

E Innovation AS - Transparency Act - Due Diligence Assessment - 2024

INTRODUCTION

E Innovation AS is the Parent Company of the E Innovation Group (E Property, E Plug, E Innovation Norge, E Innovation UK Ltd and Nitrogas). E Plug is the only stand-alone company the Transparency Act is applicable for. The performed Risk Assessment and this Due Diligence Assessment is applicable for all companies within the Group (hereafter E Innovation).

E Innovation was established in 2008, and has since then developed industry leading technology for the oil and gas sector. E Innovation is a fully owned Norwegian company which is steadily expanding its international presence. E Innovation has implemented a Quality Management System (QMS) on Parent Company level to ensure consistency over the Group and to ensure a common compliance with National and International laws, regulations, and standards.

EMPLOYMENT

All employees at E Innovation are treated fairly and equally and have equal opportunity to develop their skills and competence within the context of the various organisations in the Group and the products and services we deliver. All employees on all levels of the organization shall review and sign the Code of Conduct annually. The Code of Conduct forms the basis for how an E Innovation employee shall act and perform his/her duties. Any breach of the Code of Conduct requirements may lead to disciplinary actions and in worst case, termination of employment. Within the frames of the Code of Conduct is the right to speak up against injustice and illegal activity. E Innovation has implemented a system for speaking up (whistleblowing), both openly and anonymously.

SUPPLIERS

E Innovation's Key- and Critical suppliers are located within EU, USA and Canada, which in normal terms will mean that they are subject to strict national laws and regulations regarding environment, sustainability and governance. Still, it is E Innovation's duty, according to the Company's Code of Conduct and QMS to ensure that the Suppliers comply with these requirements. This process starts when a potential supplier is considered for future relations. Before entering an agreement with a supplier, a thorough due diligence process is performed. Based on the complexity of the delivery and the location of the supplier, the QMS have various parameters to evaluate the potential supplier against.

All Suppliers shall sign and accept E Innovation's Code of Conduct, and resign every 3 years. All Key- and Critical suppliers are subject to Supplier Quality Audits, performed on a 3-5 year interval. Code of Conduct compliance is always on the agenda during these Audits.

It is a clear and communicated requirement from E Innovation that its suppliers shall enforce E Innovation Code of Conduct through their supply chains.

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E Innovation acknowledges that labour laws and human rights track records are controversial in a very few of the Countries we operate. E Innovation will need to review the qualification process for both the existing suppliers (however small they may be) and potential new ones in those Countries. Qatar is one such Country.

NEW MARKETS AND NEW CUSTOMERS

As a supplier to the Oil and Gas industry, it is natural for E Innovation to look for new and emerging markets for further growth and development. E Innovation acknowledges the fact that some of these Countries have, from a Norwegian point of view, substandard labour laws and human rights track records. E Innovation will always, before entering such a market, perform a Management of Change and a thorough Due Diligence process.

In light of the current geopolitical situation, with a handful of Countries being subject to strict international sanctions, E Innovation will monitor the presence and the activities of existing and potential future business partner's activities in such Countries. A Management of Change and a thorough Due Diligence process will be performed before entering an agreement with a new multinational Customer.