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## Modern Slavery Act Transparency Statement

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 2021 we continued to improve our understanding of the modern slavery related risks faced by our business by maturing our human rights due diligence program.

Pursuant to Section 54 of the UK Modern Slavery Act 2015 we hereby present Aker Solutions' sixth 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 21, 2022 and covers the financial year, ending December 31, 2021.

### 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.

Aker Solutions is majority owned by Aker Holding AS and is made up of over 70 legal entities with facilities in 22 countries worldwide. Of these countries, the Democratic Republic of Congo is very high risk for modern slavery. Saudi Arabia, China, Russia, Malaysia, Brunei and Angola also have an increased risk of modern slavery.<sup>1</sup> 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 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: [Offices | Aker Solutions](#)

### Our People

At the end of 2021 we had approximately 15,000 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 2021 can be found in our Sustainability Report 2021 and our Annual Report 2021. In 2021 approximately 25 percent of employees were contract staff.

Our commitment to human and labor rights, and to the elimination of modern slavery, is strengthened by the Global Framework Agreement between Aker Solutions ASA and the Norwegian and international trade unions Fellesforbundet, IndustriALL Global Union and Tekna.

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<sup>1</sup> See Global Slavery Index, [Global Slavery Index](#)

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## Supply Chain

Our supply chain management team works with around 13,800 direct and indirect suppliers across the globe and employs 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. 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 Modern 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 risk of 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.

- Code of Conduct [Link to document](#)
- Business Integrity Policy [Link to document](#)
- Human Rights Policy [Link to document](#)
- Business Integrity Procedure
- Country Risk Procedure
- Country Entry Procedure
- HR Global Recruitment Principles and Guidelines Document
- Business Partner Qualification and Integrity Due Diligence Procedure
- Supplier Approval Procedure
- Supply Chain Risk and Compliance Management Procedure
- Supplier and Subcontractor Declaration Form
- Terms and Conditions for Suppliers
- Business Ethics Training Procedure
- Global Whistleblowing Procedure

## 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 the UN Global Compact. Our commitment to human and labor rights is also addressed in the Global Framework Agreement entered 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

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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 vision and company attitudes 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.

## Approach

Human rights concerns are by their very nature multi-faceted and linked to multiple business processes. We strive to integrate human rights considerations into core business processes in our own operations as well as in cooperation with our suppliers and business partners and in interactions with communities where we operate. We think that such a holistic approach contributes to building a company culture where managing human rights risk and minimizing harm to people is considered as part of our core business. To meet our commitments as to respect and support of human rights, Aker Solutions shall maintain a human rights program which is embedded in our global compliance program managed by the Business Integrity & Compliance (BIC) team and led by the Chief Compliance Officer (CCO). The CCO has a direct and independent reporting line to the Audit Committee.

Our global compliance program is risk-based and designed to prevent, detect and respond to compliance and integrity risks, including human rights risks arising from the company's own activities and business relationships with suppliers and other partners, and learn from incidents of human rights violations.

The program consists of these key elements:

### 1 Governance

The multifaceted nature of human rights requires cross-functional coordination. We have therefore established a Human Rights Committee with participation from the following functions/ representatives: HSSE, BIC, People and Organization (P&O), Data Protection, Sustainability, Supply Chain and Communications, as well as representatives from the Unions. The Human Rights Committee's mandate is to ensure that the company has a sound human rights system and to continuously improve this system. The committee's mandate is authorized by the CEO. The committee reports to the CEO and the Audit Committee on a quarterly basis.

Aker Solutions has a Code of Conduct which is endorsed by the Board of Directors, and it constitutes a framework for managing compliance and integrity risks. It describes our commitments and requirements regarding business practice, personal conduct and expectations towards business partners. The Code of Conduct outlines clear principles and rules in key compliance and integrity areas, including Caring for People which comprises human rights and labor rights, health, safety and security, anti-harassment and diversity topics. Our Code of Conduct was revised in 2021 and is available in 7 languages.

In 2021, we launched a stand-alone Human Rights Policy anchored in our existing firm commitment to respecting human rights expressed in the Code of Conduct. The Policy is aligned with the requirements of the International Bill of Rights and the ILO Fundamental Conventions. It constitutes a building block in our framework for managing human rights risks. Our Human Rights Policy is approved by the executive management team, is available in 7 languages and can be found in our management system as well as on our website.

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## 2 Due diligence - Activities to Identify, Prevent and Mitigate Human Rights Violations

### Risk assessment

Assessment of business integrity risks including human rights is an integrated part of our Enterprise Risk Management (ERM) process which is subject to a quarterly review. We have an established process for conducting country risk assessments, including human rights, for new country entries or for projects in new countries. We use Maplecroft's 11 indices on human and labor rights to risk-assess countries where we currently operate.

Aker Solutions has identified that potential significant risk exposure to human rights violations may be detected in the global supply chain. The most important prescriptions in the International Bill of Human Rights related to supply chain management are:

- Right not to be subjected to slavery, servitude, forced labor, or child labor
- Right to enjoy just and favorable conditions of work, and
- Right to health

We strive to ensure that our suppliers, vendors and subcontractors share our commitment to safety, business integrity, respect for human rights and compliance. We also expect that they in turn also apply the same principles towards their own employees, suppliers, subcontractors and agents with whom they work in the delivery of goods and services to Aker Solutions. We therefore cascade our expectations and requirements for human rights protections to our suppliers and subcontractors. These requirements are included in our Supplier Declaration. The Supplier Declaration is used in our supplier pre-qualification process and commitment to the Supplier Declaration is a prerequisite for becoming qualified as a supplier, vendor or subcontractor to Aker Solutions.

### Contractual clauses

Contractual clauses are a tool to signal expectations of respect for internationally recognized human rights to our business associates. Contractual clauses can allow us to demand a contractual party address and eventually rectify human rights violations or terminate a contract if deemed necessary. We endeavor to include human rights clauses in all contracts with our business associates.

We include 'audit rights' clauses in our contracts with suppliers to have the possibility to verify their compliance with the Supplier Declaration commitments on a risk basis.

Going forward, we aim to conduct more focused human rights impact assessments for specific projects, including their respective supply chain and other business partners.

### Training, communication, and awareness building

Business ethics training is one of Aker Solutions' key initiatives in building awareness about business integrity and preventing unethical behavior or breaches of the Code of Conduct, including human rights infringements.

We provide various types of ethics and compliance training to our employees:

- We provide a Code of Conduct refresher e-learning training to all employees on an annual basis. In 2021, approximately 71 percent of employees defined as the target group completed the training
- Business ethics training is offered to all new employees and in 2021, approximately 1,200 new employees completed this training online
- There are numerous trainings on other compliance topics provided to defined target groups of employees throughout the year, via internal online platforms

- During 2021, we conducted business integrity awareness training including human rights topics to some selected key suppliers in Malaysia and Angola. These training were conducted by BIC Compliance Officers responsible for these geographical regions

We conduct regular communication campaigns to build awareness in the organization around the Code of Conduct, whistleblowing, and other relevant business integrity topics, including human rights. In 2021, we celebrated International Human Rights Day on December 9 and marked it with the ‘*All Human - All Equal*’ campaign on our internal communication channel as well as on social media.

## Due diligence

Aker Solutions performs integrity due diligence (IDD) on our customers, suppliers and other business partners such as JV partners, third-party representatives, and alliance partners. Projects and new country entries are subject to integrity and country risk assessments. The purpose of the IDD process is to ensure that adequate level of risk assessment and risk mitigation is performed on the background and profile of potential new or existing business partners or other stakeholders when evaluating whether they meet Aker Solutions’ compliance and integrity standards. In our IDD review, a business partner or a stakeholder is analyzed to identify potential integrity and compliance concerns with the purpose to mitigate compliance and reputational risks for Aker Solutions. Potential integrity and compliance concerns and risks may relate to:

- Corruption
- Human rights violations
- Violations of international sanctions
- Other economic crimes (e.g., money laundering, terror financing)
- Environmental breaches
- Other material risks

Key procedures governing this process are:

- Business Integrity Policy and Procedure
- Country Risk Procedure
- Business Partner Qualifications and Integrity Due Diligence Procedure
- Supplier Approval Procedure

### 3 Monitoring and Reporting

## Inspections, reviews, and audits

We perform regular inspections for our own locations, projects and business partners. Controls of human rights guidelines and directives are regularly carried out, sometimes also in conjunction with a broader review of health and safety, procurement procedures and/or quality. A key risk exposure to human rights violations can potentially be found in the supply chain. Supply Chain teams conduct ISO-based supplier audits, where human rights and anti-corruption is part of the audit program. A risk-based audit selection methodology has been developed to ensure that high risk suppliers are subject to audits. During 2021, we conducted risk-based human rights supplier audits in Angola.

During 2022, we plan to engage external specialized human rights inspection service providers to support our auditing efforts in the supply chain and expand our on-site and worker-centric audit capacity and capabilities.

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## Reporting of concerns, whistleblowing, and grievance mechanisms

We are committed to building a culture of trust where employees are comfortable to ask questions, seek guidance, raise concerns and report suspected violations. Aker Solutions' whistleblowing channel allows anyone (including externals) to report concerns, incidents, breaches or suspected breaches of the Code of Conduct, other internal policies, or laws and regulations. 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. Notifications can be sent anonymously through Aker Solutions whistleblowing channel or by email to [whistleblowing@akersolutions.com](mailto:whistleblowing@akersolutions.com).

We do 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.

## Investigations

All notifications to the whistleblowing channel are received and managed by our BIC department and are treated with strict confidentiality. BIC has a mandate from Aker Solutions' Board of Directors to investigate alleged compliance violations. Investigations are carried out in accordance with the rules set out in the Whistleblowing Procedure and the Investigation Procedure.

Incidents and investigations that uncover malpractices or breaches of causing, contributing to or being complicit in human rights violations shall result in recommended remediation and improvement actions. In such cases, remediation and improvement actions will be directed at the negatively impacted people and will prevent and mitigate the adverse effects now and reduce the risk of causing adverse effects in the future.

## Internal and external reporting

Aker Solutions is a listed company on the Oslo Stock Exchange and follows the Norwegian Accounting Act for annual reporting. In addition, Aker Solutions follows the Euronext guidance on ESG reporting of January 2020. Pursuant to the UK Modern Slavery Act 2015, the company reports annually on steps that have been taken to ensure that there is no slavery or human trafficking in the supply chain. Internally, the Human Rights Committee reports on a quarterly basis to the Audit Committee through the Chief Compliance Officer.

## Performance

During 2021, we carried out, as planned, four quarterly meetings of the Human Rights Committee and reported on our human rights program to the Audit Committee.

In addition, we launched a stand-alone Human Rights Policy which is anchored in our existing firm commitment to respecting human rights expressed in the Code of Conduct. The Policy is aligned with requirements of the International Bill of Rights and the ILO Fundamental Convention and constitutes a building block in our framework for managing human rights risks.

Whistleblowing cases and follow-up. The number of cases reported through our whistleblowing channel in 2021 was at 0.63 reports per 100 employees as compared to 1.1 for the previous year. There were 95 reports recorded in 2021, compared to 169 reports in 2020 and 176 reports in 2019. Around 50 percent of received reports in 2021 concerned employee relations and human resources issues, compared to 59 percent in 2020. The remaining cases were related to other business integrity topics.

In 2021, we enhanced our risk assessment of the supply chain with human rights index data and contracted Maplecroft as a provider of such data. This is yet another step to enhance our focus and supply chain risk assessment on human rights and working conditions.

We continued executing on our responsible and sustainable supply chain processes which among others require that all new suppliers commit to our Supplier Declaration (including human rights and labor rights

requirements) as a prerequisite of being approved as a supplier to Aker Solutions. More information about how we manage a sustainable and responsible supply chain and about our supplier qualification process including our Supplier Declaration can be found on our website.

There were no reported human rights-related breaches of contracts in 2021.

In 2021, we continued a collaborative approach to sharing best practice in the area of human rights in the supply chain with our key customers. This particular collaboration is a very important forum for us to learn and share. Collaborative industry initiatives like this allow a stronger, joint message meant to trigger actions and positive change throughout the layers of the supply chain.

Our new Code of Conduct was launched in the fourth quarter of 2021, and we rolled out a global e-learning to all company personnel; this e-learning included a chapter on human rights as well other material topics.

During 2021, we initiated valuable collaboration with Aker Solutions' internal global Supply Chain network with the purpose of working together towards achieving compliance with the new upcoming legislation on human rights due diligence, the Norwegian Transparency Act, coming into force as of July 1, 2022.

## Looking Forward

Throughout 2021, we continued further development of our human rights program. We continued a valuable cross functional collaboration across departments on human rights risks and mitigation. All in all, our human rights program is maturing with each year. Looking into 2022 we have new ambitions and goals to be achieved to continuously improve our performance in this area and to avoid harm to people.

Our focus areas for 2022 have been defined and we will concentrate on:

- Strengthening the Human Rights framework in own operations as well as in the supply chain
- Building awareness and competence on human rights and business for our employees including a roll out of an e-learning on human rights and other campaigns
- Implementation of the requirements of the Norwegian Transparency Act and collaborating with our internal global Supply Chain network on reviewing our existing process for responsible supply chain and ensuring adequate processes for human rights due diligence in the supply chain as per the legal requirements
- Reviewing risk and continuing human rights salient issues mapping to ensure it corresponds with developments in the business
- Extending our audit capacity by establishing framework agreements with external professional service providers of worker-centric human rights and working conditions audits especially for higher risk countries
- Enhancing collaboration with key business partners to ensure a lasting positive impact on human rights and working conditions for identified higher risk areas of common supply chains.

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

Mr Leif-Arne Langøy

Chairman, Aker Solutions ASA

Date: June 21, 2022

## 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
- Kvaerner Resources AS
- Kvaerner Contracting Ltd
- Kvaerner Resources Ltd
- Kvaerner Finland Oy
- Kvaerner Americas Holdings 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
- Kvaerner AS
- Norwegian Contractors AS
- Kvaerner Ghana AS
- Kvaerner Engineering & Technology (Beijing) Co. Ltd
- Kvaerner COOEC Engineering & Technology (Quingdao) Ltd
- Kvaerner LLC
- K2 JV ANS
- ASK JV AS