

Norwegian Transparency Act Statement

Introduction

With reference to the Norwegian Transparency Act (Åpenhetsloven) section 5, the below statement outlines Repsol Norge AS (RNAS) policies and procedures to safeguard fundamental human rights and decent work conditions in connection with the production of goods and services.

The statement should be read together with the latest published:

- Code of Ethics and Business Conduct
- The annual Sustainability Plan
- Human Rights and Community Relations policy
- Suppliers Ethics and Conduct Code

All the above documents are available at www.repsol.no

Structure, business and supply chain

RNAS is a part of the international Repsol group with headquarters in Madrid and a total of 25,000 employees in over 20 countries. In Norway, RNAS has approximately 200 employees and is an operator on the Norwegian Continental Shelf on Yme, Blane and Rev fields. In addition, the company also holds interests in a number of non-operated fields with associated production facilities and intrafield pipelines including Gudrun, Veslefrikk, Visund, Mikkel and Tambar East.

Globally, and locally, adherence to international human rights standards including the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises is considered crucial. We commit to conduct continuous human rights due diligence in our activities. This means: identify and assess potential impacts of our activities on human rights before undertaking a new activity or business relationship, and when relevant operational changes occur; integrate the conclusions in Repsol's internal processes; take appropriate prevention and mitigation measures; monitor the effectiveness of the measures adopted; and externally communicate the measures adopted.

Our employees who interact with suppliers and contractors within the following departments: Supply Chain, Contract Owners and Management, go through extensive training and mandatory courses to enhance awareness and focus on fundamental human rights and decent work conditions. The courses include the following topics:

- o Human Rights
- o Code of Ethics and Business Conduct
- o Supplier Management
- o Microlearning Due Diligence
- o Conflicts of Interest/Compliance

There are also numerous policies employees must adhere to. Amongst others, and most relevant for the compliance with the Transparency Act, is our Labor Risk Evaluation, Risk Assessments Supply Chain Management and Procurements and Contracts. In addition, our supply chain department has its own procurement function procedure which describes risk assessment of the suppliers and contractors' integrity.

RNAS also has several vendor qualification systems and a tender/award system (Ariba) used for assessment of potential, new suppliers. The systems include a self-assessment questionnaire.

RNAS implemented measures

RNAS standard terms and conditions include a clear requirement for the contractor to comply with applicable laws, regulations and international conventions and our “Code of Ethics and Business Conduct” to ensure compliance with fundamental human rights and decent work conditions. Further, in order to be registered in the company's Procurement Management System, a supplier must have accepted the "Repsol's Suppliers Ethics and Business Conduct Code".

Actual identified or potential impacts on human rights and decent working conditions

This statement applies for the period 1 January – 31 December 2025. Through our due diligence process and assessments of new suppliers, RNAS has not had any incidents and has not identified any actual or potential negative impacts on human rights or decent working conditions in 2025.

This statement has been approved by the Repsol Norge AS board of directors on the 22nd of June 2026.