

Risavika Production AS

Account of Due Diligence pursuant to the Transparency Act

Reporting Period: 1 January 2025 to 31 December 2025

1. Background

This report has been prepared in accordance with Section 5 of the Norwegian Transparency Act (Åpenhetsloven). It sets out the measures taken by Risavika Production AS (“RPAS”) to detect, assess and address actual and potential adverse impacts on fundamental human rights and suitable working conditions in its own operations, supply chain and among its business partners.

This report covers the period from 1 January 2025 to 31 December 2025. RPAS publishes its annual accounts in English, and this statement is therefore 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”). 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 and Management Agreement, which includes the provision of personnel, operational and management services, support functions (including HR and IT) and technical services. The majority of RPAS’s 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. This is managed at a local level with RPAS resources and with support from the Selkie Group leadership team and NSMP Operations Limited.

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.

3.1 Human Rights Policies and Procedures

RPAS adheres to the Selkie Group's Code of Conduct, which sets out our commitment to respecting fundamental human rights, as defined by international conventions including the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises, and to ensuring suitable working conditions that promote safety, fairness and equality across all aspects of our operations and in our relationships with suppliers and business partners. The Code of Conduct covers health and safety, non-discrimination and worker protection. It is mandatory for all RPAS employees and is provided to all suppliers via the Service Provider.

3.2 Supplier and Business Partner Requirements and Due Diligence

RPAS holds suppliers to the same standards set out in the Code of Conduct. These requirements are enforced through the following practices:

- Pre-Qualification Questionnaire ("PQQ"): All suppliers onboarded by the Service Provider on behalf of RPAS must complete a PQQ or be certified through the Achilles procurement system. Both routes include questions specifically related to human rights and compliance with the Transparency Act. The Supplier Approval Questionnaire, updated with additional Transparency Act questions, has been completed by 100% of RPAS category A and B suppliers. While some suppliers had initially shown reluctance to complete the extended PQQ due to its length, the process is now embedded in procurement practice.
- New Supplier Onboarding: New vendors were onboarded during 2025 following completion of the pre-qualification process. RPAS's new form of contract for Norway, which incorporates Transparency Act provisions, is used for all new supplier contracts.
- Supplier Audits: During 2025, two supplier audits were conducted directly by the Service Provider, with no non-conformances identified. Audits were also completed for two suppliers, likewise, selected on a risk-based approach. Achilles Ethical Employment audits were completed on a number of Risavika suppliers and are monitored via the Achilles dashboard.

3.3 Training and Awareness

In 2025, RPAS employees continued mandatory training on the Code of Conduct, covering human rights, health and safety and environmental protection.

The Service Provider's procurement and contracts team received Transparency Act awareness training at the group procurement away day in July 2025. The procurement team is CIPS qualified or working towards CIPS qualification; human rights content is included within the CIPS curriculum, and all procurement personnel complete annual Ethical Procurement and Supply eLearning.

3.4 Stakeholder Engagement

The Service Provider, on behalf of RPAS, engaged with Risavika stakeholders throughout the reporting period. Quarterly working environment committee meetings were held at site, attended by management, employee representatives and the occupational health service provider. Quarterly working environment inspections were carried out with employees' safety representatives, with no reportable findings arising from these inspections. Salary negotiations were conducted with the local union during the year.

3.5 Whistleblowing and Grievance Mechanisms

RPAS provides multiple channels through which employees and external stakeholders can raise concerns, including direct reporting to the Selkie Group leadership team, an anonymous and confidential whistleblowing hotline, and an external reporting mechanism for third parties. All reports are investigated and corrective actions taken where necessary. No whistleblower reports related to human rights or suitable working conditions were received during 2025.

4. Health, Safety and Environment

RPAS is 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, including the Norwegian Major Accidents Regulation (Storulykkeforskriften). The Service Provider ensures that all employees and contractors undergo mandatory health and safety training covering the risks associated with their tasks and the protective measures in place, including the handling of hazardous materials and the use of personal protective equipment.

RPAS continuously monitors health, safety and environmental performance and maintains processes for reporting, investigating and addressing incidents and near misses. While incidents may occur from time to time in the course of operations, no incidents identified during the reporting period were assessed as constituting an actual adverse impact on human rights or decent working conditions.

Where incidents or unsafe conditions are identified, they are subject to investigation to determine root causes and appropriate corrective, and preventive actions are implemented. Lessons learned are communicated where relevant to support continuous improvement and to reduce the likelihood of recurrence.

5. Assessment of Impacts on Human Rights and Suitable Working Conditions

5.1 Own Operations

The Service Provider confirmed that there were no identified adverse impacts on human rights or suitable working conditions within RPAS's own operations during 2025, including no issues related to discrimination or unsatisfactory working conditions. RPAS oversees the Service Provider's due diligence activities through established governance arrangements, regular

performance reporting and periodic reviews of compliance, procurement and health and safety matters, thereby providing oversight of measures taken to promote respect for human rights and decent working conditions

5.2 Supply Chain and Business Partners

The Service Provider confirmed that there were no identified adverse impacts on human rights or suitable working conditions within RPAS's supply chain or among its business partners during 2025. The Service Provider has not been informed of any allegation of human trafficking or modern slavery involving any suppliers. The supplier audits completed during the year — including direct audits of two suppliers, and Achilles Ethical Employment audits — did not identify any significant risks or adverse impacts relating to human rights or suitable working conditions.

6. Mitigating Measures and Priorities for 2026

Building on the measures implemented during 2025, RPAS and the Service Provider will continue to strengthen their approach to human rights and suitable working conditions. Planned activities for 2026 include:

- Three supplier audits, with suppliers selected on the basis of a risk-based assessment identifying those with the highest potential exposure to adverse impacts on human rights and suitable working conditions. The audits will be designed to assess specific risk areas identified in our due diligence process, including working hours, working conditions and human rights. Human rights aspects will also be addressed within the procurement process as part of vendor audits for external personnel.
- Continuous focus on HSE measures aimed at safeguarding employee wellbeing and working environment, through health monitoring, structured employee involvement, risk-based occupational health planning, and psychosocial risk assessment in accordance with applicable legislation.
- Ongoing monitoring of the supply chain and continued training and awareness activities on the Transparency Act and related policies.

7. Conclusion

RPAS continues to adhere to its commitments to respect fundamental human rights and maintain suitable working conditions across its operations and supply chain. RPAS remains committed to continuous improvement in its due diligence processes and to ensuring full compliance with the Transparency Act.

Date: 19 June 2026

<p>Signed by: <i>Laurits Haga</i> FC2A16DD7FD0485...</p> <p>Laurits Haga Chair of the Board</p>	<p>Signed by: <i>Iryna Podoliak</i> BFD6A3FA242D461...</p> <p>Iryna Podoliak Board Member</p>	
<p>DocuSigned by: Gary Blackburn 476F844A223549D...</p> <p>Gary Blackburn Board Member</p>	<p>Signed by: <i>Angela Fletcher</i> 5484A6C28CCE481...</p> <p>Angela Fletcher Board Member</p>	<p>Signed by: <i>Paul Warwick</i> 17FD062A7005457...</p> <p>Paul Warwick Board Member</p>