

Statement 2025

Norwegian Transparency Act (the “Act”)

Tampnet AS (org. no. 983 991 742) – reporting period 1 January to 31 December 2025

1. Introduction

This Statement has been prepared in line with the requirements of the Act relating to enterprises' transparency and work on human rights and decent working conditions. It covers Tampnet AS and the financial year 1 January to 31 December 2025, and describes the due diligence carried out during that period as well as relevant measures implemented or decided up to the date of this Statement.

The registered office of Tampnet AS ("Tampnet") is Hinna Park, Stadionblokk C, Jåttåvågveien 7, 4020 Stavanger, Norway.

Tampnet is a privately owned international telecommunications provider operating in the North Sea and is part of the larger Tampnet Group, which has similar operations in other parts of Europe, in the US and in Latin America.

Tampnet shall be, and is, a promoter of a culture which has respect for fundamental human rights and decent working conditions. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard these values in our own business as well as within our supply chain and towards our clients. The Tampnet Group recognizes its responsibility to contribute to the global efforts to achieve the Sustainable Development Goals of the United Nations, and the culture of our group is anchored in and starts with our owners, our Board of Directors and our top management.

2. Structure

Tampnet's ultimate owners are the Danish pension fund ATP and the private equity firm 3i, the latter being listed on the London Stock Exchange. The policies, procedures, and systems described in this Statement have been adopted by Tampnet, and the Tampnet Group's Ethical and Compliance Framework is reviewed and approved annually by the Board of Directors, most recently in June 2026.

3. Operations

Tampnet was founded in 2001 in Stavanger, Norway and the Tampnet Group now operates the world's largest offshore high-capacity communication network, serving customers within oil &

gas, wind energy, carbon capture and storage, maritime and carrier sectors with telecommunications services.

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/5G LTE coverage networks enabling roaming and the digital transformation and internet of things (IoT) on offshore oil and gas platforms, offshore windfarms and service vessels and other commercial vessels.

4. Standards, procedures and processes

Tampnet is certified to the ISO 9001 standard and thus has a management system, and way of working, which is risk based and focused on continuous improvement.

The primary policies and procedures which guide and support our approach to human rights and decent working conditions are:

4.1 Code of Conduct

As stated in the Tampnet Group's Code of Conduct, we are committed to respect all internationally recognized human rights and we will conduct our business consistent with the United Nations Guiding Principles on Business and Human Rights. The general expectation is for suppliers and business partners to comply with applicable laws, respect internationally recognized human rights, including the right to freedom from slavery, human trafficking, servitude, or forced labour, and to be compliant with the Tampnet Group's ethical requirements, when working for or together with us.

4.2 Tampnet's Human Rights Policy

As announced in our previous Statement, Tampnet developed a standalone Human Rights Policy during autumn 2025. The policy was approved in January 2026 and replaces the former Corporate Social Responsibility Policy. It commits Tampnet to respect human rights consistent with the UN Guiding Principles on Business and Human Rights and the International Bill of Human Rights, and applies to all employees and contractors, all business operations worldwide and all suppliers and partners. The policy sets out our commitments on non-discrimination, a safe and healthy workplace, fair employment (including a strict prohibition of child labour, forced labour and human trafficking, and respect for the right to form and join trade unions), privacy, due diligence and risk management, supply chain responsibility, training, grievance mechanisms and Board oversight. The policy is reviewed and approved annually by the Board of Directors.

4.3 Tampnet's Whistleblowing Policy

Provides a mechanism through which employees, consultants, former employees, job applicants, suppliers, business partners and other stakeholders can raise concerns about suspected misconduct, including breaches of the Code of Conduct, human rights or decent working conditions, unethical conduct or violations of law, with protection against retaliation. Concerns can be raised through line management, senior management, the CEO, the CFO or the Chairman of the Board.

4.4 Tampnet's Supplier Approval and Evaluation Procedure

Tampnet operates a supply chain policy, pursuant to which we conduct an evaluation of all suppliers before allowing them to become an approved supplier. Where appropriate, we also conduct on-site audits which include a review of the supplier's working conditions. Our internal processes and governing documents require that our suppliers respect and commit to implement Tampnet's Code of Conduct and Human Rights Policy or alternatively an internationally recognized standard of equivalent or higher standard within the areas of human rights, anti-corruption, environment and labour, such as, but not limited to, the United Nations Global Compact Principles. The Supplier shall require the Supplier Group and all sub-suppliers and sub-contractors to implement similar rules and as appropriate pass on such requirements to their sub-suppliers and sub-contractors and so on.

4.5 Organizational Pulse Survey

Tampnet has for several years performed a pulse survey amongst its employees. The pulse surveys are anonymous, conducted twice a year and covers topics such as employee well-being, company culture and organizational performance. By conducting the surveys, the goal is to give our employees an anonymous arena to speak freely and openly about how they are experiencing Tampnet. Leaders are expected to share their team-specific results and create a customized action plan to be implemented throughout the year. The pulse survey also results in an action plan on company level which is followed up by the executive management and reported on to the Board of Directors. Tampnet will from 2026 reduce the number of pulse surveys from two to one.

4.6 Training

All Tampnet employees are on a yearly basis required to undergo training and testing in Tampnet's Ethical and Compliance framework.

Following the adoption of the Human Rights Policy, the annual training programme has been extended to cover the policy and employees' responsibilities for respecting human rights and decent working conditions.

5. Human rights risks

For the purpose of preparing this Statement, Tampnet has assessed actual adverse impacts and significant risks of adverse impacts on fundamental human rights and decent working conditions in its own operations, its supply chain and its business partners for 2025. The assessment is based on our supplier approval and evaluation process, the Group's enterprise risk assessments and risk factors relating to sector, product and geography.

5.1 Assessment and description of the human rights risk in own operations

In our operations, we do not utilize forced or compulsory labor. All of our employees are above the legal employment age in Norway and are recruited and provided with working conditions and the payment of wages and benefits that comply with applicable laws and regulations.

Our operations require deep technical skills and the majority of our employees are higher-skilled professionals and trained labor with technical degrees, including from scientific and engineering disciplines.

Our own operations are mainly carried out in countries with strong protection of labour rights, including Norway, the United Kingdom and the United States. The most relevant risks in our own operations relate to health, safety and working hours for personnel working offshore and in the field, which are managed through our ISO 9001 management system and HSE procedures. The Group's expansion into Latin America increases our exposure to jurisdictions with a higher general risk of human rights violations, and entry into new markets is therefore subject to risk assessments supported by external legal advisers. The full policy framework will also be subject to a full review in 2026 to mitigate this risk.

No actual adverse impacts on fundamental human rights or decent working conditions were identified in our own operations in 2025.

5.2 Assessment and description of the human rights risk in supply chain

As outlined in the Supplier Approval and Evaluation Procedure described earlier in this Statement, all suppliers are assessed prior to being approved, and approved suppliers are subsequently re-evaluated on an annual basis. Tampnet expects the same high standards from our suppliers as we apply to ourselves. As a general practice, our client and supplier contracts include provisions requiring all parties working for or with Tampnet to comply with all applicable laws and regulations, and to refrain from any conduct that conflicts with human rights.

5.3 Actions taken to address human rights risks

We maintain a commitment to safeguarding the health and security of our employees and the public, responsibly managing our social impacts, and upholding respect for human rights in our operations. It is our policy to comply with all applicable laws and regulations, including those related to employment, safety, security, health and the environment.

In 2025, Tampnet updated its Corporate Social Policy to strengthen its focus on human rights, transparency, anti-competitive behavior, and compliance training and reporting.

As part of the Board's 2025 annual review of the Group's Ethical and Compliance Framework, it was decided to develop a standalone Human Rights Policy. This work was carried out during autumn 2025, and the Human Rights Policy was approved in January 2026 (see section 4).

Tampnet remains committed to respecting human rights as a fundamental principle in our operations, reinforced through training and integrated into our policies and practices.

6. Information requests

Anyone may request information from Tampnet on how we address actual and potential adverse impacts on fundamental human rights and decent working conditions, in accordance with section 6 of the Act. Requests can be submitted in writing to info@tampnet.com.

Stavanger, 22 June 2026



**Chairman Board of Directors
Tampnet AS**