Aker Solutions



Code of Conduct

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Message from our CEO

Dear colleagues,

We solve global energy challenges for future generations. At Aker Solutions, we have a long and proud industrial history. We honor that legacy and secure our future license to operate by acting responsibly and with integrity everywhere we operate. We adhere to the highest standards and honor our commitments to gain and maintain trust of one another, our customers, business partners and other stakeholders.

Our success depends on each and every one of us constantly doing what is right. Our Code of Conduct reflects our continued commitment to applying ethical business practices and legal compliance throughout our global organization wherever we operate and conduct business on behalf of Aker Solutions. Our Board of Directors and I are absolute in our expectations that the rules and principles set out in our Code of Conduct are to be followed without exception.

Integrity starts with you and me. It is important that we understand the integrity risks we face in our roles, how to manage them, and who to turn to for advice and help if ever in doubt. We all have a responsibility to raise compliance and integrity concerns. When you speak up, we can resolve issues before they become more serious, and we have the opportunity to improve. If you have seen or heard anything that might constitute a breach of law or regulations or our Code of Conduct, you should report it either within your line organization or via our whistleblowing channel.

Thank you for your continued commitment to upholding our culture of compliance and integrity.



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President and CEO Aker Solutions

1. Understanding and living our Code of Conduct

Sustainability and the Code of Conduct

Our commitment to compliance and integrity

How the Code of Conduct applies

Our responsibilities

Declaration of compliance



1. Understanding and living our Code of Conduct

Sustainability and the Code of Conduct

Sustainability at Aker Solutions is about making responsible business decisions that create value while protecting people, the environment and contributing to the good of society and the Code of Conduct guides us in this direction. To us, a sustainable business is one that:

- Acts responsibly to the benefit of our employees and society
- Commits to working together to face the climate change challenge, and
- Takes ownership to create a cleaner, safer and more sustainable future by finding improved solutions

The Code of Conduct outlines the behaviors and actions expected of all Aker Solutions' employees as work to solve global energy challenges for future generations.

Our commitment to compliance and integrity

Aker Solutions shall conduct its business with integrity, respecting the laws, cultures, dignity and rights of individuals in all the countries where we operate. All Aker Solutions employees are expected to act in accordance with these company principles and requirements.

This Code of Conduct describes Aker Solutions' commitments and requirements regarding compliance and ethical business practices and personal conduct. It describes the behavior Aker Solutions expects from you and what you and our business partners, can expect from Aker Solutions.

To help us all apply this Code of Conduct in our daily work and decisions, we have developed related policies and procedures to provide more detailed guidance on compliance requirements.

We shall always strive to exercise good judgment, care and consideration in our service for Aker Solutions. If there are differences between applicable laws and regulations, and the standards set out in this Code of Conduct, the highest standard consistent with applicable local laws shall be applied.

Violation of this Code of Conduct or applicable laws may lead to internal disciplinary actions, dismissal or even

criminal prosecution. Violations of law may be reported to the appropriate enforcement authorities.

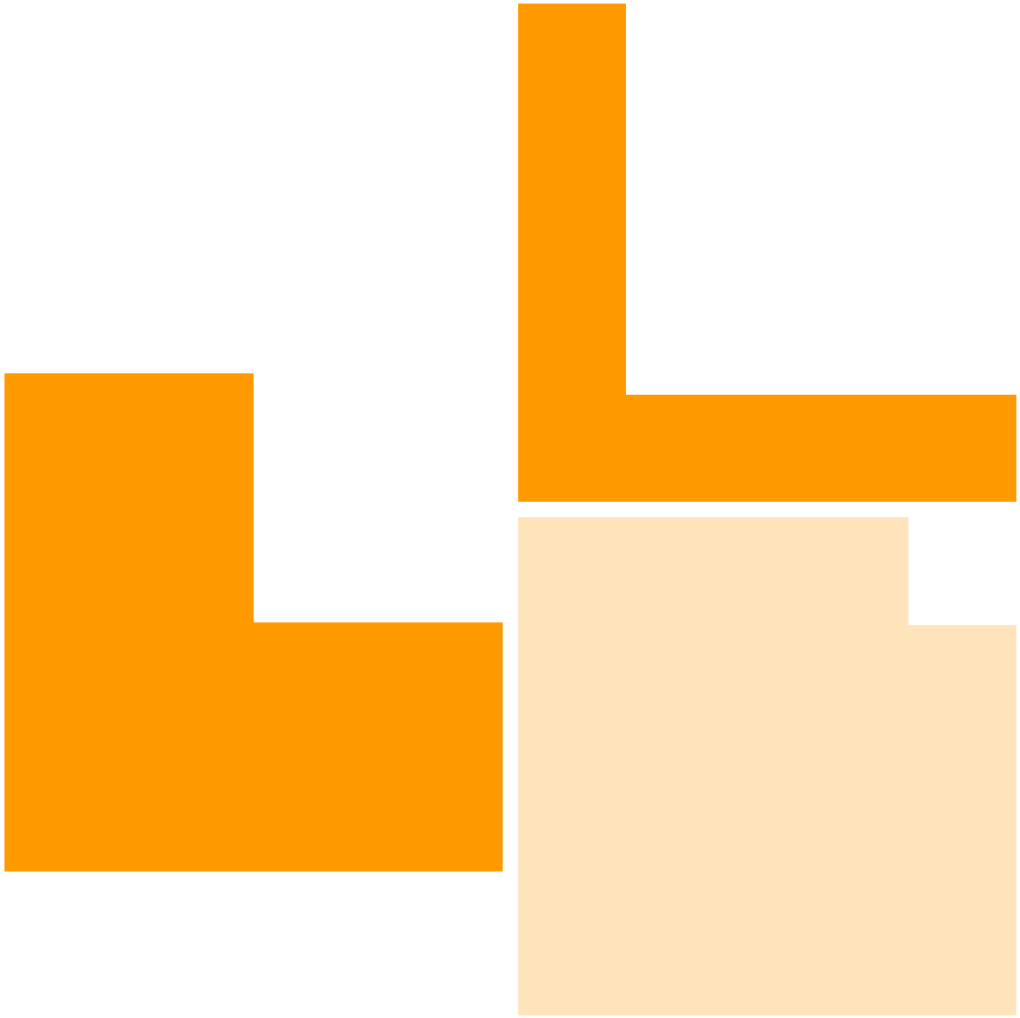
If you have questions regarding the content of this Code of Conduct or the interpretation thereof, please contact Legal or Compliance & Integrity teams. If you require advice in the handling of a specific ethical dilemma, you shall consult with your manager or other appropriate authority. You can always contact our Ethics Helpline at:

ethics@akersolutions.com

You are required to report any evidence of violations of this Code or applicable laws that you identify. Reporting violations in good faith will never serve as a basis for disciplinary action. The Code of Conduct has been approved by the Board of Directors of Aker Solutions ASA. All deviations, if any, must be approved by the CEO, except that any deviation pertaining to the President and CEO or any Director will be handled by the Board of Directors.

How the Code of Conduct applies

This Code of Conduct applies to all employees (including temporary personnel) and directors in Aker Solutions ASA and its subsidiaries, corporate affiliates, and joint ventures that are majority owned or controlled by Aker Solutions (individually and collectively). It also applies to intermediaries, lobbyists,



consultants and others who act on behalf of Aker Solutions.

Aker Solutions encourages all our business partners to adhere to principles that are consistent with this Code of Conduct. Suppliers, subcontractors and other contracting parties of Aker Solutions, including companies in which Aker Solutions owns a minority stake, are expected to adhere to standards which are consistent with applicable laws and Aker Solutions' Code of Conduct, and Aker Solutions shall do its best to ensure such adherence.

Our responsibilities

Personal responsibility of all employees

As an Aker Solutions employee, you shall strive to exercise good judgment, care and consideration in your service for Aker Solutions. You have a responsibility to act with integrity in every aspect of your role.

You have a responsibility to comply with our governing documents i.a. policies, procedures, mandates, authorization matrices as well as applicable laws and regulations relevant to your role. You are expected to familiarize yourself with, sign off on, and perform your duties in line with the principles set forth herein. You are expected to understand the risks you face in your role, and how to manage and mitigate these risks. If you need advice in handling a specific ethical dilemma, you are advised to consult with your manager or other appropriate authority. Compliance & Integrity department may also be contacted for advice.

Executive vice presidents' and line managers' responsibility

Executive vice presidents and line managers are expected to actively communicate and implement the requirements in the Code of Conduct to their direct reports, and to act as role models. Managers are also responsible for promoting and monitoring compliance with the Code of Conduct within their respective area of responsibility.

Board of directors and CEO's responsibility

Aker Solutions' Board of Directors is responsible for safeguarding and overseeing the management of this Code of Conduct. The CEO of Aker Solutions shall ensure that employees are aware of and comply with this Code of Conduct. The CEO shall also ensure that annual Code of Conduct training is conducted for the company's employees, and that the employees, as part of such training or other suitable process, sign that they have read and understood the Code.

Declaration of compliance

You as an employee will be requested on an annual basis to confirm by signing the Annual Statement of Compliance that you have read and familiarized yourself with this Code of Conduct, and that you for the previous year have conducted your tasks and responsibilities in accordance with the requirements set forth in this Code of Conduct.

Suppliers, subcontractors, representatives and other contracting parties of Aker Solutions are expected to have compliance and ethical standards that are compatible with this Code of Conduct and shall also sign declarations confirming compliance with the requirements reflected in this Code of Conduct.



2. Speaking up and reporting concerns

Speak up culture

Whistleblowing

Respecting people



2. Speaking up and reporting concerns

Speak up culture

We are committed to building a culture of trust where employees are comfortable to ask questions, seek guidance, raise concerns and report suspected violations. We take your questions and concerns seriously. We all have a responsibility and must have the courage to speak up promptly about ethical questions or issues, and anything we believe, in good faith, to be a suspected violation.

Whistleblowing

If you are aware or have suspicions concerning any misconduct, you shall immediately notify your manager, People & Transformation team, or another Aker Solutions manager you trust or Compliance & Integrity team (C&I).

If you fail to obtain a response to your notification or if you would prefer not to notify any of those identified above, you are urged to notify through Aker Solutions whistleblowing channel 'Integrity Line':

The whistleblowing channel is open for all employees and non-employees to notify of a concern of misconduct. All notifications to this whistleblowing channel are received and managed by Aker Solutions' Compliance & Integrity department and are treated with strict confidentiality. C&I has a mandate from Aker Solutions' Board of Directors to investigate alleged compliance violations. All investigations are subject to regular reporting to and monitoring by the Board Audit Committee.

Notifications can be sent anonymously

Through Aker Solutions whistleblowing channel at
https://www.akersolutions.com/sustainability/whistleblowing/

By email to
whistleblowing@akersolutions.com



Zero tolerance for retaliation

We will not tolerate retaliation against anyone who speaks up in good faith to ask questions, raise a concern, report a suspected violation or participate in an internal company investigation.

Good faith means that your sincerely believe that a legitimate issue exists. Any employee knowingly making a false notification for the purposes of harming another individual will be subject to disciplinary action.

3. Respecting people

Harassment-free workplace

Diversity and equal opportunities

Human and labor rights

Health, safety and security

Substance abuse and other personal conduct



3. Respecting people

Harassment-free workplace

At Aker Solutions, everyone shall be treated with fairness, respect and dignity. We do not tolerate any form of abuse, harassment, intimidation, bullying, degrading treatment or sexually offensive behavior by or towards employees or others affected by our operations. Comments or any other forms of offensive messages, derogatory remarks or inappropriate jokes are unacceptable.

Your responsibility

- Take steps to create a good working environment – free of all harassment
- Never engage in abuse, harassment, bullying, workplace violence, sexually offensive behavior or other behavior that colleagues or business partners may regard as threatening or degrading
- Respect other people's customs and culture
- If you become aware of any situation in breach of the above principles, speak up or report your concern (see chapter covering Speaking up and reporting concerns)



Diversity and equal opportunities

In Aker Solutions, we see diversity as a source of creativity, innovation, and as a key competitive advantage. Building a strong inclusive culture is foundational to our success as a company, and to bring out the best in everyone. Our goal is to make Aker Solutions a place where everyone can perform at their best by creating opportunities for all.

Aker Solutions values the unique contributions of every employee and is committed to fostering an environment where diverse backgrounds, identities, and experiences are welcomed, listened to, and respected.

Our employees shall expect a workplace free from discrimination. We do not tolerate discrimination against any employee based on age, gender, sexual orientation, disability, race, nationality, political opinions, religion or ethnic background, or any other grounds prohibited by law.

Your responsibility

- Contribute to an inclusive working environment where everyone is treated with dignity, fairness and respect
- Base your work-related decisions on merit
- Encourage and listen to those who speak up are subject to regular reporting to and monitoring by the Board Audit Committee.

Human and labor rights

Aker Solutions is a member of the UN Global Compact. We support and respect internationally proclaimed human and labor rights, including the UN Declaration and International Conventions on Human Rights, the OECD Guidelines for Multinational Enterprises, the ILO Declaration on Fundamental Principles and Rights at Work as well as the ILO's core conventions.

Aker Solutions acknowledges all employees' right to form and join trade unions of their own choice. We have a long tradition of including and involving employees and their unions and believe this improves decision-making processes. In countries where rights to organize are restricted, Aker Solutions will seek to establish alternative avenues to provide employees opportunities to influence their work situation.

Aker Solutions will not use child or forced labor and will not tolerate working conditions or treatment that is in conflict with international laws and practices. We have a zero-tolerance approach towards modern slavery and human trafficking.

Aker Solutions shall ensure that the company, through its operations, does not cause any infringement of human and labor rights. The company is committed to implement and enforce effective systems to minimize risks of human and

labor rights infringements in our own operations and in our supply chain.

Your responsibility

- Never cause or contribute to the infringement or circumvention of human and labor rights
- Respect the personal dignity, privacy and rights of everyone you interact with during the course of work and those affected by our business operations
- Notify your manager in writing if you become aware of any situation in breach of the above principles

Health, safety and security

Safe operations are of paramount importance to us. Aker Solutions often engages in work under challenging conditions, requiring the highest level of diligence in order to maintain health and safety of employees and customers, subcontractors, consultants and other parties. We believe all incidents can and should be prevented, and strive to achieve zero harm to people, assets and the environment. We are committed to providing a safe workplace for our employees, contractors and visitors.

Aker Solutions follows the Voluntary Principles on Security and Human Rights to ensure that we operate within a framework and by standards that encourages respect for human rights.

Your responsibility

- Safety and security are everyone's responsibility. You must understand and act on your responsibilities to contribute to a healthy, safe and secure work environment
- Stop work immediately if you consider it unsafe
- Report any incident or unsaf condition as soon as possible. If you see something, say something
- Know the relevant emergency procedures for your work



Substance abuse and other personal conduct

Drugs and alcohol

Aker Solutions is a drug and alcohol-free workplace We will not tolerate anyone being under the influence of drugs or alcohol while at work for Aker Solutions. Limited amounts of alcohol may, however, be consumed when local custom and occasion make it appropriate, and provided the consumption is not combined with operating machinery, driving or any other incompatible activity. Tests for drugs and alcohol may be conducted whenever deemed necessary and in accordance with applicable laws.



Your responsibility

- Never work under the influence of drugs or alcohol
- Be conscious about work-related events where alcohol is served and show moderation

Purchase of sexual services

Purchase of sexual services may be illegal, support human trafficking and pose a security risk. Human trafficking is a violation of human rights. Regardless of local rules, regulations and customs, Aker Solutions prohibits the purchase of sexual services when on assignments or business trips for the company. This also includes any contribution to the purchase of such services.

Your responsibility

- Never purchase sexual services when you are on business trips or other assignments, including long term assignments.
- Never influence others to purchase sexual services and never accept to receive sexual services others have paid for

4. Acting with integrity

Anti-corruption

Working with business partners

Anti-money laundering

Confidentiality

Conflict of interest

Fair competition

Gifts and hospitality

Insider information

International trade sanctions and disputed territories

Export controls

Public officials

Safeguarding of property, information and assets

Responsible artificial intelligence development and use



4. Acting with integrity

Anti-corruption

Aker Solutions prohibits any provision, offering or accepting of bribes of any variety to any person, whether private or public, either directly or through any third party.

Bribery occurs when you offer, pay, seek or accept an improper payment, gift or advantage to influence a business or governmental outcome or decision. Engaging in bribery or turning a blind eye to your suspicions of bribery, can result in liability for Aker Solutions and for you personally. Bribes can be in the form of money, or anything else of value, such as a gift or donation, travel benefits, employment benefits, or any other advantage.

Illegal trading in influence exists when a person who claims to be able to influence a decision-maker, exploits an opportunity to demand or receive advantages in return for exercising such influence, and when the advantage is improper. It is strictly prohibited for anyone representing Aker Solutions to become involved in any transactions which might involve or be perceived to involve illegal trading in influence.

“Facilitation payments”, also known as “speed” or “grease” payments, are small unofficial payments aimed at expediting or securing the provision of products or services to which you or the company is legally entitled. A facilitation payment is illegal under several anti-bribery laws relevant for Aker Solutions and is considered by Aker Solutions to be a type of bribe. It is strictly prohibited for anyone representing Aker Solutions to offer or make facilitation payments. Aker Solutions has strict regulations on the use of commercial third parties to support sales-related activities. All use of Third-Party Representatives shall be done in accordance with the Business Partner Qualification and Integrity Due Diligence (IDD) Procedure.

No employee or business partner will suffer adverse consequences for refusing to engage in improper payment activity, even if this results in loss of business.

Your responsibility

- Make sure that all payments made are proper and legal, that they are approved by relevant Aker Solutions personnel, and that they are recorded accurately in Aker Solutions’ books and records
- Never (either directly or indirectly through a third party) offer anything of value to improperly influence the actions or decisions of any person, including any public official or private



party, in pursuit of Aker Solutions' interests

- Do not make facilitation payments even if not considered to be a criminal offense under certain jurisdictions. If a payment is demanded from you in order to avert an immediate threat to the life or health of any person, such payments are not prohibited, but they must be immediately reported to Compliance & Integrity department
- Do not use Third Party Representatives without the specific approval of the Aker Solutions CEO

Working with business partners

Our company's success depends on a cooperation from our business partners – suppliers, contractors, agents, joint venture partners, consultants and others. Our suppliers and other business partners are expected to comply with all applicable laws and regulations, respect internationally recognized human rights and conduct their business with integrity. Suppliers with direct contractual relationship with Aker Solutions shall

adhere to compliance and integrity standards detailed in our Supplier Declaration which sets out clear Suppliers with direct contractual relationship with Aker Solutions shall adhere to compliance and integrity standards detailed in our Supplier Declaration which sets out clear requirements and expectations in the areas of business ethics and anti-corruption, respecting human rights and working conditions, and environmental compliance. Failure to comply with these requirements may result in the termination of the business relationship.

We must exercise caution when entering into agreements with intermediaries, i.e. business partners who are acting on our behalf which may include agents, consultants, lobbyists, as Aker Solutions may be held responsible for their actions.

Your responsibility

- Before establishing or renewing the business relationship you must follow our procedures for integrity due diligence and risk based human rights due diligence
- Clearly communicate our business integrity expectationsto suppliers and business partners
- Be vigilant in exercising oversight throughout the duration of the contractual engagement with us
- Promptly report any concern you may have about integrity or misconduct by supplier or a business partner to your line manager, Compliance & Integrity department or other available reporting channel

Anti-money laundering

Money laundering supports criminal activity, including drug trafficking, terrorism, corruption and tax evasion. Money laundering is the process of disguising the proceeds of crime in order to hide its illegal origins or otherwise dealing with the proceeds of crime. Criminal proceeds include not only money, but all forms of assets, real estate and intangible property that are derived from criminal activity.

Aker Solutions is committed to complying with all anti-money laundering and anti-terrorism laws. We will conduct business only with reputable customers and business partners involved in legitimate business activities, with funds derived from legitimate resources.

Your responsibility

- Conduct appropriate counterparty due diligence to understand the business and background of our prospective business partners and to determine the origin and destination of money and property
- Even though few of us will come across money laundering issues, be attentive to attempts to receive or make payments in cash or transactions otherwise involving unusual banking or payment arrangements
- Report suspicious transactions or incidents of money laundering to Compliance & Integrity department

Confidentiality

Aker Solutions is committed to protecting confidential information. We will not misuse information belonging to ourselves or any of our partners.

Your responsibility

- You have a duty of confidentiality which also applies after the conclusion of the employment or contractual relationship with Aker Solutions and for as long as the information is considered sensitive or confidential in nature
- Keep confidential all matters that could provide third parties unauthorized access to confidential information
- Carefully consider how, where and with whom Aker Solutions-related matters are discussed
- If you find yourself in possession or become aware of anyone in possession of unauthorized confidential information belonging to an external party, immediately contact Legal department. Do not discuss or share the information with anyone



Conflict of interest

A conflict of interest occurs when personal relationships, participation in external activities or interest in another venture can influence or could be perceived to influence a person's decision making when acting for Aker Solutions. They may result from personal ambition, financial or business commitments, membership of an organization, family members or personal relationships. A "family member" includes a spouse, romantic partner, parents / stepparents, children / stepchildren, siblings / stepsiblings, cousins, nephews, nieces, aunts, uncles, grandparents, grandchildren, and in-laws, and any other person living with you, except tenants and household employees.

All business transactions must be entered into solely for the best interests of Aker Solutions. Any actual or perceived conflicts of interest that cannot reasonably be avoided shall be made fully transparent and reported.

Managers are responsible for evaluating the notification, considering mitigating actions and ensuring that these are implemented.

All directorships, employment or other assignments held or carried out by Aker Solutions employees in other enterprises which have, or may be expected to have, commercial relations to Aker Solutions, must be approved in writing by Aker Solutions.

Your responsibility

- Act in the best interests of Aker Solutions and take necessary steps to avoid situations and positions that may create or appear to create a conflict of interest
- Do not participate in any transactions or other business arrangements on behalf of Aker Solutions where you directly or indirectly have, or could reasonably be suspected to have, a personal interest or otherwise, directly or indirectly, benefit from your position in Aker Solutions
- Avoid having interests outside the



company in any business that competes with or provides services to Aker Solutions or its subsidiaries, which could affect your objectivity in carrying out your company responsibilities
- Avoid doing business on behalf of Aker Solutions with a close personal friend or family member
- If you think you may be in a situation that could be perceived as a conflict, it is your personal responsibility to disclose the potential conflict and all relevant facts to your supervisor or manager immediately
- As a manager, ensure that conflicted individuals are isolated from any operation, influence, and/or decision-making process associated with the subject of the conflict

Fair competition

Antitrust law protects free enterprise and prohibits behavior that limits trade or that restricts fair competition and applies to every level of business. The antitrust laws combat illegal practices like price-fixing, market-sharing or bid-rigging conspiracies, or behaviors that aim to achieve or maintain monopoly.

Aker Solutions does not tolerate violation of any antitrust laws and regulations. The company is committed to fair and open competition and to not engaging in any activities that involve unlawfully obtaining, receiving, using or sharing non-public competitively or commercially sensitive information. Examples of such information can include current or future prices, existing contracts, competitive bids, commercial strategies, costs, or other types of non-public competitively or commercially sensitive information.

Your responsibility
- Comply with applicable antitrust laws
- Do not engage in any activities that involve obtaining, receiving, using or sharing non-public competitively or commercially sensitive information without a lawful reason
- If you find yourself in possession or become aware of anyone in possession of non-public competitively or commercially sensitive information, immediately contact Legal department. Do not discuss or share the information with anyone
- Seek advice from Legal in all matters involving risk of antitrust exposure for Aker Solutions, yourself or any of your reports

Gifts and hospitality

Aker Solutions does not allow gifts or hospitality where giving or accepting them could influence business decisions, violate any local laws or the policies of the recipient company, or cause others to perceive such influence or violation. Aker Solutions does not expect gifts or hospitality from any of our business partners.

It is our company policy that Aker Solutions does not accept or offer gifts or hospitality - except in the limited circumstances as detailed in our Gifts

and Hospitality Procedure. Hospitality may only be accepted or offered if it is in combination with a business meeting or there is another clear business reason for attending, and the expenditure is within applicable amount limits as set out in the same Procedure.

All offered and received gifts and hospitality shall always be properly recorded in Aker Solutions' Gifts and Hospitality Register. This applies to both gifts and hospitality accepted in accordance with the Gifts and Hospitality Procedure, and when gifts or hospitality are offered but declined as non-compliant with our policies.

Gifts, hospitality or any financial or other advantage shall not be promised, offered to or received from public officials unless this is subject to specific written pre-approval from Compliance & Integrity department. Local laws may restrict or even prohibit the offering of gifts and hospitality to public officials (see chapter covering Public Officials).

Your responsibility

- Never accept or offer a gift or hospitality that would influence your or any other person's judgment, or cause others to perceive such influence
- Never solicit a gift, hospitality or other favor for personal benefit from any of Aker Solutions' stakeholders
- Do not accept or offer gifts in situations of contract negotiation, bidding, or award
- Do not offer or accept hospitality, expenses, or other favors where it could be perceived to influence decision making in situations of contract negotiation, bidding or award
- In cases of doubt, always consult with your manager or Compliance & Integrity department



Insider information

You are involved in insider dealing when you trade in public traded shares or other securities while in possession of specific information capable of affecting the price of shares or securities and which is not publicly available or generally known in the market or when you disclose this information to someone else or influence someone else who then trades in those shares or other securities. It is a criminal offense to trade in Aker Solutions shares or other securities based on insider information.

Holders of insider information relevant for the Aker Solutions share price can only pass this information to individuals who need this information in their work for Aker Solutions and only subject to authorization from his/her manager and appropriate listing of the individual in Aker Solutions' insider listing system.

More details and guidance are further set out in our internal Insider Procedure.

Your responsibility

- Protect confidential business information and never use it for your own benefit, in particular when trading in shares or other securities or recommending anyone else to do so
- Do not spread rumors, mislead with false information or manipulate prices
- Comply with Aker Solutions policies when trading in the shares or other securities of Aker Solutions or any other relevant company that you may receive insider information about through your work for Aker Solutions
- Seek advice from Legal in all matters involving risk of insider information

International trade sanctions and disputed territories

International and economic sanctions impose restrictions and prohibitions against specific countries over sale, supply, transfer, provision or export, directly or indirectly, of certain goods, technology, software, services and funds, as well as brokering services and technical assistance, including disclosure of information. Sanctions laws also prohibit dealings with certain parties, who are specifically designated by governments for sanctions restrictions.

Aker Solutions adheres to all applicable sanctions' laws and regulations. Doing business in certain countries therefore requires particular attention to sanctions laws. Aker Solutions shall also refrain from delivering work to projects in disputed territories, and exercise caution when doing work that in other ways may involve disputed territories.

Your responsibility

- Ensure compliance with all applicable sanctions' laws
- Before you engage in business with

any party, ensure that those parties are not subject to sanctions
- Think carefully about the potential impact of international sanctions before transferring goods, technology, software or services across national borders
- Be attentive to dealings with parties that are from sanctioned countries, or that are otherwise designated for financial sanctions

Export controls

Export control laws impose restrictions and prohibitions over certain sale, shipment, electronic transfer, provision, or disclosure of information, software, goods, assets, funds, and services across national borders or involving parties subject to economic sanctions. Export subject to export control laws requires custom clearance documents, license and/or approval from national authorities prior to the export. Exports include not only those concluded via traditional shipping methods, but can extend to transfer electronically, through discussions or visual inspections. Aker Solutions complies with all applicable export control laws.

Your responsibility
- Think carefully about the potential impact of export control laws before transferring goods, technology, software or services across national borders and make sure it is in line with all applicable export control laws
- Always assess whether any of the exported goods, technology, software or services are listed on any dual-use list, or common military lists. If in doubt, consult you manager for advice

Public officials

A “public official” means any officer or employee of a government, a government department, agency, or government owned or controlled state enterprise, any person acting in an official capacity for or on behalf of a government or government entity or of a public international organization, any



political party or party official, or any candidate for political office. Public officials include not only elected officials, but also consultants who hold government positions and political party officials.

Dealings with public officials require that we exercise extra caution in the way we conduct ourselves. Gifts, hospitality or any financial or other advantage shall not be offered, promised, given to or received from public officials unless this is subject to specific, written pre-approval from Compliance & Integrity department. Local laws may restrict or even prohibit the offering of gifts and entertainment to public officials.

Your responsibility

- As a representative of Aker Solutions, never, in order to obtain or retain business or other improper advantage in the conduct of business, offer, promise, or give any undue advantage to a public official to make the official act or refrain from acting in relation to the performance of her/his duties. This applies regardless of whether the advantage is offered directly or through an intermediary
- When engaging with public officials, do so in a transparent and straightforward manner and exercise the utmost integrity at all times
- Properly record any gifts and hospitality given to, or received from, public officials in Aker Solutions' Gifts and Hospitality Register

Safeguarding of property, information and assets

Aker Solutions' property, information and assets must be secured by adequate protective measures. Our information and assets are only to be used for legitimate business purposes and only by authorized employees or their designees. This applies to tangible assets, e.g. equipment, and intangible assets such as intellectual property and confidential information. Information produced and stored on Aker Solutions' IT systems is regarded as the property of the company. Private use is only permitted to a limited extent, and information that may be considered illegal or inappropriate must under no circumstances be processed or downloaded. Use of IT systems and internet services in particular, must be governed by the needs of the business and not by personal interests.

Your responsibility

- Act responsibly when accessing information and systems, and protect Aker Solutions' property, information and assets from theft and loss
- Report any security breaches of property to Aker Solutions' Security function
- Report any theft, waste or misuse of company information and assets to Aker Solutions' Security, IT or People & Transformation team

- Maintain electronic files and archives in an orderly manner
- Avoid infringing the IP rights as well as protect the assets of our partners which are entrusted to us as part of operations



Responsible Artificial Intelligence development and use

Artificial Intelligence (AI) can be a powerful technology to augment business models and human processes, but it can also bring severe and uncharted risks. In Aker Solutions, we view responsible development and use of AI as a core element of responsible business conduct – and a necessary complement to the emerging regulatory landscape.

We consider key elements of responsible AI to include:

- Board accountability,
- Transparency and explainability,
- Robust risk management processes that look beyond traditional business risks and address privacy, security, non-discrimination, and human oversight and control.

Your responsibility

- You must follow our internal procedure for Responsible AI
- You should develop your knowledge on Responsible AI use and our procedures through provided internal awareness sessions and trainings

5. Working with our stakeholders

Local communities

Personal data protection

Protecting the environment

Sponsoring and donations

Financial and ESG reporting



5. Working with our stakeholders

Local communities

Aker Solutions is a significant part of many local communities and is committed to engage constructively with our stakeholders to create lasting local value. We aim to create such value to local communities through our business activities. In our dialogue and engagement with them we seek to understand their expectations and explore opportunities for mutual benefits. Solutions must be relevant to our business needs and local conditions and comply with our principles, policies, and local regulations. Our contribution to communities may include direct and indirect local employment, local procurement of goods and services, local infrastructure development and capacity building as well as social investments.



Your responsibility

- Systematically consider and address the impact our activities may have on local communities and take this into account when making business decisions
- Actively identify opportunities related to our activities that can contribute to local value creation through



local employment, procurement and capacity development
- Ensure that social contributions are made in compliance with our anti-corruption requirements

Personal data protection

At Aker Solutions, we take your privacy seriously. As a company governed by the General Data Protection Regulation (GDPR), we are committed to protecting your personal data and ensuring your rights are respected.

How we protect your data

- Fair, lawful and transparent processing: We process personal data when the law says we can and we are open about how we collect, use, and store your data. As an employee or consultant, you will find detailed information about how we process your personal data on Arena. If you are an external, you will find the same on https://www.akersolutions.com/privacy-statement/
- Security: We use advanced security measures to protect your data from unauthorized access, loss, or theft.
- Data Minimization and retention: We only collect the data we need to conduct our business purposes and we keep your data only as long as necessary for the purposes we collected it for, unless the law requires us to keep it longer.
- Sharing: We do not share your personal data unless we need to as part of our business operations. When we do, we ensue the data is protected also where it is received in accordance with the applicable legal requirements.

Your rights

When your data is being processed by Aker Solutions, your rights are adhered to. Examples of such rights are your tight to access personal data, have it erased or rectified when applicable, have processing restricted. If you want to exercise any of your rights, please contact your manager or the Compliance & Integrity department. If you believe that we have not handled your data correctly, you have the right to report a complaint with your local data protection authority.

Protecting the environment

Aker Solutions shall act responsibly with an ambition to reduce direct and indirect negative influences on the external environment, taking into consideration the full life cycle of our products. We shall adhere to relevant international and local laws and standards, strive to minimize our environmental impact and take a sustainable approach in our day-to-day operations. Our aim is to support our customers and the industry to be better environmental performers through our products and services. We are focused on achieving energy efficiency, minimizing harmful discharge, reducing emissions and waste, improving circularity of resources, mitigating impacts to nature, and engaging with stakeholders on understand and mitigating environmental aspects and impacts.

Your responsibility

- Secure knowledge on environmental issues through awareness sessions, training and e-learning
- Leaders to identify relevant legal requirements and implement accordingly
- All employees to understand the environmental impacts in your area of work and find solutions to minimize impacts including those related to customers, business partners and suppliers' operations

Sponsoring and donations

Aker Solutions may utilize sponsorships to promote the company and its business. All sponsoring relationships shall be strategic and aligned with Aker Solutions' integrity principles. There must be documented tangible benefits for Aker Solutions associated with any sponsorship, such as commercial gain, professional development, enhanced profiling, etc. All sponsoring relationships shall be structured as 'win-win situations' whereby both parties achieve some gain. All sponsorship shall follow the regulations in Aker Solutions Authorization Matrix.

No religious or political groups or organizations may be sponsored. There shall be no personal conflict of interest involved in the decision to sponsor an organization. In situations where a conflict of interest exists, the individual with a conflict shall withdraw from any associated decision-making process.



Charitable donations - gifts - to organizations do not carry the same requirement for mutual benefit. However, no charitable donations shall be made to political or religious organizations. All charitable donations must be approved in advance by Compliance & Integrity department.

Financial and ESG Reporting

Aker Solutions will communicate relevant business information on a timely basis to its employees and external stakeholders. All accounting and financial information, as well as other disclosure information, including Environment, Social and Governance (ESG) information, must be accurately registered and presented in accordance with laws, regulations and applicable standards.

Aker Solutions is committed to providing the financial markets and other relevant stakeholders with quality information, enabling them to maintain a correct picture of the company's financial and ESG situation as well as the risks and opportunities facing it in the future. Aker Solutions will provide accurate disclosure information to the financial markets in line with all relevant laws and regulations for listed companies on the Oslo Stock Exchange. All material information is disclosed to recipients equally in terms of content and timing.

Aker Solutions

Code of Conduct



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