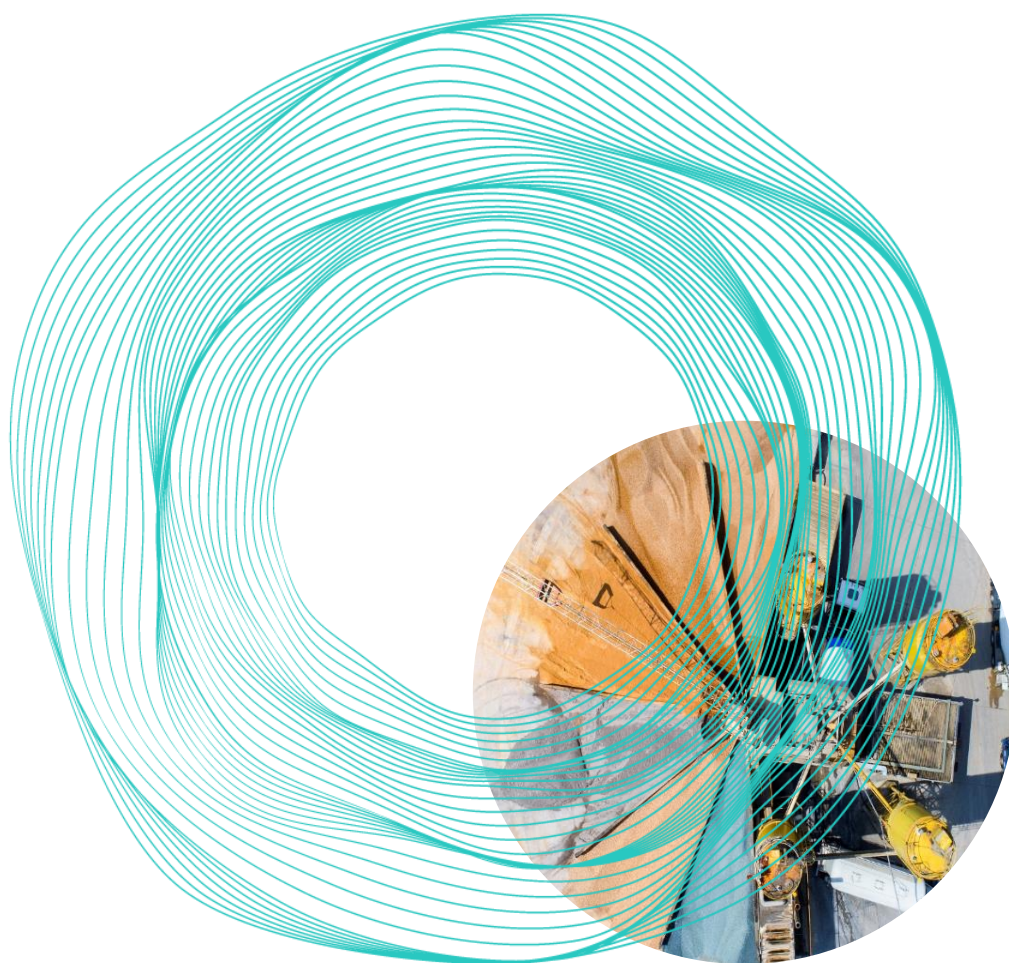


Transparency Act 2024

Report



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1. Introduction

The objective of the Transparency Act is to promote the respect that companies should have for fundamental human rights and decent working conditions, in connection with the production of goods and the provision of services. This legislation should also ensure that the public has access to information about how companies should address adverse impacts on fundamental human rights and decent working conditions.

This act requires that Worley Rosenberg must therefore conduct due diligence on its suppliers to identify and assess the impacts on fundamental human rights and decent working conditions within the company and our supply chain and then publish an account of the due diligence carried out.

1.1 Reporting the Transparency Act

Pursuant to Section 5 in the Transparency Act, the company will hereunder account for our work with the legislation for our fiscal year 2023/2024.

This includes:

- A general description of the company's process structure, area of operations, guidelines, and procedures for handling actual and potential adverse impacts on fundamental human rights and decent working conditions.
- Information regarding any adverse impacts and significant risks of adverse impacts that the company has identified through its due diligence.
- Information regarding measures the company has implemented, or plans to implement, to cease actual adverse impacts, or mitigate significant risks of adverse impacts, and the results, or expected results, of these measures.



2. Company structure

Rosenberg Worley AS, located in Stavanger, Norway, is fully owned by Worley Ltd. with its main office located in Sydney, Australia.

Worley Ltd is a global entity that provides engineering and EPC services to multiple industries worldwide.

Worley Rosenberg has been conducting business since 1896. The core business is to deliver fabrication and EPC(I) (Engineering, Procurement, Construction and Installation) services to the offshore oil and gas industry on the NCS (Norwegian Continental Shelf). Worley's purpose is to deliver a more sustainable world, and therefore Worley Rosenberg has a clear focus on the energy transition. We are embracing new markets, including floating offshore wind, electrification, hydrogen, and Carbon Capture Utilization and Storage.

3. Due Diligence

To meet the requirements of the Transparency Act, Worley Rosenberg has established a local task force.

This task force will work, solely and specifically, to ensure that the Transparency Act is implemented within and followed up throughout our organization and business to ensure that Worley Rosenberg fully adheres to the requirements of the act.

The local task force consists of representatives from the following departments:

- HR
- Legal
- Risk & Sustainability
- Supply Chain

4. Implemented process

Worley Rosenberg’s task force uses a step-by-step process, based on OECD’ guidelines for multinational companies, to ensure that the Transparency Act is enforced.

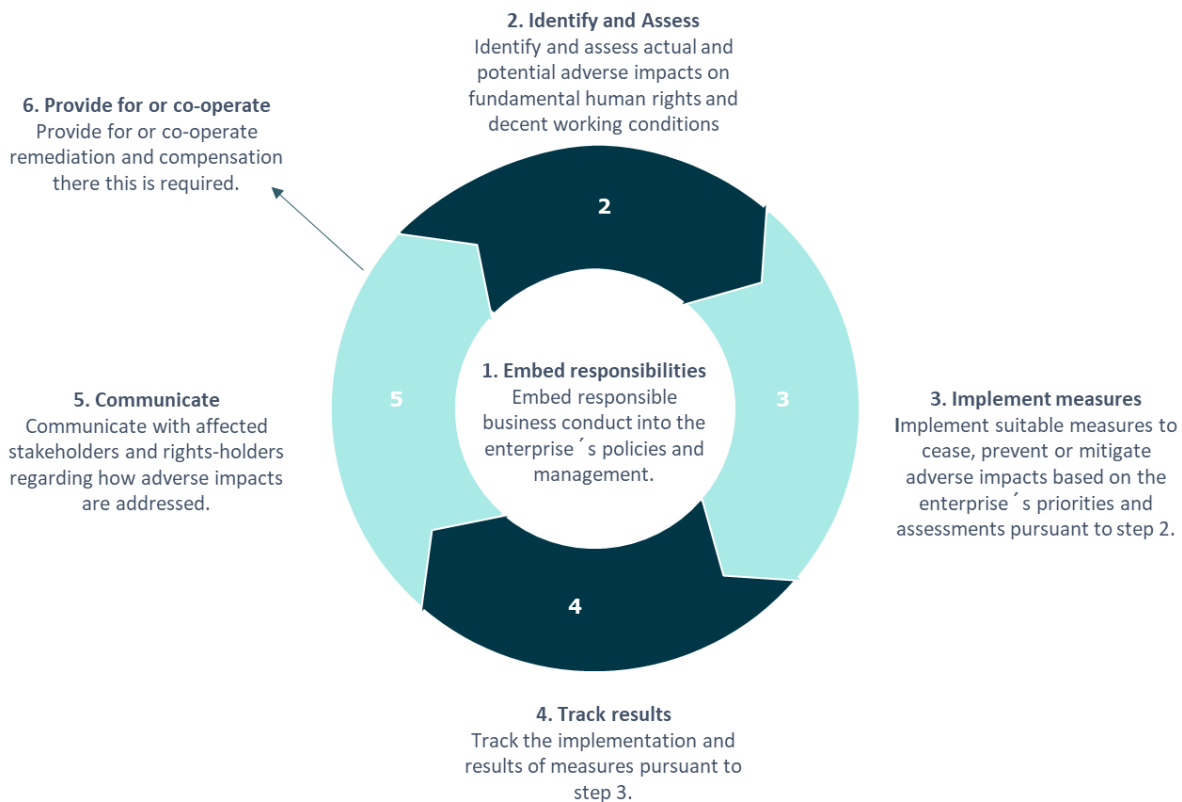


Figure 1: Step-by-step process.

4.1 Step 1 – Embed responsibilities

The requirements of the Transparency Act and the following responsibilities are established by the board of directors. The company has also established a task force to work with and ensure the requirements of the act is endorsed.

Rosenberg Worley AS and Worley Ltd operate in accordance with their established and comprehensive management systems that is certified according to the ISO 9001:2015 Standard. The Management system contains policies and procedures that ensure we are equipped to both handle and prevent potential and actual adverse impact upon company values, along with local and global legislation including human rights.

A selection of policies and procedures for combating actual and potential adverse impacts on fundamental human rights and decent working conditions, both within our company and our supply chain, includes the minimum requirements to adhere to, such as:

“Code of Conduct” - sets the minimum requirements for ethical standards and compliance with all laws and regulations which apply to us. Specifically, this addresses our obligation to prevent bribery and corruption and ensure ethical behavior. We are committed to encouraging a highly ethical culture and preventing bribery in Worley. All Worley Rosenberg staff, contract and temporary hire, shall complete the mandatory Code of Conduct when they begin employment and provide annual refresher training.

“Supply Chain Code of Conduct” - sets the standard (and minimum level) of ethical expectations for the suppliers and contractors who work with Worley.

“Human Rights Policy” – states our commitment to respecting the basic human rights of all people we deal with. Furthermore, we will not be complicit nor engage in activities that solicit or encourage human rights abuse. We operate responsibly on a global level and commit to engaging with our stakeholders to manage the social, economic, and environmental impact of our activities. This policy applies to all Worley employees (staff, contract, and temporary hire), and it extends to all our business dealings and transactions occurring within the countries in which we operate.

“Modern Slavery Policy” – states our respect for the fundamental human rights of the people we deal with, along with not partaking in activities that encourage human rights abuse. Our efforts to prevent modern slavery are published in our annual Modern Slavery Statement.

“Ethics Reporting and Whistleblower Standard” – encourages whistleblowers to come forward with information relating to breaches and potential breaches of Worley’s Code of Conduct and to make disclosures of reportable conduct. This Standard outlines the framework for whistleblowers to report such matters and provides clarity on how whistleblowers can be supported, protected, and encouraged to raise their concerns.

Adherence to all policies and procedures mentioned above are mandatory requirements for the prequalification of all suppliers.

4.2 Step 2 – Risk identification and assessment

As a part of our continued work with the Transparency Act at Worley Rosenberg, an assessment was made to identify and assess actual and potential adverse impacts on fundamental human rights and decent working conditions that the company has either caused or contributed to, or that was directly linked to the company’s operations, products, or services via the supply chain or business partners.

When assessing our company for the risk of actual and potential adverse impacts on fundamental rights and decent working conditions to occur within our own business, we found the risk to be acceptable given our comprehensive management system.

During our previous work with the Act, the task force identified a potential risk due to the high number of suppliers in our supply chain. The number of suppliers represents a statistical risk of adverse impacts on human rights and decent working conditions within our supply chain.

To manage an assessment of suppliers, the task force used a risk-based approach to reach a manageable number of suppliers subject to due diligence. The selection of suppliers subject to due diligence was based on the following criteria:

- Countries of operation
- Contractual turnover
- Size of supplier
- Our ability to influence
- General suspicion
- Suppliers' response

As a follow up on last year's due-diligence work in relation to the Transparency Act, it was decided to focus on the suppliers where we have the greatest ability to impact, based on the contractual turnover. The following questionnaire was sent to the selected suppliers to obtain replies and evidence of:

1. Whether or not your enterprise is subject to the Norwegian Transparency Act
2. An account of measures and steps taken by your company in order to be in compliance with the legislation
3. An overview of your enterprise's structure, area of operations, guidelines, and procedures for handling actual and potential adverse impacts on fundamental human rights and decent working conditions, including your supply chain and business partners.
4. Information regarding any potential and adverse impacts and significant risks of adverse impacts that your enterprise has identified through its due diligence.
5. Information regarding measures your enterprise has- or plans to implement to cease actual adverse impacts or mitigate significant risks of adverse impacts and the results or expected results of these measures.
6. If your enterprise is subject to the Norwegian Transparency Act, please submit the report for 2023.

The risk assessment was performed using the company's risk management system PIMS, ensuring the risk assessment process is in accordance with management system standards in our company.

4.3 Step 3 – Implemented measures

This step includes a mix of internal measures and measures within the supply chain.

4.3.1 Internal measures

- Continue to dedicate resources to the task force to work with the Transparency Act.

- Assessment of our own policies and procedures has been done throughout the year 2023/2024 and were found to be in compliance with the Transparency Act.
- As our number of suppliers in our supply chain continues to pose a statistical risk of adverse impacts on human rights and decent working conditions within our supply chain, our supply chain function has reviewed and improved our local prequalification procedure. The new revision includes a more comprehensive list of requirements for both existing, potential, and new suppliers, including assurance to Human rights and decent working conditions.
- To comply with the upcoming EU Corporate Sustainability Reporting Directive, including a highlighted focus on Human rights and decent working conditions, the company has established a designated team with the mandate to improve, coordinate and prepare Worley Rosenberg to comply to the directive. Complying to the new directive, together with the Transparency Act, will strengthen Worley Rosenberg 's overall focus on Human Rights and Decent working condition across functions.

4.3.2 Supply chain measures

Following a review of the chosen suppliers' responses that were subjected to due diligence, the company defined suitable measures to cease, prevent or mitigate adverse impacts on fundamental human rights and decent working conditions caused by the suppliers or residing within the supplier's supply chain.

Implemented measures:

- Continue to create awareness of the new legislation amongst our suppliers by sending them the due diligence letter. The letters will include our minimum requirements which will increase awareness regarding human rights amongst our suppliers and, where necessary, provide knowledge sharing.
- Request further feedback on how they have, or plan to, secure fundamental human rights and decent working conditions either within their own operations or in their supply chain. (E.g., those with unsatisfactory replies to our due diligence request.)
- In addition to our above-mentioned work with the Transparency Act, Worley Rosenberg perform annual audits on our suppliers providing contract- and temporary hire. This includes a dedicated human rights assessment, to ensure fundamental human rights, as well as decent working conditions for hired-in-personnel. These audits, and following measures, are conducted according to our procedure for "Supervisory responsibility in regards of salary- and working conditions for hired-in-personnel."

4.4 Step 4 – Track results

Based upon the responses received from our suppliers, the Transparency Act risk register was reassessed. As the Act requires, the risks of impact were mitigated based on the provided

information from the suppliers. The responses from suppliers were of acceptable standard. Those suppliers who did not respond, or provided unsatisfactory answers, or otherwise are still considered as having a potential unacceptable risk will continue to be included in our annual work for the Transparency Act. Next year a new risk assessment will be performed in accordance with the Transparency Act, and Worley Rosenberg must consider if other suitable measures to cease, prevent, or mitigate the risks that can be identified.

Options available to us to further mitigate risks for suppliers with unsatisfactory responses are to request for more information, and to include a review of the supplier's implementation of the Transparency Act in our general audit of the suppliers. General measures will be to consider including contractual clauses with relevant requirements by way of amending our agreements, and to highlight and assess compliance with the Transparency Act in our supplier evaluations.

4.5 Step 5 – Communicate

This report will be made available for the general public on our website. (LINK). Detailed information can be provided upon request in accordance with the Transparency Act § 6.

4.6 Step 6 – Cooperate

In this initial period after the enactment, our due diligence within the chosen suppliers has not revealed any actual or potential adverse impacts on fundamental human rights and decent working conditions within our supply chain. If the due diligence had revealed any adverse impact, required remediations would be implemented.

5. Summary

This work process is now implemented in our company's management system, and the work with the Transparency Act requires a continuing process evaluation. Each year we will conduct the required assessment and further develop insights in our supply chain as required in the act. On a yearly basis a report will be published.

Worley Rosenberg will evaluate the opportunity to include a broader selection of suppliers and perform verification activities based on responses.

