# Transparency Act Statement 2024







Aker Horizons Transparency Act Statement 2024

## Introduction

This document represents Aker Horizons' account of its risk assessment and obligations pursuant to the Norwegian Act relating to Enterprises' Transparency and Work on Fundamental Human Rights and Decent Working Conditions ("Transparency Act").

This report has been prepared in accordance with section 5 of the Transparency Act and summarizes the approach taken by Aker Horizons ASA ("Aker Horizons" or "the Company") to identify and assess actual and potential adverse impacts on human rights and decent working conditions in the Company's own operations, supply chain and business partners, and provides information on the results of Aker Horizons' human rights due diligence.

This report covers the period 1 January 2024 to 31 December 2024. Any questions regarding the report, can be directed to Aker Horizons Chief Compliance Officer, at compliance@akerhorizons.com.

#### **About Aker Horizons**

Aker Horizons is an investment company that develops green energy and green industry to accelerate the transition to net zero emissions, while aiming to provide substantial value creation over time.

As an active owner, Aker Horizons develops and strengthens its portfolio companies by driving strategy development, financing, restructuring and transactions, to ensure long-term sustainable value creation for stakeholders. Each Aker Horizons portfolio company works to maximize value individually, with separate management teams and boards, but with strong, continuous support from Aker Horizons. Aker Horizons also offers services and support to its portfolio companies.

Aker Horizons portfolio companies hold and develop wind and solar energy projects, carbon capture services and develop sustainable industrial assets. As part of the Aker group, Aker Horizons applies industrial, technological and capital markets expertise with a planet-positive purpose to drive decarbonization globally.

Aker Horizons is committed to respecting internationally proclaimed human rights, including the rights set out in the International Bill of Rights and the UN Guiding Principles on Business and Human Rights (UNGPs) and the Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises. The Company is also committed to the principles and rights described in the eight fundamental conventions identified in the Declaration of the International Labor Organization on Fundamental Principles and Rights at Work, as well as the United Nations Declaration on the Rights of Indigenous Peoples. Aker Horizons has been a member of the UN Global Compact since 2021.

#### About the report

As a Norwegian company, Aker Horizons is obligated to undertake human rights due diligence work and to report annually on its processes, its risks, and potential and actual negative impacts on human rights.

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The Transparency Act specifies that a parent company's own operations include the operations of its subsidiaries, irrespective of where those subsidiaries are registered or operate. In addition to its operations in wholly owned Aker Horizons Holding AS, Aker Horizons has three subsidiaries that are majority owned and consolidated for accounting purposes: Mainstream Renewable Power ("Mainstream"), Aker Horizons Asset Development ("Asset Development" or "AAD") and Aker Narvik. Mainstream itself is not in scope of the Act but is considered part of Aker Horizons' own operations and therefore included in the report. Aker Horizons Asset Development and Aker Narvik are also considered Aker Horizons own operations.

Aker Carbon Capture (ACC), of which Aker Horizons holds a 43% share, sold 80% of its operating subsidiary to SLB in June 2024, and now holds 20% of a JV with the name SLB Capturi. ACC and SLB Capturi are both in scope of the Transparency Act and required to report on the companies' human rights due diligence work. They are therefore not included in Aker Horizons' report.

Equity-accounted investees that are not majority owned or controlled by Aker Horizons are not considered subsidiaries of Aker Horizons – and therefore not included in Aker Horizons Transparency Act report. They are, however, included in Aker Horizons' general work with human rights.

# Aker Horizons' management of human rights

Aker Horizons respects, supports, and acknowledges the principles and values of fundamental human rights and decent working conditions. Aker Horizons requires that its business operations, including its supply chain and business partner relationships, do not cause or contribute to, or are directly linked to, actual or potential adverse impact on human rights and decent working conditions.

### Embedding responsibility in policies and management systems

Aker Horizons has embedded human rights commitment in policies and governing documents, and works to enforce an effective governance system to minimize risks to human rights and decent labor conditions in its own operations and in the supply chain. Aker Horizons' human rights policy is contained in the Aker Horizons Code of Conduct and in the Sustainability Policy, both of which are approved by the Board. Both documents were reviewed and updated in Q4 of 2024 and are available on Aker Horizons' web page.

The requirements and processes to manage human rights risks is set out in several procedures. The policies and procedures are regularly reviewed to ensure they remain relevant to Aker Horizons' business strategy and risks, investment decisions and exercise of ownership interests.

The policies and procedures include the following:

 The Code of Conduct outlines the values and principles that guide the work for every employee and other representatives of the company, ensuring that Aker Horizons and our portfolio companies adhere to the highest standards of honesty, transparency and sustainability. The Code of Conduct sets out that Aker Horizons shall ensure that its business operations do not cause or contribute to any infringements to human and

- labor rights and that Aker Horizons is committed to implementing and enforcing effective systems to minimize risks of human and labor rights infringements in Aker Horizons' own operations and in the supply chain.
- The Sustainability Policy sets out the frameworks and specific human rights commitments, including how Aker Horizons shall execute its active ownership and requirements to business partners. The Sustainability Policy commits Aker Horizons to ensure Environmental, Social, and Governance (ESG) emergency preparedness, including responsible remedy, monitoring, and equal access to remedy for the affected persons or communities.
- The Integrity Due Diligence Procedure specifies steps that
  must be taken to assess and monitor integrity risks relating to
  new and existing suppliers and other business partners. The
  IDD Procedure is risk based, and requires for example, indepth due diligence of suppliers and business partners with
  direct involvement in the construction, infrastructure, or
  extractives and mining industries and those located in
  medium- or high-risk countries.
- The Management of Integrity Procedure sets out the compliance program for ESG and integrity risk management.
- The Whistleblowing Procedure sets out the rights to report on negative conditions and stipulates how the company should address received reports and grievances. A whistleblowing channel, operated by a third party, is available on Aker Horizons web pages.
- The Business Partner Code of Conduct sets out Aker Horizons' requirements of its business partners, including an expectation that they respect fundamental human rights and decent working conditions. Furthermore, they are expected to carry out human rights due diligence to understand and mitigate potential and actual adverse impacts of their operations.



#### **Accountability**

Aker Horizons' efforts to comply with the requirements of the Transparency Act are anchored with its Board of Directors. The Board, through the Board's Audit Committee, has since the second quarter of 2022 received regular updates on Aker Horizons' progress to ensure compliance with the Transparency Act and improve human rights due diligence. Updates on human rights-related activities and matters are given to the Audit Committee on a quarterly basis and to the Board once a year. Human rights data is included in the portfolio companies' quarterly ESG reporting to the Aker Horizons management.

The Chief Executive Officer is responsible for overseeing the implementation of the work. The Sustainability function maintains Aker Horizons' policies and procedures relating to preventing adverse impacts on human rights and decent working conditions, whereas the Compliance function is responsible for implementing risk management and due diligence processes, and implement audits where risks are identified.

In addition to the Company's commitments and efforts in this area, all Aker Horizons employees are individually responsible for respecting human rights and decent working conditions.

#### Human rights management in the portfolio

Aker Horizons portfolio companies implement their own codes of conduct, policies and procedures, that are in line with Aker Horizons' values. Aker Horizons engages closely with its portfolio companies to ensure that high ESG standards are implemented across the group. Aker Horizons expects all its portfolio companies to develop appropriate due diligence processes to identify, mitigate and prevent (as appropriate) any actual or potential adverse impacts on human rights and decent working conditions in their operations and supply chains, and to have mechanisms in place that allow for any grievances to be raised and adequately addressed. Joint approaches are often developed in cooperation with portfolio companies which have more specialized insights in specific human rights areas. Currently, all portfolio companies have implemented human rights regulations in their internal governance framework and procedures. These procedures shall ensure respect for and adherence to fundamental principles of human rights and labor rights and sets out the process to identify, assess and monitor actual and potential adverse impacts on human rights and decent working conditions. They also set out the required steps to cease, prevent, mitigate and/or remediate (as appropriate) any such adverse impacts.

As part of the Aker Group, Aker Horizons is covered by the Global Framework Agreement between Aker ASA, the Norwegian United Federation of Trade Unions (Fellesforbundet), IndustriALL Global Union, NITO and Tekna. The agreement commits Aker ASA and its portfolio companies to respect and support fundamental human rights and union rights in societies where the companies operate. Aker Horizons encourages works councils and promotes the consultation and participation rights of workers through social dialogue. Aker has a long tradition of cooperation on employment matters between its main shareholder, board, management and employee representatives, as well as an open dialogue with authorities and other partners. This is referred to as the "Aker model". Aker Horizons' ambition is to carry this forward through the expansion of investments and the building of new industrial businesses and workplaces for a low-carbon future – and to embody the concepts of a just transition and decent green jobs.



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## Human rights impact of Aker Horizons' business

This section describes the findings from Aker Horizons' human rights impact assessment, as identified using a combination of quantitative and qualitative methods to map and assess the Company's actual and potential negative impact on human and labour rights in its own operations, supply chain and other business partner relationships.

Aker Horizons and its subsidiaries undertook Human Rights Risk Assessments for all its portfolio companies in 2024. This was undertaken in connection with training provided by the UN Global Compact, as part of their Business and Human Rights Accelerator Program, where representatives from several Aker Horizons companies participated.

The risk assessment is described below and covers the period from 1 January 2024 to 31 December 2024. Aker Horizons has not identified any actual adverse impacts on fundamental human rights or decent working conditions in the company's operations, its supply chain or its business partner relationships.

The Aker Horizons companies are taking concrete steps to mitigate the risks and potential impacts identified and described below. Some risks require specific actions which are described in the relevant sections. The company generally employs due diligence procedures and monitoring, including audits, to assess human rights risks of projects and business partner relationships. Human rights training is a part of the general Code of Conduct training offered to all employees, to ensure broad awareness, while more specific training have been offered to functions and individuals that are more directly involved with managing such risks. Environmental and social impact assessments and early community involvement and communication helps identify potential risk areas. Robust mechanisms for grievance reporting and whistleblowing are also considered important tools which are implemented across the group to identify and address specific concerns.

#### Inherent risks in green industries

In green industries generally, there is an inherent risk of adverse impacts on local communities affected by renewable energy development projects. Wind and solar farms require large areas of land to generate enough electricity, which can displace people or affect areas used for farming, animal grazing, water access etc. which again may affect livelihoods. Ammonia projects and other large industrial developments also require land, construction and transport which may affect the environment and nearby communities. The inherent risk is generally higher where communities that are affected include indigenous people or other vulnerable groups. This is particularly relevant where energy projects are established in new (greenfield) areas, previously not used by industry.

In the construction of infrastructure for renewable energy projects there is also an inherent risk of adverse impacts due to labor-intensive work, use of heavy machinery and lifting and handling potentially explosive or hazardous materials. Health and safety risks for own and contracted employees is a key concern for all of Aker Horizons' businesses, and mitigated through risk assessment, implementation of HSE plans, awareness-raising, training and monitoring of HSE statistics.

Further, there is an inherent risk of adverse impacts associated with the renewable energy sector's supply chains, as these are often concentrated in high-risk markets where there is low transparency. One example of such a high-risk market is China in general and the Xinjiang province in particular, where links to forced labor and human rights breaches towards ethic groups are an important risk. Risks of human rights breaches in the value chain is also relevant in other high-risk markets such as Chile and South Africa, where workers' safety and equal opportunities are key focus areas.

The mining and processing of metals and minerals – an important aspect of many green energy and green industry projects – is associated with a high inherent risk of adverse impacts due to the nature and location of such operations.

The risks associated with suppliers and value chain are mitigated through procurement procedures, where Aker Horizons portfolio companies work to select companies that are committed to human rights and have procedures in place to implement a risk management framework. Where human rights issues such as forced labour, indecent working conditions or procurement of minerals frequently related to conflicted areas are considered relevant, this is brought into the contract negotiations, and specific responsibility allocated to the supplier. Aker Horizons direct suppliers and contractors are required to assess and monitor the same for their supply chains, and relevant monitoring activities are set out in the contract. In order to enable more oversight ovf these areas among its sub-suppliers, Mainstream in 2024 developed a pre-approved sub-supplier list for key areas, where sub-suppliers are vetted and pre-approved before they can be engaged to work for Mainstream.

Detailed below are the actual and potential risks identified in the operations and supply chains of Aker Horizons, Aker Horizons Asset Development, Aker Narvik and Mainstream resulting from the 2024 human rights impact assessment, and concrete mitigation actions.

#### **Aker Horizons Holding**

Aker Horizons Holding AS is the holding company of Aker Horizons portfolio and its invested assets and is focusing on increasing the value of the portfolio. Its offices are in Norway, and the suppliers are mainly service providers providing services such as office space, legal and financial services, media and information services, analysis and consulting services and corporate services such as IT and security. All the suppliers are based in countries that represent a low risk to human rights, and the majority are based in Norway. The risk of negatively impacting human rights and decent labor conditions are considered low and no actual negative impact has been identified.

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#### **Aker Asset Development**

Aker Asset Development (AAD) is working to develop Hydrogen power production, mainly through its work on the Narvik Green Ammonia project and a few less matured concepts. Its offices are in Norway, and currently, no project is in construction or operation phase. The primary focus is on studies and procurement planning. Its main procurement in 2024 was related to consulting services, primarily from large or specialized consulting companies based in Europe. The risks identified in the human rights risk assessment for AAD are mainly potential future risks, that may become relevant once projects reach operational phases, such as risks to life and health, impact on local communities and indecent working conditions in the supply chain. These risks are carefully analyzed and considered in the current company activities.

#### Aker Narvik and Powered Land

Aker Narvik and Powered Land are two companies dedicated to sustainable industrial development in Northern Norway. Aker Horizons owns 80% of the shares, and Nordkraft AS owns 20%. The teams are based in offices in Norway.

Aker Narvik owns several properties in Northern Norway and is working to develop and explore options for the sites with the long-term objective to support energy transition and sustainable energy use. Powered Land is exploring possibilities to support power-intensive industries, including data center development.

In 2022 and 2023, construction work was undertaken at Aker Narvik's Kvandal site to prepare the site for future development. This work was finalized in 2023. A social audit implemented in 2023 found no adverse impact on human rights. The main work focus of Aker Narvik in 2024 has been on studies and stakeholder engagement. Aker Narvik's main procurement in 2024, related to manpower, consulting services for various business opportunities and professional advisory services. Powered Land similarly procured mainly advisory and consulting services. The majority of suppliers and service providers are based in Norway.

The human rights risk assessments for Aker Narvik and Powered Land identified risks mainly relating to future potential impacts on communities and HSE and supply chain risks once projects come into operations. No

actual negative impact on human rights or decent working conditions have been identified.

#### Mainstream Renewable Power

Mainstream develops, builds, and operates renewable energy projects across a wide range of markets and technologies, in collaboration with local and international business partners. In 2024, Mainstream was active in Ireland, United Kingdom, Norway, Sweden, Chile, Colombia, South Africa, Philippines, Singapore, South Korea, Vietnam and Australia.

In its assessment of Human Rights risks in 2024, Mainstream did not identify actual adverse impacts on fundamental human rights or decent working conditions in the company's operations or supply chain or in relationships with other business partners. The potential negative impact on human rights associated with Mainstream's own operations are mainly considered to be its potential impact on local communities, including impacts on indigenous people, loss of livelihoods and negative impacts on cultural heritage sites and environments, where people may be affected by project activities. A potential negative impact is also identified related to working conditions with a risk to health and safety. Factors that increase the risk of occupational injuries include construction work, use of contractors on site, and presence in emerging markets The potential negative impact includes in the upstream value chain, in a short to medium time horizon. Other salient human rights risks identified include indecent working conditions in its supply chain and forced labor in the value chain. Throughout the year, risk reduction measures and mitigating actions have been put in place to manage identified potential adverse impacts, and these are described below.

#### **Human Rights Due Diligence in projects**

Mainstream is the company with the longest operational track record in Aker Horizons' portfolio. For many years, it has been actively building relationships with local communities. The company practices early and regular engagement, starting at the outset of a project to understand any concerns local communities may have. These are then considered during the project design phase. Mainstream has dedicated community liaison officers for all its operating project locations to ensure that communities' needs and concerns are well understood. The company has also established a Global Development Standard that guides its engagement with local communities. Its Global Development Standard

outlines a stakeholder engagement approach that is aligned with international performance standards, such as the International Finance Corporation's Sustainability Framework and the Equator Principles. The principle of free, prior and informed consent is an integrated part of the Company's Global Development Standard and its Community Charter.

The human rights risk associated with Mainstream's engagement with local communities and indigenous people is considered high for markets where indigenous people are affected by project developments, which in 2024 were Chile, South Africa and Vietnam. Managing and mitigating such impacts can be challenging as the same people can be affected by the totality of impacts from several infrastructure developments by unrelated developers in the same area. Mainstream recognizes the importance of early and frequent engagement and therefore establishes community liaison officers and investment plans for all project locations to understand communities' needs or concerns.

Human and labor rights risks are monitored through quarterly updates of Mainstream's Enterprise Risk Management system, with the main risks reviewed by the Board's Audit Committee.

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#### Mainstream has identified the following countries where indigenous people are affected by its projects:

Country	Community affected	Risks identified and mitigating actions taken to reduce likelihood of adverse impacts
Chile	The Atacameños, Quechuas, Aymaras and Mapuche indigenous people are located in neighboring areas to four of Mainstream's projects.	Ckhúri wind farm (under construction): The project is in an area which affects the Atacameños, Quechuas and Aymaras indigenous peoples. Three of four communities have raised concerns related to archaeological heritage impacts and these are being addressed through a "Puesta en Valor" process whereby the Company undertake agreed studies, the results of which are shared with the communities. Project construction has recommenced since August 2024 following staged approval by the Council of National Monuments who had stopped the project for reasons relating to archaeological information and protection measures for archaeological sites.
		<b>Puelche Sur (in operation):</b> Relations with the community and compliance with the commitments by the Environmental Qualification Resolution (RCA) have been maintained in a timely manner. A decision was made to reduce the project by one wind turbine due to an ancestral land claim filed with the government by the Weichan Mapu indigenous community. This turbine has now been removed from the plant.
		Caman windfarm (under construction): The project is in an area that encompasses nine organizations, four of them from the Mapuche indigenous people. All organizations, through working groups, are periodically informed about progress in the construction process. The organizations are involved in the implementation of community investment funds (FIC) and have space to present and resolve concerns with the company. Local community groups participate in community monitoring to verify the progress of the project in situ. The project is now on hold due to issues associated with the restructuring of the MRP business. Additionally, this project experienced an arson attack in June 2023.
		Entre Ríos windfarm (pre-construction): Entre Ríos wind farm (pre-construction): The project is in an area which affects the Mapuche indigenous people. The main concern that the five communities have with respect to the construction stage relates to vehicular traffic along the local road, the distance to the location of the wind turbines and possible archaeological finds. The community has been kept informed about the status of the project and the
South Africa	Historically Disadvantaged South Africans	<b>Project Ilikwa</b> is a 50 MW solar power plant that reached financial close in October 2024, and where Mainstream holds a 70% share. Mainstream also holds a 49 % share of the 97.5 MW solar PV project in the same area. There is an important focus in South Africa to support and protect the rights of Historically Disadvantaged South Africans. The project team, together with the EPC contractor and other stakeholders, have assessed the vulnerabilities of the communities near the base, and are working to develop a Community Investment plan to alleviate some of the challenges of the communities. No actual negative impact on human rights has been identified from the project activities, but potential negative impacts could include increased violence and tensions relating to differences in and limited work opportunities. The project aims to ensure several positive impacts on human rights through the Community Investment plan (see Text Box on Economic Development in South Africa).
Vietnam	The Hoa and Khmer people form a large percentage of the population in the five communities in the project area of Soc Trang offshore windfarm.	Soc Trang windfarm (pre-construction) is in an area which affects certain Hoa and Khmer communities. An environmental impact assessment, including an assessment of affected communities and indigenous people, has been conducted, and a mitigation and management plan has been developed to eliminate or reduce potential impacts from the construction of turbines on natural resources under customary use of the Khmer community. Free, Prior and Informed Consent (FPIC) is required from the indigenous people for the project to proceed and Mainstream is engaging with the communities in that respect.

#### **Grievances**

Mainstream has processes in place to receive and manage grievances in relation to their projects, including a Speak Up Line where communities can raise their concerns anonymously, should they not feel comfortable raising concerns with the liaison officers directly. In 2024, 18 grievances were reported, mainly received through the community liaison officers. Several were related to noise, while at least one related to working conditions. All cases have been followed up according to internal procedures, and the majority solved except for one case that is awaiting feedback from regulatory authorities. None of the grievances concluded identified adverse impacts on human rights.

#### Health and safety

Mainstream continued its focus on health and safety in 2024, a year in which almost 3 million employee and contractor hours were recorded in the build-out and operation of multiple wind and solar power assets. There were no fatal events, and the number of environmental, health and safety incidents with a high risk of serious injury or death, known as a Significant Incidents with Potential (SIPs), ended at 2.04. The goal for 2024 was 1,73, but was not achieved due to incidents in Chile, including a nacelle dislocation in an operational windfarm. The dislocation of the nacelle brought no physical injuries but is considered a serious incident and has been followed up with improvements in Mainstreams monitoring of operational data. There were no SIPs among Mainstream employees, but one contractor in South Africa had an injury leading to a partial amputation of a finger. Mainstream continues to track key HSE data and improve the management of health and safety, both for Mainstream employees and the employees of its contractors.





Images from Mainstream's Economic Development team in South Africa.

#### **Asset Based Community-led Development**

Mainstream's primary emphasis in South Africa in 2024, which will continue in 2025, is on the two solar PV plants, both located in Free State Province. For both projects, Mainstream has committed to spending at least 1.2% of revenue on economic development during Operations. Mainstream has implemented the Asset Based Communityled Development (ABCD) methodology as a community development strategy since 2020. This approach focuses on community members as the change activists, either already working to improve the lives of their fellow residents or planning to make a positive difference. Mainstream South Africa has a team dedicated to this, and in the construction phase they engage with stakeholders to assess the needs in the communities surrounding the projects. Based on community assets identified, community investment plans are being developed. The goal is to support sustainable development, and to support the development of resilient, transformed and empowered communities through building on inherent community strengths. Focus areas involve skills development, such as financing education through bursaries and other accredited skills programs and enterprise development, where enterprises or individuals are trained with the aim to develop or build companies. Socio-economic development, with focus areas for example education, health care, environmental projects and Supplier Development, with the focus on local businesses who received business opportunities on the projects. Mainstream and its EPC provider are also working closely with the communities to inform about job opportunities and engage with local suppliers and service providers.

#### Supply chain and business partner relationships

Mainstream's procurement involves EPC Contractors, and directly or indirectly, procurement of equipment and products such as wind turbines, solar PV modules, inverters, cables and other related infrastructure, which are considered to involve human rights risks. Mainstream also has, among its top suppliers, service providers such as financial and insurance services and technical and environmental consulting services which are considered low risk of negative human rights impact. Mainstream considers that the risk of human rights breaches in its supply chain remains high despite efforts to improve processes, as it is challenging to achieve full transparency of the renewable energy supply chain and therefore to uncover aspects that require mitigating actions. As part of the company's efforts to manage these challenges, Mainstream in 2024 worked to build stronger relationships with a selected number of key suppliers.

Mainstream will continue to engage with tier 1 suppliers through 2025 to progressively increase wider supply chain transparency. Solar PV suppliers has been a focus, where an "Approved Supplier List" has been developed, based on quality, financials, integrity and human rights risks. Each module supplier on the list has been engaged with to understand their due diligence approach and transparency in the value-chain. Short lists have also been developed for other key equipment such as inverters and trackers. This will enhance the ability to increase supply chain transparency in future projects. Mainstream will continue to engage with suppliers to progressively increase wider supply chain transparency. However, the challenge to achieve full transparency in the wind and solar power supply chain, all the way back to raw materials. continues to be significant. Feedback received from suppliers noted that some are not yet able to identify every supplier in their supply chains for every component. This limits their - and Mainstream's - ability to carry out due diligence

Mainstream requires all suppliers to read and accept its Business Partner Code of Conduct, sign a Compliance Certification document, and commit to compliance clauses in the contracts. The key areas that are addressed in Mainstream's standard clauses relate to Contractor reporting obligations in the event of discovering a breach of the Modern Slavery Policy and the right that Mainstream has to take action in the event that actual adverse impacts on human rights or decent working conditions are identified, including audit rights for Mainstream and requirements for the major contractors to incorporate similar protections in subcontractor agreements. Human rights clauses are included in all contracts where it is considered a relevant risk.

Before selecting a supplier or contractor, all candidates are required to undergo an assessment through the Integrity Due Diligence process. The IDD process highlights any risk areas and mitigating activities which are allocated to the project for follow-up. The IDD is regularly updated (frequency and scope depending on risk level) after a supplier has been contracted. Monitoring activities are also put in place for its direct suppliers, including engagement on how the sub-suppliers and value chain are followed up with regards to ESG-risks. The goal is to strengthen this engagement in 2025.

No actual adverse impacts were uncovered in Mainstream's supply chain or business partner relationships in 2024. However, several risks of potential adverse impacts were identified, including areas that are linked to Mainstream's business. To address these risks, Compliance functions continue to be directly involved in procurement discussions with JV-partners and EPC contractors to include human rights clauses and Human Rights Due Diligence requirements in key agreements. Specific preventive actions are described in the table below.



Fornebu, 2 April 2025 Board of Directors and CEO of Aker Horizons ASA

Kristian Røkke

Chair (non-independent)

Øyvind Eriksen

Deputy Chair (non-independent)

**Trond Brandsrud** 

Director (independent)

Kimberly Mathisen

Director (non-independent)

Lone Fønss Schrøder

Director (independent)

Lars P. Sørvaag Sperre

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