

A modern, multi-story building with a facade of dark blue and black panels and windows. The building is reflected in a large, calm pool of water in the foreground. A large, leafy green tree stands to the right of the building, also reflected in the water. The sky is clear and blue.

Code of Conduct

AKER CARBON
CAPTURE ASA

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General

Aker Carbon Capture shall conduct its business with integrity, respecting the laws, cultures, dignity and rights of individuals in all the countries where we operate. We shall be guided by internationally acknowledged standards on ethical business conduct, such as the OECD Guidelines for Multinational Enterprises. All Aker Carbon Capture employees are expected to act in accordance with our company values.

This Code of Conduct describes Aker Carbon Capture's commitments and requirements regarding ethical business practices and personal conduct. It describes the behaviour Aker Carbon Capture expects from you and what you, and our business partners, can expect from Aker Carbon Capture.

It is important to be aware that some of Aker Carbon Capture's policies and procedures provide more detailed information about what is acceptable behaviour and what is not.

You shall always strive to exercise good judgment, care and consideration in your service for Aker Carbon Capture. If there are differences between applicable laws and regulations, and the standards set out in this Code of Conduct, the highest standard consistent with applicable local laws shall be applied. Violation of this Code of Conduct or applicable laws may lead to internal disciplinary actions, dismissal or even criminal prosecution.

If you have questions regarding the content of this Code of Conduct or its interpretation, please contact our legal and compliance personnel. If you require advice in the handling of a specific ethical dilemma, you shall consult with your manager or other appropriate authority.

You are encouraged to consult with colleagues when you have concerns or dilemmas regarding compliance with

the Code. You are also required to report any evidence of violations of this Code or applicable laws that you identify. Reporting violations will never serve as a basis for disciplinary action.

The Code of Conduct has been approved by the Board of Directors of Aker Carbon Capture AS. All deviations, if any, must be approved by the CEO.

Scope

This Code of Conduct applies to all employees (including temporary personnel) and directors in Aker Carbon Capture ASA ("Aker Carbon Capture") and its subsidiaries, corporate affiliates, and joint ventures that are majority owned or controlled by Aker Carbon Capture (individually and collectively). It also applies to intermediaries, lobbyists, consultants and others who act on Aker Carbon Capture's behalf.

Aker Carbon Capture encourages all our business partners to adhere to principles that are consistent with this Code of Conduct and the [Code of Conduct for Business Partners](#). Suppliers, subcontractors and other contracting parties of Aker Carbon Capture, including companies in which Aker Carbon Capture own a minority stake, are expected to adhere to standards which are consistent with applicable laws and Aker Carbon Capture's Code of Conduct and the [Code of Conduct for Business Partners](#), and Aker Carbon Capture shall do its best to promote and secure the same.

Responsibility and implementation

Personal responsibility

As an Aker Carbon Capture employee, you shall strive to exercise good judgment, care and consideration in your service for Aker Carbon Capture. You are expected to familiarise yourself with, sign off on, and perform your duties in line with the principles set forth herein. If you need advice in handling a specific ethical dilemma, you are advised to consult with your manager or other appropriate authority. Our legal and compliance personnel may also be contacted for advice.

for safeguarding, implementing and overseeing the management of this Code of Conduct. The CEO of Aker Carbon Capture shall ensure that employees are aware of and comply with this Code of Conduct. The CEO shall also ensure that annual Code of Conduct training is conducted for the company's employees, and that the employees, as part of such training or other suitable process, sign that they have read and understood the Code.

Executive Vice Presidents and Line Managers' responsibility

Executive Vice Presidents and Line Managers are responsible for communicating the requirements in the Code of Conduct to all their direct reports. Managers are also responsible for promoting and monitoring compliance with the Code of Conduct within their respective area of responsibility.

Board of Directors and CEO's responsibility

Aker Carbon Capture's Board of Directors is responsible

Declaration of compliance

As an employee (including temporary personnel) and/or director in Aker Carbon Capture, you will be requested on an annual basis to confirm by signing the Annual Statement of Compliance that you have read and familiarised yourself with this Code of Conduct, and that you are committed to conduct your tasks and responsibilities in accordance with the requirements set forth in this Code of Conduct.

Business and commercial partners that Aker Carbon Capture has an ongoing engagement with, including but not limited to suppliers, customers, or service providers, shall proactively ensure that they have ethical standards that are compatible with Aker Carbon Capture's Code of Conduct.

Acting with Integrity

Anti-corruption

Aker Carbon Capture expressly prohibits any provision, offering or accepting of bribes of any variety to any person, whether private or public, either directly or through any third party. We shall at all times comply with the Norwegian Penal Code's provisions on corruption, the UK Bribery Act and the US Foreign Corrupt Practices Act, as well as other applicable laws and regulations regarding bribery and corruption.

Bribery occurs when you, for yourself or a third party, offer, pay, seek, receive or accept an improper payment, gift or advantage in connection with a position, an office or performance of an assignment, e.g. to influence a business or governmental outcome or decision. Engaging in bribery or turning a blind eye to your suspicions of bribery, can result in liability for Aker Carbon Capture and for you personally. Bribes can be in the form of money, or anything else of value, such as a gift or donation, travel benefits, employment benefits, or any other advantage.

"Facilitation payments" are small unofficial payments aimed at expediting or securing the provision of products or services to which you or the company is legally entitled. A facilitation payment is illegal under several anti-bribery laws relevant for Aker Carbon Capture and is considered by Aker Carbon Capture to be a type of bribe. It is strictly prohibited for anyone representing Aker Carbon Capture to offer or make facilitation payments.

Aker Carbon Capture restricts the use of commercial third parties to support sales-related activities. Any use of third-party representatives shall be in accordance with the relevant internal procedures.

No employee or business partner will suffer adverse consequences for refusing to engage in improper payment activity, even if this results in loss of business.

Your responsibility

- Make sure that all payments made are proper and legal, that they are approved by relevant Aker Carbon Capture personnel, and that they are recorded accurately in Aker Carbon Capture's books and records
- Never (either directly or indirectly through a third-party) offer anything of value to improperly influence the actions or decisions of any person, including any public official or private party, in pursuit of Aker Carbon Capture's interests
- Do not make facilitation payments even if not considered to be a criminal offence in the jurisdiction you are in. If a payment is demanded from you in order to avert an immediate threat to the life or health of any person, such payments are not prohibited, but they must be immediately reported to our legal and compliance personnel.
- Do not use third-party representatives without the specific approval of the Aker Carbon Capture CEO

Anti-money laundering

Money laundering supports criminal activity, including drug trafficking, terrorism, corruption and tax evasion. Money laundering is the process of disguising the proceeds of crime in order to hide its illegal origins or otherwise dealing with the proceeds of crime. Criminal proceeds include not only money, but all forms of assets, real estate and intangible property that are derived from criminal activity.

Aker Carbon Capture is committed to complying with all anti-money laundering and anti-terrorism laws. We will conduct business only with reputable customers and business partners involved in legitimate business activities, with funds derived from legitimate sources.

Your responsibility

- Conduct appropriate counterparty due diligence to understand the business and background of our prospective business partners and to determine the origin and destination of money and property
- Even though few of us will come across money laundering issues, be attentive to attempts to make payments in cash or otherwise involving unusual banking or payment arrangements
- Report suspicious transactions or incidents of money laundering to our legal and compliance personnel or via the whistleblowing channel

Confidentiality

Aker Carbon Capture is committed to protecting confidential information. We will not misuse information belonging to ourselves or any of our partners.

Your responsibility

- You have a duty of confidentiality which also applies after the conclusion of the employment or contractual relationship with Aker Carbon Capture and for as long as the information is considered sensitive or confidential in nature
- Keep confidential all matters that could provide third parties with unauthorized access to confidential information
- Carefully consider how, where and with whom Aker Carbon Capture-related matters are discussed

Conflict of interest

A conflict of interest occurs when personal relationships, participation in external activities or interest in another venture can influence or could be perceived to influence a person's decision making when acting for Aker Carbon Capture. A personal relationship could include spouse or other immediate family, relative and close personal friends.

All business transactions must be entered into solely for the best interests of Aker Carbon Capture. Any conflicts of interest that cannot reasonably be avoided shall be made fully transparent and reported. Managers and the compliance function are responsible for evaluating the notification, consider mitigating actions and ensuring that these are implemented.

All directorships, employment or other assignments held or carried out by Aker Carbon Capture employees in other enterprises which have, or may be expected to have, commercial relations to Aker Carbon Capture, must be approved in writing by Aker Carbon Capture.

Your responsibility

- Act in the best interests of Aker Carbon Capture and take necessary steps to avoid situations and positions that may create or appear to create a conflict of interest
- Do not participate in any transactions or other business arrangements on behalf of Aker Carbon Capture where you directly or indirectly have, or could reasonably be suspected to have, a personal interest or otherwise, directly or indirectly, benefit from your position in Aker Carbon Capture
- Avoid having interests outside the company in any business that competes with or provides services to Aker Carbon Capture or its subsidiaries, which could affect your objectivity in carrying out your company responsibilities
- Avoid doing business on behalf of Aker Carbon Capture with a close personal friend or relative
- If you have a conflict of interest, notify your manager in writing and disclose all relevant facts and ensure that all parties involved are fully aware and advised of the potential conflict of interest
- As manager, ensure that conflicted individuals are recused from any operation, influence, and/or decision-making process associated with the subject of the conflict

Export controls

Export control laws and regulations impose restrictions and prohibitions over certain sale, shipment, electronic transfer, provision, or disclosure of information, software, goods, assets, funds, and services across national borders or involving parties subject to economic sanctions. Export subject to export control laws and regulations requires custom clearance documents, a license and/or approval from national authorities prior to the export. Exports include not only those conducted via traditional shipping methods, but can extend to electronic transfers, through discussions or visual inspections. Aker Carbon Capture shall comply with all applicable export control laws and regulations thereto.

Your responsibility

- Think carefully about the potential impact of export control laws and regulations before transferring goods, technology, software or services across national borders and make sure it is in line with all applicable export control laws and regulations
- Always assess whether any of the exported goods, technology, software or services are listed on any dual-use list, or common military lists. If in doubt, consult your manager for advice

Fair competition

Antitrust laws and regulations protect free enterprise and prohibit behaviour that limits trade or that restricts fair competition and apply to every level of Aker Carbon Capture's business. The antitrust laws combat illegal collusive practices like price-fixing, market-sharing or bid-rigging, or behaviours that aim to achieve or maintain monopoly.

Aker Carbon Capture does not tolerate violation of any applicable antitrust laws and regulations. The company is committed to fair and open competition and shall not engage in any activities that involve unlawfully obtaining, receiving, using or sharing non-public competitively or commercially sensitive information. Examples of such information can include current or future prices, existing contracts, competitive bids, commercial strategies, costs, or other types of non-public competitively or commercially sensitive information.

Your responsibility

- Comply with applicable antitrust laws
- Do not engage in any activities that involve obtaining, receiving, using or sharing non-public competitively or commercially sensitive information without a lawful reason
- If you find yourself in possession or become aware of anyone in possession of non-public competitively or commercially sensitive information, immediately contact our legal and compliance personnel. Do not discuss or share the information with anyone
- Take no risk of antitrust exposure for Aker Carbon Capture, yourself or any of your reports, and seek advice from internal or external experts when relevant

Gifts and hospitality

Aker Carbon Capture does not allow gifts or hospitality where giving or accepting them could influence business decisions, violate any local laws or the policies of the recipient company, or cause others to perceive such influence or violation. Aker Carbon Capture does not expect gifts or hospitality from any of our business partners.

It is our company policy that Aker Carbon Capture does not accept or offer gifts or hospitality - except in the limited circumstances detailed in our internal procedures and guidance and always in accordance with applicable local legal requirements. Hospitality may only be accepted or offered if it is in combination with a business meeting or there is another clear business reason for attending, and the expenditure is within the applicable monetary limits defined in internal procedures and guidance.

All offered and received gifts and hospitality shall always be properly recorded in accordance with our internal procedures and guidance. This applies to both gifts and hospitality accepted in accordance with the Gift and Hospitality Procedure (GV-BI-0005-P00-000), and when gifts or hospitality are offered but declined.

Your responsibility

- Never accept or offer a gift or hospitality that would influence your or any other person's judgment, or cause others to perceive such influence
- Never solicit a gift, hospitality or other favour for personal benefit from any of Aker Carbon Capture's stakeholders
- Do not accept or offer gifts in situations of contract negotiation, bidding, or award
- Do not offer or accept hospitality, expenses, or other favours where it could be perceived to influence decision making
- In cases of doubt, always consult with your manager or contact our legal and compliance personnel for guidance

Insider information

You are involved in insider dealing when you trade in publicly traded shares or other securities while in possession of specific information capable of affecting the price of shares or securities and which is not publicly available or generally known in the market or when you disclose this information to someone else or influence someone else who then trades in those shares or other securities. It is a criminal offence to trade in Aker Carbon Capture shares or other securities on the basis of insider information.

Holders of insider information relevant for the share price of Aker Carbon Capture can only pass this information to individuals who need this information in their work for Aker Carbon Capture and only subject to authorisation from their manager and the subsequent appropriate listing of the individual in Aker Carbon Capture's insider listing system.

More details and guidance are further set out in Aker Carbon Capture's internal Insider Procedure (GV-BI-0003-P00-000).

Your responsibility

- Protect confidential business information and never use it for your own benefit, especially when trading in shares or other securities or recommending anyone else to do so
- Do not spread rumours, mislead with false information or manipulate prices
- Comply with Aker Carbon Capture policies when trading in the shares or other securities of Aker Carbon Capture or any other relevant company that you may receive insider information about through your work for Aker Carbon Capture
- Be cautious of risks in any matter involving insider information

International and economic sanctions

International and economic sanctions impose restrictions and prohibitions against transactions with specific countries, regions, or persons. They can also restrict and prohibit the sale, supply, transfer, import, provision or export of certain goods, technology, software, services, funds and economic resources, as well as brokering services and technical assistance, including disclosure of information.

Aker Carbon Capture shall adhere to all applicable sanctions laws and regulations. Doing business in or involving certain countries, regions and parties therefore requires particular attention to sanctions laws and regulations.

More details and guidance are set out in our internal procedures and guidelines or can be obtained from our legal and compliance personnel.

Your responsibility

- Ensure compliance with all applicable sanctions laws and regulations and always consider carefully what rules may be applicable for example due to the parties involved and where an activity takes place
- Before you engage in business with any party, ensure that those parties as well as other parties involved in the business relationship, including their respective owners, are not subject to sanctions
- Think carefully about the potential impact of international sanctions before transferring goods, technology, software or services across national borders
- Be attentive to dealings with parties that are from sanctioned countries or regions, or that are otherwise designated for financial sanctions

Protecting personal data

Aker Carbon Capture is committed to protecting the privacy rights of our employees and everyone with whom we do business. We remain responsible and accountable for the way we handle personal data. Personal data shall be processed in accordance with applicable data protection laws, such as the General Data Protection Regulation, and our internal requirements.

Aker Carbon Capture shall ensure that personal data are only used for legitimate business purposes, limited to what is necessary and carried out in a secure and transparent manner. More details and guidance are set out in our internal procedures and templates.

Your responsibility

- Respect everyone's right to privacy. Ensure that you are familiar with applicable requirements
- Read and follow Aker Carbon Capture's established data protection procedures when processing personal data
- Only access or share personal data when relevant and necessary for a legitimate business purpose
- Strive to understand and document the privacy implications of your dealings with personal data
- Require a high level of privacy compliance from business partners you engage with
- Speak up if you notice personal data being processed in an unauthorised way, or if you see indications that personal data has been compromised

Public officials

A "public official" means any officer or employee of a government, a government department, agency, or government owned or controlled state enterprise, any person acting in an official capacity for or on behalf of a government or government entity or of a public international organisation, any political party or party official, or any candidate for political office. Public officials include not only elected officials, but also consultants who hold government positions and political party officials.

Dealings with public officials require that we exercise extra caution in the way we conduct ourselves. Gifts, hospitality or any financial or other advantage shall not be offered, promised, given to or received from public officials unless this is subject to specific, written pre-approval according to our internal procedures. Local laws may restrict or even prohibit the offering of gifts and entertainment to public officials.

Your responsibility

- As a representative of Aker Carbon Capture, never, in order to obtain or retain business or other improper advantage in the conduct of business, offer, promise, or give any undue advantage to a public official to induce the official to carry out a specific act or refrain from acting in relation to the performance of her/his duties. This applies regardless of whether the advantage is offered directly or through an intermediary
- When engaging with public officials, always do so in a transparent and straightforward manner and exercise the utmost integrity
- Properly record any gifts and hospitality given to, or received from, public officials in accordance with Aker Carbon Capture's internal procedures and guidance.

Safeguarding of property, information and assets

Aker Carbon Capture's property, information and assets must be secured by adequate protective measures. Our information and assets are only to be used for legitimate business purposes and only by authorised employees or their designees. This applies to tangible assets, e.g. equipment, and intangible assets such as intellectual property and confidential information. Information produced and stored on Aker Carbon Capture's IT systems is regarded as the property of the company. Private use is only permitted to a limited extent, and information that may be considered illegal or inappropriate must under no circumstances be processed or downloaded. Use of IT systems and internet services must be governed by the needs of the business and not by personal interests.

Your responsibility

- Protect Aker Carbon Capture's property, information and assets from theft and loss
- Report any security breaches of property to according to our internal procedures
- Report any theft, waste or misuse of company information and assets according to our internal procedures
- Maintain electronic files and archives in an orderly manner

Caring for our People

Anti-harassment and intimidation

At Aker Carbon Capture, everyone shall be treated with fairness, respect and dignity. We do not tolerate any form of abuse, harassment, intimidation, degrading treatment or sexually offensive behaviour by or towards employees or others affected by our operations. Comments or other forms of offensive messages, derogatory remarks or inappropriate jokes are unacceptable.

Your responsibility

- Take steps to create a good working environment – free of all harassment
- Never engage in abuse, harassment, bullying, workplace violence, sexually offensive behaviour or other behaviour that colleagues or business partners may regard as threatening or degrading.
- Respect other people's customs and culture
- If you become aware of any situation in breach of the above principles, speak up or report your concern

Diversity and equal opportunities

Aker Carbon Capture is committed to ensuring that the unique contributions each employee brings to the company are encouraged. In order to ensure that everyone can make full use of their talents we shall welcome, listen to and respect the ideas of people from different backgrounds.

Our employees can expect a workplace free from harassment and discrimination. We do not tolerate discrimination against any employee based on age, gender, sexual orientation, disability, race, nationality, political opinions, religion or ethnic background, or any other basis prohibited by law.

Your responsibility

- Treat everyone with dignity, fairness and respect
- Base your work-related decisions on merit
- Encourage and listen to those who speak up

Human and labor rights

Aker Carbon Capture supports, and respects internationally proclaimed human and labour rights, such as the UN Guiding Principles on Business and Human Rights, including the principles and rights set out 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 International Bill of Human Rights, the UK Modern Slavery Act and the OECD Guidelines for Multinational Enterprises. Aker Carbon Capture acknowledges all employees' right to form and join trade unions of their own choice.

Aker Carbon Capture shall ensure that its business operations do not cause or contribute to any infringements to human and labor rights as set out above. We will not use child or forced labour and will not tolerate working conditions or treatment that conflicts with international laws, regulations, and practices. We have a zero-tolerance approach towards modern slavery and human trafficking.

The company is committed to implement and enforce effective systems to minimise risks of human and labour rights infringements in our own operations and in our supply chain. Human rights related grievances can be reported to communications@akercarboncapture.com or via the whistleblowing channel available at our company website.

Your responsibility

- Never cause or contribute to the infringement or circumvention of human and labour rights
- Respect the personal dignity, privacy and rights of all individuals you interact with in connection with your work and those affected by our business operations
- Notify your manager in writing if you become aware of any situation in breach of the above principles

Working with our Stakeholders

Relations to business partners

Aker Carbon Capture cannot achieve its business goals without its business partners. We endeavor to deal honestly, ethically, impartially, and fairly with our stakeholders. We expect all our business partners to adhere to principles that are consistent with our Code of Conduct for Business Partners.

Your responsibility

- Promote Aker Carbon Capture's ethical principles in your dealings with business partners
- Comply with applicable internal integrity due diligence procedures before you establish or amend any business relationship
- Clearly communicate our expectations to our business partners
- Report any knowledge or suspicion of non-compliance with the principles set out in this Code of Conduct by any of our business partners

Protecting the environment

Aker Carbon Capture shall act responsibly with an ambition to reduce direct and indirect negative influences on the external environment. We shall adhere to relevant international and local laws and standards, strive to minimize our environmental impact and take a sustainable approach in our day to day operations. Our aim is to support our customers and the industry to be better environmental performers through our products and services. We are focused on reducing waste, reducing carbon dioxide (CO₂) emissions and improving the environmental mind-set amongst our employees.

Your responsibility

- Strive to understand and minimize the environmental impact in your area of work
- Share environmental best practices in your area of work
- Participate actively in environmental programs

Sponsoring and donations

Aker Carbon Capture may utilise sponsorships to promote the company and its business. All sponsoring relationships shall be strategic and aligned with Aker Carbon Capture's values. There must be documented tangible benefits for Aker Carbon Capture associated with any sponsorship, such as commercial gain, professional development, enhanced profiling etc. All sponsoring relationships shall be structured as 'win-win situations' whereby both parties achieve some gain. All sponsorships shall follow the regulations in Aker Carbon Capture's Authorisation Matrix.

No religious or political groups or organisations may be sponsored. There shall be no personal conflict of interest involved in the decision to sponsor an organisation. In situations where a conflict of interest exists, the individual with a conflict shall withdraw from any associated decision-making process.

Charitable donations - gifts - to organisations do not carry the same requirement for mutual benefit. However, no charitable donations shall be made to political or religious organisations. All charitable donations must be approved in advance according to our internal procedures.

Transparency and financial reporting

Aker Carbon Capture will communicate relevant business information in full and on a timely basis to its employees and external stakeholders. This includes information on responsible business conduct and sustainability in line with applicable laws, regulations and recognized international standards. All accounting and financial information, as well as other disclosure information, must be accurately registered and presented in accordance with laws, regulations and relevant accounting standards. Aker Carbon Capture is committed to providing the financial markets with quality information, enabling investors and analysts to maintain a correct picture of the financial situation as well as risks and opportunities facing it in the future. Aker Carbon Capture will provide accurate disclosure information to the financial markets in line with all relevant laws and regulations for listed companies on the Oslo Stock Exchange. All material information is disclosed to recipients equally in terms of content and timing.

Reporting

Whistleblowing - Reporting a breach

If you are aware of incidents or have suspicions concerning any violation of applicable laws and regulations or any breach of the Code of Conduct or other misconduct, you are obligated to report it immediately to the CEO. If you fail to obtain a response or if you would prefer to report through a different channel, you are urged to report the matter to Aker Carbon Capture's whistleblower channel available at our company website.

If you prefer not to report the matter to any of the persons or channels set out above, you may contact the Board of Directors directly.

The whistleblower channel and the whistleblower email are open for all employees and non-employees to report misconduct. Please provide as much detail as you can to assist investigations when using any of these channels. All reports are treated confidentially, and you may choose to report anonymously. Aker Carbon Capture shall endeavor to keep the identity of the whistleblower confidential in cases where the identity of the whistleblower is known. The identity of the whistleblower shall only be disclosed to the extent necessary for the proper follow-up of the whistleblowing report and, when possible, by consent.

Aker Carbon Capture will ensure that there will be no retaliation against a whistleblower, including that there is no impact on a whistleblower's professional career, for reporting possible violations in good faith. Any employee knowingly making a false report for the purposes of harming another individual will be subject to disciplinary action.



AKER CARBON CAPTURE ASA

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