



Sekal AS Transparency Act Statement

This report covers the fiscal year of 2025.

1. INTRODUCTION

About Sekal

Sekal AS is an international technology company offering unique software systems and expertise to better simulate, analyze, control, and automate the drilling process primarily in the oil and gas industry but also in other industries like geothermic, water supply, earth science, carbon capturing where Sekal technology and know-how create value for clients.

Sekal has its headquarters in Norway (Stavanger) and an office in Scotland (Aberdeen). We have a multicultural working environment with employees from many different countries contributing to our success.

Sekal's Vision is: *"To be recognized as a global leader in advanced modelling and autonomous drilling"*.

Sekal's aim is to make drilling operations safer, more predictable, consistent, efficient and more cost effective by using digital technology and software in controlling and automating the drilling and well operations. Sekal has a unique track record from over 1500 wells globally showing reduced drilling costs and lower emissions.

Software that enables autonomous drilling operations is a major paradigm change that will structure and shape the drilling industry in the next decades. There is a growing demand for software and IT expertise as the world becomes ever more digitized. We believe that a good working environment with personal and professional development opportunities helps to attract and retain employees.

Sekal mainly supports operations in the oil and gas industry across the globe but also aims to reach projects related to sustainability such as carbon capture and storage.

Sekal solutions can save significant amounts of CO2 during drilling operations while also increasing personnel safety



Halliburton AS acquired Sekal in 2026.

CEO statement

I am pleased to present our 2026 human rights report as an overview of our commitment to human rights in our operations and business.

This report outlines the steps that we have taken to embed human rights into our business, including our supply chain, stakeholder engagement and human resources policies. It also highlights challenges that we face and the areas where we recognize that we can do more.

Thank you for your interest in our human rights commitment.

Sincerely,

Jarle Vaag

1. GUIDELINES AND ROUTINES

Sekal has conducted due diligence on human rights in our own company and our supply chain, evaluating impacts and significant risks of human rights violations. The main responsibility lies with our board of directors, and the day-to-day follow-up is managed by the general manager. Sekal has also engaged a third-party QHSE advisor to assist with this work, supported by relevant internal resources at Sekal.

To integrate the work with human rights and working conditions in our daily operations, we have established new internal policies and revised existing ones. Our framework for this work consists of the following Sekal procedures:

- QHSE Policy
- QHSE Manual
- Code of conduct – Anti Bribery & Corruption Policy
- Personnel handbook
- Procedure for notification of unacceptable situations
- Procedure for supplier approval
- Work Environment Survey
- Employee Appraisals Interview procedure

In addition, Sekal has a well-implemented procedure and system in place to report if any unacceptable conditions should occur in the workplace. Employees can choose to report anonymously or by name. As stated in the Working Environment Act § 2-5, it is prohibited that the employee filing the complaint should experience any negative consequences for themselves, directly or indirectly.

When assessing suppliers as part of our due diligence, Sekal categorizes suppliers as A, B and C suppliers based on their risk profile. For this purpose, Sekal uses The ITUC (International Trade Union Confederation) Global Rights Index as a reference. The index lists companies and countries violating human rights, and rates countries on a scale from 1 to 5+ on the degree of respect for workers' rights, where 1 stands for sporadic violations of rights and 5+ for no guarantee of rights due to breakdown of the rule and law.

The suppliers are evaluated on a regular basis based on their category. Category A vendors are evaluated more frequently and are required to answer an annual questionnaire to ensure that new relevant information is provided to Sekal. This is also a topic during the audits conducted according to our ISO certification.

2. GENERAL RISKS RELATED TO HUMAN RIGHTS, AND OUR APPROACH TO THESE RISKS

a. GENERAL RISKS AND MITIGATING MEASURES IN OUR OWN OPERATIONS:

1. *There is a risk that discrimination, racism, or other inappropriate behavior may occur.*
-Universal Declaration of Human Rights Article No. 1, 2, 18 and 29.

In Sekal we embrace diversity and inclusion. This is reflected through work personnel consisting of 13 different nationalities. A multicultural workplace not only drives business success through

innovation and market insights but also creates a dynamic and engaging environment for employees.

In 2025, Sekal group has 97 employees. During 2025, Sekal received 0 reported violations of human rights.

Implemented measures: Sekal policies, which include a strong focus on human rights and prohibits racism, discrimination, and other inappropriate behavior, are well implemented.

Sekal carries out an annual work environment survey where topics such as bullying, harassment, and other inappropriate behavior are assessed. If any findings are reported on these topics, actions will immediately be initiated to mitigate any harm and start recovery.

All employees have an annual appraisal interview with their immediate manager. The employee can report on matters that do not comply with our objective of having a good and safe working environment.

Sekal has two safety delegates and a working environment committee. Their task is to safeguard the interests of the employees.

2. *There is a risk that personal injury may occur in a work-related context, both on our premises, on a business trip or at a customer's site.*
-Universal Declaration of Human Rights Article No. 3.

During 2025, Sekal registered 0 work-related injuries.

Implemented measures: Sekal has a risk based HSE system and applies it to Norwegian laws and regulations and work according to ISO 45001.

Sekal monitors the annual work environment survey to ensure personnel feel safe at work, on business travels, and on customer's site.

Sekal has an Emergency Response Plan in case an incident should occur internally or externally. All personnel in the emergency response group have received the necessary training, and exercises are conducted regularly.

In addition, Sekal has a reporting system for the reporting of non-conformances (NCR). All NCRs are handled by management. Risks are assessed and risk reducing measures taken to lower the risk and to prevent recurrence.

3. *There is a risk that employees fear that they cannot join a trade union.*
-Universal Declaration of Human Rights Article No. 23 and HR20.

Implemented measures:

Both the Norwegian law and Sekal's Personnel handbook state that personnel are free to join any trade union they prefer. This is also communicated internally in the company.

4. *There is a risk that personnel do not receive equal pay for equal work.*
-Universal Declaration of Human Rights Article No. 23.

Implemented measures:

Sekal is part of the private sector and individual employment contracts can sometimes be negotiated. This poses a risk that employees with equal competence, performance, and experience may have different salaries. However, Sekal has a system in place with annual employee appraisal interviews and annual salary adjustments to mitigate this risk.

Upon employment, salary is benchmarked with trade unions, the market, and current employees.

Sekal has a well implemented procedure and system to report if any unacceptable conditions should occur in the workplace. Employees can choose to report anonymously or by name.

5. *There is a risk of breaching the law on working hours and holidays.*
-Universal Declaration of Human Rights Article No. 24.

Average overtime in the industry sector in Norway was 11,3 % (SSB statistics 2020). The overtime rate at Sekal is significantly lower than this industry average.

Implemented measures:

Sekal records and monitors employee working hours and overtime regularly. Overtime must always be approved in advance (in departments where applicable). In general, employees work minimal overtime in Sekal, however Operations on occasion require flexibility in this area.

A report is generated quarterly showing overtime for the Operations department, which is used in the planning of future work, to ensure that employees are not working beyond the legal limitations and that there is a fair distribution of overtime that may arise.

Sekal has two safety delegates and a working environment committee who safeguard the interests of the employees.

b. GENERAL RISKS AND MITIGATING MEASURES RELATED TO OUR SUPPLIERS / BUSINESS PARTNERS:

1. *There is a risk that our suppliers / business partners may violate human rights or that they do not have proper control over their value chain as to whether violations of human rights occur. Examples of violations may be:*

- breach of working hours and holiday regulations*
- discrimination and racism*
- unfair wages*
- purchase of goods or raw materials from countries where violations of human rights are more common*
- logistics companies delivering goods to Sekal are not complying with regulations on driver's hours, the right to breaks and rest or have an acceptable standard of living while working*

-Universal Declaration of Human Rights Article No. 1-30.

Implemented measures:

Sekal has a procedure for approval of suppliers. Suppliers must fill out a form where they confirm if they are compliant with laws, regulations, and human rights, and if they assess subcontractors regarding this. Suppliers will only be approved if they are compliant. Approved suppliers are regularly reevaluated to ensure that compliance is maintained, either through audits or the approval of supplier form.

2. *The United Kingdom is rated a 4 on Global Rights Index 2025, meaning systematic violations of rights occur. This is a concern to Sekal, since one of the offices is in Aberdeen.*

-Universal Declaration of Human Rights Article No. 1-30.

Implemented measures:

The management is located in Norway. In Norway the workers' rights are subject to strict legislation to ensure that they are safeguarded. Our employees in Aberdeen have the same employment rights and working conditions as the employees in Norway, and we strive to ensure that violations do not occur both through employee interviews, working environment surveys, a safety representative located in Aberdeen and through frequent conversations and meetings. In addition, the management system is set up according to ISO 45001:2018.

3. IDENTIFIED ADVERSE IMPACTS AND RISKS OF ADVERSE IMPACTS

We have not identified any actual adverse impacts or significant risks of adverse impacts through our due diligence in 2025. However, we will continue our work related to the general risks identified, as described above.

4. THE ROAD AHEAD

Sekal is committed to continuing its efforts to promote respect for human rights and compliant working conditions throughout its operations and supply chain. The company will monitor and further develop its process for identifying, assessing, and addressing actual and potential adverse impacts in line with the requirements of the Norwegian Transparency Act.

In the first half of 2026, Sekal was acquired by Halliburton AS. Going forward, Sekal will work to align its due diligence practices with Halliburton AS's comprehensive policies and procedures for human rights, responsible business conduct, and supply chain management.

Contact

A key component of the Transparency Act is the right of anyone to request information about how we handle actual and potential negative consequences in relation to human rights and working conditions. To ensure a clear communication channel, we have established a separate e-mail address that will answer any questions related to the Act, at transparencyact@sekal.com.

Inquiries will be responded to promptly.

This report has been approved by the board and General Manager:

- Rune Hobberstad (Chairman of the Board)
- Aage Andreassen (Board Member)
- Jeanette Gimre (Board Member)
- Jarle Vaag (General Manager)