

# 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 2022 we continued to improve our understanding of the modern slavery related risks faced by our business by maturing the company's human rights due diligence program.

Pursuant to Section 54 of the UK Modern Slavery Act 2015, we hereby present Aker Solutions' seventh 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 3 May 2023 and covers the financial year ending 31 December 2022.

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## 1. Organization Structure and Supply Chain

Aker Solutions delivers integrated solutions, products and services to the global energy industry. Aker Solutions accelerates the transition to sustainable energy production. 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 made up of over 70 legal entities with operations in more than 20 countries. Of these countries, the Democratic Republic of Congo is very high risk for modern slavery. Saudi Arabia, UAE, China, 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 modern slavery and human trafficking seriously and are committed to mitigate the risk to ensure 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 2022 Aker Solutions had approximately 15,800 own employees in more than 50 locations in more than 20 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. In 2022 approximately 6,600 employees were hired-in staff. More information on our key staff figures and our financials for 2022 can be found in our Sustainability Report 2022 and our Annual Report 2022 and both reports can be found [here](#).

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<sup>1</sup> See Global Slavery Index, Global Slavery Index

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

## Supply Chain

Aker Solutions has a duty to responsibly manage our relationships with our suppliers, monitor their activities and actively work to diversify our supplier portfolio. With over 10,000 suppliers in our global supply chain, ensuring a responsible approach and management of this network to mitigate negative impacts is a material topic for Aker Solutions.

Suppliers are expected to adhere to our business ethics and Code of Conduct, including our standards for health and safety, human and labor rights, environment, quality management, business integrity and corporate social responsibility, as well as being competent and trustworthy. Our expectations are further outlined on our website: [Driving a Responsible and Sustainable Supplier Base | Aker Solutions](#)

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.

## 2. Our approach and human rights due diligence

Human rights concerns are by their very nature multifaceted 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 maintains 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).

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.

Our human rights program is centered around human rights due diligence, incl. risks of modern slavery and human trafficking, and consists of these key elements.

- I. Governance and commitment
- II. Due diligence - Activities to Identify, Prevent and Mitigate Negative Human Rights Impacts
- III. Monitoring and reporting.

### **I. Governance and commitment**

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.

Aker Solutions introduced 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 internal management system as well as on our website.

#### ▪ **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 company 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 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.

## **II. Activities to Identify, Prevent and Mitigate Negative Human Rights Impacts**

### **▪ Risk assessment**

Aker Solutions has established a process for conducting country risk assessments, including human rights impact assessment, 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.

### **▪ Cascading the requirements in the supply chain**

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 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.

### **▪ 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. In 2022, approximately 11,000 personnel (own employees and direct hired-ins) completed our mandatory annual Code of Conduct certification e-learning where they confirmed to have read and understood Aker Solutions' Code of Conduct. This is approximately ninety-six percent of all personnel identified in the target group. Additionally, approximately 3,400 new hires completed the mandatory introduction to business integrity e-learning and approximately 1,100 employees in high-risk roles, such as supply chain and business development, have been trained on relevant compliance topics through dedicated face-to-face or Teams-based training sessions.

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 2022, we celebrated International Human Rights Day on December 9 and marked it with the '*Dignity, Freedom, and Justice for All*' 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.

### **III. 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.

As planned, during 2022, we engaged three external specialized human rights audit service providers to support our auditing efforts in the supply chain and expand our on-site and worker-centric audit capacity and capabilities.

- **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.

- **Remediation**

Aker Solutions is committed to providing remediation for negative impacts or harm to people caused by our operations or through those of our immediate suppliers, when such instances have been identified. Where incidents further in our supply chain are identified, we are committed to facilitating remediation, where we are able to.

The company has defined a process for human rights due diligence in the supply chain. In instances where we identify potential risks or weaknesses of measures implemented at our suppliers, we have a number of actions that we execute including enhanced due diligence, supplier questionnaire, compliance follow-up with supplier representatives, or we call for an audit by an external service provider (Aker Solutions has entered into framework agreements with three professional specialized human rights audit providers).

In a specific case during 2022, the collaboration with our client allowed us to finalize a joint human rights due diligence follow up plan for a strategic supplier and secure their engagement. This collaboration made it possible to monitor progress in order to mitigate the risk of potential deterioration of working conditions for the shop-floor employees.

- **Internal and external reporting**

Aker Solutions ASA 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.

### 3. Performance in 2022

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 2022, we revised and updated our Supplier Declaration to enhance the expectations in the area of human rights and decent working conditions in the context of implementation of the Norwegian Transparency Act.

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 2022.

During 2022, we significantly improved our human rights risk assessment of the global supply chain. The risk assessment provides a higher level of granular information as to purchase categories, countries of origin, type of human rights or working conditions risks. Multiple indices on human rights data are contracted from Maplecroft as a provider of such data. The risk assessment provides a platform for a risk-based approach to human rights due diligence process and tracking of actions to be implemented. This is yet another step to enhance our focus and supply chain risk assessment on human rights and working conditions.

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 2022 we continued to improve our understanding of the modern slavery related risks faced by our business by maturing our human rights due diligence program and risk assessment.

In the third quarter of 2022, we rolled-out our annual Code of Conduct certification course. The e-learning course included a chapter on respecting and promoting human rights as well as other material topics e.g., anti-corruption / anti-bribery section, data protection section. In 2022, approximately 11,000 personnel (own employees and direct hired ins) completed a mandatory annual Code of Conduct certification e-learning where they confirmed to have read and understood Aker Solutions' Code of Conduct. This constitutes approximately 96 percent of all personnel identified in the target group.

During 2022, we continued valuable collaboration across the company with key stakeholders with the purpose of working together towards improving our human rights due diligence process, in compliance with the OECD guidelines as well as the new legislation on human rights due diligence i.e., the Norwegian Transparency Act which came into force as of 1 July 2022.

### 4. Looking Forward into 2023

Throughout 2022, 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 2023 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 2023 have been defined and we will concentrate on:

- Continue strengthening the human rights framework in the supply chain.
- Continue building awareness and competence on human rights and business for our employees.
- Reviewing risk and continuing human rights salient issues mapping to ensure it corresponds with developments in our business and supply chain.
- Execute risk based human rights and worker-centric audits of selected suppliers based on established plan.
- Continue building a collaboration with key external stakeholders 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: 3 May 2023



## 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
- 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 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
- Aker Solutions Finland Oy
- Kvaerner Americas Holdings Inc
- Kvaerner Renewables US LLC
- Aker Solutions Marine Contractors Limited
- 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 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
- Aker Solutions Contracting AS
- Norwegian Contractors AS
- Kvaerner Engineering & Technology (Beijing) Co. Ltd
- Kvaerner LLC
- ASK JV AS
- Ah Åtte AS
- Aker Solutions Hydropower AS
- Rainpower Kristinehamn AB
- Rainpower Hangzhou Co Ltd
- Rainpower Switzerland AG
- Rainpower Hydro Enerji ve Ticaret Ltd
- Rainpower Peru S.A.C.
- Aker Solutions Subsea S.r.l.
- Aker Solutions Subsea AS
- Unitech Power Systems AS