

## **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. The report outlines the measures taken by Risavika Production AS ("RPAS") to detect, assess, and mitigate actual and potential adverse impacts on fundamental human rights and suitable working conditions in its own operations, supply chain, and among its business partners. The report also provides updates based on the due diligence processes and actions taken by RPAS in response to any identified risks or concerns.

This report covers the period from 1 January 2024 to 31 December 2024. RPAS publishes its annual accounts in English and, therefore, this statement is also in English.

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#### **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"). RPAS operates the Risavika Liquefaction Plant ("RLP") in Southern Norway, which processes natural gas into Liquefied Natural Gas ("LNG") for customers who use the LNG for shipping, road transport, and heating. The plant has a designed capacity of 900 metric tonnes of LNG per day, and RPAS holds a long-term liquefaction services contract with Gasum AS.

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' supply contracts are entered into by the Service Provider directly on RPAS's behalf.

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.

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#### **3. Our Procedures and Routines Relating to Human Rights and Suitable Working Conditions**

RPAS is committed to ensuring respect for human rights and maintaining suitable working conditions throughout our operations and in our supply chain. These commitments are integral to our core values and align with the principles outlined in the Selkie Group's Code of Conduct, which governs all of RPAS's operations and business relationships.

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### 3.1. Human Rights Policies and Procedures

RPAS adheres to the Selkie Group's Code of Conduct, which sets forth our commitment to:

- Respecting fundamental human rights, as defined by international conventions such as the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises; and
- Ensuring suitable working conditions that promote safety, fairness, and equality across all aspects of our operations and in the relationships with our suppliers and business partners.

The Code of Conduct covers various aspects, including health, safety, non-discrimination, and worker protection. It is mandatory for all RPAS employees, and a copy is provided to all suppliers via our Service Provider. RPAS employees and relevant personnel receive regular training on the Code of Conduct to ensure full compliance.

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### 3.2. Training and Awareness

The Selkie Group ensures that all employees and business partners are familiar with our human rights and working conditions policies through regular training programs. In 2024, RPAS employees underwent training on the Code of Conduct, which covered aspects of human rights, health and safety regulations, and environmental protection. In addition, the Service Provider employees complete regular training to stay updated on policies and procedures.

Although no specific Transparency Act training was provided in 2024, the Service Provider's procurement team is scheduled to receive awareness training in July 2025 to deepen their understanding and ensure full compliance with the Transparency Act.

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### 3.3. Supplier and Business Partner Requirements

RPAS holds suppliers to the same high standards as set out in the Code of Conduct, requiring them to adhere to human rights principles and provide decent working conditions. We enforce these requirements through the following practices:

- Pre-Qualification Questionnaire ("PQQ"): All RPAS direct suppliers (with certain exemptions for some organisations such as professionally regulated entities) must complete a PQQ, which includes questions specifically related to human rights and compliance with the Transparency Act. All suppliers onboarded by the Service Provider (with certain exemptions for some organisations such as professionally regulated entities) either complete a PQQ or are certified through the Achilles procurement system, both of which routes include questions specifically related to human rights and compliance with the Transparency Act.
  - Supplier Audits and Due Diligence: The Service Provider, on behalf of RPAS, conducts regular audits of suppliers to assess compliance across various metrics, including in relation to human rights standards and working conditions. These audits focus on ensuring that suppliers are adhering to the principles outlined in the Code of Conduct. In 2024, four such audits were conducted.
  - Contract Clauses: All new supplier contracts include clauses ensuring compliance with applicable law, including as it relates to human rights and suitable working conditions.
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### 3.4. Whistleblowing and Grievance Mechanisms

RPAS encourages the reporting of any potential violations of human rights or working conditions. We provide multiple channels through which both employees and external stakeholders can report concerns, including:

- **Internal Reporting:** Employees can raise concerns directly to the Selkie Group leadership team.
- **Whistleblowing Hotline:** We offer an anonymous, confidential hotline for external stakeholders and employees to report any ethical concerns or breaches of the Code of Conduct.
- **External Stakeholder Reporting:** A system is also in place for external parties to report human rights abuses or unethical behaviour.

All reports will be investigated, and necessary corrective actions will be taken to address any identified issues. There were no incidents reported in 2024.

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### 3.5. Health & Safety Management

Health and safety are critical aspects of our operations at RPAS, and we are committed to providing a safe and healthy working environment for all employees, contractors, and partners. Our health and safety management system aligns with Norwegian legislation and international standards.

**Key measures include:**

- **Health and Safety Policies:** RPAS follows a strict set of health and safety guidelines to protect the well-being of our workers, including those handling hazardous materials and operating machinery at RLP.
  - **Compliance with Norwegian Safety Regulations:** RPAS adheres to the Norwegian Major Accidents Regulation (Storulykkeforskriften), which aims to prevent major accidents involving dangerous chemicals and mitigate their impact on human health, the environment, and property.
  - **Employee Health and Safety Training:** The Service Provider ensures that all its employees and contractors undergo mandatory health and safety training, ensuring they understand the risks associated with their tasks and the protective measures in place. This training includes proper handling of chemicals and the use of personal protective equipment ("PPE").
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### 3.6. Accident Prevention

RPAS is committed to maintaining a proactive approach to accident prevention. Our risk management strategy includes:

- **Safety Audits and Inspections:** Regular safety audits are conducted to ensure compliance with safety protocols, identify potential hazards, and implement corrective actions where necessary. These audits are carried out by both internal teams and external experts.
  - **Incident Reporting and Investigation:** Any incidents, including near-misses, are reported and thoroughly investigated to identify root causes and prevent recurrence. RPAS uses these investigations to improve safety measures and enhance employee awareness of risks.
  - **Emergency Preparedness:** RPAS has established comprehensive emergency response procedures, including evacuation plans and contingency measures, in case of accidents or hazardous events.
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### **3.7. Continuous Improvement**

RPAS remains committed to improving health and safety, as well as human rights and decent working conditions. We will continue to:

- Enhance our training programs to ensure that all employees and contractors are well-versed in health and safety and human rights policies.
- Strengthen our due diligence processes with suppliers, focusing on those with a higher risk of potential human rights violations or unsafe working conditions.
- Increase our focus on accident prevention and emergency preparedness to ensure that our operations remain safe and compliant with regulations.

By focusing on continuous improvement, RPAS aims to uphold the highest standards of safety, health, and human rights in all aspects of our operations.

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## **4. Assessment of Actual and Potential Impacts on Human Rights and Suitable Working Conditions**

### **4.1. Approach and Methodology**

In 2024, RPAS, in collaboration with the Service Provider, conducted a comprehensive risk assessment to identify and assess any actual or potential adverse impacts on human rights and suitable working conditions within RPAS's own operations, its supply chain, and among its business partners. This risk assessment involved both high-level and more in-depth evaluations of RPAS's activities, suppliers, and business partner relationships.

The following updates are based on confirmation received from the Service Provider:

### **4.2. Outcome of Assessment of Actual and Potential Adverse Impacts in RPAS' own Operations**

The Service Provider confirmed that there have been no identified actual adverse impacts on human rights or suitable working conditions within RPAS's operations during the reporting period. This includes physical injuries, discrimination, or unsatisfactory working conditions.

Per the Service Provider's assessment, there were no incidents or negative findings regarding human rights or labour conditions within RPAS' direct operations in 2024.

### **4.3. Outcome of Assessment of Actual and Potential Adverse Impacts in RPAS's Supply Chain and Business Partner Relationships**

The Service Provider, acting on behalf of RPAS, also confirmed that there have been no identified actual negative consequences on human rights or suitable working conditions within RPAS's supply chain or among its business partners in 2024. The Service Provider has not encountered any issues related to human rights or labour rights in its direct or indirect supplier relationships.

### **4.4. Supplier Audits and Risk Assessments**

The Service Provider conducted audits and risk assessments of suppliers to ensure compliance with human rights and suitable working conditions, as outlined in the Transparency Act. Audits were performed for four suppliers in 2024, and these audits did not uncover any significant risks or adverse impacts related to human rights or suitable working conditions.

Moreover, the Service Provider reported that the additional questions in the Pre-Qualification Questionnaire ("PQQ"), which includes Transparency Act compliance, are now an integral part of the procurement process. While the extended PQQ raised some pushback from suppliers, it has become embedded in the Service Provider's process. All new suppliers onboarded in 2024 have completed this process. RPAS is nearing full compliance for pre-existing suppliers in relation to these additional questions and continues to pursue full compliance.

#### **4.5. Whistleblowing and Grievances**

During the reporting period, the Service Provider confirmed that no whistleblower reports related to human rights or suitable working conditions were received. RPAS continues to encourage employees, contractors, and external stakeholders to report any concerns regarding potential violations.

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### **5. Mitigating Measures and Priorities for 2025**

The measures implemented in 2024 are described in section 3 above. We expect the implemented measures to enable RPAS to raise awareness on human rights and decent working conditions among RPAS' employees, suppliers and business partner relationships, and to enable RPAS to identify risks and implement relevant mitigating measures, including by ensuring robust health and safety standards.

In 2025, RPAS, in collaboration with the Service Provider, will continue to implement and reinforce measures to mitigate any adverse impacts on human rights and suitable working conditions. This includes:

- Completing the remaining enhanced supplier PQQs and increasing ongoing monitoring of RPAS's supply chain.
- Continuing audits and risk assessments of key suppliers.
- Increasing training and awareness regarding the Transparency Act and related policies.

We expect these measures to strengthen RPAS identification and assessment of relevant risks, thus enabling RPAS to implement more targeted and effective mitigating measures.

RPAS remains committed to continuously improving its due diligence efforts, ensuring all business operations and relationships meet the highest standards of human rights and working conditions.

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### **6. Conclusion**

RPAS continues to adhere to its commitments to respect fundamental human rights and suitable working conditions across its operations and supply chain. RPAS is dedicated to ensuring compliance with the Transparency Act and will maintain its focus on continuous improvement in due diligence processes and risk mitigation strategies.

Date: 19 June 2025

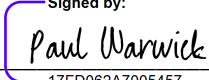
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