# Content

Message from the CEO 3  
Introduction 4  
Overview of Equinor presence worldwide 5  

**Part I: Our approach** 6  
1. Our commitment to respecting human rights 6  
2. Embedding human rights into the way we work 7  
3. Prioritisation of risks and key concerns 9  
4. Assessing and addressing risks 9  
5. Stakeholder engagement 10  
6. Tracking 11  
7. Grievance mechanisms and our commitment to remedy 11  

**Part II: Human Rights Due Diligence undertaken in 2023** 12  
1. Supply Chain 12  
2. Communities 16  
3. Own Workforce 19  

**Part III: Our work going forward** 20  

About this statement 21
Message from the CEO

2023 marked the 75th anniversary of the UN Declaration of Human Rights – a landmark achievement at the time of proclamation by the UN General Assembly on 10 December 1948 as it set out a universal protection of fundamental human rights.

Sadly, 2023 was also a year with armed conflicts, geopolitical tensions and deterioration of the situation for vulnerable groups in many parts of the world, including for women, children, indigenous peoples and minorities.

Equinor's role is to be a stable and reliable energy provider that contributes to societal progress at large. In this role, we have embarked on a journey to transition our existing energy systems in support of a net zero society. For such a transition to be successful, it must also be seen as just and inclusive from the perspective of the people feeling its impact.

Our commitment to respecting human rights is contributing to the safety, health and security of all people involved in and affected by our business. It is also important for people's ability to live meaningful lives, develop their skills and enjoy their full potential.

Companies like Equinor do not operate in a vacuum. We often need to navigate conflicting dilemmas and balance competing expectations. As such, there are limits to what we can achieve – alone or collectively – in the face of systemic issues and weak governance in many countries across the world. However, we believe in the enhancement of our human rights efforts and continue to seek ways to strengthen our own human rights due diligence performance.

That is why we in 2023 have taken new steps to increase collaboration with peers and other stakeholders to understand how to address common challenges in global supply chains. Other notable efforts include strengthening our internal requirements and processes for human rights due diligence to ensure alignment with new and emerging legislation within sustainability.

In this spirit of continuous improvement, collaboration and transparency we continue our efforts to respect the rights of people across the whole of our operations in line with our Human Rights Policy.

Anders Opedal, President and CEO
Introduction

Equinor is an international energy company headquartered in Norway, with activities in more than 30 countries. Most of our operations take place in our core countries Norway, the United Kingdom, Brazil and the United States. Our portfolio of projects encompasses oil and gas, renewables and low-carbon solutions. Our activities span from exploration, development and production, electricity generation, transportation, processing and refining. Our products are offered to the market through our marketing and trading operations. We have over 22,000 employees, of which 85% are based in Norway. Across our global supply chain, we engage with around 8,000 first-tier suppliers.

Equinor can be connected to human rights impacts on our workforce, workers in the supply chain, and communities affected by our business. This connection to risks and impacts can happen primarily through these paths:

a. Through our direct operations
b. Through our suppliers and their sub-suppliers
c. Through our partnerships, where we are a non-operating partner
d. Together with our partners, in joint operating companies / joint ventures or other forms of shared responsibility for a project execution or operation

How we assess and address risks of adverse human rights impacts is guided by our Human Rights Policy (Policy) and varies in these different paths and across our different business areas. Further information regarding how our business is structured through business areas, including details of the activities undertaken in the various parts of our business, can be found in the Annual Report for 2023, available on equinor.com.

Understanding and managing the risk of adverse human rights impacts related to our business remains at the core of our human rights commitment. We recognise that our business can cause, contribute to, or be linked to negative human rights impacts, especially in jurisdictions with weak regulatory frameworks or enforcement. We use a risk-based approach to embed our human rights commitment in our business activities from the initial business development stages through project planning, execution, operations, decommissioning and any potential exits.

This human rights statement is divided into three main sections.

Part 1: Our Approach – Overview of our human rights-related policies, procedures, governance, and core human rights due diligence activities.

Part 2: Human Rights Due Diligence Undertaken in 2023 – Overview of actions taken in 2023 to address specific impacts identified through our HRDD efforts.


Given the range of the salient human rights issues covered by our Policy, layered onto the complexity of our business activities, we have in this statement particularly focused on the human rights risks and issues that are most prevalent in our current portfolio. Other topics that intersect with human rights include our approach to the just transition, safety performance related to the more traditional health and safety aspects, our work to address discrimination and harassment, and diversity and inclusion. These are all covered separately in our Annual Reports, previous Annual Sustainability Reports and on equinor.com.
Our business
Equinor is present in around 30 countries around the world.

<table>
<thead>
<tr>
<th>Operator of Assets</th>
<th>Partnerships and Presence</th>
</tr>
</thead>
<tbody>
<tr>
<td>Brazil</td>
<td>Algeria, China, India</td>
</tr>
<tr>
<td>Norway</td>
<td>Angola, Canada, France, Germany, Libya, Netherlands, Nigeria, Singapore, Tanzania</td>
</tr>
<tr>
<td>UK</td>
<td>Argentina, Australia, Austria</td>
</tr>
<tr>
<td>USA</td>
<td>Belgium, Canada, China, France, Germany, India, Japan, Italy</td>
</tr>
<tr>
<td>Poland</td>
<td>Austria, Brazil, China, France, Germany, India, Japan</td>
</tr>
</tbody>
</table>

**KEY ACTIVITIES**
- EXP = Exploration
- D&P = Development & production
- REN = Renewables
- M&T = Marketing & Trading
- R&P = Refining & processing
- LC = Low carbon project funnel

**PARTNERSHIPS AND PRESENCE**

1) Countries we announced exits from in 2023.

The overview includes countries with fully owned subsidiaries of Equinor.
Part I: Our approach

In this section, we provide an overview of how we embed the business responsibility to respect human rights in our policies, governance and internal work processes.

1. Our commitment to respecting human rights

In Equinor, our practices and behaviours are shaped by the principles captured in the ‘Equinor Book’, which hosts the Code of Conduct. The Code sets out our expectations, commitments and requirements for ethical conduct, and applies to Equinor’s board members, employees and hired personnel.

Equinor’s Human Rights Policy, also included in the Equinor Book, confirms our commitment to alignment with the UN Guiding Principles on Business and Human Rights (UNGPs) and expresses our respect for all internationally recognised human rights, including those set out in the International Bill of Human Rights and the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work.

Both the Code of Conduct and the Human Rights Policy are owned by the Board of Directors (BoD), also reflecting how we believe respecting people is a key business enabler.

To succeed, Equinor relies on a large number of suppliers, in multi-layered tiers. This supplier universe employs an extensive number of workers, all part of Equinor’s human rights scope. Hence, specific ‘Human Rights Expectations of Suppliers’ have been adopted, intended for all current and future suppliers.

We seek all our suppliers to develop and implement a ‘do no harm’ approach consistent with the goals of the UNGPs. Specifically, we expect our suppliers to share the spirit and intent of Equinor’s human rights commitment, be transparent about incidents, challenges and efforts, engage their own supply chain and be determined to continuously improve. In return, we commit to support our suppliers in their efforts.

Human rights standards we expect of all our suppliers include:

- Ensuring fair treatment and non-discrimination
- Providing safe, healthy and secure workplace and accommodation
- Providing fair wages and reasonable working hours
- Respecting freedom of assembly, association and the right to collective bargaining
- Preventing modern slavery
- Preventing child labour and protecting young workers
- Respecting affected community members
- Providing access to remedy

Equinor’s Human Rights Journey

In 2000, Equinor (Statoil at the time) was one of 33 companies that supported the UN Global Compact Principles from day one, an initiative that now has 15,000 participating companies.

In 2011, the UN Human Rights Council gave us an even more tangible tool to address human rights with the adoption of the United Nations Guiding Principles on Business and Human Rights (UNGPs). The same year, we were among the first companies to commit to the UNGPs which later were included as part of the OECD Guidelines for Multinational Enterprises.

In 2015, Equinor adopted the stand-alone Human Rights Policy (Policy). The Policy is translated into 11 languages and is easily available to both internal and external stakeholders on equinor.com.

Our Policy was developed based on a bottom-up assessment of typical human rights risks relevant to our sector and set of activities and projects, aligned with specific issues we had come across or were concerned with. Various internal and external stakeholders and experts were consulted for inputs and advice.
2. Embedding human rights into the way we work

Human Rights Governance
The corporate executive committee, chaired by the President and Chief Executive Officer (CEO) and inclusive of the company Executive Vice Presidents, is ultimately responsible for day-to-day operations and business-wide strategy, goals, actions, and investments.

Twice a year the BoD’s Safety, Sustainability and Ethics Committee (SSEC) receives a report from the administration on its efforts to implement the Policy. Deep dives on specific human rights matters, cases or particular risks are brought to the BoD or the SSEC routinely as well as upon request. As part of the regular corporate risk and performance updates by the CEO to the BoD, all identified severe human rights risks are reported.

A Human Rights Steering Committee meets at least four times per year. The committee oversees the status of the human rights work, discusses specific challenges and dilemmas, reviews external trends and developments, and endorses internal improvement initiatives and new requirements. The committee is chaired by the Executive Vice President (EVP) for Safety, Security and Sustainability, and comprises EVPs for Projects, Drilling and Procurement; Exploration and Production International; Midstream, Marketing and Processing; Renewables; Communications; Legal and Compliance; and People and Organisation.

Global ownership of human rights sits within the Corporate Climate and Sustainability team, which is part of the Equinor Safety, Security and Sustainability corporate function. In practice, this means that Corporate Climate and Sustainability is responsible for policy and advocacy, developing internal requirements, guidelines and tools for Human Rights Due Diligence (HRDD), supporting implementation throughout the business, performing capacity building, and for internal and external reporting.

Assessing and addressing human rights risks in daily operations is according to Equinor’s governance model a business line responsibility. That means that the relevant line, within its portfolio, shall ensure that a risk-based approach to HRDD is applied and that activities are subject to HRDD in accordance with our Policy and specific internal requirements. Similarly, each business line is responsible for reacting to emerging risks and conducting additional HRDD where a need arises.

Lastly, Equinor has a group Competence Centre that includes a group of human rights specialists tasked with supporting the business lines and the corporate functions in their HRDD efforts. Similarly, there are dedicated resources in Equinor’s legal and compliance department.
Our Human Rights Due Diligence Systems
HRDD is embedded in our management system through functional requirements, governing documents and work processes, in a combination of dedicated documents concerning HRDD, and HRDD requirements embedded in other specific requirements.

HRDD in the Enterprise Risk Management framework
Internationally recognised human rights are embedded within Equinor’s Enterprise Risk Management Framework (ERM), a mandatory tool for risk management across all business activities. By utilising the tool, we set out to assess, document, report and follow-up the risk of adverse impacts on the human rights of people touched by our business, including the activities of our suppliers and partners. Requirements to mitigate and report on human rights risks are aligned with how we manage safety risks. This means that risks above a defined severity level must be mitigated as soon as possible, and shall be reported through the line, including to CEO and BdD as part of regular risk updates. See more in Section 4 - Assessing and addressing human rights risks.

HRDD in business development
As part of the overall business development process, a toolbox for HRDD exists. This includes targeted questionnaires, templates for contract clauses, guidelines for the consideration of potential red flags, and recommendations for actions and deliverables per decision gate. The toolbox also includes examples of good practice. The purpose of these tools is to support early identification of risks and allow decisions to be made based on all available information, including to which extent risks can be prevented or effectively mitigated. This also allows for early identification of actions to enable effective risk management as well as what resources such management will imply. Requirements for conducting HRDD also applies to country or asset exits.

HRDD in our Supply Chain Management process
Requirements for how to perform HRDD in procurement are embedded in the corporate Supply Chain Management process. All new contracts are set to undergo an initial risk screening. Where the initial assessment has identified that there is a more qualified human rights risk, further actions should be considered. These could include detailed prequalification questionnaires, supplier engagement and audits, and on-site assessments including worker interviews. Lastly, the consequences of managing the residual risk once a contract has been effectuated shall be factored into follow-up plans. We seek either basic or more extensive human rights human rights requirements are embedded in e.g.,

Stand-alone human rights requirements in the Corporate Management System
- Working Requirement - Human Rights Due Diligence – setting out requirements for how to perform human rights due diligence throughout Equinor’s activities
- Working Requirement - Sustainability Data – setting out requirements for recording of sustainability data, including data related to human rights training, human rights due diligence, Community Grievance Mechanisms and remedy.
- Working Requirement - The rights of indigenous and tribal people – setting out requirements and guiding principles aimed at ensuring respect for the rights of indigenous peoples affected by our operations.

External engagement
To stay informed and further improve ourselves, as well as to contribute to helping others advance, we engage and collaborate externally with key partners and associations:
- We have been a long-standing participant to the international Shift Business Learning Programme
- We engage regularly with the Confederation of Norwegian Enterprise (NHO) and other state-owned companies in Norway
- We engage with human rights specialist organisations such as Shift, Impactt, Triple R Alliance and Synergy Global Consulting
- We are a member of IPIECA, the global oil and gas association for advancing environmental and social performance across the energy transition
- We are observers to the Business Network on Civic Freedoms and Human Rights Defenders
- We deliver guest lectures through our CEMS Global Alliance in Management Education corporate partnership and upon request from other academic institutions or organizations
- We prioritise participation at UN Annual Forum for Business and Human Rights

Capacity building
Building on a strong Policy foundation, our human rights work has gradually pivoted more towards focusing on the strengthening of our capacity to manage human rights across our workforce, suppliers, peers, and industry associations. This type of engagement offers insights and experiences to enable a more open discussion on human rights challenges and management best practices.

Stand-alone human rights requirements in the Corporate Management System
- Working Requirement - Human Rights Due Diligence – setting out requirements for how to perform human rights due diligence throughout Equinor’s activities
- Working Requirement - Sustainability Data – setting out requirements for recording of sustainability data, including data related to human rights training, human rights due diligence, Community Grievance Mechanisms and remedy.
- Working Requirement - The rights of indigenous and tribal people – setting out requirements and guiding principles aimed at ensuring respect for the rights of indigenous peoples affected by our operations.

HRDD requirements are embedded in e.g.,
- Supply Chain Management Process
- Business Development Process
- Enterprise Risk Management Process

External engagement
To stay informed and further improve ourselves, as well as to contribute to helping others advance, we engage and collaborate externally with key partners and associations:
- We have been a long-standing participant to the international Shift Business Learning Programme
- We engage regularly with the Confederation of Norwegian Enterprise (NHO) and other state-owned companies in Norway
- We engage with human rights specialist organisations such as Shift, Impactt, Triple R Alliance and Synergy Global Consulting
- We are a member of IPIECA, the global oil and gas association for advancing environmental and social performance across the energy transition
- We are observers to the Business Network on Civic Freedoms and Human Rights Defenders
- We deliver guest lectures through our CEMS Global Alliance in Management Education corporate partnership and upon request from other academic institutions or organizations
- We prioritise participation at UN Annual Forum for Business and Human Rights

Capacity building
Building on a strong Policy foundation, our human rights work has gradually pivoted more towards focusing on the strengthening of our capacity to manage human rights across our workforce, suppliers, peers, and industry associations. This type of engagement offers insights and experiences to enable a more open discussion on human rights challenges and management best practices.

Stand-alone human rights requirements in the Corporate Management System
- Working Requirement - Human Rights Due Diligence – setting out requirements for how to perform human rights due diligence throughout Equinor’s activities
- Working Requirement - Sustainability Data – setting out requirements for recording of sustainability data, including data related to human rights training, human rights due diligence, Community Grievance Mechanisms and remedy.
- Working Requirement - The rights of indigenous and tribal people – setting out requirements and guiding principles aimed at ensuring respect for the rights of indigenous peoples affected by our operations.

HRDD requirements are embedded in e.g.,
- Supply Chain Management Process
- Business Development Process
- Enterprise Risk Management Process

External engagement
To stay informed and further improve ourselves, as well as to contribute to helping others advance, we engage and collaborate externally with key partners and associations:
- We have been a long-standing participant to the international Shift Business Learning Programme
- We engage regularly with the Confederation of Norwegian Enterprise (NHO) and other state-owned companies in Norway
- We engage with human rights specialist organisations such as Shift, Impactt, Triple R Alliance and Synergy Global Consulting
- We are a member of IPIECA, the global oil and gas association for advancing environmental and social performance across the energy transition
- We are observers to the Business Network on Civic Freedoms and Human Rights Defenders
- We deliver guest lectures through our CEMS Global Alliance in Management Education corporate partnership and upon request from other academic institutions or organizations
- We prioritise participation at UN Annual Forum for Business and Human Rights

Capacity building
Building on a strong Policy foundation, our human rights work has gradually pivoted more towards focusing on the strengthening of our capacity to manage human rights across our workforce, suppliers, peers, and industry associations. This type of engagement offers insights and experiences to enable a more open discussion on human rights challenges and management best practices.

Stand-alone human rights requirements in the Corporate Management System
- Working Requirement - Human Rights Due Diligence – setting out requirements for how to perform human rights due diligence throughout Equinor’s activities
- Working Requirement - Sustainability Data – setting out requirements for recording of sustainability data, including data related to human rights training, human rights due diligence, Community Grievance Mechanisms and remedy.
- Working Requirement - The rights of indigenous and tribal people – setting out requirements and guiding principles aimed at ensuring respect for the rights of indigenous peoples affected by our operations.

HRDD requirements are embedded in e.g.,
- Supply Chain Management Process
- Business Development Process
- Enterprise Risk Management Process

External engagement
To stay informed and further improve ourselves, as well as to contribute to helping others advance, we engage and collaborate externally with key partners and associations:
- We have been a long-standing participant to the international Shift Business Learning Programme
- We engage regularly with the Confederation of Norwegian Enterprise (NHO) and other state-owned companies in Norway
- We engage with human rights specialist organisations such as Shift, Impactt, Triple R Alliance and Synergy Global Consulting
- We are a member of IPIECA, the global oil and gas association for advancing environmental and social performance across the energy transition
- We are observers to the Business Network on Civic Freedoms and Human Rights Defenders
- We deliver guest lectures through our CEMS Global Alliance in Management Education corporate partnership and upon request from other academic institutions or organizations
- We prioritise participation at UN Annual Forum for Business and Human Rights

Capacity building
Building on a strong Policy foundation, our human rights work has gradually pivoted more towards focusing on the strengthening of our capacity to manage human rights across our workforce, suppliers, peers, and industry associations. This type of engagement offers insights and experiences to enable a more open discussion on human rights challenges and management best practices.
3. Prioritisation of risks and key concerns

In the Human Rights Policy, we define particular commitments related to our key risks (commonly referred to as salient issues), which guide our HRDD efforts.

These areas of particular priority are:
- Discrimination
- Working conditions
- Forced and child labour
- Affected community members
- Security activities

At business area level, we aim to set both generic and specific human rights priorities. A generic priority could be an activity type that generally is considered to carry higher risk and as such should be subject to deeper HRDD, while a specific priority could be a project, asset or supplier with known or potential higher risk. These priorities are to be re-assessed and updated at regular intervals. In addition to guiding our HRDD efforts, they inform how we build capabilities and deploy expert capacity.

Within supply chain, priorities are set based on the following considerations:
- What degree of impact does Equinor have on the technical specification of the product being delivered by the supplier?
- What is the duration of the relationship with the supplier?
- Where in the supply chain is the activity performed?
- Does Equinor own, lease, rent or utilise the equipment or plant?

Based on our current portfolio, priorities, and experience from human rights risk assessments, we consider the most severe human rights issue to be the risk of poor working conditions, including possible indicators of forced labour, within our supply chains.

There are also possible impacts on land and fishing communities related to on- or offshore infrastructure or activities we are linked to both relating to traditional oil and gas activities as well as in the renewables space. As we accelerate our growth in renewables and develop low-carbon solutions, more of our operations will be onshore, also in regions with indigenous populations. Hence, we foresee that the risk of adverse impacts on local communities could rise and require increased attention going forward.

Relevant to our internal workforce, the main risk is currently assessed to be various forms of discrimination and harassment. The limited specific risks and impacts identified or reported related to our own workforce are routinely handled through established internal procedures for misconduct matters and are not covered in more detail as part of this statement.

4. Assessing and addressing risks

As referenced in Section 2, requirements for how to conduct human rights risk assessments are integrated into our Enterprise Risk Management (ERM) framework. The required steps to assess risk level are:
- Define asset or activity in scope
- Map human rights at risk of being impacted
- Identify potentially affected stakeholders
- Determine risk level using predefined impact categories and probability scale

Where we are not able to engage directly with potentially affected stakeholders to inform our risk assessment, for example, if we have no access or prior relationship to build on, we use credible sources such as independent expert advisors, local or international NGOs, human rights defenders or other members of civil society and credible proxies to inform our assessment.

We apply the UNGPs’ concept of cause, contribution, and direct linkage to determine what actions we should take in each case. When prioritising such actions, the concept of scale, scope and irremediability (severity) is applied.

As risks are identified, measures to avoid or effectively mitigate these can be explored to inform decision-making as the business case moves towards the next milestone. For instance, in the event an impact assessment has concluded that a physical installation could impact a local community or create a conflict with other stakeholders in the area, we consider if there are alternative concepts or execution methods to avoid such impacts entirely. Potential measures could include re-routing a pipeline or cable, scaling down the footprint of a plant, or introducing specific technical barriers.

Actions to address remaining risks once a project is sanctioned or an investment decision is made should be included in project execution or asset follow-up plans. In practice, this means that where we have identified a risk of a supplier not meeting our standards, we seek to define actions in collaboration with the supplier, often supported by a third-party expert, and in accordance with our internal guidelines. The action plan can where possible be part of the contract, and follow-up procedures are sought included in internal project follow-up plans. Often, we perform on-site verifications to confirm that actions have been taken and to assess if outcomes have been effective. The risk level as reflected in our risk-management systems should not be reduced unless a mitigating action has proven effective.

The level of depth and frequency in which an asset or unit assesses its human rights risks will depend on several factors such as the complexity of business operations, supply chain and other business relations, the context and severity of risks, and the nature and context of planned operations. Operating in higher risk environments or volatile contexts may create an additional need to revisit a previous risk assessment.

Where we have identified actual adverse impacts, such as for instance impacts resulting from resettlement of a household or the finding of payments of recruitment fees, we seek ways to secure restitution to the satisfaction of the affected person, consulting external good practice and recognised international HRDD frameworks and guidelines.

For certain issues, typically of systemic nature, there are routinely limitations to what Equinor can achieve in terms of avoidance, mitigation, or remediation. See separate section on Systemic issues in Part II.
5. Stakeholder engagement

The way in which we engage with actually or potentially affected stakeholders varies with the types of activity and stakeholders.

**Own workforce**

It is imperative that our own employees feel respected, safe, and secure and that they can have an open dialogue with the organization. Such dialogue is fostered through leadership, employee representations and safety delegates.

At Equinor, we actively use the annual Global People Survey (GPS) to determine targeted actions to enhance inclusion and combat discrimination in our organization. Initiatives to build skills and prepare our people for the future should be equally available to all Equinor employees, regardless of age, gender, and nationality. We are dedicated to conducting our operations in a socially responsible manner to adapt to the just energy transition and we embed diversity and inclusion (D&I) in our human resources processes. In Equinor, D&I aligns with our values, our focus on safety and our purpose as a company.

The safety delegate service at Equinor covers offshore installations, plants and office locations through a network of volunteers who are elected to represent the employees in matters concerning safety, health and working environment. The safety delegates are important partners to management in addressing concerns and proposals for improving working conditions.

We respect our employees’ freedom of association, and thus also their right to collective bargaining and cooperation through representative bodies, a guiding principle for all our activities, in all markets. The specific ways in which we involve and consult employees or their appropriate representatives may vary according to local laws and practices.

We continuously seek to improve how to have meaningful and continuous engagement with employees.

**Supply chain workers**

Important to the success of project execution is close follow-up and on-site presence at construction and fabrication yards. Through e.g., safety inspectors, we regularly meet workers and seek to build trust to ensure people feel safe to speak up about issues or concerns.

Specifically, to address labour rights issues, we use third-party experts to visit certain identified sites and construction yards, to conduct stakeholder engagement via on-site interviews directly with workers in local languages. This allows us to hear their experiences and concerns first-hand and establishes a feedback loop for continued engagement. Perspectives and insights from worker testimonies are actively used to inform risk assessments for ongoing and new projects.

**Community members**

Engaging with potentially and actually affected people is an integrated part of our model for project planning and execution. This often takes place through our Impact Assessment (IA) process where we map stakeholders and seek their input.

Given our various types of business activities, engagements with potentially affected stakeholders may take place before we have finalised agreements with host authorities. Practicing stakeholder engagement in these situations can be challenging, and we often use trusted third parties with knowledge of local conditions and international standards to support us. Such actions may include public consultations, surveys, interviews, one-to-one meetings, or community panels to better understand the concerns of members of local communities. IAs performed for Equinor-operated assets are routinely published and available on equinor.com.

Once our projects are in operation, regular stakeholder engagement continues via our asset management team. This may include having community liaison officers working in community locations, and having office-located points of contact assigned to community groups or municipalities. We seek to have multiple methods of contact to suit each situation, such as centralised local landline numbers, in-app communication messaging, email addresses, and operational-level grievance mechanisms. See Section 7 Remedy and grievance mechanisms for more details.
6. Tracking

Equinor's ERM system is used during the life cycle of a risk. Against the initially documented risk, mitigating measures shall be documented and the risk re-evaluated for consequence and probability. This enables transparency and allows us to track the risk reduction process and understand the effectiveness of mitigating measures applied. Importantly, we aim to only use credible sources to evaluate the outcome of actions taken to reduce risk. This could be that we speak with the affected stakeholders to understand their satisfaction, or that our own employees report progress.

Tracking an organisation’s overall human rights performance is a complex and challenging matter as it, to a large extent, will have to rely on qualitative data. We have systems in place to provide for data collection for human rights risk assessments, actions to address risks, grievances and remedy. Improving tracking of human rights performance is a continuous effort and includes assessing meaningful targets to track and improve human rights performance.

Pilot indicators

In our efforts to address our most salient issue, forced labour like conditions in our supply chain, we have developed two indicators for internal monitoring that will be tested from 2024:

- Tracking remediation of identified priority forced labour indicators, including time to remediate such
- Tracking the performance of HR DD within the procurement processes

7. Grievance mechanisms and our commitment to remedy

Equinor’s grievance mechanisms ‘ecosystem’

Grievance mechanisms form an important part of the remediation process through assisting in identifying actual impacts, as well as by capturing input to ongoing risk assessments. We have several channels through which grievances can be formally raised. Equinor has a non-retaliation policy set out in our Code of Conduct for all good faith raising of concerns. The Code also describes through what channels a concern should be reported, proposing the following steps:

1. Inform your leader immediately if you become aware of any activity that you think is a violation of the Code. Alternatively, you can contact your leader’s superior.
2. If you do not feel comfortable with those options, you can contact your local people and organisation representative, your local compliance officer or the legal, ethics and compliance function.
3. If you are uncomfortable using any of these channels, you can report your concern to the Ethics Helpline.

The Ethics Helpline

The primary, global channel is our Ethics Helpline available for anyone involved in or affected by our activities to raise a concern, both employees and externals. This helpline is a service available 24 hours a day, 7 days a week and provides a phone service and a web submission portal. Moreover, the helpline allows for anonymity, where allowed by law, and is available in six different languages.

Community-based grievance mechanisms

To address human rights concerns in our own operations, we typically establish community-based grievance mechanisms (CGM). Where we are not the operator, we seek that those having suffered or still suffering from adverse impacts are remediated as appropriate and to avoid potential future similar harms.

Corporate requirements for a CGM follow the UNGPs 8 steps of effectiveness criteria for non-judicial grievance mechanisms, see fact box. It is a business line responsibility to both host and properly manage these mechanisms. This allows for the process of collecting concerns or complaints to be tailored to suit the potentially affected stakeholders.

Guiding principles for our CGMs

- Prompt, consistent, and respectful
- Simple, local and culturally appropriate
- Free, well publicised and without retribution
- Designed and operated to the highest applicable standards and laws
- Not impeding access to judicial or administrative remedies

Handle grievances in our supply chains

As set out in our Human Rights Expectations of Suppliers, we expect our suppliers to provide appropriate mechanisms for raising complaints, and where necessary, provide remedy. This expectation is supported by specific compliance requirements related to remedy and grievance mechanisms within our templates for standard supplier contracts.

In practice, and often because of site visits, we have seen there is a need to raise awareness of both individuals’ rights, as well as the mechanisms available to them. In certain cases, we might establish a site-level grievance channel managed by a specialist third party. Workers will in such cases typically be informed of how to use the channel and its purpose by the operators themselves, and are free to contact the operators via e.g., text or through phone calls in workers’ native language.

Worker testimony that comes through the grievance mechanism shall be considered confidential and anonymous unless the worker wishes for their identity to be disclosed to the supplier’s management. The concerns are logged on a tracker and categorised by severity and risk to the worker. The supplier shall, if the concern is considered high-risk, typically be informed within 24 hours after receipt of such. Workers are informed via the operator about the actions taken by the supplier. If the workers consider the issue to be resolved, then the case is closed. However, where the action taken by the supplier is considered not to be satisfactory to the workers, further actions could be suggested by the operator.

Our commitment to remedy

Although we seek to apply a zero-harm philosophy, there are occasions where, despite our best efforts, actual adverse impact on human rights might occur. In these instances, remediation is important, both to seek that those having suffered or still suffering from adverse impacts are remediated as appropriate and to avoid potential future similar harms.

Where necessary and natural based on our role, Equinor seeks to actively cooperate with other potential non-judicial and judicial remedy processes, such as the OECD National Contact Points and Ombudsman offices.

We do not tolerate any forms of recrimination or retaliation to those who raise a concern with us. We recognise and respect the right of human rights defenders to advocate for and defend human rights in a peaceful manner on behalf of those whose rights may be at risk.
Introduction
In this section we seek to provide a description of work undertaken in 2023 to identify and address human rights impacts. As an integral part of this narrative, we provide information on select cases to highlight how we in practical terms apply our human rights requirements and standards. By doing so, we also highlight the main risks and adverse impacts identified, and how these have been addressed in 2023. The section is structured according to our supply chains, communities, responsible exits, and own workforce.

1. Supply Chain
Overview
Every year, Equinor has multiple different projects in its project portfolio. These projects typically include new build offshore oil and gas installations and vessels, modifications, subsea developments, renewables and low carbon projects, both in planning and execution phase. Our risk-based approach has directed our HRDD efforts towards suppliers performing fabrication and construction activities in countries with known risk of forced labour-like conditions.

Although Norway is our main country of operation, regarding the scale of our employee base, suppliers and plants in operation, we assess the risk of adverse human rights impacts there to be low. This pertains to strong regulations related to employee relations and safety, followed with supervision and enforcement by authorities, and the introduction of the requirements for human rights’ due diligence and Transparence Act. However, we have identified that services to onshore and offshore producing assets in Norway involving foreign personnel, and seasonal workers, to be among our specific priorities for supply chain due diligence.

We continued to prioritise HRDD work in project planning and procurement, as we consider early engagement with possible suppliers to be key to effectively avoid or mitigate potential adverse impacts in line with our human rights expectations.

In 2023, we have performed 25 onsite assessments supported by external human rights experts, resulting in 642 workers interviewed and a total of 283 findings in seven countries (Angola, Brazil, India, Indonesia, Norway, South-Korea, USA). The most serious findings relate to indicators of forced labour as referenced by the ILO Forced Labour Indicators. Although all forced labour indicators are concerning, our primary focus has been towards payment of recruitment fees, retention of identity papers and lack of freedom of movement. The reason for this is that any prevalence of these forced labour indicators increases the risk of forced labour. In 2023, no actual impacts related to these three priority forced labour indicators were identified.

In addition to the Equinor commissioned assessments referenced above, several of our direct suppliers have started to perform separate third-party onsite assessments including worker interviews. Equinor does currently not have reporting procedures in place to track the findings and outcomes of these assessments. However, we seek to engage on a case-by-case basis with suppliers in addressing findings and following up so that appropriate actions are taken.

Fatality in supply chain
Late August 2023, a man fell overboard from Equinor-chartered vessel en-route to discharge in Malaysia and unfortunately lost his life. Following the incident, Equinor reached out to the ship owner to express our condolences and to offer support in investigating the incident. Moreover, Equinor was enquiring with the shipowners whether appropriate financial and other forms of support were offered to the immediate family of the deceased. Equinor followed up with shipowner to ensure that the remaining crew members onboard the vessel received the necessary care and support.

Systemic issues in the supply chain
At times, risks of adverse human rights impacts which we encounter are not specific to our supply chains. Rather, they can be more systemic in nature and form an integral part of an economy, a particular sector, or an industry. Such systemic challenges are often too large for one company alone to take on successfully and can rarely be addressed effectively on a project basis alone. Accordingly, multifaceted, and often deeply engrained challenges like these, require us to challenge ourselves and to explore a broad set of tools and levers in a search for meaningful solutions including through collective efforts of governments and companies alike.
As such, we are actively pursuing opportunities for wider collaborations globally and at specific locations, building on industry initiatives and joint commitments such as through Ipieca, the global oil and gas association dedicated to advancing environmental and social performance, and between smaller and less formal groups of companies.

One example of a systemic issue requiring building and leveraging collective efforts is the occurrence of sub-standard labour conditions, not least for migrant workers, in the construction sector (e.g., in EMEA and South-East Asia). In 2023, we worked with BP, Shell and Ørsted to improve the rights and welfare of migrant workers in our supply chains, which is central to responsible business conduct and a just transition. As a first step, the companies together drafted a set of principles and guidelines in consultation with suppliers and civil society organisations. The aim is to improve accommodation and transport for migrant workers, drive the "employer pays" principle and implement effective grievance mechanisms. The next step is to pilot the principles and guidelines in fabrication yards in Singapore as a construction hub in East-Asia.

Another example is the widely reported risk of forced labour in solar supply chains with particular focus on the production of photovoltaics (PV) modules. Equinor continues to address this human right risk through a two-pronged approach: (i) implementation of systematic processes to increase traceability in the supply chain for our projects, and (ii) active participation in industry associations working to address labour rights conditions in solar supply chains. Given the nature of systemic challenges, and in light of the fact that more substantial governmental support also might be required, we realize that desired change is not always likely to happen swiftly. However, our intent is to continue to stay impatient and to explore new ways, unilaterally and collectively, to also address challenges of this systemic nature.

**Supply Chain Case Studies:**

The case studies presented here highlight examples of Equinor’s engagement throughout our supply chains. Common HRDD themes from these examples include:

• Our objective to learn from past experiences and mature our supplier relationships.
• Engagement with our supplier yards and industry peers to increase leverage and create consistent and clear expectations.
• Risk-prioritisation within projects in a manner that fits operational contexts and geographic risk profiles.
• An emphasis on capacity building as a means to increase leverage and support our supplier yards during follow-up, rather than taking a strict “auditing approach.”

**Offshore Oil & Gas – Case Study I**

**Affected stakeholders:** Supply chain workers

**Relevant salient issue(s):** Working conditions

**Overview:**

As part of a large, multi-year construction project in Asia, a human rights strategy was introduced due to high regional risk. The strategy was implemented across all yards in scope, with a specific focus on two yards in one specific country. The implementation of the strategy began in 2020 with an initial human rights assessment that identified 144 adverse findings, of which 53 were classified as serious. These included withholding of wages, unsanitary living conditions, financial penalties imposed on workers, excessive working hours, payment of recruitment fees, lodging of deposits, and lack of paid leave. Action plans were developed for both yards, prioritising remediation of the most severe impacts to workers, whilst also building the capacity of the yards to monitor their extensive subcontractor portfolio.

**Actions taken by Equinor:**

Monthly updates from the yards were requested and received. As part of such feedback the yards were asked to share information on actions taken that could be verified by a specialist third party. This was submitted by an on-the-ground monitoring team trained to spot the signs of serious human rights impacts to workers, and how to communicate these findings effectively to the yard management. Monitoring of this kind took place until sail-away in 2022 and was supplemented throughout with additional training sessions that also included the yard and its subcontractors.

Although follow-up assessments during project execution showed that improvements had been made – especially regarding the increased controls on workers paying recruitment fees – certain issues remained entrenched. As with similar projects, Equinor decided to prioritise the most severe adverse impacts identified and where progress was slowest. To support this prioritisation, outcomes-based targets were developed across the short, medium, and long-term with accompanying specific training delivered to the yard and subcontractors. The initiative included grievance management, subcontractor management and internal auditor training, worker-foremen dialogue, and wages/working hours control.

The nature of the identified issues reflected the pressures on the operating model that exists within the yards in question. Understanding the risk factors that were causing negative impacts was thus considered instrumental in order to implement sustainable improvements. Consequently, a series of drop-in clinics with subcontractors were also arranged to understand why certain practices – such as the late payment and withholding of wages – were re-occurring issues.

**Outcomes:**

Over the course of the project execution, over 1,000 workers at both yards were interviewed and surveyed, with over 40 subcontractors taking part in training sessions, drop-in clinics, and assessments. Key outcomes for workers and for the yards included:

• Recruitment fees being covered by the employer for direct workers.
• Abolishment of the practice of seeking deposits paid by workers for PPE and accommodation.
• Improvements of dormitory conditions.
• Mitigation of wage withholding at certain subcontractors.
• Increased oversight of subcontractors’ payment schedules for wages to increase the likelihood of any late payments to workers being flagged and remedied.
• Provision of pay slips and contracts.

The effectiveness of grievance mechanisms at both yards was also increased with workers reporting that after using these mechanisms they felt greater trust that their concerns could be raised and would be listened to.
**Offshore Oil & Gas – Case Study II**

**Affected stakeholders:** Supply chain workers

**Related salient issue(s):** Working conditions – risk of forced labour

**Overview:**
Throughout a recent subsea project development, several assessments were conducted to identify actual and potential human rights impacts within the scope of the project.

As a result, amongst select sub-suppliers, identified issues included examples of poor working conditions – as well as indicators of forced labour. At an Asian sub-supplier, identified issues included a small number of instances where workers’ passports were withheld, recruitment fees being paid without reimbursement, the inability of workers to join/form trade unions, insufficient worker payment verification processes, and the absence of appropriate grievance mechanisms. At a South American sub-supplier, identified issues included inadequate wages, misuse of freelance contracts, lack of emergency plans, unsafe equipment, and use of excessive overtime.

**Actions taken by Equinor:**
Equinor actively engaged with suppliers to follow up on the above-mentioned findings. Contractual terms between Equinor’s first tier supplier and second tier sub-suppliers were also updated to increase alignment with Equinor’s human rights expectations. Additionally, Equinor has engaged with our main supplier’s local supply chain management team to improve practices and enable closer follow up of any adverse human rights impacts identified in the future. Lastly, an additional impact assessment through an external third party was conducted to verify that actions had been taken and the results of them.

**Outcomes:**
Although a final assessment has not been concluded, Equinor remains optimistic that once finalised, it will show positive developments. Accordingly, the direct and intentional engagement with our main supplier to date has been productive in improving working conditions and addressing specific impacts identified throughout the larger project’s supply chain.

---

**Offshore Oil & Gas – Case Study III**

**Affected stakeholders:** Supply chain workers

**Related salient issue(s):** Working conditions – risk of forced labour

**Overview:**
In a large construction project in an Asian country with known systemic human rights issues we have returned to a legacy sub-supplier. During the previous project, the sub-supplier having undertaken material steps to improve its human rights performance. At the close-out of the project, a responsible exit strategy was implemented, including actions to continue the improvements already initiated. The lessons learnt from the responsible exit strategy implemented at the close-out of the previous project have been applied in the early phases of our new project.

The exit strategy and our previous relationship with this legacy sub-supplier has enabled open and frank conversations with continued emphasis on the five areas of concern addressed in the previous project, namely responsible recruitment, working hours and pay, working and living conditions, and subcontractor due diligence.

**Actions taken by Equinor:**
Working through our main contractor and a specialist third party, we made the decision to implement three actions early on in the project.

- A baseline assessment to understand progress made on the five focus areas and to understand the specific realities for workers on our new project.
- Training for our project team on the identified types of human rights risk and how these risks can be managed based on work already performed in the legacy project, associated with the region and how they can build on the work previously done.
- Development of a customer forum mandate, to be led by our sub-supplier to increase consistency in what clients are expecting regarding respect for human rights in their workforce and that of their contractors. Other existing industry / peer collaboration initiatives across Equinor were used as a model.

Following the baseline assessment, an updated action plan within the five focus areas was negotiated and agreed for the project. Further work was conducted to gain accurate data on the level of recruitment fees being paid by workers to ensure discussion about appropriate reimbursement figures are reflective of what workers had paid.

Our site teams have also been speaking with workers and visiting accommodation facilities at the construction site to ensure that we have an accurate picture of the current situation. Training for the sub-supplier in conducting worker interviews is planned for 2024. The project is also in discussions on how to bring the human rights lens into safety toolbox talks to improve communication and respect throughout a diverse workforce.

**Outcomes:**
Regular follow-up with the sub-supplier has been taking place during 2023, with updates to policies, processes, and procedures being reviewed and agreed upon across all five focus areas. Of the 86 improvement actions agreed, 75 have already commenced. Our aim is, in early 2024, to verify whether these actions have reduced the risks to workers and whether full and effective remedy has been achieved where appropriate.
Offshore Wind – Case Study

Affected stakeholders: Supply chain workers

Related salient issue(s): Working conditions - risk of forced labour

Overview:
In 2023 we began the construction of an offshore wind sub-station at a yard in southeast Asia.

The project gave us the opportunity to leverage learnings gained from previous projects at the same yard. As a result, human rights discussions that took place already during the 2022 tender phase, particularly related to the treatment of workers, were followed through to execution. Previously identified impacts and risks related to this project included payment of recruitment fees, low salaries, financial penalties, heavy reliance on overtime, unsafe transportation, and unsanitary accommodation.

As part of the tender process the yard was requested to develop a revised action plan for how it would address the remaining risks to workers identified during earlier projects. The action plan was later incorporated into the contract with the yard. Moreover, the yard was as part of the bidding process requested to stipulate the costs of implementing such an action plan to ensure financial capacity to address the identified risks. Although we regularly request bidders to include the costs of living up to our human rights expectations in all bids, the project is one of the first examples of Equinor having requested such costs to be stipulated on the basis of a more concrete action plan.

Actions taken by Equinor:
Since the contract award in early 2023, we have been following up on the actions outlined in the plan and within the contract. These actions include:
- Efficacy of new employer-pays recruitment model and protocol for investigating worker-paid recruitment fees.
- Remediation of recruitment fees for new joiners, where present.
- Improvements to accommodation, specifically hygiene and personal space.
- Introduction of safer methods of transport for workers housed outside of the yard.
- Removal of unjust financial penalties for workers.
- Drafting of a progressive wage model.
- Introduction of a mental health helpline and other improvements to communication on site.

Actions taken in 2023 have included yard and accommodation visits by our project team, as well as the planning of a deeper dive into the recruitment channels used by the yards and their subcontractors, with an aim to identify the risk factors that lead to the presence of forced labour risks within the recruitment journey of workers.

Outcomes:
Follow-up and verification of improvements with workers is planned for 2024 and we remain optimistic that we will be able to confirm positive results.

Seafarers on Chartered Vessels – Case Study

Affected stakeholders: Supply chain workers (seafarers)

Related salient issue(s): Working conditions - risk of forced labour

Overview:
Our Norwegian operations present comparatively fewer risks to workers due to strong working environment regulations both on and offshore. Nonetheless, issues may arise in the labour supply chain.

During a verification with focus on seafarers’ conditions, we found that in some instances can be a risk that seafarers are requested to pay costs associated with their replacement if terminated for misconduct. Seafarers are contracted through a ship crewing agency where approximately 20% of their wages routinely are withheld until the end of their contracts. Ultimately and in combination with other risk factors, such perceived barriers for resignation can in certain circumstances contribute to working conditions carrying forced labour indicators.

Actions taken by Equinor:
Equinor requested evidence for procedures ensuring seafarers a right to influence how salaries are paid. Similarly, it as requested documentation of seafarers being given the option to voluntarily let their salary in parts or in whole, be deposited to family members. Equinor also asked for evidence of an updated collective bargaining agreement making clear to crew members that they were not expected to pay for their replacement or repatriation.

Given no, limited, or sub-optimal responses from sub-contractors employing the seafarers in question, Equinor is continuing to stay in close dialogue with its primary contractor to ensure that additional measures are put in place vis-a-vis the sub-contractor in order to decrease the likelihood of similar incidents. The findings will act as examples to be aware of in future supplier assessments. Further, Equinor is considering how to best use its leverage in order for contractor to set higher expectations to its network of subcontractors with respect to the identified issues.

Outcomes:
Ultimately, the contract between Equinor’s contractor and the particular vessel expired during the course of the investigation to verify the claims. Thus, final outcomes are unknown. The reason for this uncertainty is due to the fact that subcontractors are not contractually obliged to act on these findings following the expiration of their contract, and there is little way for Equinor to follow up with a sub-supplier in this situation.
2. Communities

Equinor is present in around 30 countries worldwide. We have activities in North and South America, Africa, Asia, Oceania, and Europe. Any single one of our own operations, or partner operations, inherently has some degree of interaction with and impact on local communities, whether positive or negative. Below is an overview highlighting some of our operations, adverse community impacts, and respective engagement with local communities. A full overview of the geographies in which Equinor has activities can be found on our ‘Where we are’ webpage.

Norway
Equinor operates as the leading supplier of energy to Europe and is the largest oil and gas operator on the Norwegian Continental Shelf. Our Norwegian operations present comparatively fewer human rights risks for multiple reasons, including more direct operational control and the offshore nature of most of our Norwegian operations which somewhat reduces the risk of impacts on human rights and local communities.

While this generally is the case, Equinor acknowledges that in parts of Norway, low-carbon developments to our onshore infrastructure can have an impact on local communities, including potentially on the rights of the Sámi population of Norway. This issue has been raised by Sámi communities related to the electrification of Equinor’s Melkøya liquefied natural gas (LNG) plant due to alleged impacts on reindeer husbandry.

Since the first phases of the project, and for several years thereafter, Equinor has sought close and continued dialogue with the local Sámi community in the project’s vicinity. In response to initial Sámi concerns regarding possible adverse impacts on reindeer husbandry from overhead power lines to Melkøya, Equinor in 2021 selected a concept with underground cables to minimize impact on third parties. Based on consultations carried out with the relevant Sámi reindeer district, it was Equinor’s understanding that in this way burying the cables, significantly would reduce the project’s risk of negatively affecting reindeer husbandry. Equinor remains committed to continued consultation with all relevant stakeholders to the project.

Canada
Equinor operates numerous offshore licenses in the Flemish Pass basin and is a partner in two developments in the Jeanne d’Arc basin offshore the province of Newfoundland and Labrador. Equinor has been present offshore Newfoundland and Labrador since 1996. The area includes the Bay du Nord discovery, first made in 2013. In May 2023, following changing market conditions and subsequent high-cost inflation, Equinor and our partner BP made the decision to postpone the Bay du Nord development project for up to three years.

Equinor Canada Ltd., along with the Minister of Environment and Climate Change Canada, is a respondent in the Federal Court of Appeal of Canada in an ongoing case related to the approval of the Bay du Nord project brought by Ecojustice, on behalf of Équiterre, Sierra Club Canada Foundation and Mi’gmawe’l Tplu’taqnn Incorporated (the “NGOs”). The NGOs argued that the approvals process failed to consider downstream greenhouse gas emissions and that proper consultation had not been carried out with certain indigenous groups. The Federal Court Trial Division found in favour of the Minister of Environment and Climate Change Canada and Equinor, finding that the appropriate procedures had been followed. However, this decision has been appealed and a hearing is expected in 2024.
Tanzania
Equinor has been in Tanzania since 2007 and continues to mature opportunities for the development of the gas resources located about 100 km offshore from the coast of Lindi. Equinor on behalf of Block 2 and Shell on behalf of Block 1 and 4 have signed a MoU to jointly develop the resources and are now on behalf of the partnership in the final phase of negotiating the framework required to proceed with the project.

In 2023, Equinor together with Shell, have continued to work towards minimizing human rights risks and impacts associated with the potential LNG site – details regarding previous updates for this project are available in Equinor’s annual sustainability reports archive.

After the Government of Tanzania – through TPCD (the national oil company)-finalized the compensation and relocation of families from the land designated for the project, Shell and Equinor have contracted a third-party service provider to run a post-compensation livelihood programme available to all those who were resettled. The agricultural livelihood programme is ongoing and is followed up with a monitoring and evaluation programme supported by a local grievance mechanism.

U.S.A Offshore Wind – Case Study

Affected stakeholders: Communities and community members

Relevant salient issue(s): Affected communities

Overview:
Currently, Equinor is involved in offshore wind activities in the U.K., with future activities under development in Norway, the U.K., the U.S., Poland, and South Korea.

This case study describes how Equinor over the course of the development process for planned offshore wind projects in the U.S. works to assess and address concerns regarding the potential impact of these activities on local communities.

Actions taken by Equinor:
Equinor has taken several actions to engage with potentially affected fishing communities related to planned developments off the coast of New York state. These have included, but are not limited to the following:

- Equinor’s Fisheries Liaison Officer and Marine Affairs Manager have conducted extensive dialogue and engagements with stakeholders including commercial and recreational fishermen.
- Over a thousand marine stakeholders, including the commercial and recreational fishing communities, have been contacted via email regarding survey notifications, lease project updates, fisheries & benthic monitoring updates, fisheries open houses, port visits, fisheries trade show participation, etc.
- Equinor held regular “Port Hours” in prime ports and has been present at fishing trade shows and fisheries working groups as these serve as opportunities to provide project updates and engage with stakeholders and organizations.
- Through these engagements, specific concerns have been addressed such as boulder removal, compensation/mitigation, noise impacts on marine life, safety/navigation issues etc. Avenues to address these impacts included the creation of designated subcommittees and consultations with subject matter experts.

In context of our offshore wind activities, it has also been identified that the construction of Empire Wind outside New York, and the Atlas Wind project in California may potentially disturb ancient submerged landforms culturally significant to tribal nations. Towards this, for Empire Wind, Equinor has agreed to a number of mitigation measures to avoid, minimize, and/or mitigate these potential impacts during construction and operation. Related to our California Wind Lease, Equinor has mapped communities that may be affected, temporarily or permanently, by the future projects and has initiated engagement with potentially affected indigenous communities.

Outcomes:
More than 15 mitigation measures to avoid, minimize, and or mitigate potential impacts to tribal communities during construction and operation of Empire Wind. As an example, Empire Wind will work with Tribal Nations to provide them with an opportunity to participate as monitors during ground disturbing activities in potentially sensitive areas.

The extensive and regular meetings, communication and engagement seek to ensure emerging issues are known to all parties. Equinor considers that this process facilitates cooperation and respectful coexistence with local fishing communities. Equinor will continue to learn and improve in these engagement processes in current and future projects.
International non-operated assets
In addition to assets fully owned and operated by Equinor, Equinor is involved in partnerships with various international operators across the globe. Equinor’s level of proximity to possible impacts and the ability to mitigate and remediate impacts varies due to the nature of these business relationships. Accordingly, human rights due diligence actions may include direct engagement with our partners and suppliers and, where possible, utilising leverage to ensure that risks and impacts are appropriately addressed.

Equinor’s process of human rights due diligence often includes engaging with third-party experts to conduct human rights assessments. Such has been the case in Algeria, where Equinor has been present since 2003. Equinor’s human rights assessment identified risks associated with working conditions and geographic security conditions resulting in the implementation of audits and focused security training.

In Argentina, where Equinor has been present since 2017, Equinor has focused our efforts on close collaboration with the local operator related to addressing the risk of poor working conditions among contracted workers. We have continued to monitor and assess contractor-related grievances and follow up with subcontractors to ensure appropriate implementation measures are in place.

In other locations, such as Libya, there remains wider risks pertaining to ongoing political instability. The most significant potential risks for Equinor’s activities are towards the health, safety and security of workers, contractors and local communities. In 2023, we continued our efforts to strengthen engagement with our local partners around human rights and security. Competence development on this topic remains a priority, though implementation of the identified mitigating measures remains challenging due to the political instability.

Equinor remains committed to engaging with our operating partners across the globe to ensure that respect for human rights is promoted across all projects.

Planned Country Exits – International Oil and Gas Business
In 2023, Equinor entered into two major transactions related to its international oil and gas business. In Nigeria and Azerbaijan: We sold our Nigeria business, including our share in the Agbami offshore oil field, to the Nigerian company Chappal Energies in November 2023. We sold our Azerbaijani assets, including our interests in the Azeri Chirag Gunashli offshore oil fields in the Azerbaijan sector of the Caspian Sea, the Baku-Tbilisi-Ceyhan (BTC) pipeline and the Karabagh field, to SOCAR (State Oil Company of Azerbaijan Republic) in December 2023. The closing of both transactions is still subject to the fulfilment of certain conditions including all regulatory and contractual approvals. However, Equinor expects to exit both countries as soon as the aforementioned approvals are secured.

In tandem with these transactions and the exit processes, we are conducting human rights due diligence exercises to assess the possible impact of Equinor’s exits on stakeholders and consider mitigating actions as needed. The potentially affected stakeholders we have identified are our employees, external hires, consultants, suppliers and to some extent local communities. Given that Equinor was not operating any assets in Nigeria or Azerbaijan, our supply chain was limited to suppliers to Equinor’s local offices. We are likely to be positioned to provide an update on the outcome of these processes in next year’s human rights statement.
3. Own Workforce

Equinor’s work to continuously respect human rights and decent working conditions for our own workforce has continued throughout 2023.

Living Wages

Equinor is committed to providing reasonable and competitive compensation and benefits to our employees in all locations. During 2023 we partnered with The Fair Wage Network, a recognised specialist in this field, to undertake an extensive review of our employees’ compensation against living wage benchmarks. Our analysis, carried out using the Anker Methodology, shows that Equinor has no employees globally below any applicable minimum wage or within 10% of the living wages threshold. The analysis was carried out on base salaries alone and did not include compensation items such as variable pay, allowances, or other benefits. Accordingly, we remain confident that all our employees are paid a wage which meets the accepted definitions of living wage.

Diversity and Inclusion

Please reference chapter two of Equinor’s Annual Report: Workforce for the future for additional information on D&I metrics and actions taken in 2023.

Health and Safety

Please reference chapter two of Equinor’s Annual Report: Safe and secure operations for additional information on health and safety metrics and actions taken in 2023.

Human Rights Training and capacity building

Equinor prioritises human rights training across our workforce, to ensure that all employees are aware of Equinor’s human rights responsibilities, policies, and procedures, and can apply them appropriately to their area of work. Additionally, we seek to ensure that employees particularly exposed to potential human rights risk receive additional, specified training.

In 2023, over 1700 participants (Equinor employees and hired personnel) attended human rights courses arranged through Equinor University, including basic e-learning, targeted training and awareness sessions.

In addition to regular risk and performance updates, the Board of Director’s Safety, Sustainability and Ethics Committee received a human rights deep dive in 2023 related to the risk of forced labour in our supply chain.

To celebrate the international Human Rights Day in 2023, where 10 December 2023 marked the 75th anniversary of the Universal Declaration of Human Rights, Equinor chose to have particular focus on indigenous people’s rights through internal awareness sessions.
Part III: Our work going forward

The primary focus of our human rights work continues to be to perform risk-based human rights due diligence (HRDD). We seek to gradually increase the coverage of our HRDD efforts as we evolve our business, while improving consistency in how we work and documentation thereof.

Recognising the continued evolution within the field of business and human rights, we will continue to take steps to advance and improve our processes and systems for effective HRDD. This includes making necessary preparations to enable reporting in line with the EU Corporate Sustainability Reporting Directive (CSRD).

Another key priority in the coming year is to initiate a review of our Human Rights Policy considering the external context, our strategy and our portfolio of business activities. Central to this, we intend to perform a corporate-wide saliency review to guide our future HRDD efforts.

Based on an internal gap analysis, supported by the human rights expertise centre Shift, we have in 2023 assessed the status and effectiveness of our current grievance mechanism ecosystem as well as our tools for stakeholder engagement. Based on this analysis, we will initiate necessary steps to improve our grievance mechanism systems.

To address systemic issues primarily related to labour rights we will continue to drive and leverage collaboration initiatives at a global or industry level. At the same time, we will also pursue opportunities for location-specific initiatives. Further, as we continue to grow our renewables business, we will seek to build our understanding of any systemic human rights issues connected to onshore and offshore wind, solar and batteries supply chains, both internally as well as together with partners and the wider industry. Longer term, we also intend to further explore how to approach the topic of living wage beyond the ranks of our own employees. As part of this work, we will seek effective ways to encourage best practice on living wage matters within our supply chains.

Finally, we will initiate preparations for EU Corporate Sustainability Due Diligence Directive, currently being negotiated and expected to be enforced from 2025 at the earliest.

Equinor remains committed to continuous improvement of our HRDD. Requests for information regarding this report, or our human rights work in general, can be made via Contact Us at equinor.com.
Equinor has made some delimitations for this human rights statement. The statement does, e.g., not cover alleged cases of discrimination or harassment within Equinor’s own workforce; these cases are reported in our Annual Reports. Further, the statement does not cover matters which only have a tenuous human rights dimension to them.

It should also be noted that there will continue to be certain human rights risks and impacts linked to Equinor’s business which we remain unaware of, and which are hence not covered in this statement. You are invited to inform us about such matters via equinor.com.

The statement covers relevant aspects of Equinor’s human rights due diligence work undertaken in 2023 and was prepared up to February 15, 2024. It provides an overview based on our best knowledge at the date of the statement. We will not necessarily update this statement in case we become aware of inaccuracies or changes to the status presented in the statement after this date.

This statement is prepared on behalf of the Equinor group.
• Equinor is organised into six business areas:
  • Exploration & Production Norway
  • Exploration & Production International
  • Renewables
  • Technology, Digital & Innovation
  • Project, Drilling & Procurement
  • Marketing, Midstream & Processing

In addition, there are six staff and support divisions. More information on Equinor’s corporate structure and governance can be found on www.equinor.com.

It is this basic group architecture and operational model, rather than separation based on different group companies or subsidiaries, which forms the basis for how we work on a day-to-day basis – including with respect to identifying and addressing human rights impacts and risk. Accordingly, as often is the case for groups of Equinor’s size and complexity, many of our subsidiaries do not have employees of their own. Instead, they heavily depend on central corporate staff functions and support divisions. An example is our centralized procurement function which provides services to large parts of the group across corporate structures.

We believe that this way of organizing Equinor activities comes with clear advantages. It creates efficiency, allowing group resources to be shared more seamlessly. In addition, it contributes to building robust and competent group functions on complex and specialized matters challenging to manage in a more compartmentalized fashion.

Similarly, we believe that our integrated way of working facilitates learning across the group, as well as culture and competence building.

Our annual human rights statement is published in response to the requirements of the Norwegian Transparency Act. It describes, in a comprehensive way, how we in 2023 have worked to both identify and address potential and actual adverse impacts on human rights and decent working conditions across the Equinor group, reflecting the organizational structure explained above. In most cases, it is not very meaningful or even possible to identify which group company a concrete impact sits with. This might typically be the case where an impact involves or is linked to several of our group subsidiaries and their activities.

Still, the overall objective is providing interested parties with a holistic account, easily accessible on our group webpage, describing our work on human rights and decent working conditions, identified risks and impacts, our accomplishments to date, and areas and topics where we still will have to strengthen our efforts and improve. We welcome any concrete feedback on the statement that you might have.

Handling information requests according to the Norwegian Transparency Act

To be able to effectively respond to information requests under the Act in force since July 2022, we have developed an internal procedure to receive and handle requests. We have adjusted the ‘Contact Us’ form on equinor.com, linking it to our internal workflow system, to ensure requests are handled in a timely manner in accordance with the Act. During 2023 we received and processed six requests relevant to the Act.