

aibel

**Account of due diligence pursuant
to the Transparency Act**

25.04.2024

Contents

INTRODUCTION	3
ABOUT AIBEL	3
Aibel Legal Structure as of 18 March 2024	4
Snapshot of some key Aibel facts as of year-end 2023	5
HUMAN RIGHTS IN AIBEL	6
Commitment and responsibility	6
Our approach to human rights	7
COMPLIANCE WITH THE TRANSPARENCY ACT	9
Identified risk areas	9
Measures/Improvements	10
CLOSING CONSIDERATIONS	11

INTRODUCTION

Pursuant to Section 5 of the Transparency Act, we hereby present Aibel's account of our work to respect fundamental human rights and decent working conditions in our company and our operations.

This account was approved by Aibel's Board of Directors (BoD) on 25.04.2024 and covers the financial year 2023. Our account is written in English, in line with Section 3-4 third paragraph of the Accounting Act.

ABOUT AIBEL

Aibel ASA is a Norwegian company, and its registered head office is located in Stavanger, Norway. The Aibel Group is also located in Asker, Haugesund, Bergen, Harstad and Hammerfest, as well as in Singapore and Thailand. In addition, Aibel holds a 50% financial investment in Egyptian Maintenance Company (EMC), and a 40% shareholding in Deeline Construction Company Ltd. Financially, EMC and Deeline are non-consolidated entities, and are hence not considered part of the Aibel Group.

The operating entity in Norway is Aibel AS, which is the entity that is issuing and signing this account in accordance with the regulations in the Transparency Act.

Aibel ASA is ultimately owned by Ferd (50%), Ratos (32%) and the Swedish pension fund Sixth AP Fund (18%). The Aibel Group Legal Structure chart as per 18 March 2024 is displayed below.

Aibel Legal Structure as of 18 March 2024

The Aibel Group (Aibel/the Group) is headed by an Executive Management Team (EMT), which consists of the Chief Executive Officer (CEO) and six other executives. (One additional EMT member from 1 May 2024). The CEO reports to the Aibel ASA Board of Directors (BoD), which consists of eight directors, of which three are employee representatives. Current information about the Aibel BoD members and the management team is available at Aibel.com.

Aibel is a leading service company within the oil, gas and offshore wind industries, and provides clients with optimal and innovative solutions within engineering, procurement, construction and installation (EPCI) throughout a project's entire life cycle. In short, Aibel builds and maintains critical infrastructure for major reputable clients within the energy industry.

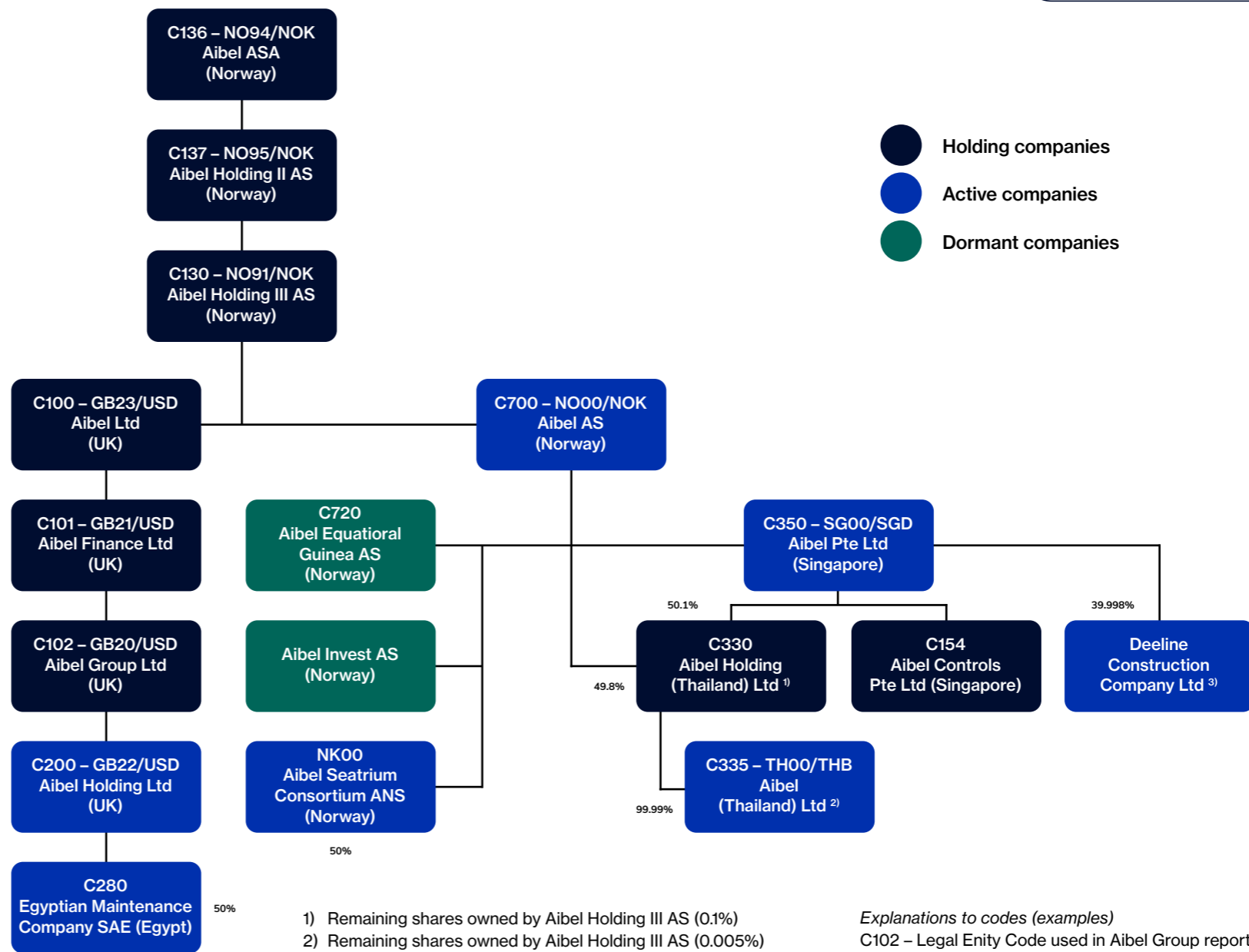
The Group's operations are organised within three business segments: Field Development, Offshore Wind & Electrification, and Modifications & Yard Services.

As per 31 December 2023, Aibel had more than 4,950 employees working at the company's offices in Norway, Thailand and Singapore. In addition, Aibel operates three yards located in Haugesund, Norway, and in Laem Chabang and Map Ta Put in Thailand, with significant prefabrication and construction capacity.

Contents

Transparency Act account

- Holding companies
- Active companies
- Dormant companies



- 1) Remaining shares owned by Aibel Holding III AS (0.1%)
- 2) Remaining shares owned by Aibel Holding III AS (0.005%) and Aibel AS (0.005%)
- 3) One share owned by Aibel Controls Pte Ltd (Singapore) (0.002%)

Explanations to codes (examples)
 C102 – Legal Entity Code used in Aibel Group reporting
 GB20 – the entity's Company Code in the SAP system
 USD – the entity's booking currency in the SAP system

Snapshot of some key Aibel facts as of year-end 2023



in	69k
f	12k
@	2.3k

HUMAN RIGHTS IN AIBEL

Commitment and responsibility

Our commitment

Aibel's commitment related to human rights is clearly stated in the Code of Conduct and in the Human Rights Policy. Aibel respects and adheres to the human rights and labour standards based on international law. We follow the principles of the Universal Declaration of Human Rights, ILO Declaration on Fundamental Principles and Rights at Work and the fundamental conventions. Furthermore, we follow the principles of the UN Guiding Principles on Business and Human Rights and the Modern Slavery Act of 2015. Our commitment extends across all our locations and throughout our value chain, with special attention to those who are most vulnerable to adverse impacts, including women, children and migrant workers. Aibel became a proud UN Global Compact signatory in 2017.

Responsibility for human rights

The Board of Directors and the Executive Management Team hold the overall responsibility in Aibel to ensure that the Group upholds fundamental human rights and decent working conditions.

The follow-up related to human rights reporting, investigating claims of misconduct and the implementation of human rights in the management system, lies with the Legal & Compliance department and Human Resources (HR) department. This work is further supported by Supply Chain Management.

The Executive Management Team participates in the Compliance and Human Rights Committee in relation to investigating possible violations in our supply chain.

Our approach to human rights

Aibel's preferred method to achieve improvements in the handling of human rights issues in the operations has been to incorporate all new initiatives and actions into existing processes and procedures, where relevant.

We continuously implement updates and improvements into our management system to ensure that respect for fundamental human rights and working conditions are in accordance with best practice.

The intention is to make human rights considerations and human rights risk awareness a natural part of our day-to-day work and part of everything that we do.

Tools and processes

Internal tools to prevent violations of human or labour rights in Aibel consist of the Code of Conduct supplemented by training, policies, procedures, processes, work instructions, guidelines, employee manuals, contracts and checklists. Additionally, Aibel actively collaborates with trade unions and utilises collective agreements to further enhance safeguarding measures.

Below is a more detailed description of the key processes, documents and policies that are available in our management system and are applicable to all of Aibel's operations.

Due diligence in the supply chain

Evaluating the potential risk of human rights violations within the supply chain is an important part of Aibel's risk-based approval process for suppliers and third parties. The process is supported by an overall Integrity Due Diligence (IDD) policy statement, the IDD work instruction, guidelines and checklists.

Human rights considerations and compliance with human rights best practices are requirements in our Code of Conduct, and we require commitment to the prevailing principles from all suppliers and subcontractors, which they confirm by signing the Aibel Supplier Code of Conduct.

Country risk assessment

Conducting a country risk assessment is a critical process when evaluating potential business engagements with third parties in new countries. Any request for Aibel's activities in a high-risk or

medium-risk country mandates a thorough country risk assessment, which requires approval by the EMT and/or the BoD. The risk of human rights violations in a specific country impacts the risk categorisation of a supplier located or operating in that country, and influences the scope of the due diligence.

Whistleblowing system – Grievance reporting

WhistleB is the Group's online reporting system and is provided by an external company. It is available 24/7 via the intranet, Aibel.com, a Url or a QR code for both internal and external users. The system enables anonymous reporting in 8 languages.

Aibel diligently investigates all actual or suspected violations and breaches related to our Code of Conduct, corruption, human rights violations, and any other compliance incidents or other types of unethical or unlawful actions. The Compliance and Human Rights Committee oversees these reports and investigations, as outlined in our process and work instruction.

Ethics and compliance awareness training

Aibel Group employees are required to complete an annual certification (e-learning), whereby they confirm

that they understand and agree to comply with the principles of our Code of Conduct.

In addition, a selection of employees are required to attend a classroom-based compliance awareness and dilemma training session every third year.

With regard to EMC, Aibel has continued to provide support with respect to compliance and human rights awareness and training during 2023.

Employee involvement

Aibel promotes employee involvement, and we cooperate with employee representatives across all business segments. Approximately half of all Norwegian Aibel employees are trade union members, and almost three-quarters of all Norwegian employees are covered by collective agreements. This is different for the group companies in Singapore and Thailand, where no unions are registered.

Therefore, a Working Environment Group in Aibel Singapore has been established, consisting of volunteers who undertake the role of employee representatives in monthly meetings with management to discuss issues related to the workplace or working environment.

Similarly, a Welfare Committee consisting of elected employee representatives has quarterly meetings with management representatives in Aibel Thailand. In addition, Aibel Thailand has an HSE committee, consisting of management and employee representatives, which holds monthly meetings to ensure safe working conditions and a good working environment.

As part of ensuring viable wages and decent working conditions, all staff suppliers of blue-collar workers to Aibel AS must be bound by collective agreement and are annually assessed and approved by our employee unions.

Equal opportunities, diversity and inclusion

Aibel has a zero-tolerance approach to harassment, intimidation and improper behaviour. Hence, at Aibel, no one shall be subjected to discrimination on the grounds of gender or gender identity, religion, age, political views, race, skin colour, national or ethnic origin, physical impairment, sexual orientation or style of cohabitation. This is clearly stated in Aibel's Human Rights Policy.

COMPLIANCE WITH THE TRANSPARENCY ACT

Identified risk areas

Although our due diligence process has not revealed any serious or actual adverse impacts, we have identified specific areas with heightened risk that require our ongoing monitoring and targeted improvements. This focus lies particularly on the following two main areas.

1. The construction yards

The risk of potential human rights violations in our yard in Haugesund is considered low due to the incorporated procedures and policies, the extensive cooperation with unions and the use of collective agreements. The risk is, however, not viewed as non-existent. We have sub-contractors, assigned suppliers and a significant number of workers provided by manpower supply agencies operating within our yard. As a result, we closely monitor and proactively address any risk related to these third parties.

Yard operations in Thailand are assessed as having higher potential risk. However, we have established procedures and instructions to prevent incidents from

occurring. Aibel is committed to being a best practice company and setting a good example. Hence, we strive to ensure that our Thailand yard continuously meets higher standards than the minimum requirements under Thai law. As an example, Aibel enforces a lower working time limit than what is permitted under the Thai labour law. Despite this, a gap remains to fulfil the expectations in conventions of the International Labour Organization (ILO) and internationally recognised labour practice. The working time limit in Aibel Thailand will be reviewed and assessed by Aibel in 2024. It is expected, however, that becoming fully compliant with the ILO convention regarding working hours will be challenging for yard operations in Thailand, and this is expected to require changes in local regulations in Thailand, combined with Aibel actions.

Several external human rights assessments have been conducted in Thailand, most recently in October 2023, which provides us with valuable input on areas of improvement. We make continuous efforts to reduce potential risk, in close cooperation with both customers and suppliers.

2. The supply chain

The second main risk area, and possibly the most significant and challenging to manage, is within our supply chain.

Aibel has a large and diverse supplier list, ranging from important strategic subcontractors with whom we have a close and long-lasting relationship, down to low-spend, minimal-risk suppliers. Our comprehensive due diligence approval and monitoring process is tailored to the risk category level for each supplier.

We consistently evaluate the various categories and matrices to approve, monitor and reassess the different types of suppliers. Typical factors that affect this evaluation include type of scope/product, country of origin, size of counterparty, global presence, use of unskilled labour, magnitude and length of contract.

Measures/Improvements

IT improvements

In 2023, Aibel implemented a new system, Ignite, for third-party management. This new system has an incorporated Transparency Act module that is designed to facilitate due diligence assessments of suppliers and identify human rights risks. The system provides an initial automatic risk assessment and a continuous and systemic evaluation over time.

Information & training

Campaign in the yards

We have an information campaign planned for our yards called “You know your rights, right?” Posters with a QR code providing access to a page with more information on human rights and working conditions will be posted around our yards.

New e-learning

In 2023, we implemented a new and improved code of conduct e-learning. This course includes human rights considerations, dilemmas and red flags.

Human rights due diligence specific training and information meetings

Training and information sessions for internal stakeholders and gatekeepers were conducted in 2023. The intention for the training is to ensure that key personnel are trained to ensure that human rights risks are identified, handled and prioritised throughout the project lifecycle and across the Group.

CLOSING CONSIDERATIONS

This report has described the progress and status within the Aibel Group with regard to what tools we have at our disposal and how we work to ensure that human rights and labour standards are being duly considered when doing business.

The efforts are continuously ongoing to ensure that improvements progress, and both the Board of Directors and the Executive Management Team have high ambitions with regard to Aibel remaining a top performer within this important area.

Asker, 25.04.2024

The Board of Directors of Aibel AS

/s/ Helle Marie Bay
Board member

/s/ Helge Midttun
Chairman of the Board

/s/ Ina Grønlien
Board member

/s/ Charlotte Strand
Board member

/s/ Johan Christian Johansson
Gebauer
Board member

/s/ Karsten Amble Bøe
Board member

/s/ Kristian Eikre
Board member

/s/ Rune Eriksson
Board member

/s/ Mads Andersen
CEO

aibel