

20<sup>24</sup> Statement on due diligence, human rights and decent working conditions



**TSS NORWAY**

**TUBACEX**  
GROUP

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Letter from Managing Director

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TSS Norway, a Tubacex company

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# Letter from Managing Director

TSS Norway is 100% owned by Tubacex S.A, an international company with over 2500 employees in more than 30 countries. TSS Norway has 23 employees, and the head office is in Bergen. In addition we have an office and warehouse in Stavanger and a department in Spain for document control and project management. TSS Norway delivers products of high quality both from Tubacex production and from international recognized manufacturers. We are certified to ISO 9001 Quality management, ISO 14001 Environmental management and ISO 45001 Work environment management.

TSS Norway works to ensure compliance with human rights, employees' rights and a healthy environment. We follow the UN Global Compacts principles for responsible business operations. These principles form an integrated part of our Code of Conduct and ethical guidelines, which also applies to our suppliers. We respect international sanction lists and requirements related to Conflict Minerals and expect the same from our suppliers.

Our suppliers and sub-suppliers shall recognize and approve to work in compliance with our ethical principles. TSS Norway is a transparent company and information is published on [www.tubacex.com](http://www.tubacex.com)

We cooperate with well-established suppliers, mainly in Spain, Austria, Thailand, England and Germany. Our suppliers are expected to comply with UN's principles for responsible business operations and prefer that they are certified to known quality, work environment and environmental standards.

All our suppliers are responsible for follow-up of their sub-suppliers.

**André Drønen,**  
Managing Director TSS Norway AS



# Introduction

Stavanger

Warehouse

**3,500 sqm**

Bergen and Stavanger

Offices

Bilbao, Spain

Office

NORSOK

Standard

**M-650**

**M-630**



**TSS Norway is a distributor and stockist of pipes, fittings, flanges and other pipe related products, in addition to special items. We are 100% owned by the Spanish manufacturer group TUBACEX S.P.A.**

We are located with an office in Bergen and an office and a warehouse in Gamle Forusvei 11 in Stavanger. TSS Norway has frame agreements with the most important Norwegian operators in the energy, oil and gas industry.

Technical Manager is a member of the NORSOK M-650-committee and the NORSOK M-630-committee. We perform Norsok M-650/ISO 17782 qualifications as certifying company for our main suppliers and manufacturers.



# TSS Norway, a Tubacex S.A. company



2500  
Employees



24  
Manufacturers



14  
SERVICE centers



2  
Innovation centers



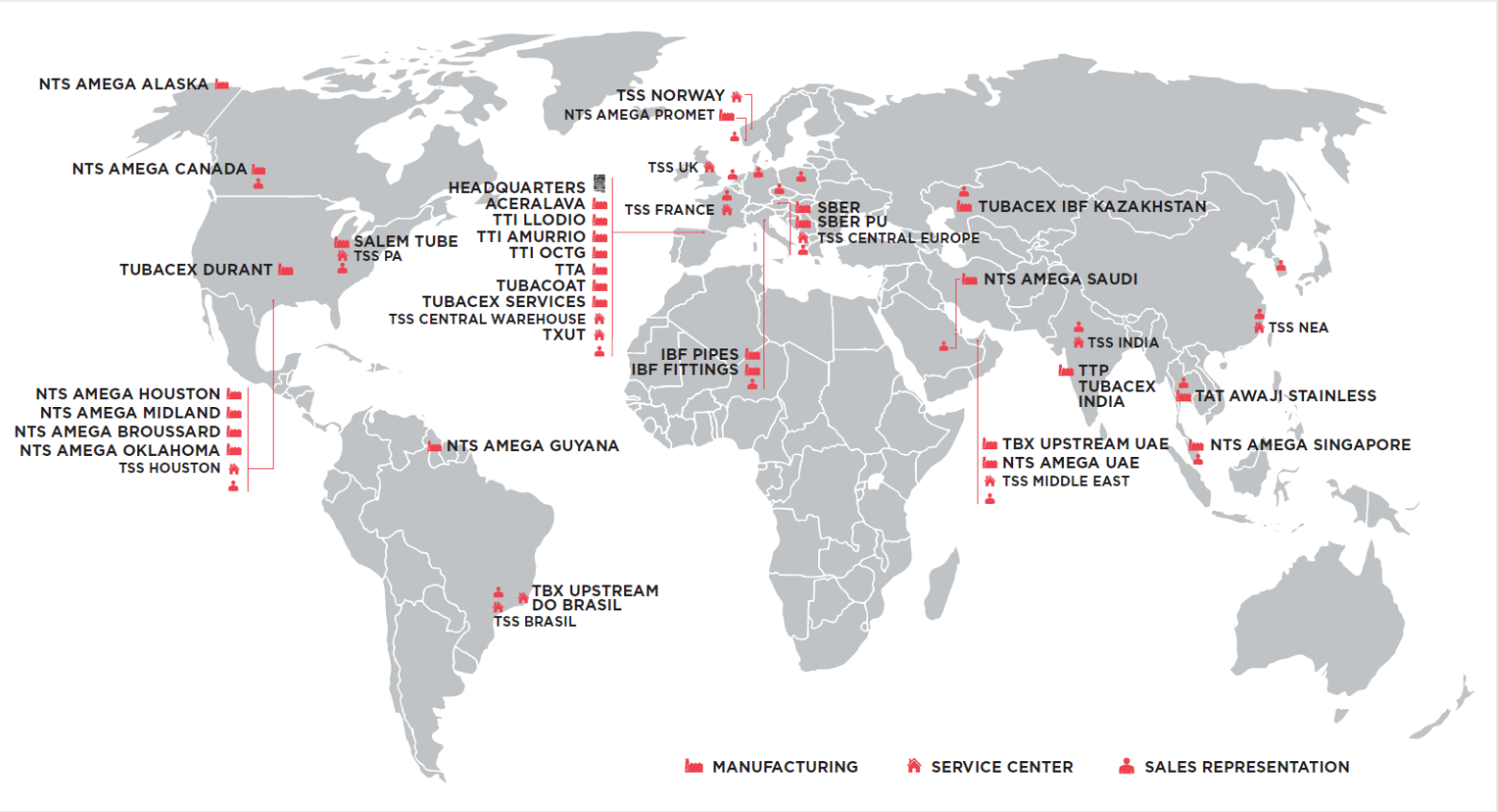
60  
Supplier to 60  
countries



15  
Sales offices



400  
Qualifications



# Del 1: Our Approach

## 1. TSS Norway's obligations to respect human rights

Human rights standards that TSS Norway shall, and that we expect our suppliers, to be in compliance with:

- Fair treatment and non-discrimination
- Safe, healthy and secure working conditions
- Fair conditions and working hours
- Respect freedom for assembly, freedom of association and the right to engage in collective bargaining
- Prevent modern slavery
- Prevent child labor and protecting young workers
- Respect members of affected communities

TSS Norway supports and respects international recognized human rights. This work is firmly rooted in Tubacex, in addition to good business practices, ethical guidelines and corporate responsibility being well integrated in our HSEQ system.

Compliance with human rights is an important part in approving new suppliers, where we require the supplier to comply with TSS Norway Code of Conduct. We expect that the employees have a good working environment, conditions according to local laws and regulations and the freedom of association.



# Del 1: Our Approach

## 2. Anchoring our commitments in the company guidelines

TSS Norway's HSEQ system includes documentation such as:

- Code of Conduct
- Corporate Social Responsibility Procedure
- Human Rights Policy
- Integrity Due Diligence Procedure
- HSE Policy
- Quality Policy
- Procedure for NCR and other registrations
- Business Hospitality Procedure
- Risk Management Procedure

In addition to other internal procedures that contribute to compliance with the Transparency Act.



## Part 1: Our Approach

### 3. Evaluation of risks

In compliance with the Transparency Act, risk assessments with focus on critical suppliers with the highest risk for negative impact are conducted. A critical supplier is defined based on criterias such as:

- Frame Agreements
- Supplier defined as a main supplier
- Suppliers located in high-risk areas/country with a score between 0-45
- Suppliers of products and/or raw materials with limited access and/or restrictions

Existing suppliers are risk assessed annually. Risk assessments conducted in 2024 show only limited risks at both suppliers and other business partners. TSS Norway has a good and long-lasting business relationship with all suppliers and conduct regular follow-ups.



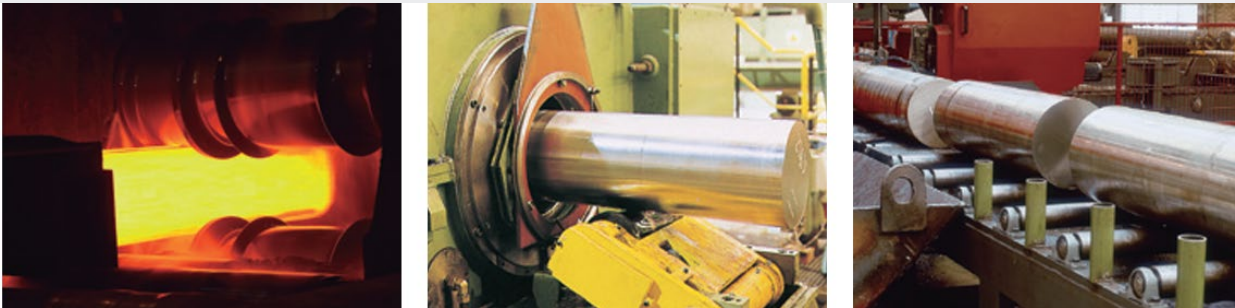


## Part 1: Our Approach

### 4. Management of risks

As mentioned, there is only limited risks related to our suppliers and business partners. TSS Norway works systematically to reduce and prevent risks related to safety, environment, human rights and corruption, including measures such as;

- TSS Norway employees confirm adherence to our ethical guidelines
- TSS Norway employees conduct training and e-learning in ethical guidelines and compliance
- Suppliers must confirm compliance with TSS Norway ethical guidelines and expect the same from their sub-suppliers
- TSS Norway conducts audits and other follow-up of our suppliers



# Part 1: Our Approach

## 5. Involvement of stakeholders

### **TSS Norway Employees**

It is very important that our employees feel respected, safe and secure, and that there is an open dialogue with applicable managers. Such dialogue is promoted through management, the union- and safety representative.

TSS Norway utilises employee surveys to identify measures to achieve increased involvement and to prevent discrimination.

### **Local content**

TSS Norway is an open and transparent company. All stakeholders with a right to information may send a request to [post@tssnorway.no](mailto:post@tssnorway.no).



## Part 1: Our Approach

### 6. Follow-up

It is important for TSS Norway to have a good overview and a close follow-up of our suppliers through annual risk assessments and evaluation of each supplier. Eventual high-risk elements will be addressed and followed-up closely with measures such as audits, supplemental questionnaires and other documentation. In case of unsatisfactory results, we will require improvement plans with actions and deadlines, and in worst case terminate the business relationship.



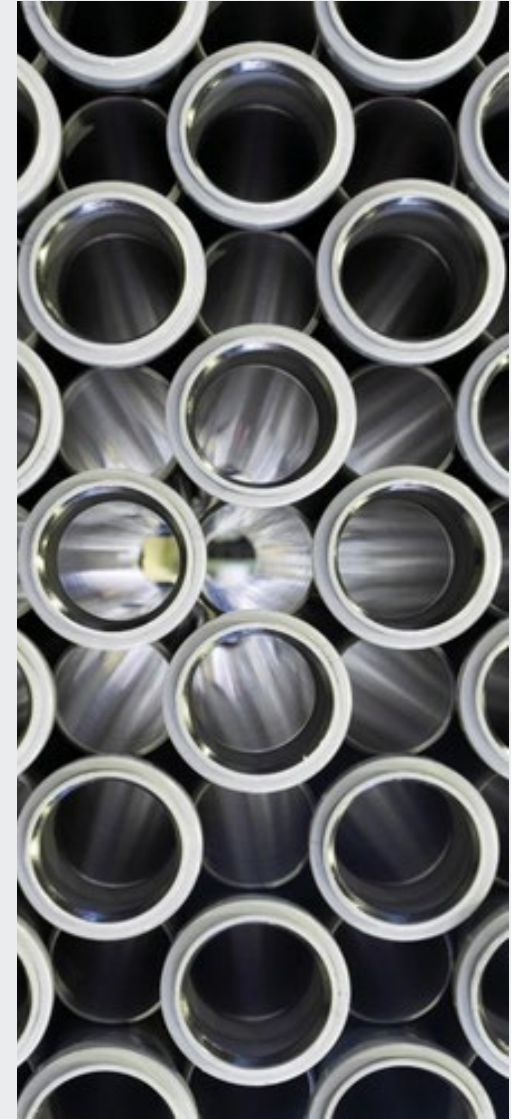
## Part 2: Activity Assessment 2024

### 1. Supply chain

Risk assessments related to procurement and human rights continues to be a focus area. Our belief is that early involvement with suppliers is key to avoid or reduce potential negative consequences on human rights and decent working conditions.

TSS Norway prefer, and strongly encourage, our suppliers to be certified according to management systems such as ISO 9001 quality management, ISO 45001 management of work environment and ISO 14001 environmental management.

All suppliers are responsible to follow-up their sub-suppliers.





## Part 3: TSS Norway's future work

TSS Norway's main focus in our work related to human rights going forward will be to conduct regular risk assessments. This includes to gradually increase the extent in coverage according to our growing business and in our ability to conduct such assessments in a consistent and documentable way.

Locally in Norway, we will continue to be a main sponsor to Trond Mohn Games. This is an important arena to engage youth in healthy environments and in sports.



Sincerely,

The board of TSS Norway

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Miguel Lacabex Gomez  
Chairman of the board



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Ana López de Mendoza Laburu  
Member of the board



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André Drønen  
Board deputy / Managing  
Director

The background is a dark blue gradient with numerous glowing, curved lines in shades of blue and red. These lines create a sense of motion and depth, resembling light trails or abstract orbits. The lines are concentrated in the center and spread out towards the edges, creating a dynamic and futuristic feel.

**TUBACEX**  
GROUP

[www.tubacex.com](http://www.tubacex.com)