

Modern Slavery Act Statement

Effective Period: FY 2022

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Modern Slavery Act Statement

1. Effective Period

This Modern Slavery Act Statement (the “**Statement**”) is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 (the “**Act**”) on behalf of Altera Infrastructure L.P. and its relevant subsidiaries (“**Altera**”, the “**Group**”, “**we**”, “**us**”) for the period 1 January 2022 to 31 December 2022.

2. Business Structure and Supply Chain

Altera provides critical infrastructure assets to the offshore energy industry. Through our three business lines – Altera Production, Altera Shuttle and Storage, and Ocean Towing and Offshore Services (under our ALP Maritime Services brand) – we directly owned and/or operated a fleet of 45 vessels in 2022, including seven floating production, storage, and offloading (FPSO) vessels, 24 shuttle tankers, three floating storage and offloading (FSO) units, 10 long-distance towing and offshore installation vessels, and one unit for maintenance and safety (UMS). Most of our fleet is employed on medium- to long-term stable contracts. Our primary markets are the offshore regions of the North Sea, Brazil, and the eastern coast of Canada.

During the reporting year, we relied on a large supply chain of reputable subcontractors and suppliers to support our service obligations to our customer base.

3. Culture

Altera values ethical and honest business. The Board of Directors of our general partner, Altera Infrastructure GP L.L.C. (the “**Board**”), and Altera’s executive leadership seek to set a strong tone from the top throughout the organisation and support a shared leadership approach in which our core values of trust, excellence, accountability, and momentum are embraced as the shared responsibility of all employees. Our core values of trust and accountability reflect our belief in conducting business ethically and in compliance with all applicable requirements regarding anti-corruption, international trade controls, competition, privacy, and human and labour rights.

4. Policies to Prevent Modern Slavery

Modern Slavery, as used in this Statement, refers to any offense set forth in the Act (and any other similar applicable legislation) including slavery, servitude, forced or compulsory labour, child

labour, and human trafficking. Altera prohibits Modern Slavery in our business operations and in our supply chain. In 2022, we relied on the following policies, procedures, and practices to prevent Modern Slavery:

- The Altera Code of Conduct is the cornerstone of our business ethics program (the “**Code**”). The Code sets out the rules of ethical conduct required of all employees and compliance with the Code is mandatory. The Code reinforces our strict approach to business ethics, including our firm stance against Modern Slavery, and provides guidance on how workers may report suspected violations of the Code. We require our board members and workers to confirm their commitment to our Code in writing annually. *The Code is available at alterainfra.com.*
- Our Global Sustainability Policy expressly establishes our support for human rights, our opposition to child and compulsory labour, and our support for the rights to free association and collective bargaining. In May 2022, we published our consolidated sustainability report for 2021, covering all business units and operations. We will publish our sustainability report for 2022 within the first half of 2023. *Our Sustainability Policy and published sustainability reports are available at alterainfra.com.*
- Our Global Human Rights Standard establishes the baseline framework of actions we take in support of our commitment to respecting and supporting internationally recognised standards of fundamental human rights and decent working conditions, including freedom from Modern Slavery.
- Our Supplier Code of Conduct was adopted in the last quarter of 2022 to clearly communicate our expectations of suppliers and business partners, particularly with regards to complying with all applicable laws, and respecting and adhering to internationally recognised labour and human rights standards, including to prohibit all forms of forced labour, human trafficking and child labour. Furthermore, the Supplier Code of Conduct mandates that our suppliers ensure that their own business partners, suppliers, and contractors agree to and comply with standards at least as stringent as those set forth in Altera’s Supplier Code of Conduct. *Our Supplier Code of Conduct is made available to our suppliers at alterainfra.com.*
- Our Global Asset Recycling Policy governs the processes and standards applicable to recycling end-of-life vessels and commits us to meeting or exceeding the standards of the 2009 Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships in these activities. In 2022, we undertook significant activities to check and approve the integrity and labour practices of potential recycling yards and service providers and only engaged those parties that demonstrated acceptable environmental

and labour practices. We also participated in the steering committee of the Ship Recycling Transparency Initiative (“**SRTI**”), which supports and promotes socially and environmentally responsible ship recycling. *Our Global Asset Recycling Policy is available at [alterainfra.com](https://www.alterainfra.com).*

5. Due Diligence Methodology

Altera employs a third-party due diligence process governed by our Global Third Party Due Diligence Standard. This process covers a third party’s performance, track record, reputation, and commitment to observe the Act, as well as other applicable laws. We define a “**Third Party(ies)**” as parties with which we have a contractual relationship, such as direct suppliers and customers, as well as parties that are connected to our business activities, but with which we do not have a direct contractual relationship, yet we chose to exercise diligence in order to verify compliance with our expectations, such as ship recycling facilities.

We assess Third Parties for compliance risks as well as human rights risks, including risks of violating the Act. Those Third Parties assessed as high risk for human rights are subject to enhanced due diligence focused on both compliance and human rights. In 2022, we finalised and incorporated human rights-focused enhanced due diligence questionnaires (“**Human Rights Questionnaires**”) into our due diligence process, covering the Third Party’s compliance with the Act and approach to the protection of fundamental human rights, fair labour conditions and the elimination of child and compulsory labour. These comprehensive Human Rights Questionnaires are issued to Third Parties classified as high risk for human rights and the responses are monitored and reviewed as part of the existing Altera third party due diligence process.

Our due diligence process must be followed when selecting and engaging Third Parties to provide goods and services to Altera or to act as business partners to Altera and no Third Party classified as high risk for human rights can be onboarded to our system without confirmation that necessary enhanced human rights focused due diligence has been completed. The Group has a single set of suppliers and suppliers approved for use are approved for use for all subsidiaries and business lines.

6. Risk Management, Measurement, and Monitoring

Altera operates according to a series of internal governance controls, including a formal enterprise risk management process, to identify existing and emerging risks which may originate internally or externally. We use these risk inputs to assess and prioritise our mitigation responses. Business ethics, including Modern Slavery considerations, are routinely considered as part of these risk assessments. To further ensure that we appropriately mitigated risks, including Modern Slavery risks, in 2022 our independent Risk & Audit Services (“**RAS**”) function conducted regular

audits of our internal control framework. Guided and informed by risk management data, RAS supplemented the ongoing monitoring of business ethics risks, including Modern Slavery risks.

In 2022, in support of our commitment to the Act and more generally protecting against negative impacts to fundamental human and labour rights in our global supply chain, we finalised a comprehensive human rights impact assessment of our global operations, which we initiated with external advisors in 2021 (the “**Impact Assessment**”). The Impact Assessment involved in-depth workshops across our business units to identify inherent human rights risks, including forced labour indicators and these were assessed for consequence and likelihood and classified according to a four-level severity scale and then documented in a comprehensive risk register.

The Impact Assessment refreshed and confirmed our mapping and evaluation of potential negative human rights impacts related to our business activities and informed the continued review and improvement of our internal procedures. The Impact Assessment is intended as a living document and will be updated periodically over time to reflect the current effect of Altera’s mitigating actions and the development of our business models and activities.

One of the many important outcomes of the Impact Assessment was the identification that the most acute risks of forced labour indicators accrue for three categories of workers: (1) yard workers; (2) crew and offshore workers employed and managed by third parties; and (3) workers producing purchased goods. To prioritise efforts to mitigate potential risks, we considered both the severity and impact of the potential risks as well as Altera’s ability to impact treatment of each of these groups. We then assessed our supply chain and identified that the Third Parties presenting the highest risk for human rights abuses due primarily to the heightened risk potential for Modern Slavery, include shipyards, recycling yards, and dry docks, manning agents that directly employ crew to Altera operated vessels, and Third Party ship / vessel technical managers that engage and oversee crew on Altera-owned vessels.

Of these, we assessed the most acute risks to be present at shipyards. This is due to the nature of the work, which is largely manual and often unskilled, and many yards rely on a network of subcontractors to provide workers, many of whom are migrant workers. These workers are at high risk for several forced labour indicators, including retention of identity documents, abusive working and living conditions, delayed and/or incorrect wage payments, and debt bondage.

In 2022, Altera identified 54 active Third Parties classified as representing a high risk to human rights according to supplier type. We assigned Human Rights Questionnaires to 35 of these Third Parties during 2022, of which 24 completed the questionnaire so far and we monitored and evaluated each response. We actively follow up with Third Parties from which we have not received responses. Failure to complete the Human Rights Questionnaire within a reasonable timeframe may lead to the deactivation of Third Party in our systems.

Based upon the outcome of the Impact Assessment, we made some further updates to our governance framework in 2022, including adopting a new Global Human Rights Standard, which sets the baseline for our group-wide efforts. We also developed and strengthened our standard contractual clauses, which explicitly prohibit Modern Slavery and provide Altera with the right to audit or to require the supplier to engage an independent third party to audit their compliance with the human rights obligations of the contract terms. In the last quarter of 2022, we adopted a new Supplier Code of Conduct, which clearly communicates our expectations that suppliers and business partners respect human rights and prohibit Modern Slavery in their operations and supply chains.

In addition, we took steps in 2022 to strengthen practical implementation of our governance requirements, such as through the development of human and labour rights-focused audit and monitoring procedures. We started to conduct gap analysis work, reviewing the current audit programs within Altera to identify where human rights risk areas, including Modern Slavery are already in focus and assessing where we needed to strengthen our efforts and include more human rights focused elements into our audit regimes.

We focused our efforts on further developing our audit procedures for yards since we identified such Third Parties as presenting the highest risk for Modern Slavery and other human rights abuses to workers. In 2022, we conducted onsite audits with labour and human rights components at two recycling yards where Altera vessels were being recycled, one in India and one in Turkey, and we began working with one of these yards to set up a corrective actions plan. Although we do not have a direct contractual relationship with these recycling yards, given the high risk for workers we have chosen to use our leverage and communicate our expectations to try to improve the working conditions for workers at these yards. The President of Altera's Shuttle & Storage business line visited both yards in 2022 to view the labour conditions and to further recapitulate Altera's expectations of the yards.

In the context of a large project in Dubai, we have undertaken an in-depth human rights impact assessment of a key supplier there. We engaged a reputable consultancy specialising in ethical trade and human rights (the "**Consultancy**"), to conduct a baseline human rights assessment to assess the key supplier's compliance against local labour and human rights laws and international standards, including relevant International Labour Organisation ("**ILO**") Conventions, as well as Altera's expectations of suppliers. As part of this assessment, the Consultancy interviewed a representative sample of 125 workers to gather perspectives. The assessment identified 2 out of 11 forced labour indicators at the supplier and 9 out of 11 forced labour indicators were identified across 3 of its subcontractors. All findings, along with the detailed road map for improvement, were communicated to the supplier during the final quarter of 2022. Going forward, we will continue to support the supplier to take follow up actions to address all forced labour indicators as an immediate priority and to generally improve working conditions.

Measuring and monitoring are essential parts of our efforts to ensure compliance with the Act, as well as internationally recognised labour and human rights standards, including as described in the United Nations Guiding Principles on Business and Human Rights and to applicable modern slavery legislation in the countries where we operate. We will continue to develop and expand our human and labour rights-focused audit and monitoring procedures through 2023 and beyond.

7. Training and Communications

In 2022, we provided business ethics training to our workforce onshore and offshore/aboard in a variety of ways, including via an annual Code of Conduct e-learning course, and topic-specific webinar training on an ad hoc basis. Our 2022 Code of Conduct training covered anti-corruption, conflicts of interest, and fraud prevention. The training was completed by 100% of our Board, 98% of assigned onshore workforce and 91% of our assigned workforce offshore and aboard. In addition, we delivered more than 400 hours of targeted compliance and ethics training to relevant employees in our offices around the world.

In 2022, we added a new Human Rights page to our internal Compliance Portal which contains information and resources for use across Altera and communicates the key elements of our human rights compliance program, including the new Global Human Rights Standard. We also began developing appropriate human rights training for relevant Altera functions on identifying and managing negative human rights impacts.

8. Reporting Concerns

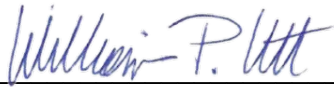
The Altera Code requires employees to report compliance and ethics concerns, including any suspected Modern Slavery offences, either internally (e.g., HR, Legal or our corporate Compliance function), or via our confidential reporting hotline, the details of which are available on our website and in our Code. In 2022, we received a total of 7 reported cases, all of which have been handled in line with our internal requirements. None of the reported cases related to the area of Modern Slavery.

Our Supplier Code of Conduct sets out our expectations of our suppliers to provide workers with a reliable and confidential channel to report concerns about the supplier's business practices and to prohibit any form of retaliation against those who report concerns in good faith.

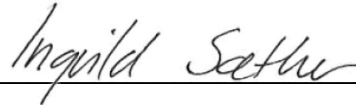
9. Authority and Approval

The Board of Directors of Altera Infrastructure GP L.L.C., the general partner of Altera Infrastructure L.P., has approved this Statement for and on behalf of the Group and its subsidiaries for 2022.

Altera's subsidiaries in 2022 are listed in its Sustainability Report 2022 (expected to be published within the first half of 2023 on our website at alterainfra.com) and included: Altera Infrastructure Holdings L.L.C., Altera Infrastructure FSO Holdings Limited; Altera Infrastructure Production Holdings Limited; Altera Infrastructure FPSO Holdings Limited; Altera Infrastructure Arendal Holdings Limited; Altera Infrastructure FFTA Holdings Limited; Altera Production UK Limited; Altera Varg Production Limited; Altera Voyageur Production Limited; Arendal Spirit UK Limited; Golar-Nor (UK) Limited; Salamander Production (UK) Limited, and Tiro Sidon UK L.L.P.



William Utt
Chairman of the Board
Altera Infrastructure GP L.L.C.
March 2023



Ingvild Sæther
President and Chief Executive Officer
Altera Infrastructure Group Ltd.
March 2023