

Risavika Production AS

Account of due diligence pursuant to the Norwegian Transparency Act

1 BACKGROUND

In this account, we summarize the measures Risavika Production AS ("Risavika") has in place to detect, assess and mitigate actual and potential adverse impacts on fundamental human rights and decent working conditions in our own operations, supply chain or business partners. We also address the results of Risavika's human rights due diligence, including measures that have been or are planned to be implemented in this regard.

This account has been prepared in accordance with section 5 of the Norwegian Transparency Act and covers the period 1 July 2022 until 31 December 2022. Risavika publishes its annual accounts in English and this account is therefore also in English.

2 OUR BUSINESS OPERATIONS

Risavika was established by Gasum AS in June 2021. Risavika was acquired by NSMP Norge AS from Gasum AS in November 2021 and is now part of the Selkie Investments Group (the "Selkie Group") that was formed in September 2018 for the purpose of owning and operating midstream gas infrastructure assets in the North Sea.

Risavika 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 Risavika is also located in Risavika Harbour.

RLP converts natural gas from Norwegian gas fields into Liquefied Natural Gas ("LNG") for shipping, road transport and heating. The plant is equipped with a full suite of modern facilities consists 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. Risavika has a long-term contract with Gasum AS for the provision of liquefaction services.

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

Risavika'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, including support functions, HR functions and IT services, as well as technical services.

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 Risavika resources and with support from the leadership team within the Selkie Group.

3 HANDLING ADVERSE IMPACTS ON HUMAN RIGHTS AND DECENT WORKING CONDITIONS

3.1 Our approach to prevent adverse impact in human rights and decent working conditions

Risavika is covered by Selkie Group's Code of Conduct (the "Code of Conduct"), which includes sections on fundamental human rights, health, safety and environmental matters, as well as diversity, equality and inclusion. The Selkie Group and the Service Provider also comply with the provisions of the UK Modern Slavery Act 2015 and publish a yearly a statement in accordance with the requirements set out in such legislation. Risavika also adheres to the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Human Rights.

The Board and Management want to know about any breaches of the content and spirit of the Code of Conduct. We therefore encourage the reporting of any such 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).

Risavika is also 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 such accidents may have on people, the environment and property. In line with this Regulation, Risavika works systematically and continuously to prevent any such accidents and, in the event they should arise, limit their impact.

Risavika has implemented 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.

3.2 Human rights policies and procedures

Our commitment to respect fundamental human rights and decent working conditions in our operations and in connection with the provision of our services is set out in the Code of Conduct.

In addition to setting out our expectations in relation to our own human rights and working conditions, the Code of Conduct sets out the Selkie Group's commitment to only working with suppliers and third parties whose own standards are consistent with the Code of Conduct. This means that we expect our suppliers 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 United Nations Guiding Principles on Human Rights.

Risavika and the Service Provider have put in place several measures to implement the policies and goals set out in the Code of Conduct and other procedures. For example, as part of our process for selection, approval and evaluation of supply chain partners, Risavika requires its suppliers, including the Service Provider, to use clear and objective criteria which include the respect for fundamental human rights and decent working conditions. New suppliers are required to complete a pre-qualification questionnaire, which include questions relating to the supplier's commitment to human rights and decent working conditions, as well as the supplier's own supply chain. Existing suppliers are required to complete a questionnaire confirming that they are compliant with the Transparency Act.

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

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

4.1 Approach and methodology

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

In connection with the risk assessment, a high-level review of Risavika's operations, suppliers and business partners has been conducted. In order to further assess the risk related to the suppliers and business partners, Risavika and the Service Provider have also conducted more in-depth assessments of certain select suppliers and business partners and no further risks were identified.

4.2. Outcome of assessment of actual and potential adverse impacts in Risavika's own operations

Risavika has identified certain risks with respect to working conditions, including for hired-in personnel and service workers, in its own operations. 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.

Risavika has so far not identified any actual adverse impacts on human rights and decent working conditions in its own operations. It has continued to operate its assets in a safe and reliable manner, and there were no recordable injuries, reportable incidents or regulatory enforcement action in the reporting period.

4.3 Outcome of assessment of actual and potential adverse impacts in Risavika's suppliers and business relationships

Risavika 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 improve continually 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.

5 MITIGATING ACTIONS AND TRACKING PROGRESS

Risavika 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 Risavika's own operations and in Risavika's supply chain / business partner relationships.

In order to address the risks identified with respect to Risavika's own operations, Risavika will continue its focus on adhering to all applicable regulations relating to decent working conditions, including in particular regulations relating to health and safety. We will continue to have an absolute commitment to the health and wellbeing of our colleagues and partners.

More generally, our supplier contracts include clauses pertaining to fundamental human rights and decent working conditions. Amongst others, these clauses 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. The clause also gives Risavika 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 a proper human rights due diligence. The intention and expected result of these contract clauses are to strengthen the respect for fundamental human rights and decent working conditions in our supply chain and amongst our business partners.

6 PRIORITIES FOR 2023

As noted above, and on the basis of the outcomes of the overall risk assessment, working conditions, including for hired-in personnel and service workers, will continue to be a focus area for Risavika in 2023.

In the coming year, we will also conduct a more thorough assessment of any actual or potential adverse impact on fundamental human rights and decent working conditions in order to continually improve our human rights due diligence. In particular, Risavika and the Service Provider intend to perform more in-depth assessments of our suppliers and business partners, including continuing our work with engaging with our suppliers to fill out and assess the tailor-made supplier questionnaires we have developed, in order to better understand any actual or potential adverse impacts, and to further refine any necessary mitigating actions as well as necessary stakeholder dialogue.

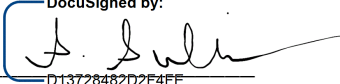
We will continue to communicate our human rights commitments internally and externally, including to our suppliers and business partners. Risavika and the Service Provider will further formalize the procedures to ensure continuous compliance with the due diligence requirements in the Transparency Act, and we will also provide human rights training and raising of awareness raising amongst the relevant personnel.


We remain focused on respecting fundamental human rights and decent working conditions across all our operations as well as operating in accordance with all applicable regulatory frameworks, including the Norwegian Transparency Act.

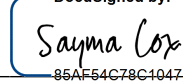
SIGNATURES

DocuSigned by:

FC2A16DD7FD0485...
Laurits Haga
Chair of the board

DocuSigned by:

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Sara Sulaiman
Board member

DocuSigned by:

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Gab Barbaro
Board member

DocuSigned by:

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Sayma Cox
Board member

DocuSigned by:

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Paul Warwick
Board Member

Date: 30 June 2023