

# Modern Slavery Act Transparency Statement

#### Introduction from the Chief Executive Officer

At Aker Solutions we conduct our business with integrity, respecting the laws, cultures, dignity and rights of individuals in all countries where we operate.

Considering the size and complexity of our supply chain, we understand that a global organization like ours can risk being drawn into human or labor rights violations. However in support of internationally accepted human and labor rights principles and by adopting a zero tolerance approach towards modern slavery and human trafficking, we are committed to implementing and enforcing effective systems to ensure that slavery and human trafficking is not taking place in our own business or our supply chain.

Pursuant to Section 54 of the UK Modern Slavery Act 2015, we hereby present our Modern Slavery Act Transparency Statement for the financial year ending December 31, 2016 which has been approved by Aker Solutions' Board of Directors.

Luis Araujo Chief Executive Officer

#### **Our Organization**

Aker Solutions is a global provider of products, systems and services to the oil and gas industry. We have over 14,000 employees worldwide and operate in 46 locations. More details about our locations around the world can be found <a href="here">here</a>.

This Statement and the policies and procedures detailed herein apply to all of Aker Solutions legal entities which are listed in Attachment 1 to this Statement.

# Our Supply Chain

Aker Solutions' Supply Chain Management function currently employs approximately 750 people who are located at almost all of our locations where we operate. Supply Chain Management undertakes activities such as inventory management, logistics, procurement and strategic sourcing. We mainly procure tubes, valves, actuators, forgings, connectors and instrumentation through our supply chain.

## Our Commitment to Anti-Slavery and Human Trafficking

Aker Solutions' Code of Conduct and Business Integrity Policy are the foundations of our drive to uphold the highest levels of integrity and avoid becoming complicit in unethical or illegal behavior. To show our increased focus and commitment to ensuring that modern slavery and human trafficking is not taking place in our business and supply chain we updated our Code of Conduct at the end of 2016 to include specific references to the UK Modern Slavery Act and its requirements. This Code applies to all employees and directors in the Aker Solutions Group, and Aker Solutions 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. We also encourage all of our business partners to adhere to principles that are consistent with our Code of Conduct and our suppliers, subcontractors and other contacting parties are expected to adhere to standards which are consistent with



our Code of Conduct and applicable laws. Aker Solutions Code of Conduct can be found on the company's website.

Aker Solutions' Code of Conduct, Business Integrity Policy and UN Global Compact membership underpin our respect and support for international standards such as the UN Declaration and Conventions on Human Rights, the OECD Guidelines for Multinational Enterprises, the ILO Declaration on Fundamental Principles and Rights at Work and the UK Modern Slavery Act. We also adhere to the Voluntary Principles on Security and Human Rights.

Aker Solutions' commitment to human and labor rights is also addressed in the Global Framework Agreement between Aker ASA and the Norwegian and international trade unions Fellesforbundet, IndustriALL Global Union, NITO and Tekna dating from 2008. This Agreement was renewed in 2013 for an indeterminate duration if not cancelled or asked renegotiated and focuses specifically on standards such as non-discrimination and the prohibition of child and forced labor.

#### Due Diligence Processes to Prevent Slavery and Human Trafficking

As part of Aker Solutions initiative to identify and mitigate risk we have implemented a Country Risk Procedure which sets specific procedures for operations in or deliveries to countries that are associated with having high political, reputational and corruption risks. New activities in listed countries are subject to an assessment conducted by Aker Solutions' Business Integrity and Compliance Department. This assessment includes, among other things, an analysis of a country's human and civil rights and the risk of Aker Solutions becoming complicit, either directly or in directly, in violation of such rights. The aim of these assessments is to avoid participation in activities which are considered unethical or illegal. Aker Solutions performed 97 project assessments in 2016.

In addition, Aker Solutions' global procedure on whistleblowing encourages all of our employees, customers and other business partners to report any concerns, breaches of the Code of Conduct, other internal policies, or laws and regulations related to the direct activities of the organization or our supply chain, including any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Aker Solutions' whistleblowing channel can be found on Aker Solutions' website.

In relation to our supply chain, our Supplier Qualification and Information System ("SQiS"), which is described in more detail below, sets additional requirements such as qualification questionnaires, audits and due diligence analysis for the company's suppliers and subcontractors.

## Supplier Adherence to our Values and Ethics

We strive to ensure full compliance with laws and human and labor rights in our supply chain with a responsible and accountable supplier base. Within the Global Framework Agreement between Aker ASA and the Norwegian and international trade unions mentioned above, there is a clear commitment from us to use our influence with suppliers to ensure that they also respect human and labor rights.

In order to be able to deliver to Aker Solutions, all new suppliers (direct or indirect) must be registered in our SQiS system after undergoing background checks on areas such as human and labor rights management and anti-corruption and compliance management. As part of the qualification process, all of our suppliers must also sign Aker Solutions' Supplier Declaration Form which includes minimum ethical requirements to be complied with by our suppliers. This Form can be found <a href="here">here</a>. No deviations to the content of the Supplier Declaration can be made and suppliers who refuse to sign the declaration cannot be approved in SQiS and subsequently cannot deliver to Aker Solutions. Audits are conducted to verify the information provided in the qualification process and to investigate a supplier's ability to meet Aker Solutions' requirements. We are



committed to improving our systems to ensure that slavery and human trafficking are not taking place in our supply chain. We therefore enhanced our screening of human rights infringements through additional qualification requirements and implemented a new tool for background screening of all our suppliers in 2016. 644 new suppliers were registered in SQiS in 2016.

The SQiS system is also used to measure and predict supplier performance through a monitoring and performance evaluation process. This enables continuous monitoring of our qualified suppliers with daily screening of financial and compliance information. It also enables integration with the internal Audit Management Tool with input and tracking of audit reports and findings. Our audit program is risk based and determines where we should focus our audits. 187 external audits of suppliers were conducted in 2016.

In addition to the foregoing, Aker Solutions General Conditions for Purchase require that our suppliers shall comply with all applicable laws, rules and regulations of any governmental, judicial or regulatory body having jurisdiction over the work or worksite including laws relating to the organization of labor and fundamental human rights norms as described in the Universal Declaration of Human Rights. These terms and conditions also require that suppliers undertake to fulfil the requirements of the Supplier Declaration. A link to Aker Solutions General Conditions for Major Purchases can be found on Aker Solutions' website.

#### **Training**

Continuous focus and awareness on compliance and business integrity is important to ensure that our employees know how to react and respond if they find themselves in a difficult situation. In 2016 we continued to run regular compliance updates in management meetings, launched a new business integrity community on our internal intranet, and updated some of our policies and procedures including the Code of Conduct to specifically mention the UK Modern Slavery Act.

Further, a new Business Ethics Training Procedure was launched in 2016 describing Aker Solutions' Business Ethics Training Program and its mandatory training requirements. As part of this, a new mandatory eLearning course was launched for new employees, tailor-made training material was developed for selected employee groups exposed to integrity risks, and the traditional classroom training material was updated to reflect new external and internal requirements, including a specific focus on modern slavery and human trafficking.

# **Further Steps**

We are continuously taking additional steps to ensure that human and labor rights violations, including slavery and human trafficking, do not take place in our supply chain or in any other part of our business. At the end of 2016, new annual training requirements were issued by Aker ASA which will be implemented in 2017 throughout the organization.

Mr. Øyvind Eriksen

Chairman

Aker Solutions ASA Date: April 4, 2017



### **Attachment 1: Aker Solutions Group**

