




Procedure

Anti-Corruption

Document no.: 02-000704
Rev. no.: 4.0
Date: 2025-12-19

	Anti-Corruption		
	Doc. no.: 02-000704	Rev. no.: 4.0	Page: 2 of 15

About this document


Purpose	The Anti-Corruption Procedure is implemented to prevent corruption in all of Aker BP's business activities and is meant to be a resource for all Aker BP Representatives to act in accordance with our values. The purpose of the Anti-Corruption Procedure is to secure that all business operations of Aker BP are conducted in an ethical manner and in compliance with Applicable Rules
Valid for	This policy applies to all organisational units and geographical locations.
Revision Period	2 Years
Non-conformity/ Deviations	If unable to comply with requirements stated in this document, process for deviations and non-conformity applies.

Role	Name
Owner	Board of Directors
Verifier	Karl Johnny Hersvik
Coordinator	Vashchenkova, Elena

Rev.no.	Description of Change
4.0	<ul style="list-style-type: none"> Document name changed from Policy to Procedure throughout the document Rephrasing of lengthy and repetitive sentences for clarity Reinforcement of zero-tolerance for all forms of corruption Removal of paragraph 6.1.Anti-money laundering Minor language changes
3.0	<ul style="list-style-type: none"> Clarifications related to Gifts & Hospitality, Sponsorships & donations, Public officials, Aker BP representatives and agents chapters, minor language changes,
2.01	<ul style="list-style-type: none"> Technical revision – document kind changed from Policy to Procedure
2.0	<ul style="list-style-type: none"> Split reorganized and moved text. Minor language edits throughout the policy Added employee and manager responsibilities in chapter 1.4 Updated text and added new rules and procedural requirements in chapter 3 (Gifts and hospitality), 4 (Charitable donations and sponsorships) and 5 (Relationship with third parties) Added new chapter 5.3 (Public Officials) Removed chapter 4.2.1 as the content is covered in chapter 3 (Gifts and hospitality) Format changes throughout policy (removed colour boxes)
1.0	First issue for Aker BP

Table of Contents

The Anti-Corruption Procedure	4
1.1 Purpose	4
1.2 Scope	4
1.3 Applicable Rules	4
1.4 Content and responsibility	5
1.4.1 Aker BP Representatives' Responsibility	5
1.4.2 Additional Responsibility for Vice Presidents, Senior Vice Presidents and Line Managers	5
2 Corruption	6
2.1 Definition	6
2.2 Advantages – Forms of Corruption	6
2.3 Improper advantages	7
2.4 Facilitation payments	7
3 Gifts and hospitality	8
3.1 Gifts	8
3.2 Hospitality	9
4 Charitable donations and sponsorships	10
4.1 Religious and political contributions	11
5 Relationships with third parties	12
5.1 Aker BP Representatives, including agents	12
5.2 Business Partners	12
5.3 Public Officials	14
6 Operating principles	14
6.1 Where to seek guidance	14
6.2 Reporting of concerns	14
6.3 Possible violation – realised in hindsight	15
6.4 Disciplinary actions and criminal sanctions	15

	Anti-Corruption		
	Doc. no.: 02-000704	Rev. no.: 4.0	Page: 4 of 15

The Anti-Corruption Procedure

1.1 Purpose

Aker BP is firmly opposed to all forms of corruption. We are committed to conducting our business with integrity and in accordance with the high ethical standards reflected in our Code of Conduct and this Anti-Corruption procedure (the “**Anti-Corruption Procedure**”), applicable laws, rules and regulations, as well as internationally accepted guidelines, conventions or similar relating to corruption, money laundering, fraud, slavery, environment, human rights, or similar activities (“**Applicable Rules**”).

The purpose of the Anti-Corruption Procedure is to ensure that all Aker BP business operations are conducted in an ethical manner and in compliance with Applicable Rules.

1.2 Scope

This Policy applies to all individuals who are acting on behalf of Aker BP, including directors, officers, employees, hired-in personnel, consultants, agents, and other intermediaries (the “**Aker BP Representatives**”).


We refer to the entities, organizations, and individuals with whom we do business as “Business Partners”. This includes partners in operated licenses, joint venture partners, entities and individuals who act on behalf of Aker BP, suppliers, subcontractors and all other third parties with whom we contract or have another type of business relationship. Our commitment to conducting our business with integrity applies similarly to all our business relationships with all our Business Partners. This involves that we always must follow the process for integrity due diligence and monitoring of potential and existing Business Partners set out in this policy and in Aker BP’s Business Partner Integrity Procedure (D2 number 72-001079). We expect all Business Partners to adhere to anti-corruption rules or policies with similar content as this Anti-Corruption Procedure, as well as Applicable Rules.

1.3 Applicable Rules

Aker BP is subject to the corruption provisions in the Norwegian Criminal Act (Nw. “straffeloven”), one of the strictest anti-corruption legislations in the world. We are also subject to relevant anti-corruption legislation in other countries where we do business, which may include the UK Bribery Act and the US Foreign Corrupt Practices Act. Although this Procedure is intended to comply with all relevant laws, rules and regulations, adherence to this Procedure does not automatically ensure compliance with all Applicable Rules. It is the responsibility of all Aker BP Representatives to be sufficiently acquainted with the Applicable Rules. All Aker BP Representatives who conduct activities in jurisdictions where other laws, rules and regulations are relevant should thus seek advice from Aker BP’s Compliance or Legal departments as needed.

Key aspects of the Norwegian Criminal Act include:

- Prohibition of all forms of corruption, including bribery, facilitation payments and trading in influence
- Prohibition of corruption performed indirectly through agents, consultants, or other intermediaries
- Application of the corruption provisions in the Norwegian Criminal Act to Norwegian citizens and companies, as well as foreign companies and individuals residing in Norway, for corruption committed in Norway and abroad, regardless of whether the conduct is a criminal offence in the foreign jurisdiction.
- Personal and corporate liability for both direct actions and complicity involving Business partners

	Anti-Corruption		
	Doc. no.: 02-000704	Rev. no.: 4.0	Page: 5 of 15

It is important to recognise that Applicable Rules and the enforcement of these are evolving with time.

1.4 Content and responsibility

The Anti-Corruption Procedure summarises the Applicable Rules, policies, and procedures to which all of the Aker BP Representatives must adhere and identifies resources that are available within Aker BP to assist you in complying with this Procedure.

- Approver: Aker BP's Board of directors
- Procedure Owner: Aker BP's Chief Executive Officer (CEO)
- Functional Owner: Aker BP's Chief Compliance Officer (CCO) – responsible for maintaining, updating and communicating this Procedure, as well as implementing changes in Applicable Rules.
- Implementation and Monitoring: The CEO is ultimately responsible for the implementation of this Procedure and monitoring its operational effectiveness.

All deviations from this Procedure must be approved by Aker BP's CEO.

1.4.1 Aker BP Representatives' Responsibility

All Aker BP Representatives are expected to uphold Aker BP's commitment to conducting our business with integrity, by adhering to this Procedure and all Applicable Rules. A failure to follow this Anti-Corruption Procedure or Applicable Rules 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.

As an Aker BP representative you are expected to:


- Familiarise yourself with this Procedure, the Code of Conduct and other relevant guidelines such as the gifts and hospitality and conflict of interest guidelines.
- Never engage in or authorize any form of corrupt activity
- Make ethical decisions and never compromise integrity in business dealings
- Report anything that is likely to constitute a breach of this Procedure or the Code of Conduct to your line manager, the Compliance or Legal departments, a member of the executive management or on the Integrity channel
- Participate in all required business ethics and compliance training
- Contact Aker BP's Compliance or Legal departments if you have any questions or concerns

1.4.2 Additional Responsibility for Vice Presidents, Senior Vice Presidents and Line Managers

Aker BP managers are expected to actively lead, promote, and implement this Procedure and act as role models. Each operational unit and business area have independent responsibility for adherence to, and the implementation of, Aker BP's anti-corruption compliance programme, accompanying policies and procedures, and compliance with all Applicable Rules at any given time.

As a Vice President, Senior Vice President or Line Manager, you are expected to:

- Familiarize yourself with this Procedure, the Code of Conduct, and Aker BP's compliance program and other relevant guidelines such as the gifts and hospitality and conflict of interest guidelines.
- Promote and implement requirements, measures and controls as defined in Aker BP's anti-corruption compliance programme in your line of business

	Anti-Corruption		
	Doc. no.: 02-000704	Rev. no.: 4.0	Page: 6 of 15

- Proactively identify and manage integrity risks in your line of business
- Lead by example in ethical behaviour and decision making
- Foster an open environment where Aker BP Representatives feel safe raising concerns and / or potential breaches and discussing ethical dilemmas
- Ensure that your team members are aware of and follow Aker BP's values, policies, and procedures
- Ensure that your team members participate in mandatory business ethics and compliance training

2 Corruption

2.1 Definition

Corruption is the abuse of entrusted power for private or corporate gain. It is a threat to business and society, and undermines legal business activities, distorts competition, damages reputations, and exposes companies and individuals to civil and criminal penalties. **No Aker BP Representative shall engage in, authorize or otherwise be complicit in any form of corrupt activity.**

In this Anti-Corruption Procedure, corruption is defined in the same way as in the Norwegian Criminal Act (Nw. "*straffeloven*") Section 387: When a person (legal or physical) promises, offers or gives ("active corruption"), or requests, receives or accepts ("passive corruption") an improper advantage in connection with the execution of a position, office or an assignment.

It is important to remember that corruption occurs everywhere, including in Norway. All Aker BP Representatives share the responsibility to proactively prevent, detect, and report corrupt actions.

Corrupt activities include, but are not limited to:

- Bribery - offering, giving, accepting, or receiving anything of value as an inducement for the other party to do something that is dishonest, illegal or a breach of trust
- Facilitation payments – small, unofficial payments made to expedite routine government actions
- Trading in influence – using one's influence to improperly obtain an advantage from a third party
- Improper advantages to the persons involved in the corruption scheme, but also improper advantages to the benefit of the involved persons' partners/spouses, relatives, and friends


Prohibited corruption includes corrupt acts performed both directly and indirectly – for example, through third parties, such as agents and consultants. It may involve:

- Public officials
- Private individuals
- Any person acting on behalf of customers or subcontractors/suppliers
- Other third parties

Corrupt activities may encompass improper advantages to the persons involved in the corruption scheme, but also improper advantages to the benefit of the involved persons' partners/spouses, relatives, and friends.

2.2 Advantages – Forms of Corruption

Advantages may include anything of material or immaterial value, provided directly or indirectly – for example through intermediaries, family members or friends, to or from any person, including national, international, and foreign public officials, private sector employees etc. An advantage can also be disguised, inter alia in an overpayment for a rendered service etc.

	Anti-Corruption		
	Doc. no.: 02-000704	Rev. no.: 4.0	Page: 7 of 15

Anything of value covers just about any form of benefit, including, but not limited to:

- Cash or cash equivalents, loans, gifts, or prizes
- Employment offers or promises of future employment (to the individual or close relatives)
- Favourable terms on a product or service, or product discounts
- Entertainment/hospitality (payment of travel, hotel, or restaurant bills, living expenses, or costs of trips or resort stays)
- Use of vehicles, vacation homes, or club membership
- Discounted or free tickets to concerts, sports events, or other entertainment
- Services, personal favours, or home improvements
- Political or charitable donations
- Securities or shares, including the opportunity to buy shares
- Transfers of value through commercial agreements or clauses, such as concession, production sharing or gas sales agreements or contracts or rebates
- Social investments, sponsorships, donations, or scholarships
- Payment of medical treatment (for the individual or close relatives)
- Payments to the close relatives of a public official for consultancy or advisory services
- Sexual favours
- Promises of further business relations

2.3 Improper advantages

An improper advantage is typically given to influence someone for an improper purpose, including to obtain or retain business or any business advantage.

Even a small gift 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”.

Is the advantage “improper”?


- What is the context and the overall situation?
- Is the advantage offered during or prior to contractual negotiations, competitive tenders etc?
- What is the size or value of the advantage?
- What is your relationship to the other party?
- What is the frequency?
- Is the advantage in conformity with internal guidelines?
- Is the advantage given in a transparent manner? Have you disclosed it to your line manager?
Can you talk about it openly with your colleagues?
- If you are in doubt, consult your line manager, the Compliance or Legal departments

2.4 Facilitation payments

A facilitation payment is a small payment made to a public official to secure or expedite the performance of a routine government action that the official is obliged to perform without receiving such payment, and to which the payer has legal or other entitlement. The payment is usually a cash payment but may also involve other benefits or favours.

Making a prohibited facilitation payment can expose both Aker BP and the individual making or authorising the payment at risk of criminal prosecution. Aker BP strictly prohibits facilitation payments regardless of amount, except for in the circumstances explained below. Prohibited facilitation payments should not be confused with payments that Aker BP are required to make under local laws or written regulations in order to obtain various types of government services.

Facilitation payments typically involve paying for:

	Anti-Corruption		
	Doc. no.: 02-000704	Rev. no.: 4.0	Page: 8 of 15

- Processing of papers
- Issuing of official approvals, permits and licenses, such as building permits, work permits and visas
- Obtaining customs clearance
- Securing public utility services, such as mail services and power and water supply
- Returning a passport at a border control, or otherwise securing permissions to leave or enter a country
- Unloading shipments within reasonable time (sometimes avoiding costly delays)

How does this apply to you?

- Inform Business Partners that Aker BP does not permit facilitation payments
- Identify and report the risk of facilitation payments. Inquiries from potential or existing Business Partners regarding facilitation payments are red flags, and should be reported
- Never authorise or make a facilitation payment, unless you genuinely believe that your or another's life, health or safety could be in danger, and no other alternative exists. In such cases you may pay the smallest amount possible to remove the risk, but first, obtain prior approval from your line manager or the Chief Compliance Officer. If that is impossible – report the payment to these individuals immediately afterward. If possible, request a receipt for the payment, and ensure that the payment is recorded in Aker BP's systems.

3 Gifts and hospitality

3.1 Gifts

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 company, or cause others to perceive such influence or violation.


A gift is defined broadly and may include anything of value, and the value does not need to be high. Irrespective of the value, gifts may have the appearance of an improper advantage, and thus corruption.

As an Aker BP Representative, you can only offer, give, accept, or receive gifts that are promotional items of minimal value. This means that Aker BP Representatives shall refrain from inter alia exchanging customary gifts at festivities (such as Christmas presents) and accepting gifts as a token of appreciation (such as gifts received after the completion of a transaction etc.). However, Aker BP Representatives may accept modest gifts given as a token of appreciation in connection with the individual's personal efforts at events or similar, such as flowers received after the individual has spoken at a conference. **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 has implemented this no gifts policy to minimize any ambiguity, and to implement rules which are easily practicable for all Aker BP Representatives. Exceptions may be permitted in special circumstances, subject to written approval from the CEO.

A gift may be anything of value (the list is not exhaustive), such as:

- Fruit baskets or chocolate boxes
- Wine
- Discounts, vouchers, gift cards
- Various memberships, such as membership to a golf club or VIP status
- Tickets to entertainment or sporting events
- Cash or cash equivalent

	Anti-Corruption		
	Doc. no.: 02-000704	Rev. no.: 4.0	Page: 9 of 15

Promotional items of minimal value may include:

- Branded merchandise such as bags, caps, t-shirts, umbrellas
- Stationery items such as calendars, notebooks, pens
- USB sticks, power banks
- Water bottles, mugs, or other branded items of minimal value
- Normally, such items are branded with a company logo which cannot be easily removed

If you receive a gift which is not in compliance with the above, you should decline or return it. If this is not possible due to practical, cultural or courtesy reasons, i.e. because such decline or return would be highly insulting, you must notify the Compliance department, who will consider whether the gift should be turned over to Aker BP, as soon as possible.

All gifts, except promotional items of minimal value, must be registered in the Aker BP Gifts and Hospitality Register, which can be found on Aker BP's internal website. This includes gifts that have been offered to you but which you have declined or returned, and gifts which you have not been able to decline or return and which have been turned over to Aker BP. It also includes gifts given as a token of appreciation in connection with the individual's personal efforts at events etc. Timely reporting will help us evaluate our existing and potential Business Partners, detect potential corruption risks, and better be able to assess with whom we should or should not do business.

How does this apply to you?

- Inform your business partners and other third parties of Aker BP's no gifts policy
- Never offer, give, accept, or receive gifts, except for promotional items of minimal value
- Never accept or offer a gift that would influence your or any other person's judgment, or cause others to perceive such influence
- Never offer, give, accept, or receive cash or cash equivalents
- Never offer, give, accept, or receive any gifts in connection with contractual negotiations, tenders, transactions etc.
- Contact the Compliance or Legal departments if you receive a gift which is not in compliance with this Procedure

3.2 Hospitality


Hospitality may take various forms, such as seminars, entertainment, sporting events, concerts, meals, travels, and other forms of business representation. For the avoidance of doubt, customary meals served at the office premises of our Business Partners or other third parties during business meetings, are not to be considered as hospitality. Hosting and attending hospitality can be a legitimate part of our business and can foster good business relationships. However, hospitality may also be considered an improper advantage, and could constitute corruption if not handled appropriately.

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.

Hospitality linked to seminars or events which have academic or business relevant programs, and where the costs for inter alia food, beverage and entertainment are within reasonable limits, are normally allowed.

Exercising good judgement:

You must exercise caution and good judgement when assessing the reasonableness and proportionality of offering or accepting hospitality. Be particularly careful in the following situations:

	Anti-Corruption		
	Doc. no.: 02-000704	Rev. no.: 4.0	Page: 10 of 15

- Contractual negotiations
- Tenders or bidding processes
- Ongoing or potential transactions

In such cases, make sure such hospitality is ethically justifiable and cannot be perceived to possibly influence business decisions.

How do I assess whether the hospitality has a clear business purpose and the costs are reasonable?

- What is the purpose of the hospitality?
- What is the form and content of the hospitality? Is there a clear academic or business relevant program?
- Under what circumstances is the hospitality offered?
- What is the value and nature of the hospitality?
- Is the hospitality transparent?
- What is the frequency of the hospitality? As a rule of thumb, no Aker BP Representative shall accept or offer hospitality from the same party more than two or three times per year

Be particularly aware in the following situations:


- Events which includes partners/spouses and/or public officials
- The program does not have a clear business or academic agenda
- The hospitality is hosted in connection with contractual negotiations, tenders, transactions etc.
- The hospitality is subject to personal taxation
- The hospitality is offered for something in return

How does this apply to you?

- Before accepting or offering hospitality, make sure it has a clear business purpose and that costs are reasonable
- Never offer or accept hospitality in connection with contractual negotiations, tenders, transactions etc.
- Never accept that costs for, accommodation, or other related expenses (such as airplane or train tickets, rental car expenses, laundry bills and expenses for meals other than joint meals) are paid by a Business Partner or any other third party. Similarly, Aker BP must not cover any such expenses for business relations or third parties
- Obtain written approval from your line manager or the Compliance department unless the hospitality is clearly acceptable
- Ensure that all hospitality is open, transparent, and given without any understanding that the recipient is in any way obligated by the acceptance of the hospitality
- Never solicit or request hospitality from Business Partners or third parties seeking to do business with Aker BP
- Ensure that all hospitality-whether accepted, declined, or returned- is registered in the Gifts and Hospitality Register.
- If you have questions or concerns, contact the Compliance or Legal departments

4 Charitable donations and sponsorships

Charitable donations are payments made, in cash or in kind, for the benefit of a community or other humanitarian causes. Typical areas include education, health, sports, culture, support to non-

	Anti-Corruption		
	Doc. no.: 02-000704	Rev. no.: 4.0	Page: 11 of 15

governmental organisations and other social welfare causes. Payments are made without demands or expectations of anything in return, but may result in goodwill for Aker BP.

A **sponsorship** is a transaction where a sponsor makes a payment, in cash or in kind, to associate its name with an activity or an organization, and receives specific rights and benefits in return, such as the promotion of the sponsor's logo, products and services. There must be documented tangible benefits for Aker BP associated with any sponsorship, such as commercial gain, professional development, enhanced profiling and branding towards different stakeholders, including future employees etc. The criteria for Aker BP's sponsorships are that the sponsorship shall be strategic and reflect Aker BP's values and brand image and is done in accordance with the Aker BP's sponsorship Policy.

Requirements for sponsorships and charitable donations:

- All sponsorships and charitable donations shall be governed by a written and approved contract, reviewed by supply chain management, clearly stating Aker BP's contribution, the recipient's contribution, project's goal, beneficiaries, milestones, timelines, and cost.
- Tax implications shall be evaluated in due time prior to entering into an agreement.
- Aker BP shall perform integrity due diligence on the receiving party to ensure it does not represent a risk related to reputation, human rights, corruption, conflict of interest, environment or similar.
- All documentation related to donations or sponsorships must be made available and kept after implementation.

How does this apply to you?

- All charitable donations and sponsoring shall be approved by the VP Communication prior to being implemented
- All charitable donations and sponsoring shall be made in accordance with Aker BP's Code of Conduct, this Anti-Corruption Procedure, the Sponsorship Policy, and all Applicable Rules
- Charitable donations and sponsoring shall never be made if the purpose is to improperly influence anyone. Neither shall such payments be made if the recipient has close ties to public officials who have authority to make decisions in matters of importance to Aker BP or existing or potential business relations.
- There shall be no personal interests involved in the decision to sponsor an organisation. In situations where a conflict of interest exists, the conflicted individual shall withdraw from any associated decision-making process.


4.1 Religious and political contributions

Political contributions are any contributions, made in cash or in kind, to support a political cause or party. Contributions in kind may include advertisement for or promotion of a political party, buying tickets for political fund-raising events and contributions to research institutions with close connections to a political party.

Neither Aker BP nor any of the Aker BP Representatives shall make financial contributions to religious organisations, political parties or in support of political causes on behalf of Aker BP. This does not preclude Aker BP from supporting political views in the interest of the company.

Aker BP Representatives may choose to participate in political or religious activities in their own personal capacity, as long as they do not use any resources that are the property of Aker BP for these activities.

How does this apply to you?

	Anti-Corruption		
	Doc. no.: 02-000704	Rev. no.: 4.0	Page: 12 of 15

- Neither Aker BP nor any Aker BP representative shall make financial contributions to religious organizations, political parties or in support of political causes on behalf of Aker BP. This does not preclude Aker BP from supporting political views in the interest of the company
- Never use resources that are the property of Aker BP in connection with your personal participation of political or religious activities

5 Relationships with third parties

5.1 Aker BP Representatives, including agents

This Anti-Corruption Procedure applies to all individuals and entities who falls under the Aker BP Representative definition. This also includes lobbyists, business agents and sales representatives who act as links between Aker BP and third parties.

In Aker BP we try to avoid the use of typical agents and intermediaries entirely. However, if the use of agents or other intermediaries is deemed necessary, the following requirements must be followed:

- A comprehensive integrity due diligence assessment must be performed, in accordance with Aker BP's Business Partner Integrity Procedure (D2 number 72-001079).
- The CEO shall approve all hiring of agents and intermediaries prior to any commitments being given and any work being initiated.
- All agreements regarding the relationship between the agent/intermediary and Aker BP shall be in writing and clearly describe the relationship between the parties, the services to be provided, the compensation structure.
- The agreed compensation for an agent or other intermediary must be proportional to the service rendered, and any payments made shall be in accordance with the agreed compensation and subject to satisfactory documentation of the rendered services. The work of the agent or intermediary shall be closely monitored. The agreement regarding the engagement shall oblige the agent/intermediary to act in accordance with Aker BP's Code of Conduct, this Anti-Corruption Procedure and Applicable Rules.


How does this apply to you?

- Never engage agents or intermediaries without first obtaining the approval from the CEO
- All agreements with agents/intermediaries shall be in writing, sufficiently describe the relationship between the parties and oblige the agent/intermediary to act in accordance with Aker BP's Code of Conduct, this Anti-Corruption Procedure and Applicable Rules
- Ensure that the agreed compensation is proportionate to the services rendered and any payments shall be in accordance with the agreed compensation and subject to satisfactory documentation
- All agreements should oblige agents/intermediaries to go through mandatory business ethics and compliance training
- No illegal payments shall be channelled through agents or intermediaries

5.2 Business Partners

Aker BP's Business Partners includes partners in operated licenses, joint venture partners, 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. Aker BP may be held accountable for corrupt activities executed by all of our Business Partners. Therefore, we expect all Business Partners to adhere to ethical standards consistent with Aker BP's Code of Conduct and the Anti-corruption Procedure.

Due diligence requirements:

	Anti-Corruption		
	Doc. no.: 02-000704	Rev. no.: 4.0	Page: 13 of 15


Prior to entering into new business relationships or before concluding a merger or acquisition process, appropriate and risk-based integrity due diligence investigations shall be conducted. This includes assessing the integrity and compliance risk associated with the proposed business partner. The different levels of integrity due diligence are described in the Business Partner Integrity Procedure (D2 number 72-001079).

All establishment of joint ventures requires the prior approval of the CEO, and no work shall commence, and no commitment may be given until approval has been given by the CEO and the contract has been signed.

All agreements with Business Partners shall to the extent possible include Aker BP's template clause for compliance with Aker BP's Code of Conduct and this Anti-Corruption Procedure, or similar commitments to adhere to ethical standards consistent with those of Aker BP. If existing contracts do not include such provisions, reasonable steps shall be taken to amend the relevant contracts to include them in connection with contract amendment or renewal.

How does this apply to you?

- Involve the Compliance department as early as possible if you consider entering into joint ventures or similar business arrangements, or before concluding a merger or acquisition process
- Ensure that appropriate integrity due diligence of potential Business Partners or business relationships is completed prior to entering into business relationships in accordance with Business Partner Integrity Procedure (D2 number 72-001079)
- Business relationships shall be continuously monitored and reassessed
- To the extent possible, all business relations shall adhere to Aker BP's ethical standards by including Aker BP's template clause for compliance with Aker BP's Code of Conduct and this Anti-Corruption Procedure
- If you have any questions to the above, contact the Compliance or Legal departments

	Anti-Corruption		
	Doc. no.: 02-000704	Rev. no.: 4.0	Page: 14 of 15

5.3 Public Officials

In our business operations, we may interact with public officials. Dealings with public officials require heightened due diligence and integrity in the way we conduct ourselves. Hospitality or any financial or other advantage shall not be offered, promised, given to, or received from public officials unless this is subject to written pre-approval from Aker BP's Chief Compliance Officer or General Counsel.

Who are considered public officials?

- An elected or appointed official, officer, or employee of national, provincial, regional, or local government agency or department
- An employee of a government-owned or controlled entity when exercising public authority
- An employee or member of a political party
- An employee of public international organizations or non-governmental organizations (NGOs)
- Any person acting in an official capacity for or on behalf of a public official

How does this apply to you?

- Never, in order to obtain or retain business or other improper advantage in the conduct of business, offer, promise, or give any improper advantage to a public official to make the official 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, do so in a transparent and straightforward manner, and always exercise the utmost integrity
- Consult the Chief Compliance Officer or Legal Counsel if you are in doubt

6 Operating principles

6.1 Where to seek guidance

It is important that all Aker BP Representative seek guidance if they are uncertain about compliance with this Anti-Corruption Procedure, the Code of Conduct or other Aker BP policies, processes, and procedures.

If this Procedure does not directly address your concern, you are encouraged to seek guidance from:

- line managers
- the Compliance or Legal departments
- other members of the executive management team.


When in doubt, Aker BP Representatives are encouraged to seek guidance and raise questions to prevent misunderstandings and ensure adherence to Aker BP's integrity standards.

6.2 Reporting of concerns

Aker BP Representatives are required to report immediately any suspected violation of Aker BP's Code of Conduct, this Procedure, Aker BP Speaking up Policy and Applicable Rules. Such reporting should be done to your line manager, other management, or a relevant function such as Compliance, Legal, P&O, a representative from the executive management.

If you are unable to speak to your line manager, a support function, or the executive management, you may report concerns of non-compliance directly through Aker BP's Integrity Channel. The Integrity Channel is available at www.akerbp.com, and you may choose to be anonymous.

The receiver of a reported concern is obliged to ensure that such cases are handled in accordance with the Procedure for handling Whistleblowing Reports (D2 number 73-000865). Aker BP strictly

	Anti-Corruption		
	Doc. no.: 02-000704	Rev. no.: 4.0	Page: 15 of 15

prohibits any form of retaliation against anyone who reports in good-faith. All reports of suspected violations will be taken seriously and will be followed up, as appropriate.

6.3 Possible violation – realised in hindsight

In case an Aker BP Representative realises in hindsight that a situation that she/he has been involved in may have been a breach of Applicable Rules, the Code of Conduct, this Anti-Corruption Procedure or international recognised standards for ethical behaviour, the Aker BP Representative shall report the matter. You may report to:

- Your line manager, who shall further escalate the matter to the Chief Compliance Officer
- or directly to the Chief Compliance Officer

6.4 Disciplinary actions and criminal sanctions

Aker BP will not accept any violation of Applicable Rules or of this Anti-Corruption Procedure, and we take appropriate actions to mitigate such violation. Properly founded allegations or evidence of violations of this Anti-Corruption Procedure will result in investigations which will result in disciplinary actions if allegations are proved. Disciplinary actions will range from verbal warnings (from line managers or P&O) to dismissal. In cases involving criminal conduct, Aker BP will support criminal investigations and prosecutions when relevant.

Any violations of Applicable Rules may expose both companies and individuals to civil and criminal penalties, such as fines and/or imprisonment. Managers and business owners may in addition be deprived of the right to exercise the profession or pursue business activities.