approved suppliers to Tampnet.

C8 – Revenues from certain sectors and exclusion from EU reference benchmarks

Zero revenue was derived from the following sectors:

- Controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons).
- The cultivation and production of tobacco.
- Fossil fuels (coal, oil and gas) sector (exploration, mining, extraction, production, processing, storage, refining or distribution, including transportation, storage and trade).

While no revenue is derived directly from the exploration and production of oil and gas, many Tampnet's clients are found within the fossil fuel sector. Approximately 60% of company revenue is derived from oil & gas companies, with a further 20% coming from other companies which support the same sector- such as rigs, PSV's etc. Tampnet has a stated ambition to diversify its client base and are actively pursuing further opportunities within the renewable sectors such as offshore wind energy, CCUS and fisheries.

C9 – Gender diversity ratio in the governance body

Tampnet seeks to build a global, diverse and inclusive company culture and we endeavor to attract more woman to the industry. Specific gender goals are maintained for management positions and across the company. For Board positions, all 4 Board members identify as male.

Attachment 1

Corporate Governance Statement 2024 Tampnet Group ("Tampnet")

1 IMPLEMENTATION ON CORPORATE GOVERNANCE

Long-term value creation and sustainable business conduct are a result of a strong corporate governance. This is recognized by the Board of Directors ("The Board") who ensures that Tampnet is committed to the highest standards of corporate governance.

This Corporate Governance Statement set's out the Corporate Governance structure of Tampnet which purpose is to ensure that:

➢ The company has the understanding and prerequisites to fulfil promises and commitments to our customers, shareholders and employees.
➢ Operational results correspond to decisions made and are structured to encourage all employees to strive, within set boundaries, towards the same goals.
➢ There is a common, clear understanding of the company's purpose, values, roles, responsibilities and authority to act.

2 BUSINESS

Tampnet's business is defined in Tampnet's Articles of Association, which states that "The company's object is to own, operate and develop telecommunications networks and offer commercial telecommunication services based on these telecommunications networks."

The Board reviews Tampnet's operational goals and strategy annually, and business risks are assessed on a continual basis.

Tampnet has undertaken an ESG strategy program with measurable targets and reporting to secure that value creation for the shareholders is created in a sustainable manner.

3 ANNUAL GENERAL MEETINGS

The Annual General Meeting (AGM) is at the top of the corporate governance structure. The Board is responsible for ensuring that the AGM is a forum for communication between the shareholders and the Board.

The Financial Statement and the Report of the Board of Directors are approved at the AGM.

4 BOARD OF DIRECTORS

The Board of Directors is elected at the AGM. The Board of Tampnet comprises of the following four members:

Title	Name
Chairman Board of Directors	Magnus Manderson
Member Board of Directors	Alexi Kirilenko
Member Board of Directors	Oscar Tylegård
Member Board of Directors	Søren Karas
Member Board of Directors	Sottomayor, Bernardo

Tampnet's executive personnel do not take part as members of the Board.

The Board is responsible for the management of Tampnet, and the day-to-day management is delegated to the CEO.

5 THE WORK OF THE BOARD

The Board is responsible for supervising Tampnet's activities and the management of the group. The Board ensures that activities are performed in compliance with the Articles of Association, applicable licenses and permits, applicable legislation, and other obligations incumbent on Tampnet's activities, such as applicable company law.

The Board receives a high-level status update on compliance with laws and regulations, as well as internal guidelines and rules on an annual basis.

The Board also reviews and approves annually Tampnet's Ethical and Compliance Framework. To secure compliance with this framework throughout the group it is a requirement that training and testing of all employees on this framework is performed at least once a year.

The Board holds regular meetings. The meetings are held as physical meetings or as a digital conference. If necessary, extraordinary Board meetings are held between ordinary meetings. The day-to-day management has been delegated to the CEO who is responsible for the operational management of Tampnet. Elie Hanna has been CEO of Tampnet since September 2021.

To improve board work efficiency, the Board has appointed a Remuneration Committee and an Audit Committee. The Committees prepare recommendations for the Board and make proposals on matters that require the Board's approval. The Committees also continuously give reports to the Board in relation to its work.

6 REMUNERATION COMMITTEE

The Remuneration Committee, among other things, assists the Board by preparing proposals on remuneration and monitor and evaluate on a regular basis the structures and levels of remuneration for the CEO, other members of the group Executive Management, as well as the current remuneration structures and levels in the company.

7 AUDIT COMMITTEE

The Audit Committee is appointed by the Board of Directors to support the Board in fulfilling its oversight responsibilities for the financial reporting, the systems of internal control and risk Management and the audit process.

The Audit Committee receives reports on the work of the external auditor, as well as updates on financial results and the status of different compliance programs that are relevant to Tampnet's risk management and internal control system.

8 EXECUTIVE LEADERSHIP TEAM

The CEO is responsible for Tampnet's business development and leads and coordinates the day-to-day operations in accordance with the Board's instructions for the CEO and other decisions made by the Board.

Following the employment of the group's new CEO in September 2021 a reorganization was implemented spring 2022 and the Executive Leadership Team now comprises of:

Title	Name
Chief Executive Officer	Elie Hanna

Chief Financial Officer	Ulf Bonnevier
Chief Technology Officer Infrastructure	Anders Tysdal
Chief Technology Officer Mobile Technology	Arnt Erling Skavdal
Chief Commercial Officer	Trygve Hagevik
Chief People Officer	Hilde Mattingsdal
Chief Legal Officer	Christian Grinde
Vice President & Head of North Sea Unit	Per Atle Sørensen
Vice President & Head of Carrier Unit	Cato Lammenes
VP Global Delivery and Operations	Danish E Khawaja
Director & Head of Gov. Solutions & Digital Transformation	David Heximer
Director & Head of GRC & CISO	Endre Kjærland

9 BUSINESS REVIEWS

The CEO sets goals for the operations based on the direction of the Board.

To ensure performance, managers have annual targets for their respective operation. The plan for each unit is followed-up in business review meetings held on a monthly basis and includes financial and operational reviews for the reporting period. The business reviews allow for frequent follow-up of operational key performance indicators (KPIs) on country and business unit level. The operational KPIs are a key part of the follow-up and consist of several measurements that give management a good overview of current state and progress over time.

The Board receives reports on operational performance monthly, and at each ordinary board meeting, the group's operational and financial performance is presented in detail by the CEO and the CFO, respectively.

10 ETHICAL AND COMPLIANCE FRAMEWORK

Tampnet is committed to acting with integrity in all business relations, believing that adherence to high standards of ethics and compliance is not a single event but an important part of its daily business practices.

Tampnet's Ethical and Compliance Framework is reviewed annually by the Board and includes the controlling documents as listed here below. The framework sets out guidelines applicable to all employees and any persons representing Tampnet. To ensure adherence and understanding all documents are stored and published in a common database available to all employees, and all employees are trained and tested in the framework once a year.

The Corporate Social Responsibility Policy has been incorporated into the Ethical and Compliance framework for annual review starting in 2025. The policy has been updated to include new provisions on Human Rights, Transparency, Anti-Competitive Behavior, Compliance Training, and Reporting. Minor amendments have also been made to the Code of Conduct to reflect these updates.

Controlling document	Description
Anti Bribery and Corruption Policy	Sets the standard for ethical business practices throughout the operations.
Anti-Fraud Management Procedure	Purpose to prevent, disclose, and track deliberate infringements of capital-market provisions and other breaches of law by Tampnet, its employees or third parties aimed at causing financial damage to Tampnet or having this effect.
Authority Matrix	Delegation of obligations and authority.
Code of Conduct	Sets out the Tampnet way of doing by defining a common ethical compass setting clear standards and expectations on how to act and helps in recognizing that doing business with integrity is a shared responsibility.
Preventing Tax Evasion Policy	Purpose to ensure that the company apply preventive tax evasion activities and guidelines within the Tampnet-organization and that Tampnet avoid being part of tax evasion
Whistle Blower Procedure	Ensures that concerns about Tampnet's accounting, auditing, internal controls, ethical matters, or breach of statutory provisions (violation of the law) can be raised to the highest level of Tampnet and that such concerns if desired may be submitted anonymously.
Corporate Social Responsibility Policy	To guide responsible, sustainable, and ethical business practices that create value for owners, stakeholders, and society, based on the principles of ISO 26000.

11 RISK MANAGEMENT AND INTERNAL CONTROL

Tampnet has an established risk management framework in place to regularly identify, analyze, assess and report business, financial as well as ethics and sustainability risks and uncertainties and to mitigate such risks when appropriate.

Following Tampnet reorganization in 2022 two new fora's have been established:

➢ Corporate Governance and Risk Forum
- Members – Executive Leadership Team
- Director and Head of GRC & CISO chair the forum

- ➢ Corporate Compliance Forum
  - ▪ Members - Group QHSE Manager, Director and Head of GRC and CISO, CFO, CLO, Director and Head of Government Solutions & Digital Transformation, CTO of Infrastructure, CTO of Mobile Technology
  - ▪ Director and Head of GRC and CISO chair the forum

The fora convene each on a quarterly basis and are tasked to follow up on the group's risk management framework and general compliance.

12 REMUNERATION OF THE BOARD OF DIRECTORS

The remuneration paid to the Board members is decided at the Annual General Meeting. The notes of the Financial Statements provide information on the remuneration for the applicable year.

13 REMUNERATION OF EXECUTIVE PERSONNEL

The remuneration paid to executive personnel is decided by the Board of Directors. The notes of the Financial Statements provide information on the remuneration for the applicable year.

14 EXTERNAL AUDITOR

EY is Tampnet's auditor. The auditor attends one Board meeting each year, where Tampnet management is not present. EY participates in meetings where the Board considers the financial statements and meetings of the Audit Committee.