



# STATEMENT IN ACCORDANCE WITH THE NORWEGIAN TRANSPARENCY ACT – 2024

ROXAR FLOW MEASUREMENT AS  
Org. nr. 978658679

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# 1. ROXAR FLOW MEASUREMENT AS – DESCRIPTION

## a. Company and Products

Roxar Flow Measurement AS (“Roxar”) is a product unit of Emerson Electric Co. specializing in combining innovative solutions with technology excellence to maximize reservoir performance using Roxar products for Downhole Monitoring, Flow Metering, Pipeline integrity and Corrosion and Erosion Monitoring. Roxar solutions empower customers with reliable, actionable data within the Energy industry value chain. By providing a continuous information flow, Roxar products consistently guide customers to make more informed decisions about production and integrity. This helps to maximize performance throughout the lifecycle of the well, along with increased profitability. (i)

Roxar Flow Measurement AS is based in Stavanger, Norway (registration number 978 658 679) with a branch office in Bergen, Norway (registration number 872 065 172). Roxar products are developed and manufactured at the company’s sites in Norway and Emerson’s campus in Cluj, Romania, generating global sales of NOK 810 million in 2024. Our main customers are located in Norway and a high percentage of our products come from suppliers in Norway.

The company had an average of 212 employees in 2024 of which 43 (20%) were women and 169 (80%) were men. The working environment is considered to be highly ethical and positive, and there are no unresolved disputes with employees. Roxar complies with the Norwegian Equality and Anti-Discrimination Act which prohibits discrimination and promotes equality based on gender, pregnancy, leave in connection with childbirth or adoption, care responsibilities, ethnicity, religion, belief, disability, sexual orientation, gender identity, gender expression, age or other significant characteristics of a person.

Roxar Flow Measurement AS aims to provide a workplace free of discrimination where there is equality of opportunity between women and men. The company employs many parents and facilitates working parenting through the use of flexible working hours and facilitates the adaptation of workplaces and tasks to avoid discrimination against persons with disabilities.

There have been no work accidents in 2024, and the company currently has no activities that could lead to significant environmental damage.

## b. Human Rights and Governance

As a subsidiary ultimately owned by Emerson Electric Co., (“Emerson”), Roxar subscribes to all of Emerson’s core values and policies, including Emerson’s commitment to Human Rights (ii), comprehensive Codes of Ethics for employees, officers, suppliers and business partners (iii) and its strategy and actions concerning environmental, social and governance (ESG) issues (iv).

As part of Emerson, Roxar values the unique experiences and perspectives of all employees and continues to build a culture based on equity, inclusion, belonging and fairness to drive innovation and growth.

# 1. ROXAR FLOW MEASUREMENT AS – DESCRIPTION (Continued)

## i. Human Rights

As members of the United Nations Global Compact, Emerson respects and promotes human rights in all our business operations worldwide. This entails specific attention to particularly challenging issues and activities, including:

**Humane Treatment** – We do not allow or condone any form of harsh or inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse, nor do we allow managers to threaten treatment of this nature.

**Prohibition of Forced Labor** – We strictly prohibit the use of any forced, bonded, indentured, involuntary prison labor or other compulsory labor in our policies, operations and supply chain. We have published a Supplier Code of Conduct that defines what is required of our suppliers in regard to this and other policies. Our policies comply with regulations, such as the UK Modern Slavery Act of 2015 and the U.S. Uyghur Forced Labor Prevention Act. Emerson fully supports these and other efforts to eradicate human trafficking worldwide.

**Prohibition of Child Labor** – Emerson does not allow the use of child labor in any of our facilities, businesses, and/or suppliers. All Emerson employees must be of an appropriate age, as defined by applicable laws. In some cases, we support legitimate workplace apprenticeship and internship programs that conform with laws and regulations. We also prohibit our suppliers from employing anyone under the local legal working age.

**Health and Safety** – We strictly forbid any persons working in unsafe conditions or in an unsafe manner. As one of Emerson’s core values, Safety is guided by our Emerson Safety Council which meets regularly to ensure alignment and progress on all priorities, including safety education, prevention, trends and compliance. All Emerson locations with 50 or more employees are required to have a dedicated safety leader that works proactively on addressing health and safety concerns.

Emerson’s Global [Human Rights Policy](#) is designed to establish global standards related to human rights and labor for all employees, suppliers, third parties and other business partners, and to facilitate compliance with those expectations.

Covered in the principles that we expect Emerson employees and its business partners to adhere to are: Equal Opportunity, Non-Discrimination and Non-Harassment, Health and Safety, Forced Labor and Human Trafficking, Child Labor, Employment Standards, Working Conditions and Compensation, Freedom of Association and Responsible Sourcing.

This policy is informed by, among other things, the International Bill of Human Rights, the OECD Guidelines for Multinational Enterprises, the United Nations Guiding Principles on Business and Human Rights, the Ten Principles of the United Nations Global Compact and the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work.

# 1. ROXAR FLOW MEASUREMENT AS – DESCRIPTION (Continued)

## ii. Social Responsibility

At Emerson, our people are at the center of what we do, and they are foundational to our value creation strategy. We recognize the importance of empowering our employees with a culture that enables them to be their authentic selves, feel valued and grow. This is our responsibility to our employees.

### Employee Engagement

Emerson launched *Your Voice Counts* listening strategy in 2023. As part of this strategy, more than 85% of employees participated in the first company-wide employee engagement survey, registering an overall engagement score of 78% (depicts data/information as of June 2024). In response to feedback from the surveys, a cadence of efforts has been initiated with the intention of cultivating an inclusive environment. Efforts included the launch of leadership development toolkits for our people managers focusing on inclusion, innovation, collaboration and change leadership.

### Labor Relations

We respect our employees' right to freedom of association in choosing labor organizations to represent them. We work collaboratively to keep positive relationships with the unions, works councils and employee associations that represent many of our employees to maintain positive relationships.

### Wages and Benefits

At Emerson, we strive to retain and grow our exceptionally talented global workforce. Our company value "Support Our People" is reflected in our efforts to provide competitive wages and benefits in the markets where we operate worldwide. Our compensation practices comply with applicable wage laws and international standards, including those relating to minimum wages, overtime compensation and legally mandated benefits.

### Discrimination and Harassment

Emerson values the contributions of all employees and does not tolerate any form of discrimination or harassment. All employees are required to attend annual ethics training that reinforces this. Emerson is an equal opportunity employer that recruits, hires, trains and promotes people in all job classifications without regard to sex, race, color, religion, national origin, age, marital status, political affiliation, sexual orientation, gender identity, genetic information, disability or protected veteran status. We do not condone any form of discrimination or harassment. We provide training for supervisors and managers to enhance employee relations and help ensure compliance with all applicable laws.

# 1. ROXAR FLOW MEASUREMENT AS – DESCRIPTION (Continued)

## iii. Governance

We take the necessary steps to help ensure our company acts responsibly and in accordance with the [Emerson Purpose, Causes & Values](#). Addressing sustainability and governance issues develops the trust and confidence of our employees, customers, suppliers, communities and shareholders. We operate all over the world and have built a comprehensive approach to all aspects of our governance activities. From our Board of Directors and executive leadership team to our employees and suppliers, we expect those who represent Emerson to uphold a high level of integrity.

### Integrity & Ethics

To support our ethics and legal compliance processes, we have established clearly defined policies and practices for employees through our [Ethics and Compliance program](#). We communicate our Ethics and Compliance program to employees through trainings, documentation and reporting channels where employees are encouraged to escalate questions or concerns. We welcome new employees to the program during their onboarding and refresh current employees and leaders on the program through annual training.

Our ethics reporting process provides employees with an efficient and trusted mechanism by which they can anonymously and confidentially report suspected or actual misconduct, ask questions, or express concerns while protecting their employment status. The program includes policies and controls to safeguard against retaliation of whistleblowers, as well as several avenues to escalate concerns, including our ethics reporting website, ethics hotline, or directly to Emerson compliance leadership. The ethics reporting website and hotline are operated by an independent third party and allow for employee anonymity.

### Supply Chain

We work closely with supply chain partners all over the world to source high quality and cost-effective components, supply chain resiliency and reinforce the importance of business integrity. We operate our global supply chain network to a high level of ethical, human rights and environmental standards which are set and managed at the Emerson corporate level. We regularly evaluate and update these standards, launch new initiatives, invest in better resources and systems and enhance our supplier engagement processes to make a positive impact for our customers and communities.

### Responsible Sourcing

Emerson developed its Responsible Sourcing Policy in 2023, which guides supplier performance management processes by establishing tiered supplier expectations. The minimum standard applies to all suppliers, who must meet [Emerson Supplier Code of Conduct](#) (iii) expectations. Emerson's purchase order Terms and Conditions and standard supply agreement explicitly state this minimum standard. The Responsible Sourcing Policy also sets forth evolving supplier expectations toward best practices, which include, but are not limited to providing evidence of actions to risk-mitigate human rights and labor violations and inhumane treatment, to calculate their greenhouse gas emissions and to set emissions reduction targets.

# 1. ROXAR FLOW MEASUREMENT AS – DESCRIPTION (Continued)

## iii. Governance, continued

Supplier performance and progress in these areas will be measured and incorporated into supplier business reviews and scorecards.

We conduct a self-assessment survey, where suppliers report their performance on these topics. These suppliers represent a majority of Emerson’s direct material spend and are assessed on their adherence to our Supplier Code of Conduct and Responsible Sourcing Policy expectations.

### **Supplier Selection and Monitoring**

Roxar follows a supplier selection and approval process when changes in suppliers are initiated. Any new supplier is requested to complete a Supplier Approval Form which includes an acknowledgment of Emerson Supplier Code of Conduct before the supplier is registered in Roxar’s ERP system. Suppliers are monitored and followed up individually in a Supplier Risk Assessment matrix which takes into consideration a range of key supply chain risk factors across Roxar’s list of suppliers.

### **Responsible Business Conduct Embedded Into Policies and Management Systems**

Responsible business conduct is a cornerstone of all Emerson policies. In addition to the policies highlighted in the sections above, Roxar is taking further steps to ensure that specific requirements of the Norwegian Transparency Act (NTA) are complied with (see Section 3 of this Report).

The Roxar Board of Directors and the Senior Leadership Team have been informed of the review of policies related to the NTA requirements and endorse the required changes in business processes and the disclosure of the [NTA report](#) on [Emerson’s website](#). In December 2024, the Roxar Board of Directors signed a policy statement confirming their responsibility for ensuring the implementation of principles and requirements of the Norwegian Transparency Act.

Questions related to the Norwegian Transparency Act report can be addressed to [info.roxar@emerson.com](mailto:info.roxar@emerson.com). Administrators of this mailbox will forward questions to relevant recipients, ensuring no time is lost with respect to Roxar’s duty to respond within the required timeframes.

## 2. RISK ASSESSMENT RELATED TO FUNDAMENTAL HUMAN RIGHTS AND DECENT WORKING CONDITIONS

### a. Roxar Business Operations Due Diligence

Roxar's business operations focus on human rights and good working conditions through its active participation in Emerson's Environmental, Social and Governance programs. This includes the conduct of annual employee surveys, voluntary participation in Emerson's Diversity, Equity and Inclusion initiatives and mandatory participation in training programs concerning Emerson's codes of ethics. Employee surveys and training participation are followed up and employees are encouraged to escalate questions or concerns.

Following Emerson's Supplier Code of Conduct, we expect all suppliers to support Emerson's values, especially as they relate to ethics, human rights and the fair treatment of their workforce. Emerson's purchase order Terms and Conditions as well as our standard supply agreement explicitly state that we expect our suppliers to comply with the Supplier Code of Conduct.

### b. Roxar Supplier Due Diligence

The duty to carry out due diligence as set out in the NTA has been met through the performance of a supplier database risk assessment and a review of supply chain policies and procedures.

#### i. Supplier Risk Assessment

Roxar has carried out a review of its supplier database based on accounting data for fiscal year 2024 in order to assess risks of adverse impact in the supply chain related to basic human rights and decent working conditions.

Suppliers have been analyzed by their country of incorporation and divided into risk categories based on the [Global Rights Index 2024](#) in which countries are rated and categorized as "Red", "Orange", "Yellow" and "Green" based on records related to violation of basic human rights and decent working conditions. The due diligence also takes into consideration the type of goods or services sourced, such as professional services, components, electronics or raw material.

Due diligence has been performed with respect to all suppliers in the highest risk category, "Red". In risk categories "Orange", "Yellow" and "Green", due diligence has been performed with respect to each supplier above defined value thresholds.

## 2. RISK ASSESSMENT RELATED TO FUNDAMENTAL HUMAN RIGHTS AND DECENT WORKING CONDITIONS (Continued)

### ii. Review of Supply Chain Procedures

The following improvements have been implemented in Roxar's supply chain procedures:

1. The inclusion of parameters related to basic human rights and decent working conditions in Roxar's supplier evaluation and selection process and in the process for continuous monitoring of suppliers,
2. Extended use of written surveys distributed to a risk-based selection of global suppliers,
3. Performance of supplier audits through site visits with respect to suppliers considered to be of high risk of negatively impacting basic human rights and decent working conditions.

### iii. Outcome of Due Diligence Exercise

No actual adverse impact or significant risks of adverse impact on human rights and working conditions have been identified as a result of the due diligence exercise and the review of supply chain procedures.

Responses have been received from all of the suppliers asked to perform the written Supplier Self-Assessment Survey in 2024. Their replies are being followed up and incorporated into supplier risk assessment scorecards and business reviews.

A risk-based analysis of Roxar's 2024 supplier database has resulted in the selection of additional suppliers who will be requested to complete the written Self-Assessment Survey.

While no significant risks or actual adverse impacts related to human rights and decent working conditions have been uncovered so far, Roxar remains committed to conducting ongoing due diligence assessments in both own business operations and towards suppliers and business partners, to identify and promptly respond to any significant risk or actual adverse impacts that may be uncovered during the process.

Roxar will continue its efforts to mitigate risk of adverse impact on human rights and working conditions in the supply chain by communicating Emerson's Supplier Code of Conduct to all of our suppliers.

Specific measures to this end in the coming year include:

1. Follow up responses related to survey requests sent to suppliers in 2024 and 2025,
2. Apply risk-based selection of suppliers in fiscal year 2025 for further distribution of survey requests,
3. Include human rights and working conditions ratings as evaluation criteria in the selection and continuous monitoring of suppliers.

# CONTACT

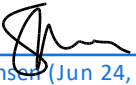
Please direct any questions you may have with respect to Roxar's compliance with the Norwegian Transparency Act to the following address: [info.roxar@emerson.com](mailto:info.roxar@emerson.com).

## SOURCES:

- i. [Roxar | Emerson NO](#)
- ii. [Other Policies | Emerson US](#), including:  
[Emerson Global Human Rights Policy](#),  
Emerson Statement on the California Transparency in Supply Chains Act and United Kingdom Modern Slavery Act of 2015
- iii. [Business Ethics | Emerson US](#)
- iv. [ESG Progress | Emerson GB](#)
- v. [Driving ESG](#)

Date: 20<sup>th</sup> June 2025

Signatures:



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