

# Modern Slavery Act Transparency Statement

## Introduction from the Chief Executive Officer

At Aker Solutions we oppose modern slavery in all its forms and we are committed to ensuring that there is no slavery or human trafficking in our business or our supply chain. Throughout 2020 we continued to improve our understanding of the modern slavery related risks faced by our business, particularly in light of the COVID-19 pandemic, and implemented further improvements to secure reduction of those risks.

Our targets in 2020 were to:

- Implement an integrity risk-based supplier audit program
- Develop a human rights e-learning course
- Ensure continuing business ethics training is provided to all employees
- Continuously identify, monitor and manage business integrity risks at both the company and segment level
- Implement an enhanced human rights criteria for the supplier qualification process
- Implement monitoring of human rights risk; and
- Evaluate criteria on human rights as part of the accreditation program.

In 2020, there was significant structural changes within Aker Solutions. This included spinning off our Aker Carbon Capture and Aker Offshore Wind businesses into independent companies. A merger was then completed between Aker Solutions and Kvaerner in November 2020, following which the company was restructured into five business segments.

A further key development in Aker Solutions in 2020 was the expansion of Aker Solutions' Business Integrity and Compliance team's mandate to include supply chain compliance, and reallocation of resources to ensure adequate support to the new business segments following the aforementioned organizational changes. The Business Integrity and Compliance team includes a global network of local compliance officers at several of Aker Solutions' geographical locations. Local compliance plans were developed for locations deemed to be higher risk, including Angola, Brazil, India and Malaysia. Our Business Integrity and Compliance team supports the operational units with expert advice and undertakes monitoring and reviews activities to identify and address human rights risks including modern slavery and human trafficking in our business operations and supply chain.

It was identified that the COVID-19 pandemic may cause an increased corruption risk that may lead to increased slavery and human trafficking. In the first quarter of 2020, the company issued a letter to over 9,000 suppliers outlining expectations and requirements in response to the COVID-19 pandemic, focusing in particular on the need to respect human and labor rights despite a challenging business climate. A corresponding awareness session was held for buyers and other relevant personnel to raise awareness of potential human rights risks in the supply chain that could be exacerbated by the global pandemic. Internally, an awareness campaign highlighting increased business integrity risks due to COVID-19 was rolled out to the global company via CEO webcast on the global internal communication channel, Yammer, as well as to several management teams.

Pursuant to Section 54 of the UK Modern Slavery Act 2015 we hereby present Aker Solutions' fifth Modern Slavery Act Transparency Statement to set out the steps we have taken to ensure that there is no slavery or human trafficking in our business or our supply chain. This Statement was approved by Aker Solutions' Board of Directors on June 14, 2021 and covers the financial year ending December 31, 2020.

### **Kjetel Digre**

Chief Executive Officer, Aker Solutions

## Organization Structure and Supply Chain

Aker Solutions delivers integrated solutions, products and services to the global energy industry. We enable low-carbon oil and gas production and develop renewable solutions to meet future energy needs. By combining innovative digital solutions and predictable project execution we accelerate the transition to sustainable energy production. We are principally engaged in the design, supply and maintenance of energy production equipment, as well as the provision of associated services including subsea lifecycle services, operational services and engineering services. In 2019, Aker Solutions updated our enterprise strategy to set clear long-term revenue targets around renewables and low-carbon oil and gas solutions. In 2020, we revised those targets to be even more ambitious. By 2025, the company's aim is that one third of our revenue should come from low-carbon oil and gas projects or from renewable energy business. By 2030, the goal is for this to increase to two thirds of our revenue.

Significant structural changes to the company were completed in 2020, including the establishment of two independent companies by 'spinning off' our Aker Carbon Capture and Aker Offshore Wind businesses. Aker Solutions then completed a merger with Kvaerner in November 2020, following which the company was restructured into five business segments. In addition, a new management team was established and Kjetel Digre replaced Luis Araujo as Chief Executive Officer.

Aker Solutions is made up of several legal entities with facilities in 22 countries worldwide. Although not all of our legal entities are required to produce Modern Slavery Act Transparency Statements in their own right, we take the matter of slavery and human trafficking very seriously and are passionate about ensuring that modern slavery is not taking place in any part of our business which is wholly owned or otherwise controlled by Aker Solutions. This Modern Slavery Act Transparency Statement is therefore applicable to all the Aker Solutions legal entities listed in Appendix 1 at the end of this Statement. Further details about each of our locations and facilities can be found here.

## Our People

At the end of 2020 we had approximately 14,500 employees in more than 50 locations in 22 countries. A significant portion of the organization's activities are performed by workers who are employees.

Due to the nature of our work and the sectors we operate in, none of the work we do is seasonal and none of our suppliers are engaged seasonally, however it is typical for us to engage personnel temporarily for specific projects or work scopes.

More information on our key staff figures and our financials for 2020 can be found in our Sustainability Report 2020 and our Annual Report 2020. In 2020 approximately 23 percent of employees were contract staff.

After the merger with Kvaerner in November 2020, our supply chain management team was working with around 13,800 direct and indirect suppliers across the globe and employed 1,400 people. Supply chain management includes strategic sourcing, category management, supplier development and accreditation, material planning, procurement, inventory management and logistics. Material costs comprise the bulk of our budget and play a significant role in the success of the business. Sourcing IT services, travel and temporary personnel are also important parts of our indirect procurement. We source services and equipment from all over the world.

## Policies and Procedures in Relation to Slavery and Human Trafficking

Our governing documents are crucial for developing effective and consistent anti-slavery and anti-trafficking standards across our business and for setting expectations for suppliers' and employees' decision making on a day-to-day basis. A list of the governing documents we have in place to address modern slavery can be found below along with links where appropriate. All of our key policies are endorsed and signed off by relevant members of Aker Solutions' senior management. These governing documents are applicable to all of Aker Solutions' operations and are available on our intranet.

- Aker Solutions' Code of Conduct: This is our key governing document and the foundation of our drive to uphold the highest levels of integrity. It addresses important principles and sets clear rules and expectations for behavior and ethical standards regarding matters such as human and labor rights, diversity and equal opportunities. At the end of 2016 our Code of Conduct was updated to include our commitment to observe a zero-tolerance approach towards slavery and human trafficking. It is made available in five different languages on our website for external stakeholders and on our intranet for employees.
- Aker Solutions' Business Integrity Policy: Reaffirmed in 2020, this describes our commitments and expected behaviors with regard to business integrity including for example commitments to respect and comply with international human rights principles; to ensure that we actively work to identify and understand business integrity risks in all of our activities; and to maintain effective and risk-based business integrity procedures.
- Aker Solutions' Business Integrity Procedure: This defines principles and provides rules, responsibilities and processes for managing integrity risks. It also describes controls to ensure compliance with the Code of Conduct with a focus on country risk, human rights and wider corporate responsibility. For example, this provides that we must undertake proper checks where risk of human rights breaches is assessed as high and ensure that minimum requirements are set regarding forced labor, child labor, working hours and employment conditions.
- Aker Solutions' Country Risk Procedure: This describes how we categorize country risk and outlines the procedure for assessing potential business opportunities in high risk countries where for example there are particular risks related to human rights violations. It supports our Business Integrity Policy and aims to reduce our risk exposure when we conduct business in countries associated with high corruption, reputational and/or political risks.
- Aker Solutions Country Entry Procedure: This describes the company's approach for assessing risk associated with establishing operations in a new country. The initial step is led by our Business Integrity and Compliance team, and the goal is to gain a preliminary understanding of the country's local regulatory environment and its receptiveness to international companies. Topics to be covered include corruption, political, social, environmental, financial and security considerations.
- HR Global Recruitment Principles and Guidelines Document: This establishes the framework with respect to our internal and external recruitment activities. For example, this provides that we shall not ask for money transfers or payment from applicants to secure a job, nor will we request payment regarding any travel expenses for interviewing or regarding visa expenses.
- Aker Solutions' Business Partner Qualification and Integrity Due Diligence Procedure: This defines our guidelines and responsibilities for qualification and integrity due diligence of potential, new and existing business partners and business relationships including customers, third party representatives, intermediaries and lobbyists, alliances and joint ventures, mergers and acquisitions and suppliers. This helps to identify whether there are any red flags associated with a business partner or a business relationship. It also assesses whether the risks associated with red flags are acceptable if relevant risk mitigating activities are implemented and instigates a process for planning and assignment of those activities and for follow up of high-risk business partners in general.

- Aker Solutions' Supplier Approval Procedure: This describes the processes and systems used to assess, qualify, approve, accredit, requalify and disqualify suppliers for use in our sourcing processes globally. It explicitly gives us the right to disqualify or disengage with a supplier if they have breached the Supplier Declaration which asks them to comply with our policies and procedures.
- Supply Chain Risk and Compliance Management Procedure: This outlines the process, roles, responsibilities and systems used to assess and manage various aspects of risk and compliance within supply chain at a global level, including human and labor rights. In this procedure a specific supplier human and labor rights risk-based monitoring program is defined, with the aim of identifying and addressing any potential risks of infringements, including child labor, minority rights, migrant workers and human trafficking. A follow up plan includes supplier human rights audits, meetings, training, communications and in the event of severe violations may lead to the suspension or disqualification of the supplier.
- Aker Solutions Supplier and Subcontractor Declaration Form: All of our suppliers must sign this undertaking during prequalification in order to be added to our integrated Approved Vendor List . This form includes minimum ethical requirements that our suppliers must comply with including compliance with laws and provisions on forced labor, freedom of association and minimum age of labor, working hours and wages.
- Aker Solutions Terms and Conditions for Suppliers: We use these terms as a basis for agreement with suppliers. These terms require that suppliers must comply with all applicable laws, rules and regulations of any governmental, judicial or regulatory body having jurisdiction over the work including applicable labor standards, anti-discrimination rights and fundamental human rights norms as described in the Universal Declaration of Human Rights.
- Business Ethics Training Procedure: This describes our Business Ethics Training Program and defines the target groups, responsibilities and cost allocation to ensure that the program is implemented in line with our requirements. Although the Business Ethics Training Program covers a range of business ethics topics, modern slavery forms an important part of this.
- Aker Solutions' Global Whistleblowing Procedure: This establishes a process for whistleblowing in order to detect, prevent and combat corrupt and/or unethical behavior, including modern slavery, in our business and supply chain. It implements clear and observable procedures for reporting a concern to the whistleblowing channel and for how such matters are investigated and handled. A link to the whistleblowing channel can be found [here](#).

## Other Commitments

In addition to the above policies and procedures, Aker Solutions continues to adhere to the Voluntary Principles on Security and Human Rights and to be a signatory to both the UN Global Compact (the world's largest corporate sustainability initiative) and Trace International (an international organization promoting transparency and compliance with anti-corruption rules). Our commitment to human and labor rights is also addressed in the Global Framework Agreement entered into by Aker Solutions and IndustriALL Global Union, Fellesforbundet (The Norwegian United Federation of Trade Unions), Nito and Tekna. This agreement dates to 2008 and reflects Aker Solutions commitment to respect basic human and trade union rights in the community, it focuses specifically on standards such as non-discrimination and the prohibition of child labor and forced labor. This agreement demands similar standards in our supply chain.

The principles of all of these agreements, initiatives and memberships underpin Aker Solutions' respect and support for international standards and are reflected in our visions and values and through our policies and procedures. We have made human rights a part of our supplier qualification requirements and we use our influence with suppliers and encourage them to work in compliance with our Code of Conduct and our visions and values to ensure that they are also committed to avoid modern slavery in their own business and supply chains. We have implemented tools to provide insights and ultimately allow improved monitoring of our Approved Vendor List suppliers in relation to human rights topics.

## Business Integrity Program

Aker Solutions established a dedicated business integrity department in 2009. The responsibility for the design and continuous improvement of our business integrity work lies with the corporate Business Integrity and Compliance team. Business Integrity and Compliance is staffed by well-qualified personnel (lawyers and political scientists) who are responsible for ensuring that Aker Solutions maintains a risk-based and effective compliance program and supports the business in implementation of the program. Business Integrity and Compliance develops and maintains relevant policies, procedures, guidelines and tools, designs and provides training and recommends training requirements, conducts project risk assessments, assists in business partner integrity due diligence, prepares and participates in audits and reviews, and manages the ethics helpline and the whistleblowing channel. Business Integrity and Compliance is also responsible for ensuring that learning from incidents contributes to continuous improvement of the compliance program.

In order to integrate compliance considerations as a part of daily operations and decision-making the operational units of the business are supported by dedicated Compliance Officers. These roles ensure a single point of contact and ability to provide specialized support and advice based on the units' core activities and risk exposure. To further ensure local capacity and knowledge of local risk, Business Integrity and Compliance is supported by a network of local compliance officers in Angola, India and Malaysia as well as a looser network of resources wherever we operate.

The Business Integrity and Compliance function reports to the Senior Vice President for Legal and Compliance. Business Integrity and Compliance also reports independently to the Board Audit Committee on a quarterly basis, with more frequent meetings or updates when relevant or necessary.

## Human Rights Committee

To meet our commitments to respect and support human rights and ensure there is no slavery or human trafficking in our business or our supply chain, Aker Solutions also maintains a human rights program that is risk-based and designed to prevent, detect and respond to human rights risks and learn from incidents of human rights violation.

The Human Rights Committee, which was set up in 2019, is responsible for maintaining Aker Solutions' human rights program. The program consists of three main elements:

### Governance

- To ensure cross-functional discussions and participation, Aker Solutions' human rights committee is comprised of representatives from Health, Safety, Security and Environment (HSSE), Business Integrity and Compliance, human resources, supply chain and communications and the employee unions. The committee's mandate is to ensure that the company has a sound human rights program and to continuously improve this program. The committee reports to the CEO and audit committee on a quarterly basis.

### Activities to identify, prevent and mitigate human rights violations

- Risk assessment: The UN Guiding Principles Business Reference Guide is applied as a tool to identify Aker Solutions' human rights risks and which human rights the company is in a position to impact. The assessment is reviewed annually.



- Communication: Regular communication campaigns are organized to increase awareness on our Code of Conduct, whistleblowing, new training programs, etc.
- Training: As detailed further below, business ethics training is one of our key initiatives in preventing unethical behavior, including human rights infringements.
- Due Diligence: To avoid becoming complicit in or associated with illegal or unethical practices conducted by other parties, including direct or indirect involvement in human rights or labor rights violations, we perform integrity due diligence on customers, suppliers and other business associates.
- Contractual Clauses: We use these as a tool to signal expectations of respect for internationally recognized human rights to business associates. Contractual clauses can allow Aker Solutions to demand a contractual party to address and rectify human rights violations or terminate a contract if deemed necessary.

### Monitoring and reporting

- Inspections, reviews and audits: We perform regular inspections at our own locations, projects and business partners.
- Reporting of concerns, whistleblowing and grievance mechanisms: See below for further details.
- Investigations: Business Integrity and Compliance is given a specific mandate to investigate alleged corporate compliance violations in accordance with the rules set out in the Whistleblowing and Investigation Procedures. Incidents and investigations that uncover unwanted practices that put the company in risk of causing, contributing to or being complicit in human rights violations shall result in recommended remediation and improvement actions to reduce the future risk for similar non-compliances in the organization. Such improvements could include updates and strengthening of governing documents, introduction of new internal controls, enhanced training and awareness activities, change of roles and responsibilities.
- Internal and external reporting:

The Human Rights Committee maintained its quarterly meetings throughout 2020. Topics covered by the committee included the direct impact of the COVID-19 pandemic on employees' right to a safe environment. The committee also addressed the impact of the merger with Kvaerner on the human rights risk picture for the new Aker Solutions and developments in the global legislative environment on human / labor rights.

The Human Rights Committee is currently working on improving our overall human rights governing documents. A new procedure and guideline draft is currently being developed and will be finalized in 2021.

### Risk Assessment and Integrity Due Diligence Processes

Business integrity risk, hereunder human rights risk, is integrated in Aker Solutions Enterprise Risk Management framework. The Business Integrity and Compliance team is represented in the Enterprise Risk Committee. Human rights risk is, as part of the overall Enterprise Risk picture, subject to quarterly reporting to the Audit Committee.

Our presence in many countries worldwide combined with global tender activities and complex on-going projects with significant supply chains poses the greatest risk to our business in terms of modern slavery. This requires a proactive approach and thorough due diligence assessments of prospects in markets associated with high integrity risks.

Before entering into new activities in countries associated with having high corruption, reputational and/or political risks, Business Integrity and Compliance will carry out a due diligence assessment in accordance with our policies and procedures, part of which includes an analysis of the risk for human or labor rights infringements. If the risks from this assessment are deemed too high, we may either decide not to bid for the prospect, conduct further evaluation with assistance from external parties, and/or implement mitigating actions to reduce the risk. The aim of these assessments is to ensure that we avoid participation in activities

that are considered unethical or illegal. We carried out 76 such assessments on potential opportunities in 2020. A separate corporate risk committee evaluates any project seen as having an extraordinary risk along with the segment Executive Vice President and General Counsel. If the assessment concludes that the opportunity has extraordinary risk, it must go to our CEO for approval.

As well as carrying out due diligence assessments on new prospects, Business Integrity and Compliance also carry out in-depth assessments on potential, new and existing business partners and business relationships including customers, third party representatives, intermediaries and lobbyists, alliances and joint ventures, mergers and acquisitions and suppliers in accordance with Aker Solutions' Business Partner Qualification and Integrity Due Diligence Procedure. Certain relationships are also subject to approval by the CEO after assessment and recommendation before any commitment is made.

It was identified in 2020 that the COVID-19 pandemic may cause an increased corruption risk which resulted in us taking specific steps to mitigate this risk.

## Encouraging Employee Representation

Good industrial relationships are an important part of Aker Solutions' history and culture. We encourage employee representation in our business units worldwide as part of our commitment to human and labor rights. Employees worldwide have the right to be heard and represented, and to form and join trade unions of their own choice. Employee representatives provide employees with influence and lines of communication through their participation in working committees, on the board of directors, and in operational improvement and organizational change projects. In 2020 union representations in Norway had regular meetings with management on a local and regional level, in addition to more regulatory discussions in accordance with union agreements entered into by Aker Solutions. Once a year, the unions hold a conference with a formal election process for all union representatives in Norway. Twice each year employee representatives from Norway, the UK, Brazil, Malaysia and India meet with management from the Aker ASA companies as part of the Global Works Council (GWC). In 2020, the GWC was expanded to include employee representatives from the US and Angola. Due to COVID-19, the meetings were held virtually. The GWC aims to develop communication and consultation between management and employees on issues such as operations and strategy.

## Responsible Supply Chain Management

In 2020, prior to the merger between Aker Solutions and Kvaerner, our global supply chain management team managed its entire list of qualified suppliers with the new integrated Approved Vendor List (AVL). Our supplier base is qualified and monitored through our AVL. Compliance with our requirements is assessed through process and / or technical audits or due diligence analyses. A chosen supplier, direct or indirect, is expected to meet certain key requirements and fully embrace our ethical standards.

The AVL is therefore a key element in our Supplier Information System and this improvement, along with existing and enhanced prequalification, risk assessments and monitoring activities support our Supply Chain Management team in securing a supply chain without modern slavery.

Our Supplier Information System is used to qualify, monitor and evaluate performance of suppliers. In order to be able to deliver to us, any new or potential suppliers, direct or indirect, must pass the pre-qualification stage and be added to the AVL. Part of this process includes validation of supplier compliance as per the Country Watch List. In case of a high risk, a further due diligence questionnaire can be added in the pre-qualification process. All new suppliers must also complete a Supplier Qualification Questionnaire (SQQ) and confirm compliance with our Supplier and Subcontractor Declaration Form. The SQQ includes an evaluation of the supplier on various topics such as business integrity, human and labor rights and corporate responsibility. This was updated in 2018 to better reflect the UN Global compact and the risks of potential slavery and forced labor.

The responses given in the SQQ are reviewed and scrutinized and may be subject to further investigation including for example: external integrity due diligence or an interview with the supplier's compliance department and/or key personnel to clarify if red flags are identified and to safeguard that any risks identified

are addressed. In addition to that, suppliers located in countries where the risk of possible human rights issues is high, are subject to a specific SQQ review by Business Integrity and Compliance.

There may be exceptional cases where the full pre-qualification stage is not completed by a new supplier, for example due to time restraints. In these limited cases the supplier may be approved by a designated member of the supply chain management team; in all cases the supplier is required to confirm compliance with the Supplier and Subcontractor Declaration Form. If the supplier is located in a high-risk country as per the Country Watch List, or provides a high risk service then additional compliance activities or due diligence may be required before the approval can be granted.

Only after formal approval of a supplier and their addition to the AVL will the supplier be eligible to receive purchase orders from us. The information about each supplier on the AVL is available to Aker Solutions employees globally via our Supplier Information System, supplier qualification summary is available to all our global procurement departments, along with operational performance evaluations, which provides the procurement departments with a solid risk picture of our suppliers, enabling an informed selection. In 2020, 2,245 direct suppliers new suppliers were pre-qualified.

In addition to qualification, the Supplier Information System enables us to continuously monitor the performance and status of our qualified suppliers, with daily screening of financial and compliance information, and is integrated with our internal audit management tool. This tool tracks audit reports and findings, lost-time incidents, near-misses, health, safety and environmental management and operational performance. It can also issue alerts when certifications are expiring. Our supplier audit program is risk-based and determines where we should focus our audits. For example, if a supplier makes any changes to approved processes, sub-suppliers, materials and/or key resources, an evaluation will be performed on whether one or more of the activities will need to be revisited. Our supplier audit process was updated in 2019 to include further auditing criteria against the Supplier Declaration Form to demonstrate overall supplier performance. In 2020, due to limitations enforced by the COVID-19 pandemic, we carried out 21 external audits of suppliers. 120 audits are planned for 2021. The audit includes a detailed questionnaire and verification of adherence with business integrity and compliance, e.g. UN Guiding Principles for Business and Human Rights.

We can remove a supplier from the AVL if the supplier is not fulfilling requirements on risk or performance including compliance with the Supplier and Subcontractor Declaration Form or due to findings from audits, including human rights topics. If the supplier is removed from the AVL, the supplier will be deactivated for sourcing. If suppliers are disqualified from the system completely, this will be formalized and recorded in the Supplier Information System for future reference.

The company identified some potential risks of human rights infringements against vulnerable supplier workers, due to the impact of the COVID-19 pandemic on supplier operations and profitability. Supply chain mitigated these risks by contacting suppliers and spreading additional awareness in respect of Aker Solutions requirements as far as human and labor rights are concerned. In addition to that, we rejected certain supplier qualifications based on poor environmental management or other compliance risks.

Following the merger with Kvaerner, the global supply chain from Aker Solutions (i.e. Subsea, Engineering, Electrification, Modification and Maintenance) in 2021 is consolidating the abovementioned processes, procedures, tools with what was Kvaerner's supply chain (i.e. Topside & Facilities and Renewables segments) with the goal of harmonizing operations and mitigate any possible risk of overlaps or gaps.

## Whistleblowing

We also have in place a whistleblowing system which is governed by Aker Solutions' Global Procedure on Whistleblowing. This encourages all of our employees, customers and other business partners to report any concerns or breaches of our Code of Conduct, other internal policies, or laws and regulations related to the direct activities of our business or supply chain. This includes any circumstances that may increase the risk of slavery or human trafficking. Business Integrity and Compliance is responsible for operating the whistleblowing channel and investigating alleged corporate compliance violations.



## Effectiveness

We understand that as a global business Aker Solutions is at risk of being drawn into human or labor rights violations. We have assessed the risk of direct involvement in such infringements to be low however indirect involvement in violations remains a risk due to the size of our supply chain.

In 2020, neither Aker Solutions nor any employee faced criminal action related to corruption. No contracts with partners were terminated or allowed to expire due to violations related to corruption. The company is not aware of any ongoing investigation or any legal actions pending for anti-competitive, anti-trust or monopoly violations where Aker Solutions is identified as a participant or suspect, nor were any such legal actions completed during 2020. In the fourth quarter, some media referred to speculation that Aker Solutions' entities in Malaysia had not aligned its business licenses with local requirements. The Company immediately provided information to both media and business partners confirming that Aker Solutions' entities in Malaysia fulfil all applicable requirements for the set-up of its entities in the country.

No material human rights grievances against the company were reported in 2020.

## Training

Continuous focus on and awareness of compliance and business integrity is important to ensure that our employees know what to do if they find themselves facing a dilemma. Although our anti-corruption compliance program, policies and procedures are applicable globally, we place importance on interacting with employees on the ground to ensure that the local context is considered in our communication and training material. This is to ensure that expectations of business conduct are understood in the context where the training is conducted.

Our Business Ethics Training Program is a key preventative activity in our Anti-corruption Compliance Program which has been designed to prevent unethical or illegal business conduct by our employees. Our Business Ethics Training Program consists of four modules which are delivered to our employees through a combination of digital platforms (eLearning) and classroom-based training. Training courses and materials are available in various languages.

### Module 1

A 15-minute eLearning course covering an introduction to business integrity. Our employees are required to confirm at the end of the course that they have read and understood Aker Solutions Code of Conduct which makes specific mention of modern slavery. This course is mandatory for all new recruits to complete as soon as possible, ideally during the first week of employment at Aker Solutions.

### Module 2

A two-to-three hour, instructor-led classroom training course which focuses on the general framework for making ethical decisions and what to do in case of breaches or suspected breaches of our internal policies or laws and regulations. This course must be completed by all employees who are based in an office and/or working in or travelling to a high-risk country. Other targeted groups may be required to complete this course if identified through a risk-based evaluation. This course must be completed within the first 6 months of employment at Aker Solutions. This course was updated in 2018 to include more in-depth material specifically on modern slavery and these and other human rights materials were further refined in 2019. This has been adapted to suit online delivery.

### Module 3

A ten-minute eLearning course focusing on selected topics of Aker Solutions' Code of Conduct. This serves as a refresher and is updated annually. It is to be completed by all our employees on an annual basis. Other targeted groups may be required to complete this course if identified through a risk-based evaluation.

## Module 4

Targeted training courses are provided to those in high risk roles which are identified by operational management in cooperation with Corporate Business Integrity and Compliance. Identification of a high risk role is based on various factors such as risk profile and operations of the relevant function, however on a general basis, employees that have frequent contact with customers, suppliers and/or public officials or local authorities or travel to or are present in high risk countries may be defined as high risk roles. Due to the risk-based target groups for this training, the format and duration of Module 4 may vary depending on the identified risk.

Completion of the various modules by employees is recorded and registered in the applicable learning portal systems. Reports on training completion are extracted and distributed regularly to enable targeted follow-up of employees who have not yet completed the relevant modules.

With respect to training of other individuals or groups (including suppliers' personnel and representatives of our business Partners), Business Integrity and Compliance will recommend and facilitate such training in cooperation with the relevant country function.

## Further Actions

Aker Solutions continuously works to ensure that human and labor rights violations, including slavery and human trafficking, do not take place in the company's supply chain or in any other part of our business.

Our 2021 targets include:

- Evaluate business integrity training program with a view to provide more risk-based targeted training and enable assessment of training effectiveness
- Provide annual Code of Conduct training to our company personnel
- Restart projects to further digitalize key business integrity work processes
- Implement and secure the risk-based human and labor rights approach through targeted communication/training initiatives and on-site supplier audits, where possible
- Finalize a human rights policy
- Purchase and roll-out a human rights eLearning course to relevant target groups
- Identify meaningful key performance indicators for human rights performance
- Further strengthen Aker Solutions' human rights program by implementing mitigating activities where appropriate and ensuring monitoring of processes with an inherent risk of human rights infringements

A handwritten signature in blue ink, appearing to read "L. Langøy".

Mr. Leif-Arne Langøy  
Chairman, Aker Solutions ASA  
Date: June 14, 2021

## Appendix 1

This Modern Slavery Act Transparency Statement applies to the following legal entities:

- Aker Solutions ASA
- Aker Solutions Holding AS
- Aker Solutions AS
- Aker Solutions (Shenzhen) Co Ltd
- Aker Solutions Tanzania Ltd
- KBeDesign AS
- Aker Solutions Ltd
- Aker Solutions DC Trustees Ltd
- Aker Solutions Angola Ltd
- Aker Solutions Enterprises International (UK) Ltd
- Enovate Systems Ltd
- Aker Engineering & Technology Ltd
- Aker Engineering Malaysia Ltd
- Aker Engineering Malaysia Sdn Bhd
- Aker Offshore Partner Ltd
- Aker Solutions de Brazil Ltda
- C.S.E Mecânica e Instrumentação Ltda
- Aker Powergas Pvt Ltd
- Aker Powergas Subsea Pvt Ltd
- Aker Solutions Holding Limited
- Aker Solutions IP Limited
- Aker Solutions EAME Limited
- Aker Solutions Ghana Ltd
- Aker Solutions Ghana Holding Ltd
- Aker Solutions USA Corporation
- Aker Solutions Inc
- Aker Solutions de México
- Aker Solutions Malaysia Sdn Bhd
- Kværner Holding AS
- Kværner Resources AS
- Kvaerner Contracting Ltd
- Kvaerner Resources Ltd
- Kvaerner Finland Oy
- Kvaerner Americas Holdings Inc
- Kvaerner North American Construction Inc
- Kvaerner Renewables US LLC
- Kvaerner Canada Ltd
- Aker Solutions India Sdn Bhd
- Aker Solutions Umbilical Asia Pacific Sdn Bhd
- Aker Engineering International Sdn Bhd
- Aker Solutions Azerbaijan LLC
- Aker Solutions Canada Inc
- Aker Solutions Asset Integrity and Management Canada Inc
- Aker Solutions Korea Co Ltd
- Aker Solutions Sdn Bhd
- PTAS Aker Solutions Sdn Bhd
- Aker Solutions Nigeria Ltd
- Aker Installation FP AS
- Benestad Solutions AS
- Aker Solutions Russia AS
- Aker Solutions Middle East AS
- Aker Insurance Services AS
- Aker Solutions SAS
- Aker Solutions Congo SA
- Aker Solutions BV
- Aker Solutions Saudi Arabia Co. Ltd
- Aker Solutions Enterprises LDA
- Aker Solutions Mocambique Ltda
- Aker Solutions Pty Ltd
- Aker Solutions Cyprus Ltd
- Aker Solutions AB
- K Water AB
- International Design Engineering and Services L td
- Aker Solutions Contracting AS
- Kværner AS
- Norwegian Contractors AS
- Kværner Ghana AS
- Kvaerner Engineering & Technology (Beijing) Co. Ltd
- Kvaerner COOEC Engineering & Technology (Qingdao) Ltd
- Kvaerner LLC
- K2 JV ANS
- ASK JV AS