



SUBJECT: DNOW Norwegian Transparency Act Statement

Reporting Year: 2024

Owner: Director of
Corporate Compliance

This statement applies to NOW Norway AS, its affiliates, and subsidiaries (collectively referred herein to as “DNO”) and is made pursuant to Section 5 of the Norwegian Transparency Act (2021) (herein referred to as “the Transparency Act”). DNO is a leading global stocking supplier of energy and industrial solutions, products, and engineered equipment packages. We provide an extensive selection of pipe, valves, and fittings, in addition to supplies, and products to the energy and industrial markets worldwide. We have a network of locations spanning over 20 countries, and our online digital channels give customers easy access to the products they need when they need them.

Pursuant to the Transparency Act, organisations which supply goods and services, carry on a business or part of a business in Norway, and holds sales revenues of NOK 70 million and a balance sheet total of NOK 35 million are required to publish a statement for each financial year. This statement represents the values and standards of the DNO Companies, as well as any affiliates or subsidiaries that may become integrated with DNO in Norway in the future. We strive to respect and promote human rights in accordance with all legal requirements and international human rights standards applicable to DNO, including but not limited to the United Nations’ Guiding Principles on Business and Human Rights and the International Labor Organization’s Forced Labor Conventions.

DNO actively monitors and enforces compliance with its ethical standards through the DNO Code of Business Conduct and Ethical Standards and the DNO Supplier Code of Conduct. These codes outline our expectations for responsible sourcing across our supply chain and strictly prohibit the use of child labor, forced labor, slavery, or human trafficking. All DNO employees are required to complete annual training on our Code of Business Conduct and Ethical Standards. The Supplier Code of Conduct applies to all first-tier suppliers, labor agencies, third parties, and in-house contractors doing business with DNO. We also ensure adherence to fair wage and hour laws in all our operations. DNO will not knowingly engage with any supplier or business partner who fails to meet these standards.

Our commitment to upholding fundamental human rights and ensuring decent working conditions, as well as preventing modern slavery, includes encouraging our stakeholders to report any suspected violations or concerns. These reports can be made through DNO’s anonymous Ethics & Compliance Hotline (visit [EthicsPoint Hotline](#) for applicable country dialing information) or via email to Risk.Mitigation@dnw.com. No reprisal or retaliation will be taken against any employee found to be raising concerns in good faith. DNO will investigate, address, and respond to the concerns of employees and will take appropriate actions as needed.

DNO will: (i) continue to hold suppliers and other business partners accountable for compliance with DNO’s human rights standards, (ii) as part of the tender process, requires suppliers and other business partners to confirm that they do not, nor will they in the future, support or knowingly do business with any other party involved in any act of slavery or human trafficking as defined in the Supplier’s Code of Conduct, and (iii) utilize the DNO Companies’ standard terms and conditions of purchase which specifically require suppliers and other business partners to comply with and enforce the Transparency Act and DNO’s human rights standards, as set forth in DNO’s policies. Failure of suppliers or business partners to provide the confirmation specified above or to comply with the DNO Companies’ standard



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terms and conditions of purchase may lead to the termination of business dealings with such suppliers and other business partners.

This statement has been approved by the board of directors of the DNOW companies, and the Compliance Departments of DNOW are responsible for oversight and implementation. This statement will be made available at <https://www.dnow.com> and is reviewed and updated as necessary (at least on an annual basis) to ensure that the statement is up to date with the current DNOW processes and controls.

Brittany Thigpen
Director of Corporate Compliance
DNOW

Ronny Wilthagen
Board of Director
NOW Norway AS