

# 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 2024 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' ninth 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 31 March 2025 and covers the financial year ending December 31, 2024.

# 1. Organization Structure and Supply Chain

Aker Solutions is a global provider of holistic solutions, products, and services to the energy industry, focusing on both traditional oil and gas production and renewable energy solutions such as carbon capture and storage (CCS), hydrogen, hydropower and offshore wind. Aker Solutions ensures a comprehensive approach to meeting the needs of the global energy industry, from initial exploration to final delivery and support. The value chain encompasses a wide range of activities and offerings from consultancy, engineering, construction and installation to life cycle operations support and decommissioning.

More information about Aker Solutions can be found on our website: [This is Aker Solutions | Aker Solutions](#). The head office is at Fornebu, Norway. Aker Solutions ASA is listed on the Oslo Stock Exchange under the ticker AKSO.

Below is an overview of the value chain, including upstream and downstream supply chains, customers and channels of distribution.

## Upstream Supply Chain

Aker Solutions sources raw materials and components from various suppliers, including steel, electronics, metals, composites, and electronic components and specialized equipment required for construction. Aker Solutions also sources expertise and knowledge from a diverse pool of engineers and industry experts and invests in research and development to stay at the forefront of technological advancements and industry trends.

## Downstream Supply Chain

Once the raw materials and components are procured, Aker Solutions engages in the engineering, procurement, construction, and installation (EPCI) of various types of energy-related facilities. This includes the design and construction of drilling equipment, processing plants and subsea systems, the installation of offshore wind farms, solar power plants, energy storage systems, power plants, substations, and transmission lines. The downstream supply chain also involves the transportation, delivery and logistics of these products and services to the project sites and/or clients, ensuring efficient delivery and installation.

## Types of Suppliers

Aker Solutions collaborates with a diverse range of suppliers to support its extensive value chain. Here are the main types of suppliers Aker Solutions works with:

- **Raw Material Suppliers:** These suppliers provide essential materials such as steel, aluminum, and other metals used in the manufacturing of subsea systems, offshore platforms, and renewable energy components.
- **Equipment Manufacturers:** Aker Solutions sources specialized equipment from manufacturers who produce items like turbines, compressors, pumps, and other machinery critical for energy production and processing.
- **Technology Providers:** These suppliers offer advanced technological solutions, including software for digital twins, automation systems, and data management tools that enhance operational efficiency and safety.
- **Service Providers:** Aker Solutions partners with companies that offer various services, such as maintenance, inspection, and repair services, to ensure the longevity and reliability of energy assets.

- **Engineering and Construction Firms:** These firms assist in the design, engineering, and construction of new build projects, including offshore wind farms, oil and gas platforms, and carbon capture facilities.
- **Renewable Energy Component Suppliers:** For its New Energies segment, Aker Solutions works with suppliers that provide components for renewable energy projects, such as wind turbine blades, solar panels, and hydrogen production equipment.
- **Logistics and Transportation Companies:** These suppliers handle the logistics and transportation of materials, equipment, and finished products to project sites around the world, ensuring timely and efficient delivery.

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.

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

## Our People

Aker Solutions employs approximately 11,800 people in 15 countries. More information on our key staff figures and our financials for 2024 can be found in our integrated Annual Report which can be found on our website: [Sustainability Reports | Aker Solutions](#)

Our commitment to human and labor rights, and to the elimination of modern slavery, is strengthened by the Global Framework Agreement between Aker ASA<sup>1</sup> and the Norwegian and international trade unions Fellesforbundet, IndustriALL Global Union, NITO and Tekna.

## 2. Our approach and human rights due diligence

Aker Solutions supports and respects internationally proclaimed human and labor rights, as defined by the International Bill of Rights and the International Labor Organization's (ILO) Fundamental Conventions.

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 Compliance and Integrity (C&I) function. 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.

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<sup>1</sup> Aker ASA is Aker Solutions main shareholder. Aker Solutions is included in the GVC work of Aker ASA.

Our approach to human rights management including risks of modern slavery and human trafficking consists of these key elements and it is based on the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct:

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

## I. Governance and commitment

The multifaceted nature of human rights requires cross-functional coordination. Aker Solutions has therefore established a Human Rights Committee with participation from the following functions/representatives: HSSE, Compliance and Integrity, People and Transformation, Data Protection, Sustainability, Supply Chain, as well as representatives from the Unions to the Board of Directors. The Human Rights Committee's mandate is to ensure that the company has a sound human rights system and to continuously improve the operations. The Committee's mandate is authorized by the CEO. The committee reports to 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, and it 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: [Code of Conduct | Aker Solutions](#)
- Business Integrity Policy - Link to document: [Business Integrity Policy](#)
- Human Rights Policy – Link to document: [Human Rights Policy](#)
- Supplier Declaration – Link to document: [Supplier Declaration](#)
- 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
- 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. Due diligence - Activities to Identify, Prevent and Mitigate Human Rights Violations**

### *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*

Aker Solutions 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*

Awareness 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 2024, approximately 8,500 of all personnel completed the company's annual Code of Conduct certification e-learning where they confirmed to have read and understood Aker Solutions' Code of Conduct. Additionally, approximately 3,800 employees completed the mandatory introduction to business integrity eLearning. Approximately 830 employees in high-risk roles or locations, such as supply chain and business development, have been trained on relevant compliance topics through dedicated face-to-face or Teams-based training sessions.

Aker Solutions conducts 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 2024, the company celebrated International Human Rights Day on December 10 and marked it with a campaign on its internal communication channel to commemorate the day. In 2024, Aker Solutions also prioritized participation in the UN Annual Forum on Business and Human Rights taking place in Geneva.

### *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*

Aker Solutions performs regular inspections of its own locations, projects and business partners. Controls of human rights guidelines and directives are regularly conducted, sometimes also in conjunction with a broader review of health and safety, procurement procedures and/or quality. A key risk exposure to human and workers' rights violations can potentially be found in the supply chain. Supply chain teams conduct ISO-based supplier audits, where human rights and anti-corruption are parts of the audit program. A risk-based audit selection methodology has been developed to ensure that high risk suppliers are subject to audits.

The company has engaged three external specialized human rights audit service providers to support supply chain auditing efforts and expand on-site and worker-centric audit capacity and capabilities. Aker Solutions has also access to an industry network and auditing capacity through Magnet JQS/ Offshore Qualific membership.

### *Reporting of concerns, whistleblowing, and grievance mechanisms*

Aker Solutions is committed to building a culture of trust where employees feel comfortable to ask questions, seek guidance, raise concerns and report suspected breaches or violations. The company's whistleblowing channel allows employees and external parties to report concerns, incidents, breaches or suspected breaches of the Code of Conduct, other internal policies, or laws and regulations. Everyone has a responsibility to speak up promptly about ethical questions or issues, and anything believed, in good faith, to be a suspected violation. Notifications can be sent anonymously through Aker Solutions' whistleblowing channel (Whistleblowing | Aker Solutions) or by email to [whistleblowing@akersolutions.com](mailto:whistleblowing@akersolutions.com).

The company does 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.

### *Internal investigations*

All notifications to the whistleblowing channel are received and managed by Aker Solutions' Compliance and Integrity (C&I) department and are treated with strict confidentiality. C&I has a mandate from the company's Board of Directors to investigate alleged compliance breaches. 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 will 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 the company's operations or through those of its immediate suppliers when such instances have been identified. Where incidents further in its supply chain are identified, the company is committed to facilitate remediation, where it is able to.

The company has identified a process for human rights due diligence in the supply chain. In instances where it identifies potential risks or weaknesses of measures implemented at its suppliers, Aker Solutions implement a number of actions, including enhanced due diligence, supplier questionnaires, compliance follow-up with supplier representatives, or it can call for an audit by an external services provider.

## Internal and external reporting

Aker Solutions is listed on the Oslo Stock Exchange and follows the Norwegian Accounting Act for annual reporting. 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 Head of Compliance and Integrity.

## 3. Looking Forward into 2025

Throughout 2024, Aker Solutions continued further development and operationalization of its human rights program. It continued a valuable cross functional collaboration across departments on human rights risks and mitigation. Overall, the human rights program is maturing with each year. Looking into 2025 the company has new ambitions and goals to be achieved to continuously improve its performance in this area and to avoid harm to people.

The priority areas for 2025 include the following activities:

- Continued risk-based operationalization the Human Rights framework in the supply chain
- Continued awareness and competence building on human rights and business for our employees
- Risk monitoring and continued human rights salient issues mapping to ensure it corresponds with developments in our business and supply chain
- Carry-out risk-based human rights and worker-centric audits of selected suppliers based on established plan
- Enhance 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.



Mr. Leif-Arne Langøy  
Chairman, Aker Solutions ASA  
Date: 31 March 2025

# Appendix 1

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

<ul style="list-style-type: none"><li>- Aker Solutions ASA</li><li>- Aker Solutions Holding AS</li><li>- Aker Solutions AS</li><li>- Aker Security AS</li><li>- Aker Solutions Financial Holding AS</li><li>- Aker Solutions Energy Solutions FZE</li><li>- Aker Solutions Tanzania Ltd</li><li>- Aker Solutions Ltd</li><li>- Aker Solutions DC Trustees Ltd</li><li>- Aker Solutions Enterprises International (UK) Ltd</li><li>- Aker Engineering &amp; Technology Ltd</li><li>- Aker Engineering Malaysia Ltd</li><li>- Aker Engineering Malaysia Sdn Bhd</li><li>- Aker Offshore Partner Ltd</li><li>- C.S.E Mecânica e Instrumentação Ltda</li><li>- Aker Powergas Pvt Ltd</li><li>- Aker Solutions Holding Limited</li><li>- Aker Solutions EAME Limited</li><li>- Aker Solutions Ghana Ltd</li><li>- Aker Solutions Ghana Holding Ltd</li><li>- Aker Solutions USA Corporation</li><li>- Aker Solutions Inc</li><li>- Aker Solutions Malaysia Sdn Bhd</li><li>- Alma Clean Power AS</li><li>- Kvaerner Resources AS</li><li>- Kvaerner Contracting Ltd</li><li>- Kvaerner Resources Ltd</li><li>- Aker Solutions Finland Oy</li><li>- Kvaerner Americas Holdings Inc</li><li>- Kvaerner Renewables US LLC</li><li>- Aker Solutions Marine Contractors Limited</li><li>- Aker Solutions Poland Sp.z o.o.</li><li>- International Design Engineering &amp; Services Limited</li></ul>	<ul style="list-style-type: none"><li>- Aker Solutions India Sdn Bhd</li><li>- Aker Engineering International Sdn Bhd</li><li>- Aker Solutions Canada Inc</li><li>- Aker Solutions Asset Integrity and Management Canada Inc</li><li>- Aker Solutions Korea Co Ltd</li><li>- Aker Solutions Sdn Bhd</li><li>- PTAS Aker Solutions Sdn Bhd</li><li>- Aker Installation FP AS</li><li>- Benestad Solutions AS</li><li>- Aker Solutions Middle East AS</li><li>- Aker Insurance Services AS</li><li>- Aker Solutions SAS</li><li>- Aker Solutions Congo SA</li><li>- Aker Solutions Saudi Arabia Co. Ltd</li><li>- Aker Solutions BV</li><li>- Aker Solutions Enterprises LDA</li><li>- K Water AB</li><li>- Aker Solutions Contracting AS</li><li>- Norwegian Contractors AS</li><li>- Aker Solutions Engineering &amp; Technology (Beijing) Co. Ltd</li><li>- Aker Solutions Hydropower AS</li><li>- Aker Solutions Hydropower AB</li><li>- Aker Solutions Hydropower Hangzhou Co Ltd</li><li>- Aker Solutions Hydropower Switzerland AG</li><li>- Aker Solutions Hydro Enerji ve Ticaret Ltd</li><li>- Rainpower Peru S.A.C.</li><li>- Unitech Power Systems AS</li></ul>
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