

## **Risavika Production AS**

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

#### **1 BACKGROUND**

This Transparency Act report has been prepared in accordance with Section 5 of the Transparency Act (also "the Transparency Act"). This report summarizes the measures taken by Risavika Production AS ("RPAS") to detect, assess and mitigate actual and potential adverse impacts on fundamental human rights and decent working conditions in its own operations, supply chain and among business partners. The report also addresses the results of RPAS's human rights due diligence, including measures that have been or are planned to be implemented in light of the findings from the due diligence and relevant changes and updates that have occurred during the reporting period.

This report covers the period from 1 January 2023 until 31 December 2023. RPAS publishes its annual accounts in English and, therefore, this account is also in English.

#### **2 OUR ORGANISATION AND BUSINESS OPERATIONS**

RPAS is wholly owned by NSMP Norge AS which is ultimately wholly owned by Selkie Investments Midstream Topco Limited (the "Selkie Group"). The purpose of the Selkie Group is to own and operate midstream gas infrastructure assets in the North Sea and gas liquefaction services in Norway.

RPAS owns and operates the Risavika Liquefaction Plant ("RLP"), a mid-scale natural gas and biogas liquefaction facility located in Risavika harbour in Southern Norway. The office of RPAS is also located in Risavika Harbour.

RLP converts natural gas from Norwegian gas fields into Liquefied Natural Gas ("LNG") for use in shipping, road transport and heating. The plant is equipped with a full suite of modern facilities consisting of a single gas treatment and liquefaction train, an LNG storage tank, a road tanker filling station, a vessel loading jetty and a third-party ferry bunkering jetty. The designed capacity of the plant is 900 metric tonnes of LNG per day. RPAS has a long-term contract with Gasum AS for the provision of liquefaction services.

The input factors necessary to produce the LNG include supplies of natural gas, electricity for production and propane, as well as other gases and chemicals.

RPAS's operations are managed by px Group Limited through its subsidiary px Norge AS ("Service Provider") under a multi-year Operations, Maintenance & Management Agreement, which includes the provision of personnel and operational and management services, various support functions (including HR IT services), as well as technical services. The majority of RPAS's supply contracts are entered into by the Service Provider directly, meaning that most of RPAS's suppliers are formally indirect suppliers.

The Selkie Group is ultimately responsible for the management, decision making and strategic outlook of RLP and this is managed both at a local level with RPAS resources and with support from the leadership team within the Selkie Group, as well as support from NSMP Operations Limited.

### **3 OUR PROCEDURES AND ROUTINES RELATING TO HUMAN RIGHTS AND DECENT WORKING CONDITIONS**

#### Human rights policies and procedures

Our commitment to respect fundamental human rights and decent working conditions in our operations and in connection with our services is set out in the Selkie Group's Code of Conduct (the "Code of Conduct"). The Code of Conduct has been adopted by the Board of Directors in the Selkie Group and it includes sections on fundamental human rights, health, safety and environmental matters, as well as diversity, equality and inclusion. RPAS employees have received training in the Code of Conduct in order to ensure compliance and implementation into our business practices. Copies of the Conduct are sent to all suppliers via the Service Provider.

RPAS seeks to adhere to the applicable sections of the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Human Rights. Additionally, the Selkie Group and the Service Provider comply with the provisions of the UK Modern Slavery Act 2015 and publish a yearly statement in accordance with the requirements set out in such legislation

The Service Provider has implemented policies covering, amongst others, modern slavery, data and information security, whistleblowing, supplier requirements, health safety and environmental matters, and diversity equality and inclusion. On a regular basis, Service Provider staff complete safety training media modules to ensure awareness of the policies and procedures.

RPAS and the Service Provider have in place a separate procedure for handling requests for information for RPAS pursuant to the Transparency Act.

#### Requirements relating to suppliers and business partners

The Code of Conduct sets out the Selkie Group's commitment to working only with suppliers and third parties whose own standards are consistent with the Code of Conduct. This means that we expect our suppliers and business partners to respect fundamental human rights and decent working conditions, comply with the applicable laws relating to these matters, and abide by the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Human Rights

Furthermore, NSMP Direct Business Partner Due Diligence Policy (the "Due Diligence Policy"), which is also applicable to RPAS and which covers human rights and decent working conditions, sets out the responsibilities for the Selkie Group and its personnel in relation to suppliers and business partners, including those with whom RPAS directly contracts. The Due Diligence Policy provides information and guidance on how Selkie Group personnel should carry out due diligence on third parties. Relevant Selkie Group personnel, including personnel working in or relating to RPAS, receive training on the Direct Partner Procurement Policy at regular intervals.

As part of our process for selection, approval and evaluation of supply chain partners, RPAS requires its suppliers, including the Service Provider, to use clear and objective criteria which include respect for fundamental human rights and decent working conditions. RPAS has a limited number of direct suppliers, as the majority of supply contracts are entered into by the Service Provider directly. Under the Service Provider's procedures, all new suppliers are screened before being approved, either through a pre-qualification questionnaire, which includes questions relating to the supplier's commitment to human rights and decent working conditions, as well as the supplier's own supply chain, or through Achilles, a third-party assessor which is an industry assurance tool for suppliers, where suppliers can answer additional due diligence questions and upload relevant documentation. Completed questionnaires are reviewed and any concerns are highlighted for further investigation and action.

Existing suppliers are required to complete a questionnaire confirming that they are compliant with the Transparency Act. Additionally, the Service Provider conducts audits of selected suppliers, as further described in section 5 of this report.

Supplier contracts entered into by the Service Provider include clauses pertaining to fundamental human rights and decent working conditions and require the supplier to carry out human rights due diligence according to the OECD Guidelines for Multinational Enterprises. These clauses also impose notification obligations on the supplier if it has any grounds to suspect actual or potential infringement of human rights and working conditions in the supplier's own business or in its supply chain or business partners. Furthermore, these clauses give RSAP a right to information and documentation relating to the supplier's own business, its suppliers, subcontractors and/or producers with a view to carrying out further human rights' due diligence.

#### Whistleblowing and grievance mechanisms

The Board and Management want to know about any breaches or potential breaches of the content and spirit of the Code of Conduct. We therefore encourage the reporting of any such breaches or potential breaches, including reporting on issues relating to the danger to the health and safety of colleagues or the public, or potential abuses of human rights. The Code of Conduct sets out various ways that a concern can be raised, including how external stakeholders may report concerns. In addition, we have a group level whistleblowing procedure in place and all employees are encouraged to report concerns about suspected wrongdoing or other censurable conditions (as defined by the Norwegian Working Environment Act).

#### Health and Safety management

RLP has procedures relating to health and safety as required by Norwegian legislation. Safety is embedded in our working practices and decision-making, encompassing the integrity of our assets and everyone involved in our activities.

#### Accident prevention

RPAS is subject to the Norwegian Major Accidents Regulation (Norwegian: *Storulykkeforskriften*), which has as its purpose the prevention of major accidents involving dangerous chemicals and to reduce the impact any such accidents may have on people, the environment and property. In line with this regulation, RPAS works systematically and continuously to prevent any such accidents and, in the event they should arise, limit their impact.

## **4 ASSESSMENT OF ACTUAL AND POTENTIAL IMPACTS ON HUMAN RIGHTS AND DECENT WORKING CONDITIONS**

### **4.1 Approach and Methodology**

RPAS in conjunction with the Service Provider, conducted a risk assessment to identify and assess actual and potential adverse impacts on fundamental human rights and decent working conditions that RPAS has either caused or contributed towards or that are directly linked with RPAS's operations, products or services via the supply chain or business partners.

As part of the risk assessment, a high-level review of RPAS's operations, suppliers and business partners has been conducted. In order to further assess the risks related to suppliers and business partners, the Service Provider on behalf of RPAS has conducted more in-depth assessments of certain select suppliers and business partners, including audits, contract management review meetings and questionnaires.

#### **4.2 Outcome of assessment of actual and potential adverse impacts in RPAS's own operations**

RPAS has identified certain risks with respect to working conditions in its own operations, including for hired-in personnel and service workers. These risks are the same as in the industry in general, i.e. health and safety risks relating to industrial work and handling of chemicals.

In 2023, two HSE-related incidents were recorded among workers in RLP. However, both incidents concerned only minor and transient injuries. Apart from these incidents, RPAS has not identified any actual adverse impacts on human rights and decent working conditions in its own operations. It has continued to operate its assets safely and reliably.

RPAS has not received any whistleblower reports relating to adverse impacts on human rights or decent working conditions in its own operations.

#### **4.3 Outcome of assessment of actual and potential adverse impacts in RPAS's supply chain and business relationships**

RPAS has a small number of direct suppliers, all of which are located in Norway or the United Kingdom. As described earlier in this report, most other supply contracts are entered into indirectly by the Service Provider. The majority of RPAS's indirect suppliers are located in Norway and the other suppliers are located in other Western European countries.

RPAS has so far not identified any significant risks or actual adverse impacts on human rights and decent working conditions in its supply chain or in its business partner relationships. Going forward we will, however, strive to continually improve our assessment and to conduct even more thorough assessments in order to identify any actual as well as other potential adverse impacts. We will also ensure that the response rates on supplier questionnaires are improved.

RPAS has not received any whistleblower reports relating to adverse impacts on human rights or decent working conditions in its supply chain or in its business partner relationships.

### **5 MITIGATING MEASURES AND PRIORITIES FOR 2024**

RPAS has, in conjunction with the Service Provider, taken measures to prevent and mitigate the risks of adverse impacts on fundamental human rights and decent working conditions in both RPAS's own operations and in RPAS's supply chain/business partner relationships. The measures include:

- RPAS has, through the Service Provider, sent out a pre-qualification questionnaire to all potential suppliers and business partners or assessed them through the Achilles portal. To qualify as a supplier, companies have to demonstrate that they are taking measures to ensure respect for fundamental human rights and decent working conditions in the supplier's own operations and supply chains. Moreover, they have to comply with the Service Provider's policies and procedures, and the default position is that when services are performed at Selkie Group Sites, the Service Provider's operating policies and procedures apply unless otherwise agreed between the parties. Before work is commenced, individuals working at the site have to pass introduction training in applicable policies and procedures.
- RPAS and the Service Provider carry out Quarterly Safety Walks at RLP in order to ensure that safety protocols are being adhered to.
- In early 2024, RPAS and the Service Providers carried out audits of certain suppliers which are considered critical to the work performed on the RLP site. The audits did not uncover any actual adverse impacts on human rights and decent working conditions or any significant risks of such adverse impacts.

Respect for human rights and decent working conditions will remain a focus area for RPAS in 2024. In particular, and based on our risk assessment, we intend to focus on the following measures:


- Finalise a policy governing contracts with our direct suppliers relating specifically to RLP, covering fundamental human rights and decent working conditions.
- Continue to conduct increasingly thorough assessments of any actual or potential adverse impact on fundamental human rights and decent working conditions to improve our human rights due diligence continually. In particular, we will work to ensure that direct and indirect suppliers complete relevant due diligence questionnaires, where relevant to ensure respect for human rights and decent working conditions. We will also direct additional focus on suppliers and business partners which are considered to present a heightened risk of adverse impacts on fundamental human rights and decent working conditions.
- Continue to communicate our human rights commitments internally and externally, including to our suppliers and business partners.

RPAS expects that the abovementioned measures will contribute towards the following results:

- Increase consciousness among RPAS's own employees and hired-in personnel, as well as suppliers and business partners, regarding respect for fundamental human rights and decent working conditions.
- Improve oversight, control and follow-up of fundamental human rights and working conditions in RPAS's supply chains and business partner relationships.
- Provide incentives for, and obligations relating to, respecting fundamental human rights and decent working conditions in RPAS's supply chains and business partner relationships.

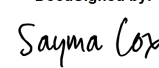
Date: 28 June 2024

## SIGNATURES

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