

# Due diligence statement

# Chevron's Fundamental Human Rights and Decent Working Conditions Commitments

# **Chevron Services Norway AS**

(company number: 921 526 016)

The Norwegian Transparency Act (2021) requires larger enterprises to account for their work related to due diligence. The law is designed to promote enterprises' respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services and ensure the general public access to information regarding how enterprises address adverse impacts on fundamental human rights and decent working conditions.

This statement is prepared by Chevron Services Norway AS (referred to as the **Company**) for the reporting period 1 July 2022 to 31. December 2022. Since the Norwegian Transparency Act came into force on 1 July 2022 and this is the company's first statement in accordance with this act, the reporting will also reflect the work conducted in 2023.

The statement is structured with each heading reflecting the specific requirements set out in section 5 of the Norwegian Transparency Act.

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### Structure and area of operations

Chevron Services Norway AS is an affiliate of Chevron Global Energy Inc (based in the USA) and is a part of the Chevron group.

The company does not have any employees but seconds personnel from various Chevron companies outside of Norway. Most of the staff in Norway reside in Oslo and there are some located in Egersund and Bergen. The majority of the staff residing in Norway reports to the Company's General Manager, or they have direct reporting lines to individuals in the Chevron company where they are employed.

The Company is engaged by Chevron group to monitor large upstream projects. The staff monitor the design and fabrication of large and complex equipment by Chevron subcontractors in Norway. The market the Company operates in is the oil & gas support services sector.

### **Guidelines and procedures**

Chevron Services Norway AS has approved the Company's guidelines, which includes the Group policies. The Company guidelines refer to the duties according to the Norwegian Transparency Act to ensure that the Company's work relating to fundamental human rights and decent working conditions is compliant with Norwegian legislation, as well as the Company's international obligations, as set forth in those guidelines.

As part of the Chevron group, Chevron Services Norway AS is committed to follow the Chevron group policies and guidelines. This includes the following (see added links for further information):

- <u>Chevron's Business Conduct and Ethics Code</u>: Includes the Human Rights Policy and includes commitments to uphold ethical business practices, including respect for labor rights. This code applies to all employees, directors, officers, contractors and suppliers.
- Chevron's Human Rights Policy: Establishes expectations for managing human rights, including forced labour, and Chevron's commitment to respect human rights as set out in the United Nations Universal Declaration of Human Rights, the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work as well as to adhere to the principles set out in the United Nations Guiding Principles on Business and Human Rights, the Voluntary Principles on Security and Human Rights, and the International Finance Corporation's Performance Standards. The policy includes compliance requirements, guidance on training, processes and procedures and tools.
- The Chevron Way: Describes Chevron's beliefs, vision, purpose and values. Chevron's purpose is to develop the affordable, reliable, ever-cleaner energy that enables human progress. Its vision is to be the global energy company most admired for its people, partnership and performance, and it aims to lead industry in health, safety and environmental performance. The protection of people, assets, communities and the environment is Chevron's highest priority.
- Chevron's <u>Operational Excellence Management System</u> (OEMS): A comprehensive system that helps identify risks and how to improve health, environment and safety performance. Chevron's management of human rights-related community issues are integrated into our <u>Operational Excellence Management System (OEMS)</u>. There are six OEMS focus areas. Our respect for human rights is reflected in all six of the OEMS focus areas. Furthermore, a global

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network of Qualified Social Facilitators (QSFs) is in place to lead social risk and impact assessments. These risk assessments allow Chevron to safeguard potentially impacted persons' rights and interests. Where further assessment is needed, Chevron teams can conduct stand-alone Human Rights Impact Assessments.

Chevron's Business Conduct and Ethics Expectations for Suppliers and Contractors: Chevron
expects its suppliers and contractors to respect human rights, align with applicable
international standards and adhere to the spirit and intent of our Human Rights Policy, as well
as our statements and guidelines relating to Indigenous Peoples, human rights defenders,
land tenure and water.

Chevron engages in various activities to identify, assess, and manage supplier risk, including those related to human rights and decent working conditions:

- Chevron's business units conduct health, safety, and environment (HSE) risk assessments prior to awarding supply contracts.
- Chevron also communicates annually with key suppliers, reiterating the importance of respecting human rights.
- Through Chevron's Contractor Operational Excellence Management (COEM) process, business unit HSE audit teams work with suppliers identified as having high operational excellence business risk which includes social and community risk, as well as, among others, potential human and labor rights impacts to increase accountability and continually improve their performance.
- Chevron's current standard contract provisions require contractors, suppliers, and service providers to comply with all applicable laws, which includes laws regarding slavery and human trafficking of the country or countries in which they are doing business.
- Furthermore, Chevron encourages our business partners, including business customers, or businesses with which Chevron is associated in a joint venture, partnership or other business collaboration, to:
  - Respect the spirit and intent of Chevron's Human Rights Policy, and statements and guidelines relating to Indigenous Peoples, human rights defenders, land tenure, and water.
  - Adhere to applicable international principles as set out in the United Nations Guiding Principles on Business and Human Rights, the Voluntary Principles on Security and Human Rights, the United Nations Universal Declaration of Human Rights, International Finance Corporation's Performance Standards and the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work.

Training on Chevron's Human Rights Policy is provided to the individuals and functions (including directors, officers and employees) we assess to be most likely to encounter issues related to human rights in higher-risk locations. Chevron's suite of human rights training, which addresses slavery and human trafficking issues, includes awareness-raising for employees and contractors, computer-based training for employees targeting key functions and regions, and ad hoc, location-specific training.



### Hotlines/Systems for handling complaints

The Chevron group has a Corporate Compliance Hotline. This is open 24/7, accessible in multiple languages and is available to employees, suppliers and contractors, as well as external stakeholders. The Hotline provides a direct, effective and risk-free way to report suspected violations of the Chevron Business Conduct and Ethics Code, company policies (including the Human Rights Policy and its prohibition against forced labour), and applicable laws or regulations.

### Conducted due diligence work

Chevron Services Norway AS' largest suppliers and business partners (based on payments) are other Chevron companies, as well as other suppliers that also have contracts with the Chevron group. Hence, these suppliers are part of the Chevron group due diligence assessment.

In addition, the Company has some Norway specific suppliers where the largest ones are large enterprises which also must comply with the Norwegian Transparency Act. These are currently viewed as lower risk companies, but the Company will make a continuous evaluation of whether further assessments are necessary and review their statements once published.

The Company does not have any direct suppliers in high-risk countries.

There is an ongoing process to assess the working conditions of Chevron staff residing in Norway. This entails mapping the staff's contracts, working hours, and general compliance with relevant regulations. Our preliminary assessment has not identified any actual adverse impact nor significant risk of adverse impact. This process is not yet finished and will continue through the end of 2023.

Furthermore, we are in the process of investigating incoming concerns from the Chevron's Corporate Compliance Hotline, for the specific purpose to review whether any results are relevant to the Norwegian business.

### Identified actual and significant risks of adverse impacts in the supply chain

As of today, our assessment has not identified any actual adverse impact in the supply chain relevant to the Norwegian business.

The Company follows Chevron's Operational Excellence Management System (OEMS), which is a risk-based and systematic approach to identifying, assessing, prioritizing and managing operational excellence risks across six focus areas: workforce safety and health; process safety, reliability and integrity; environment; efficiency; security; stakeholders.

Environment and stakeholder-related risks are managed through both the Environmental Risk Management process and the Stakeholder Engagement and Issues Management process. The types of risks captured includes, among others, social and human rights impacts. In addition, business units are required to maintain an operational-level grievance mechanism.

We are in the process of investigating to what extent these risks are relevant to the business conducted by Chevron Services Norway AS and how any such risks will be handled from a Norwegian perspective.



## Implemented measures and results

In addition to our measures described above, we will continue our due diligence-work regarding basic human rights and decent working conditions in connection with the production of goods and the provision of services that are relevant to the Norwegian business. If we identify any actual adverse impact and/or significant risks, we will update this assessment with implemented measures and results.

This statement has been adopted and signed by the board and will be made available at Chevon's website.

Signatures:

Luis Aguilar Jr

(Chairperson of the Board)

Luis Aguilar,

Alberto Montesi

(Board Member and General Manager)