

# Human Rights Statement

**Effective Period: 2025**

This is Altera Infrastructure's official statement under the Norwegian Transparency Act and UK Modern Slavery Act 2015, available on our website at [alterainfra.com](https://alterainfra.com), published in English and executed by the required Directors in accordance with section 3-5 of the Accounting Act and Section 54(6) of the UK Modern Slavery Act 2015.

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# Human Rights Statement 2025

## About this Statement

This Human Rights Statement (the “**Statement**”) is made pursuant to section 5 of the Norwegian Transparency Act (*Åpenhetsloven*) and section 54(1) of the UK Modern Slavery Act 2015 on behalf of Altera Infrastructure L.P. and its relevant subsidiaries (“**Altera**”, “**we**”, “**us**”), including each of the Norwegian reporting entities as set out in Schedule 1 and each of the UK reporting entities as set out in Schedule 2 (together the “**Reporting Entities**”) for the period 1 January 2025 to 31 December 2025. The directors of each eligible Norwegian/Norwegian managed entity are also presented in Schedule 1, along with signature execution by each identified director, in accordance with the rules in Section 3-5 of the Norwegian Accounting Act (*Regnskapsloven*).

This Statement addresses the reporting requirements set out in section 5 of the Norwegian Transparency Act and section 54(1) of the UK Modern Slavery Act 2015. In particular, this Statement describes:

- a) Altera’s structure and business operations (Section 1);
- b) Altera’s policies and due diligence processes relating to fundamental human rights and decent working conditions (Sections 1.2 to 1.4);
- c) Actual adverse impacts and significant risks of potential adverse impacts identified through due diligence (Section 2);
- d) Actions taken to prevent, mitigate and remediate such impacts (Section 3); and
- e) How Altera measures effectiveness and its priorities for continuous improvement (Sections 1.5 and 3.5).

## Section 1 – Business Overview

This Section provides a general description of Altera’s structure, area of operations, guidelines, policies and procedures, as well as due diligence methodology and monitoring frameworks for handling actual and potential adverse impacts on fundamental human rights and decent working conditions, in accordance with the UK Modern Slavery Act 2015 guidelines and Section 5(a) of the Norwegian Transparency Act.

## 1.1. About Altera

### 1.1.1. Business Structure

The Reporting Entities are indirectly owned by Altera Infrastructure L.P., a limited partnership established in 2006 (the “**Partnership**”). The Partnership is managed and controlled by its general partner, Altera Infrastructure GP L.L.C. (the “**General Partner**”), which exercises authority through its board of directors (the “**Board**”). The General Partner has one officer, serving as Vice President and Company Secretary. The Board of the General Partner is the ultimate supervising board of Altera. Pursuant to services agreements, employees of certain subsidiaries of Altera Infrastructure L.P. provide various services to Altera, including managerial, operational, and administrative services as well as other technical and advisory services.

Altera was previously structured as a group of several separate operating business units. As a result of a corporate reorganisation, Altera divested several of these business units and related assets including our shuttle tanker business in January 2025, our Stella Maris carbon capture and storage project in February 2025, and various individual vessels. Altera’s business is now focused on the operation of offshore production and related assets, and the scope of this statement is limited to this business line.

During 2025, we maintained commercial and operational offices in Brazil, Côte d’Ivoire, Norway, the Philippines, and the United Kingdom. We also maintained a project office in the Middle East, to oversee an ongoing large-scale vessel rebuilding project. Our principal office is in the United Kingdom, specifically our office at Altera House in Westhill, Aberdeenshire.

### 1.1.2. Description of Business and Areas of Operation

Altera provides critical production assets and complex project management services to the offshore energy industry. We directly owned a fleet of seven production-related vessels in 2025, including four floating production, storage, and offloading (“**FPSO**”) vessels, two floating storage and offloading (“**FSO**”) units, and one unit for maintenance and safety (“**UMS**”). Our primary commercial markets in 2025 were the offshore regions of the North Sea, Côte d’Ivoire and Brazil.

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

### FPSOs

Altera Infrastructure Voyageur AS, Altera Infrastructure Production AS, Altera Infrastructure Production Crew AS, Petrojarl I Production AS, Knarr L.L.C., and Petrojarl I L.L.C. are the Norwegian registered entities<sup>1</sup> that form part of our Production business which specialises in designing, providing, and operating FPSO vessels to extract hydrocarbons in deepwater and harsh weather

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<sup>1</sup> Comprising both Norwegian entities and Norwegian registered foreign entities

conditions. In 2025, we directly owned four FPSOs – FPSO *Petrojarl I*, which was sold in January 2025 and delivered to its new owners in May 2025, FPSO *Petrojarl Kong*, which has been operating on the Baleine field, Côte d'Ivoire, FPSO *Petrojarl Rosebank*, contracted for future deployment to the Rosebank field in the United Kingdom and during 2025 was undergoing rebuilding work in the Middle East, and FPSO *Piranema Spirit*, in lay-up in Brazil.

## **FSOs**

Altera Infrastructure Voyageur AS and Clipper L.L.C. are the Norwegian registered Altera entities which own our FSO units. FSO units provide on-site storage for oilfield installations that have no storage facilities or require supplemental storage. Each FSO is equipped with an export system that transfers cargo to shuttle or conventional tankers. Our FSO units are generally placed on long-term, fixed-rate time charter or bareboat charter contracts as an integrated part of the offshore field development plan.

In 2025, the FSO *Yamoussoukro* owned by Altera Infrastructure Voyageur AS, supported production from the Baleine field. The FSO *Suksan Salamander*, owned by Clipper L.L.C, operated in the Bualuang field in the Gulf of Thailand. A sales agreement was signed on 15 January 2026 for the FSO *Suksan Salamander*, with the sale anticipated to take place in April 2026.

## **UMS**

UMSs are used primarily for offshore accommodation, storage, and support for maintenance and modification projects on existing offshore installations, or during the installation and decommissioning of large offshore assets, such as FPSOs, floating liquefied natural gas units, and floating drilling rigs. Our only UMS, the *Arendal Spirit*, was sold in March 2025. Prior to this sale, the UMS was owned by our Norwegian managed entity, *Arendal Spirit L.L.C.*, and operated and managed by a third party.

## **Project Development and Execution**

Our clients trust Altera to deliver the largest, most complex technical and capital expenditure (Capex) projects in the offshore energy industry. Development, contracting, and execution of such large-scale projects requires advanced engineering and world class project management. Our Project Development and Execution (“**PDE**”) unit is a centre of technical and project management excellence for all large Capex projects across Altera.

In 2025, PDE focused on the rebuilding of FPSO *Petrojarl Rosebank*, contracted for deployment to the Rosebank field in the United Kingdom in 2026.

## **Altera&Ocyan Joint Venture**

In 2025, Altera&Ocyan, our 50/50 non-controlled joint venture in Brazil with Ocyan, operated a fleet of three FPSOs and one additional manned wellhead platform. This joint venture owned two of these

FPSOs – FPSO *Cidade de Itajaí*, which operated on the Baúna field (sale agreement reached in April 2025), and FPSO *Pioneiro de Libra*, operating on the Libra field. In addition, Altera&Ocyan manages operations and maintenance (O&M) of the 3R3 FPSO and 3R2 tension-leg manned wellhead platform on the Papa Terra field.

Where Altera does not have full operational control, including in joint ventures and certain third-party managed operations, our approach to human rights due diligence focuses on exercising leverage rather than direct operational oversight.

## 1.2. Governance, Policies and Procedures

### 1.2.1. General Principles of Corporate Governance

The Board of the General Partner has adopted Corporate Governance Guidelines and has established committees to which it has delegated oversight of specific governance elements. These Guidelines, together with the committee charters and applicable provisions of the Partnership's partnership agreement, provide the framework for the Partnership's and Altera's corporate governance framework. Copies of the Guidelines and all committee charters are available at [alterainfra.com](https://alterainfra.com). The Guidelines regulate activities of the General Partner's board and committees operations as well as all operations of entities controlled by the Partnership, including its subsidiaries, the eligible entities, and employees, contractors, and directors.

### 1.2.2. Key Policy Commitments

Altera is committed to respecting and supporting internationally recognised standards of fundamental human rights and decent working conditions in our business operations and in our supply chain. We are guided in our business dealings by the United Nations' Guiding Principles on Business and Human Rights.

Altera relies on several policies, procedures, and practices to identify and address potential impacts to fundamental rights and decent working conditions, including:

- The **Altera Code of Conduct**, which 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 commitment to fundamental human rights and decent working conditions and our strict prohibition of forced labour. The Code provides guidance on how workers may report suspected violations of the Code. We require our Directors and workers to confirm their commitment to our Code in writing annually. The current version of our Code is effective as of 1 December 2025 and is available at [alterainfra.com](https://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. Our Sustainability Policy and published sustainability statements from previous years are available at [alterainfra.com](https://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 ensuring the absence of modern slavery. The Standard is made available to our workforce internally via our intranet, Bridge.
- Our **Supplier Code of Conduct** communicates 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. The Supplier Code of Conduct further 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 incorporated by reference and applies to suppliers through our standard General Terms and Conditions and made available to our suppliers via [alterainfra.com](https://alterainfra.com).

We communicate the requirements and expectations of our Code of Conduct and policy commitments internally via several channels, including our intranet, Bridge. We conduct annual Code of Conduct training, require confirmation of key policies at onboarding, and provide targeted training to employees in relevant positions.

### 1.2.3. Reporting Concerns

The Altera Code requires employees to report compliance and ethics concerns, including any suspected violations of fundamental human rights and decent working conditions, either internally (e.g., to HR, Legal or our Compliance function), or via our confidential reporting hotline, the details of which are available on our website and in our Code.

In addition to Altera's internal reporting channels, we expect suppliers to maintain accessible and effective grievance mechanisms for their workers, including subcontracted and migrant workers. 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.

### 1.3. Robust Contractual Framework

Altera's General Terms & Conditions impose specific human rights obligations on suppliers of basic goods and services, through their incorporation into all Altera-issued purchase orders. Furthermore, we have defined two sets of standard compliance clauses containing detailed human rights requirements and providing Altera with audit and monitoring rights:

- Altera Specific Compliance Requirements (“**SCR**”), applicable to agreements with suppliers classified as higher risk for compliance
- Altera Specific Human Rights Requirements (“**SHHR**”), applicable in addition to our Specific Compliance Requirements, to agreements with suppliers assessed as high risk for human rights as determined necessary and appropriate by Altera’s Compliance and Legal functions.

During the 2025 period, we made substantive revisions to the SHHRs, simplifying the clauses and making expectations clearer for suppliers while enhancing transparency and our ability to monitor and audit compliance. We also updated our SCRs to align with the SHHR updates.

We also updated our compliance requirements matrix for suppliers and service providers, available on the Compliance Portal of our intranet, to guide employees as to when these contractual clauses and requirements should be used. This guidance was supplemented by numerous targeted training sessions to the Supply Chain team during 2025.

#### **1.4. Due Diligence Methodology**

Altera employs a risk-based third-party due diligence process governed by our Global Third Party Due Diligence Standard. For third parties that are in scope, this process covers the third party’s performance, track record, reputation, and commitment to human and labour rights. We define “**Third Party(ies)**” as suppliers with which we have a contractual relationship, 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.

We assess Third Parties for compliance risks as well as human rights risks, including human rights and labour risks. Those Third Parties assessed as high risk for human rights, namely those offering labour-intensive services and the use of migrant or temporary labour, including shipyards, dry docks, recycling yards, manning and crewing services that directly employ crew assigned to Altera operated vessels, as well as ship / technical vessel managers, are subject to enhanced due diligence focused on both compliance and human rights. This due diligence includes our comprehensive human rights-focused enhanced due diligence questionnaire (“**Human Rights Questionnaire**”), which covers the Third Party’s governance and approach to the protection of fundamental human rights, fair labour conditions and the elimination of child and compulsory labour. The comprehensive Human Rights Questionnaire is issued to Third Parties classified as high risk and the responses are monitored and reviewed as part of the existing Altera third party due diligence process to assess alignment with our human rights standards. We actively follow up with Third Parties who do not complete the questionnaire within a reasonable timeframe.

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.

## 1.5. Risk Management, Measurement, and Monitoring Framework

Measuring and monitoring are essential parts of our efforts to ensure compliance with the Norwegian Transparency Act and the UK Modern Slavery Act 2015, 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.

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 considerations of human rights and decent working conditions, are routinely considered as part of these risk assessments. To further ensure that we appropriately mitigate risks, our independent Risk & Audit Services (“RAS”) function conducts regular audits of our internal control framework. Guided and informed by risk management data, RAS supplements the ongoing monitoring of business ethics risks, including risks related to human rights and decent working conditions.

As part of our management system, we carry out structured health and safety risk assessments to ensure that potential hazards are identified and managed consistently across our operations and to ensure all work is planned and executed with the lowest possible risk of harm to personnel or the environment. These assessments are done regularly and involve input from those who know the work best, along with data from inspections, incident reports, and operational changes. Risks are evaluated using a common framework so we can prioritise the right measures, focusing first on reducing risks through design and technical solutions. Mitigating controls and actions are implemented, with toolbox talks at the worksite ensuring everyone is aligned on what to do before starting work. When further controls are needed, they are captured and followed up through our internal systems, helping us track actions, monitor progress, and continually improve how we protect people at work. Regular meetings are held to monitor our reporting, trends analysed and reports produced to ensure management on all levels are informed.

## Section 2 - Due Diligence Findings

This section outlines the actual adverse impacts and significant risks of potential adverse impacts that Altera has identified through its due diligence, in line with UK Modern Slavery Act 2015 guidelines and Section 5(b) of the Norwegian Transparency Act. Please note that all the findings detailed below are based on due diligence conducted on an Altera-wide basis and are not entity specific.

## 2.1. Global Human Rights Impact Assessment

We maintain a global Altera human rights impact assessment (“**HRIA**”), first completed in 2022, which identifies potential negative impacts to fundamental human and labour rights in connection with our activities. Information gathered during detailed HRIA workshops identified approximately 50 inherent risks to human rights present in Altera activities, broken down into the main general categories of health and safety, working conditions and human rights, and community impacts. These inherent risks were assessed for consequence and likelihood without any mitigating actions applied and as mitigated by existing Altera policies, procedures and practices. Assessed risks were classified according to a four-level severity scale of high, moderate, medium, and low.

Our HRIA identifies workers at yards, non-Altera crew engaged by third party ship managers, and workers involved in the production of purchased goods as at heightened risk of negative human rights impacts. This is due in part to the nature and circumstances and labour performed by these workers, and in part to the relative strength of existing mitigating actions. To prioritise efforts to mitigate these 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, as summarised in the table below.

Based on our global HRIA, regional assessments and supplier due diligence, Altera identified the following as its most salient human rights risks in 2025, taking into account severity, likelihood, and our ability to influence outcomes:

- Forced labour indicators and unfair recruitment practices in labour-intensive supply chains, particularly in shipyards and dry docks.
- Occupational health and safety risks for yard workers and subcontracted labour, including heat stress, noise, chemicals and working hours.
- Labour rights risks affecting non-Altera crew engaged through third-party ship managers, including working conditions and access to grievance mechanisms.

We recognise that our activities can have certain indirect impacts on the communities in which we operate. Altera’s activities rely on significant amounts of raw natural resources as inputs to our operations. This, and our role within the value chain of offshore energy, may indirectly contribute to potential negative human rights impacts to local communities present in the exploration, production, and extraction of such raw materials by parties in Altera’s extended upstream value chain, if such activities are not undertaken in compliance with law and international standards.

Table 1. Ability to impact negative human rights impacts assessed as high risk

Affected group	Potential risks	Altera's ability to impact	Explanation / Available tools
<b>Yard workers</b>	<ul style="list-style-type: none"> <li>Forced labour indicators</li> <li>Labour exploitation</li> <li>Harassment</li> </ul>	Strong	<ul style="list-style-type: none"> <li>Control of vendor selection process</li> <li>High negotiating power over contract terms</li> <li>Established procedures for on-site oversight of working conditions</li> </ul>
<b>Non-Altera crew engaged by third party ship managers</b>	<ul style="list-style-type: none"> <li>Forced Labour indicators</li> <li>Labour exploitation</li> <li>Physical harm</li> <li>Harassment</li> </ul>	Moderate	<ul style="list-style-type: none"> <li>Control of vendor selection process</li> <li>High negotiating power over contract terms</li> <li>No established procedures for on-site oversight of working conditions</li> </ul>
<b>Workers producing purchased goods</b>	<ul style="list-style-type: none"> <li>Forced labour indicators</li> <li>Labour exploitation</li> <li>Physical harm</li> <li>Harassment</li> </ul>	Weak	<ul style="list-style-type: none"> <li>Control of vendor selection process</li> <li>Low-to-moderate negotiating power over terms</li> <li>No established procedures for oversight of working conditions</li> </ul>

The outcome of our HRIA informs ongoing updates to our governance framework, which includes the reputational screening of Third Parties deemed high risk for negative human rights impacts, and the incorporation of robust contractual clauses to ensure suppliers act in accordance with our expectations. Our standard contractual clauses – the Specific Compliance Requirements and Specific Human Rights Requirements – both updated in 2025, provide Altera with the right to audit or to require the supplier to engage an independent third party to audit their compliance with their contractual human rights obligations.

In 2025, we engaged the Consultancy to refresh and strengthen our approach to identifying and managing human rights risks at both the local and global level, in view of embedding a practical, scalable model of human rights due diligence (HRDD) across our operations. We worked with the Consultancy to develop the framework for a new human rights risk saliency assessment tool, which was developed in line with international best practices. The Consultancy provided guidance to interpret the tool, gather information through stakeholder engagement, and populate the tool correctly.

## 2.2. Middle East Human Rights Impact Assessment

In the context of certain large projects in the Middle East, since October 2022 we have progressed an in-depth human rights impact assessment of a key supplier operating in the region (the “ME HRIA”).

The ME HRIA was initiated in 2022 and regular monitoring and evaluation continued until October 2025, when a final yearly assessment was carried out close to completion of the project. 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 and three of their key subcontractors’ compliance with local labour and human rights laws and international standards, including relevant International Labour Organisation Conventions, as well as Altera’s expectations of suppliers as set forth in our Supplier Code of Conduct and specific project contractual obligations. The assessment process included worker interviews and onsite inspections as part of reviewing working and living conditions. The ME HRIA and subsequent monitoring have been supported by a human rights charter agreed by the parties’ top management.

### **2.2.1. Actual Adverse Impacts Identified**

The initial assessment identified a number of indicators associated with forced labour risks within the key supplier’s operations and supply chain, including recruitment fees, freedom of movement restrictions, retention of personal documents, excessive working hours, and wage-related concerns. While the extent and severity of issues varied between the key supplier and its subcontractors, the findings confirmed the presence of both actual adverse impacts and systemic risk factors that required targeted follow up.

### **2.2.2. Corrective Actions**

In response to the initial assessment findings, with support from the Consultancy, we worked closely with the key supplier to implement a corrective action plan designed to address the identified human rights risks. Priority areas included the elimination of forced labour indicators; implementation of responsible recruitment practices; compliance with applicable working hour regulations and wage standards; improvement of health, safety and accommodation standards; and the strengthening of subcontractor human rights due diligence.

Monitoring, engagement and progress tracking continued throughout the project and until the Consultancy completed their close out assessment and report in October 2025.

### **2.3. Altera Operations**

Altera did not identify any severe negative human rights impacts in its own operations through its due diligence processes in 2025.

## **Section 3 - Due Diligence Activities and Results**

This section outlines the measures Altera has implemented and actions taken in 2025 to cease actual adverse impacts or mitigate significant risks of adverse impacts in line with UK Modern Slavery Act 2015 guidelines and Section 5(c) of the Norwegian Transparency Act.

### 3.1. High-Risk Third Parties

As of 31 December 2025, our systems included 36 Third Parties identified as high risk to human rights according to supplier type. Of these, 3 Third Parties were onboarded during 2025, and each was assigned a Human Rights Questionnaire as part of our onboarding due diligence process. All 3 completed the questionnaire. During 2025, we carried out a clean-up of our due diligence system and deactivated high-risk suppliers not being used or that are not planned to be used in the foreseeable future.

### 3.2. Training and Communications

In 2025, we provided business ethics training to our workforce onshore and offshore/aboard in a variety of ways, including via our annual Code of Conduct e-learning course and topic-specific webinar training on an ad hoc basis. Our 2025 Code of Conduct training covered harassment and discrimination, giving and receiving gifts, privacy and confidential information, as well as raising concerns. The training was completed by 100% of our Board, and 99.5% of the assigned onshore and onboard/offshore workforce as of 31 December 2025.

In 2025, employees also received training via an e-learning course on the Altera Management System, where our policies and procedures are available, as well as HSEQ training according to the comprehensive HSEQ training matrix covering all offshore and onshore positions, which occur every year.

In addition, we make targeted training available to those in our organisation who are exposed to elevated corruption risk because of the nature or location of their position. Our Anti-corruption Policy, along with detailed supporting guidance, is available on the Compliance Portal of our intranet. We also publish regular reminders via internal communication channels.

We communicated the key elements of our human rights Compliance program to Altera employees through a dedicated Human Rights page on our internal Compliance Portal, which we use to share information and resources for use across Altera.

In Q4 2025, the Compliance team revised their training plan to include a series of topic-specific video trainings with supporting policies. Each module fulfils a competency requirement with either a 1- or 2-year validity period, from the date of individual user completion.

During the 2025 period, we did not conduct focused training specifically on human rights and labour rights, although we did include human rights as a topic within our general in person Compliance training sessions in 2025. We recognise the absence of focused human rights training as a gap in our current approach. We plan to strengthen our internal awareness and understanding of human rights risks across our organisation in 2026 and have scheduled a human rights focused topic in our Compliance rolling competency requirement training for 2026.

### 3.3. Mitigation Measures

Altera takes seriously its responsibility to address identified adverse impacts and mitigate significant human rights risks. We engage with external human rights experts to guide our approach to ensure our efforts are effective and focus on the rights and needs of affected individuals.

In 2025, we took several steps to strengthen our due diligence measures:

- We continued our work with the key supplier in the Middle East and the Consultancy, making progress on the implementation of corrective actions identified through the ME HRIA, completing 5 additional actions in 2025. By ME HRIA close out in October 2025, 83% of actions were completed, 11% had progressed, and 6% were overdue. Key mitigating measures that progressed during 2025 included Consultancy advisory, key supplier capacity building on human rights due diligence and responsible recruitment, as well as subcontractor capacity building and policy improvements.
- We engaged the Consultancy to help us develop the framework for a new human rights risk register tool, developed in line with international best practices. The Consultancy provided guidance to interpret the tool, gather information through stakeholder engagement, develop effective mitigation methods and populate the tool correctly.
- We made updates to our Specific Human Rights Requirements contract clauses with input and guidance from the Consultancy to simplify the document, making the obligations clearer to suppliers and more straightforward for Altera to monitor and audit.
- We also use management reviews and masters reviews as part of how we follow up and strengthen our mitigating measures. Each asset carries out a yearly masters review, where findings and improvement actions are recorded and followed up in our internal systems. Senior management performs an annual management review to look at trends, risks, incidents, and system performance, and to identify where additional actions or resources are needed. Together, these reviews help ensure that issues are picked up early, actions stay on track, and we continuously improve how we manage risks and protect people across our operations.

### 3.4. Remediation Measures

Where adverse impacts do occur, Altera is committed to ensuring effective and appropriate remedies are available to affected individuals. We actively engage human rights experts to guide our remediation responses, ensuring they are tailored to context and aligned with international standards.

When a health and safety incident occurs, it is reported and assessed so the right level of investigation is launched. An investigation team with the necessary expertise and worker representation looks into what happened, identifies root causes, and agrees on corrective actions. Affected individuals receive medical follow up, and all actions are recorded and tracked in our system

to ensure they are completed. This helps us support those involved and prevent similar incidents from happening again.

In the 2025 period, Altera received a total of 4 reported cases through our reporting hotline, all of which have been handled in line with our internal requirements. None of the reported cases related to the area of human rights and we paid no fines, penalties, or compensation related to human rights impacts.

Our most substantial remediation efforts in 2025 related to the ME HRIA. Of note, the key supplier increased efforts to update heat management practices, with heat-related illnesses reducing by two thirds in 2025 compared to 2024.

### **3.5. Continuous Improvement and Next Steps**

Altera recognises that effective human rights due diligence is an ongoing and evolving process. Our approach is informed by the outcomes of our global and regional human rights impact assessments, supplier due diligence activities, and engagement with external human rights experts.

In 2026, we will prioritise the following actions to further strengthen our approach and address the most salient human rights risks identified across our operations and supply chain:

- Strengthening human rights awareness and capability by implementing human rights training modules for employees.
- Embedding human rights risk identification and monitoring through the rollout and integration of our human rights saliency assessment to support more consistent identification, prioritisation and mitigation of risks.
- Enhancing occupational health and safety standards by developing and implementing an Altera standard across health, safety and working environment topics in all the countries we operate.

Our aim is to build on what is already in place, using ongoing monitoring and lessons learned to make practical, adjustments where needed, helping us uphold a consistent and responsible approach across our activities.

We remain committed to continuous improvement, transparency, and to embedding human rights and labour standards considerations throughout our business operations and supplier relationships.

## Section 4 - Authority and Approval

The Board of Directors of Altera Infrastructure GP L.L.C., the general partner of Altera Infrastructure L.P., and Altera's Chief Executive Officer have approved this Statement for and on behalf of Altera and its subsidiaries for the 2025 period, which include the Reporting Entities as set out in Schedules 1 and 2 of this Statement.



Denis Turcotte (Mar 30, 2026 08:50:33 EDT)

**Denis Turcotte**

Chairman of the Board  
Altera Infrastructure GP L.L.C.



Duncan Donaldson (Apr 7, 2026 12:11:32 GMT+2)

**Duncan Donaldson**

Chief Executive Officer  
Altera Infrastructure Group Ltd.

## Schedule 1 – Norwegian Reporting Entities






### Norwegian Board of Director's Responsibility Statement

We confirm, to the best of our knowledge, that the above Statement for the year ended 31 December 2025, has been prepared in accordance with the Norwegian Transparency Act guidelines, and gives a true and fair account of the corporate governance, and social responsibility frameworks of Altera and the Reporting Entities.

### Directors

The directors of each eligible Norwegian / Norwegian managed entity covered by this Statement have signed this Statement below.




#### Altera Infrastructure Production AS

Christopher Allan Brett	Chairman & Director	 <small>Christopher Brett (Apr 16, 2026 15:44:01 GMT+1)</small>
Martin Spencer King	Managing Director	
Anette Øwre-Johnsen	Director	
Bente Gussiaas	Employee Representative & Director	
Erik Bugten Alsaker	Alternate Director	 <small>Erik Alsaker (Apr 8, 2026 12:18:59 GMT+2)</small>




#### Altera Infrastructure Production Crew AS

Christopher Allan Brett	Chairman & Director	 <small>Christopher Brett (Apr 16, 2026 15:44:01 GMT+1)</small>
Martin Spencer King	Managing Director	
Anette Øwre-Johnsen	Director	




#### Altera Infrastructure Ventures AS

Duncan Donaldson	Chairman	 <small>Duncan Donaldson (Apr 7, 2026 12:11:32 GMT+2)</small>
Tor Olav Øie	Director	
David Alexander Vik Smith	Director	





## Altera Infrastructure Voyager AS

Nils Ole Krogstad	Chairman & Director	
Martin Spencer King	Managing Director	
Anette Øwre-Johnsen	Director	





## Arendal Spirit L.L.C.

David Alexander Vik Smith	President & Director	
Duncan Donaldson	Director	 <small>Duncan Donaldson (Apr 7, 2026 12:11:32 GMT+2)</small>
James Joseph Brown	Director	 <small>James Brown (Apr 8, 2026 16:13:17 GMT+2)</small>

## Knarr L.L.C.

Nils Ole Krogstad	President & Director	
Anette Øwre-Johnsen	Director	
Martin Spencer King	Director	
David Alexander Vik Smith	Secretary	

## Petrojarl I L.L.C

Nils Ole Krogstad	President & Director	
Anette Øwre-Johnsen	Director	
Martin Spencer King	Director	
David Alexander Vik Smith	Secretary	

## Petrojarl I Production AS

Christopher Allan Brett	Chairman & Director	 <small>Christopher Brett (Apr 16, 2026 15:44:01 GMT+1)</small>
Martin Spencer King	Managing Director	
Anette Øwre-Johnsen	Director	

## **Schedule 2 - UK Reporting Entities**

Altera Infrastructure GP L.L.C., the general partner of Altera Infrastructure L.P., is a commercial organisation within the UK Modern Slavery Act 2015 Part 6, Article 54 definition since it is a body corporate with effective management in the UK. For transparency, we have chosen to list below all subsidiary entities within Altera that are either incorporated in the UK or have effective management in the UK.

### **UK established entities**

Altera Infrastructure Holdings L.L.C.

### **UK incorporated entities**

Altera Infrastructure Arendal Holdings Limited

Altera Infrastructure FFTA Holdings Limited

Altera Infrastructure FPSO Holdings Limited

Altera Infrastructure FSO Holdings Limited

Altera Infrastructure Production Holdings Limited

Altera Infrastructure Voyageur Holdings Limited

Altera Production UK Limited

Altera Voyageur Production Limited

Arendal Spirit UK Limited

Golar-Nor (UK) Limited

Salamander Production (UK) Limited

Tiro Sidon UK L.L.P