



## Specification

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# Code of Conduct

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| Document no.: | 02-000703  |
| Rev. no.:     | 5.0        |
| Date:         | 2025.10.22 |

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## About this document

|                                   |                                                                                                                                                                                     |
|-----------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Purpose</b>                    | The purpose of the Code of Conduct is to secure that all business operations of Aker BP are conducted in an ethical and transparent manner and in compliance with Applicable rules. |
| <b>Valid for</b>                  | This document applies to all organisational units and geographical locations                                                                                                        |
| <b>Revision Period</b>            | 2 Years                                                                                                                                                                             |
| <b>Non-conformity/ Deviations</b> | If unable to comply with requirements stated in this document, process for deviations and non-conformity applies.                                                                   |

| <b>Role</b> | <b>Name</b>         |
|-------------|---------------------|
| Owner       | Board of Directors  |
| Verifier    | Kvåle, Jorunn       |
| Coordinator | Vashchenkova, Elena |

| <b>Rev.no.</b> | <b>Date</b> | <b>Description of Change</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|----------------|-------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 5.0            | 2025.10.22  | <p>3.1. Purpose and scope chapters are merged</p> <p>3.2 Responsibility and implementation - reference to Aker BP's Compliance program, responsibilities and reporting lines of the Chief Compliance Officer is added</p> <p>4.1 Human and labour rights - statement on prohibition of purchase of sexual services is added</p> <p>Change of chapter name:</p> <p>5. "Integrity" to "Business Integrity"</p> <p>6.1 "Asset and Information Security" to "Asset and Cyber Security"</p> <p>New chapter added:</p> <p>5.7 External engagements on behalf of Aker BP</p> <p>6.1 Asset and Cyber Security - paragraph on use of AI, associated risks and relevant guidelines is added</p> <p>7. Health, Safety, Security, Environment and Quality (HSSEQ) is removed. Relevant information is moved to 4.1 Human and labour rights and 6.4 Protecting environment.</p> |

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|     |            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|-----|------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |            | 8.1 Where to seek guidance, 8.4 Training and monitoring are moved to 2.3 Responsibilities and implementation and “How does this apply to you” sections<br>Updated references to internal policies, procedures                                                                                                                                                                                                                                                                                                                     |
| 4.0 | 2023.11.30 | <p>Updates related to:</p> <ul style="list-style-type: none"> <li>• the company’s vision statement</li> <li>• requirements to conduct mandatory human rights due diligence in accordance with the Norwegian Transparency Act</li> <li>• clarifications in the following chapters: <ul style="list-style-type: none"> <li>o Diversity and equal opportunities</li> <li>o Anti-harassment and intimidation</li> <li>o Trade laws and sanctions</li> <li>o Reporting concerns</li> </ul> </li> </ul> <p>Minor language edits</p>     |
| 3.0 | 2020.10.27 | Format change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 2.0 | 2020.10.26 | <p>Updates related to:</p> <ul style="list-style-type: none"> <li>• the individual manager’s responsibility</li> <li>• addition of declaration of compliance</li> <li>• privacy/protecting personal information</li> <li>• conflict of interest</li> <li>• anti-money laundering</li> <li>• child labour, modern slavery and human trafficking</li> </ul> <p>New chapters added:</p> <ul style="list-style-type: none"> <li>• “Confidentiality” and “Sponsorship and Charitable Donations”</li> </ul> <p>Minor language edits</p> |
| 1.0 | 16.04.2018 | First issue for Aker BP                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

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## 1 Our values

Aker BP ASA's ("**Aker BP**") vision is the E&P company of the future. We are what we repeatedly do. Excellence is not an act, but a habit. Our Business Management System sets out the goal that every employee habitually acts according to our core values manifested in a set of tenets and guidelines.

Our core values are: SAFER

SEEKERS (SØKENDE)

ACCOUNTABLE (ANSVARLIG)

FORSEABLE (FORUTSIGBAR)

ENTHUSIASTIC (ENGASJERT)

RESPECTFUL (RESPEKTFULL)

## 2 A letter from the CEO

Dear colleagues,

Excellence is not an act, but a habit. Having a robust, fair and ethically responsible approach to all aspects of how Aker BP conducts business is integral to our success. This Code of Conduct is our guide to excellence. It is also a public declaration that we, as a company, and each and every one of us individually are committed to doing what is right in business.

This Code of Conduct is compulsory reading for all Aker BP employees and those acting on our behalf. We have zero tolerance for corruption at Aker BP, and we are fully committed to living up to our values and reputation as a competent, reliable and ethical player. This reputation is dependent on all of us making sure that the values and commitments set out in this Code of Conduct are second nature. I therefore ask you to do the following:

Firstly, make yourselves comfortable with the Code of Conduct and be vocal about the expectations the Code of Conduct sets out in all aspects of your work, not least when dealing with our business partners.

Secondly, if you have any doubts about what the right thing to do is in any given situation, please seek guidance from your line manager, the Compliance Officer or the Legal department.

Lastly, always speak up when you become aware of any behaviour that goes against these values and principles or where you suspect a breach of this Code of Conduct.

Karl Johnny Hersvik  
September 2025

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## 3 Understanding the Code

### 3.1 Purpose and scope

Aker BP's Code of Conduct (the "**Code**") is our public commitment to conducting business with integrity. It serves as our primary governance tool and a practical guide for ethical decision making. The Code is designed to help all Aker BP employees, consultants, business partners and others acting on our behalf understand and apply our core values in daily work. By following the Code, we build trust with colleagues, partners, shareholders, and society. The Code also supports our long-term ambition to be a respected and responsible oil and gas company.

The Code provides guidance and support needed to conduct Aker BP's business in an ethical manner and in compliance with applicable laws, rules and regulations, as well as internationally accepted guidelines, conventions or similar relating to corruption, money laundering, fraud, slavery, health, safety, environment, human rights, or similar activities ("**Applicable Rules**"). The Code is supported by detailed policies, procedures, and tools that form our governance system.

The Code applies to Aker BP's directors, officers and employees, as well as those acting for or on behalf of Aker BP, including consultants ("**Aker BP Representatives**"). It also applies to the entities, organizations and individuals with whom we do business as "**Aker BP Business Partners**". This includes entities and individuals who act on behalf of Aker BP, such as agents, distributors and other intermediaries, suppliers, subcontractors and all other third parties with whom we contract or have another type of business relationship. Our commitment to conduct our business with integrity applies similarly to all our business relationships with all of our Business Partners.

Suppliers, subcontractors, and other contracting parties of Aker BP are expected to have ethical standards that are aligned with this Code of Conduct and shall also sign declarations confirming compliance with the requirements stated in this Code reflected in the relevant compliance clauses and Supplier Declaration.

### 3.2 Responsibility and implementation

All Aker BP Representatives agree to uphold Aker BP's commitment to conduct our business with integrity. This includes adhering to this Code and all Applicable Rules. A failure to do so will be considered misconduct, which could result in disciplinary actions being taken – including termination of employment – and the case may be reported to the authorities.

The owner and approver of the Code is the Board of Directors of Aker BP. The Chief Compliance Officer is the functional owner and is responsible for the maintenance, communication and monitoring of the Code, including implementing changes in Applicable Rules and the Aker BP Compliance Program. The Chief Compliance Officer will periodically report to the Executive Management Team and the Board Audit and Risk Committee on the level of compliance within the company and our operations as well as the outcome from investigations into suspected or actual breaches of the Code.

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The CEO of Aker BP is ultimately responsible for the implementation of the Code and for the monitoring of its operational effectiveness.

All employees are required to participate in mandatory training in the Code of Conduct. All managers in Aker BP are expected to lead by example and are responsible for ensuring compliance with, and implementation of, this Code, Applicable Rules and the policies, processes and procedures set out in Aker BP's Business Management System.

It is important that all Aker BP Representatives and Business Partners seek guidance when uncertain about compliance with this Code or other Aker BP policies, processes and procedures. Asking questions and raising concerns early helps prevent potential misconduct and supports a culture of transparency and accountability.

### 3.3 Aker BP Representatives' Responsibilities

- Familiarise yourself with the Code, as well as other relevant Aker BP policies, processes and procedures
- Act in a way which is consistent with Aker BP's core values and this Code, and which is safe, ethical, with integrity and in compliance with Applicable Rules
- When in doubt about the appropriate way to act, ask your manager and discuss it openly
- Raise questions or concerns if you become aware of possible violation of the Code or Applicable Rules
- Participate in mandatory ethics and compliance training and annually sign a declaration of compliance with the Code following the mandatory compliance training
- Cooperate fully in the event of an audit, verification or investigation
- If there is a difference between a legal requirement and the Code, apply the most stringent standard

### 3.4 Additional Manager Responsibility

- Proactively manage business integrity risks, lead by example and be a role model for ethical behaviour
- Promote and implement requirements, measures and controls as defined in Aker BP's compliance program
- Help your team members understand Aker BP's core values, the Code and Applicable Rules. Assist them in implementing this in the way the team works and be consistent when enforcing the Code and hold people accountable for their behaviour at work
- Create an environment that is respectful and inclusive, and where people feel comfortable speaking up and asking questions without risk of retaliation
- Ensure that your team members participate in the mandatory ethics and compliance training

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## 4 People and working environment

### 4.1 Human and labour rights

Aker BP conducts its business in a manner which respects the human rights and dignity of people. We support and acknowledge the fundamental principles of human and labour rights as defined in the Universal Declaration of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. When considering new investments or when tendering for goods and services, we review any associated human rights issues and consider how we can ensure that our operations do not come into conflict with any of these fundamental human rights principles.

We strictly prohibit use of child labour or forced labour and do not tolerate working conditions or practices that violate international laws and standards. We have zero-tolerance policy toward modern slavery, human trafficking and the purchase of sexual services.

Aker BP recognise and respect our employees' rights to form and join trade unions, and equally their right to remain non-unionised. The company communicates and consults with employees and their trade unions on relevant matters.

Aker BP shall be a safe workplace, where the goal is to prevent any kind of harm. Everyone who works for the company – our employees, hired personnel and contractors – shall be able to perform their work in an environment where the emphasis is on safety.

#### How does this apply to you?

- Familiarise yourself with Aker BP's human rights policy and its principles
- Respect the personal dignity, privacy and rights of everyone you interact with during work and those affected by our business operations
- Never cause or contribute to the infringement or circumvention of human and labour rights
- Report any suspected abuse of human or labour rights in our operations or those of our Business Partners

### 4.2 Diversity, equality and inclusion

Aker BP is committed to fostering an inclusive work environment ensuring that the unique contributions each employee brings to the company are encouraged. To ensure that everyone can thrive and fully contribute their talents, we must actively welcome, listen to and respect individuals from all backgrounds and the ideas they bring.

Any employment-related decisions must be based on merit and qualifications. Discrimination based on gender, national origin, religion, ethnic background, race, colour, age, sexual orientation, gender identity, marital status, disability or any other characteristic protected by Applicable Rules is not tolerated.

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#### How does this apply to you?

- Familiarise yourself with the diversity, equality and inclusion policy and its principles
- Treat everyone with dignity, fairness and respect
- Make employment-related decisions based on merit

### 4.3 Anti-harassment and intimidation

It is a fundamental principle at Aker BP that everyone is treated with fairness, respect and dignity. We have zero tolerance for any form of abuse, bullying, harassment, intimidation, degrading treatment or sexually offensive behaviour by or towards employees or others affected by our operations. Offensive comments, derogatory remarks, inappropriate jokes, or any other form of disrespectful communication are strictly unacceptable.

#### How does this apply to you?

- Actively contribute to a positive and inclusive working environment – free from all forms of harassment and discrimination
- Never engage in behavior that could be perceived as abusive, threatening, degrading or sexually offensive by colleagues or Business Partners
- Communicate respectfully at all times and respect other people's identity, customs and culture
- Speak up if you witness or experience behaviour that violates these principles

### 4.4 Protecting personal data and privacy

Aker BP respects and safeguards the privacy rights of our employees, consultants and other individuals whose personal data we handle in our operations. We process personal data in accordance with Applicable Rules and internal privacy guidelines.

We process personal data for legitimate and clearly defined purposes. It is retained only as long as necessary to fulfil the specific purpose for which it was collected. All personal data is kept confidential and is accessible solely to authorized individuals with a valid reason.

#### How does this apply to you?

- Familiarise yourself with internal privacy guidelines
- Respect everyone's right to privacy. Always handle personal data with discretion and care
- If your role involves processing personal data, ensure full compliance with Applicable Rules and internal privacy guidelines
- Employees who handle personal data should complete privacy and data protection training in Aker BP Academy
- If you are unsure how to handle personal data, contact the Privacy Coordinator for guidance

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## 5 Business Integrity

### 5.1 Aker BP Representatives and Business Partners

Aker BP expects that everyone who works for, or on behalf of, the company will do so with integrity and in accordance with Applicable Rules, as well as this Code. Aker BP's reputation relies on the collective behaviour of all Aker BP Representatives and our Business Partners.

We seek to work with others who share our commitment to ethics and compliance, and we shall clearly communicate our expectations to all Business Partners. We manage risk through performing integrity due diligence investigations on our Business Partners, and mandatory human rights due diligence in line with the Norwegian Transparency Act and monitor their compliance where necessary.

#### How does this apply to you?

- Familiarise yourself with Aker BP's Business Partner Integrity Procedure
- Ensure that contractual obligations regarding ethics and compliance are implemented where applicable
- Clearly communicate our expectations to our Business Partners and monitor their adherence to these standards
- Take appropriate action if our Business Partners do not meet our expectations, and report any suspected misconduct

### 5.2 Anti-corruption

At Aker BP, we have zero tolerance for all forms of corruption. Aker BP Representatives must comply with Applicable Rules relating to anti-corruption as well as actively strive to make sure our Business Partners share this commitment. We shall operate in an open and transparent manner. Engaging in corruption may not only have serious consequences for Aker BP, but also on the individual and may result in criminal charges, penalties or sanctions.

Aker BP Representatives shall not, either directly or indirectly through a third party, offer, give, accept, receive, request or agree to receive any form of improper advantage of any kind. An improper advantage is typically given to influence someone for an improper purpose, including to obtain or retain business or any undue business advantage. Even a small gift, hospitality or gestures could be considered "improper" depending on the circumstances. However, the intention to influence is not a condition for an advantage to be assessed as "improper". Each situation must be assessed on its own merit.

#### How does this apply to you?

- Familiarise yourself with the Aker BP's Anti-Corruption Procedure
- Make sure that all payments made are proper and legal, that they are approved by relevant Aker BP personnel, and that they are recorded accurately in Aker BP's books and records
- Do not offer or accept any bribes, facilitation payments, kickbacks or other forms of improper payments or advantages

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- Make sure you know who you are doing business with by conducting due diligence on Business Partners in accordance with the Aker BP's Business Partner Integrity Procedure
- If uncertain, consult with your line manager or Compliance officer
- Speak up if you witness or experience behaviour that violates these principles

### 5.3 Gifts and hospitality

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

As an Aker BP Representative, you can only offer, give, accept, or receive gifts that are promotional items of minimal value. Gifts given or received in connection with contractual negotiations, tenders, transactions etc. are always prohibited. Aker BP Representatives must never request or solicit gifts from business relations or third parties seeking to do business with Aker BP.

Aker BP Representatives shall only accept or offer hospitality which has a clear business purpose, and provided that the cost of such hospitality is reasonable. The hospitality must be customary and commonly accepted, not excessive in value and given without any understanding that the recipient is in any way obligated by the acceptance of the hospitality.

All offered and received gifts and hospitality shall always be properly recorded in Aker BP's Gifts and Hospitality Register.

#### How does this apply to you?

- Familiarise yourself with the Gifts and Hospitality Guidelines as detailed in the Anti-Corruption Procedure
- Never accept or offer a gift or hospitality where it could be perceived to influence decision making
- Never request or solicit gifts or hospitality from business relations or third parties seeking to do business with Aker BP
- Consult with your line manager before accepting or offering hospitality in order to ensure that it is open, transparent and in line with the Code and Applicable Rules
- Exercise caution and good judgment in relation to the reasonableness and proportionality of offering or accepting hospitality
- Ensure that all offered or received gifts and hospitality is properly registered in the Gifts and Hospitality Register
- If you are in doubt, always consult with your manager or the Compliance department

### 5.4 Anti-money laundering

Money laundering is the process when a person or party hides illegally acquired funds – money or all other forms of assets – or tries to make such funds look legitimate. Money laundering also includes the use of legitimate funds to support criminal activities, including drug trafficking, terrorism, corruption, human rights violations and tax evasion.

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Aker BP is firmly opposed to all forms of money laundering. In order to avoid being involved in money laundering, all Aker BP Representatives shall ensure that Aker BP's Business Partner Integrity Procedure is followed.

#### How does this apply to you?

- Familiarise yourself with Aker BP's Business Partner Integrity Procedure
- Be attentive to requests to cash payments, unusual banking arrangements
- Report suspicious transactions or incidents of money laundering to the Legal or Compliance departments

## 5.5 Confidentiality

Aker BP is committed to protecting all information in accordance with its confidentiality level. We will not misuse information belonging to ourselves or any of our partners.

All handling of information shall be in accordance with the company specification "Security Classification of Data and Information Specification", which will ensure appropriate protection based on confidentiality, integrity and availability.

#### How does this apply to you?

- Familiarise yourself with the Security Classification of Data and Information Specification
- You have a duty of confidentiality which also applies after the conclusion of the employment or contractual relationship with Aker BP, and for as long as the information is considered sensitive or confidential
- Keep confidential all matters that could provide third parties unauthorized access to information
- Remember that Aker BP information belongs to Aker BP, respect the confidentiality label of the information and do not share it unless explicitly authorised
- Carefully consider how, where and with whom Aker BP-related matters are discussed. Especially in public or informal settings
- Do not share Aker BP information in public forums or on social media this includes also phone calls and speaking in public areas
- Apply correct security classification to the data you manage and handle it accordingly

## 5.6 Conflict of interest

Aker BP Representatives shall act impartially in all business matters. A conflict of interest may occur where your personal interests or activities may impact, or appear to impact, your ability to make objective decisions on behalf of Aker BP. Such interests or activities can include financial interests in other companies or in transactions, personal relationships, including but not limited to immediate family, or any other interests or relationships, including previous employment at Aker BP's business partners, that could improperly affect our judgement and decision-making.

All ownership interests in companies in our current or potential supply chain must be registered in the Conflict of Interest Register in accordance with Aker BP guidelines.

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Where you suspect that a situation could create a conflict of interest, or the appearance of a conflict, you should disclose this to your line manager via the Conflict of Interest Register.

#### How does this apply to you?

- Familiarise yourself with Aker BP Conflict of Interest guidelines
- Do not participate in any Aker BP transaction or project in which you, your partner, close relative or any other person with whom you or the above-mentioned persons have close relations or has a financial or personal interest
- Report any potential or actual conflict of interest to your line manager via the Conflict of Interest Register
- As a manager, ensure that all individuals with a reported potential or actual conflict of interest are isolated from any operation, influence, and/or decision-making process associated with the reported conflict

### 5.7 External engagements on behalf of Aker BP

Aker BP Representatives having external board roles can be beneficial to Aker BP, however transparency and proper handling of potential conflicts of interests are vital. Any board roles held by Aker BP Representatives on behalf of Aker BP must be registered in the Conflict of Interest Register.

If you are holding a board position on behalf of Aker BP, you are not entitled to board remuneration. If you are holding a directorship in a private capacity, you may retain any remuneration paid. Employee representatives to the Aker BP Board of Directors will receive the remuneration determined by the general assembly.

Prior to taking directorship or external board roles on behalf of Aker BP, Aker BP Representatives must obtain approval from a senior vice president level or above.

#### How does this apply to you:

- Ensure that the required approval is obtained prior to accepting a directorship role in another company
- Any directorships or boards positions held on behalf of Aker BP shall be registered in the Conflict of Interest Register

### 5.8 Insider trading

Aker BP is a publicly listed company on the Oslo Stock Exchange and is therefore subject to various laws and regulations governing the trading of publicly listed securities, such as shares and bonds. These rules prevent insider trading and protect market integrity.

If you are in possession of information which is not publicly available or commonly known and which is likely to have a significant effect on the price of the shares (or other financial instruments) of a listed company, you must not buy or sell shares or other securities in the relevant company, or provide others with investment advice. You must further keep such information confidential, also with regards to other Aker BP Representatives unless these need it for their work for Aker BP and have been authorised by the information owner. The above principles also apply if the information has been acquired incidentally. Any breaches of

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insider trading laws and regulations can result in severe consequences for both Aker BP and the individual and may result in criminal charges, penalties or sanctions.

Aker BP's management as well as business unit managers are under an obligation to continuously assess whether insider information exists and must notify Aker BP's VP Investor Relations as soon as possible.

#### **How does this apply to you?**

- Familiarise yourself with the Insider Manual and how it applies to you
- Keep inside information confidential, also with regards to other Aker BP Representatives
- Always contact Aker BP's Legal department or Investor Relations department for advice where there is a risk of insider trading
- Remember that these rules continue to apply even if you are no longer an Aker BP Representative

### **5.9 Fair competition**

Aker BP shall compete in a fair and ethically justifiable manner, and we do not tolerate any violations of Applicable Rules relating to competition. We do 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.

#### **How does this apply to you?**

- Never agree to any form of cooperation on price fixing, illegal market manipulation (such as allocating markets by territory, by products or by customers) or restricting supply of goods or services
- Never share non-public commercially sensitive information with competitors. Be vigilant of situations where such information can be exchanged, and speak up against disclosure of information by others
- If you find yourself in possession or become aware of anyone in possession of non-public competitively or commercially sensitive information, immediately contact the Legal department. Do not discuss or share the information with anyone
- Seek advice from the Legal department if you have any questions or concerns regarding risks of antitrust or competition exposure for Aker BP

### **5.10 Trade laws and sanctions**

Aker BP has a duty to abide by all applicable trade laws and regulations including export and import laws and regulations, as well as Norwegian and international sanctions regimes. These laws are complex and subject to frequent change, particularly in response to geopolitical developments. If you are involved in a transaction or negotiation with entities or persons that are from sanctioned countries or that are otherwise designated for sanctions, you should contact the Compliance or Legal departments for guidance.

#### **How does this apply to you?**

- Familiarise yourself with Aker BP's Business Partner Integrity Procedure

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- Obtain and comply with necessary governmental licences where cross-border export or import activity involves restricted items, technology or software
- If you believe your dealings may be subject to trade laws or sanctions, contact the Compliance or Legal department

### 5.11 Sponsorships and charitable donations

Aker BP will contribute to society in a responsible and strategic manner. Our sponsorship activities shall support and reflect the company's objectives and values and must have tangible benefits for Aker BP. All sponsoring activities will be carefully selected, implemented and evaluated annually.

Charitable donations are payments made, in cash or in kind, to organizations for the benefit of a community or other humanitarian causes. Payments are made without demands or expectations of anything in return. However, no charitable donations or sponsorship shall be made to political or religious organizations.

The Aker BP Sponsorship Strategy further describes the rules and framework for sponsorship and charitable donations in Aker BP.

#### How does this apply to you?

- Familiarise yourself with the Aker BP Sponsorship policy
- There shall be no personal interests involved in the decision to donate or sponsor an organisation on behalf of Aker BP

## 6 Safeguarding Aker BP's assets and interests

### 6.1 Asset and Cyber security

Aker BP Representatives are trusted with Aker BP's assets so that you can effectively do your work. It is expected that those given this trust act responsibly and ensures that Aker BP's assets are not damaged, misused or lost. Aker BP's assets include licenses, facilities, property, equipment, computers, IT systems, information and funds. Aker BP's assets shall only be used for legitimate business purposes and by authorized personnel.

Breaches in our cyber security systems can damage our business, have significant consequences for our ability to retain a competitive advantage in the market but also constitute a breach of law. All Aker BP representatives are responsible for identifying and reporting threats to our cyber security, safeguarding Aker BP's systems and data from unauthorised access or disclosure. These principles also apply to confidential information received from third parties.

As the use of Artificial Intelligence (AI) is becoming increasingly integrated in Aker BP's operations, it is important that we use AI responsibly and in compliance with applicable laws

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and internal policies. AI can enhance decision making, improve efficiency but it also introduced new risks including data misuse and security vulnerabilities.

#### How does this apply to you?

- Ensure no company assets are damaged, lost or misused
- Keep your usernames and passwords secure – and never share them with others
- Never use your personal email to send or receive Aker BP internal information
- Be vigilant against cyber-attacks and scams, and report any incidents immediately
- Follow policy for using AI tools and only use approved AI tools with company data
- Monitor and report any unintended consequences or anomalies in AI-tools you use
- All personnel at Aker BP premises shall wear a visible access card and make sure that no one is tailgating when entering Aker BP premises
- You are responsible for your visitors at Aker BP's premises throughout their stay. Make sure they do not access restricted areas without authorisation
- Report any suspicious activities to your line manager or the security department, or contact security@akerbp.com for any questions or clarifications

## 6.2 Maintain accurate and complete information records

Aker BP is committed to providing a correct and understandable picture of our business. We communicate relevant complete business information on a timely basis to employees, stakeholders, Business Partners, government officials, the financial markets and the public. Both financial and non-financial information shall be recorded completely, accurately and objectively, and in accordance with Applicable Rules relating to accounting and relevant accounting standards.

#### How does this apply to you?

- Any accounting information you provide must be accurate, complete and reliable, and in accordance with Applicable Rules relating to accounting and relevant accounting standards
- Never enter false or misleading information in our books and records, or otherwise provide such information to Aker BP or any third parties
- If you become aware of any fraudulent activities, improper financial business records, you must report this to your line manager or on the integrity channel

## 6.3 External communications

Aker BP's public communications shall be clear, open and accurate, and should reinforce Aker BP's vision, values, strategy, goals and reputation. Only authorised persons may speak on behalf of Aker BP to the media, on social media, or to the financial markets. Any information to shareholders and the market as a whole must be dealt with through the Investor Relations department in accordance with the Communication Procedure

The Communication department manages Aker BP's official social media accounts that are used to publish news, recruitment opportunities and relevant business updates. Only designated personnel within the Communication department are permitted to post on these

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social media platforms. Any private use of social media must not breach confidentiality obligations and should not compromise Aker BP's reputation, values or business interests.

Aker BP participates in public debates where this is deemed to be in Aker BP's interest. Aker BP Representatives have the right to personally participate in the political process. This must, however, be done in a way that makes it clear that your personal views and actions are not those of Aker BP. You should talk to your line manager if any political activity might have an impact on Aker BP or on your work.

#### How does this apply to you?

- Familiarise yourself with Communication Procedure
- Do not speak on Aker BP's behalf unless authorised to do so
- Exercise good judgement when you use social media
- Respect confidentiality obligations when you use social media – do not share Aker BP information
- Show respect toward Aker BP, your colleagues and Business Partners in all external communications

## 6.4 Protecting environment

Aker BP has formally integrated and embedded climate into Aker BP's strategy and decision making. Our goal is to produce oil and gas more effectively to reduce per-barrel emissions, create value and adapt our know-how to new business models.

Aker BP's policies on climate & energy, external environment, biodiversity and circular economy further describe the principles and commitments that are expected from every Aker BP representative.

#### How does this apply to you?

- Familiarise yourself with applicable policies
- Prevent and minimise impact on environment and climate
- Create awareness and maintain insight on sustainability in your supply chain

## 7 Reporting of concerns

### 7.1 Report your concerns

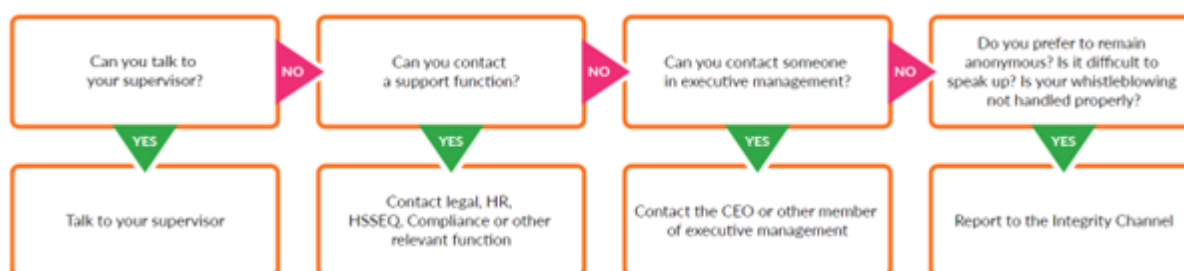
Any suspicion of unethical conduct, which is in breach of this Code, Aker BP's policies, processes, procedures and/or any Applicable Rules, should be reported to your line manager without delay. If you do not feel comfortable reporting to your line manager, consider one of the other options illustrated in the diagram below. You may also report your concern via the Integrity Channel, which you can find on the Aker BP's webpage. You may choose to be anonymous.

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The receiver of a reported concern is obliged to ensure that such cases are handled in an adequate manner and in accordance with the Aker BP Procedure for Handling Whistleblowing Reports. Aker BP will not impose any form of retaliation against anyone for making a good-faith report. All reports of suspected violations will be taken seriously and will be followed up, in accordance with internal procedures.

Examples of issues one can report include cases involving financial crime, environmental crime, harassment, discrimination, an unhealthy working environment, abuse of authority, circumstances that can lead to a risk to life and health, and breach of personal data security.

If you have questions regarding reporting concerns or the Integrity Channel, contact the Compliance department.



## 7.2 Disciplinary actions and criminal sanctions

Aker BP will not accept any violation of Applicable Rules or of this Code, and we take appropriate actions to mitigate any such violation. Properly founded allegations or evidence of violations of Applicable Rules or this Code will result in investigations. If the allegations are substantiated, disciplinary actions will follow.

Any violations of Applicable Rules may expose both Aker BP and individuals to civil and criminal penalties, such as fines and/or imprisonment. Aker BP will support criminal investigations and prosecutions when relevant.