



Joint UK Modern Slavery Act and Norwegian Transparency Act statement

This statement is made pursuant to Section 54 of the United Kingdom Modern Slavery Act 2015 and the Norwegian Transparency Act 2022 § 5 (the “Acts”).

Introduction

Golar LNG Limited is a leading independent developer, owner, and operator of floating liquefied natural gas (FLNG) infrastructure. Our strategy focuses on expanding our portfolio of FLNG projects, with a clear competitive advantage in delivering cost-effective solutions quickly.

From our origins in LNG shipping and floating regasification, Golar has evolved into a pioneer in floating liquefaction. Our expertise spans the full value chain, from design and conversion to ownership and operation of marine-based gas liquefaction infrastructure. We believe natural gas will continue to play a vital role in the global transition to cleaner energy, and our innovative floating solutions provide a sustainable, safe, and commercially attractive means of unlocking stranded gas resources around the world.

Today, Golar operates FLNG Hilli offshore Cameroon and FLNG Gimi offshore Mauritania and Senegal. FLNG Hilli is scheduled for redeployment to Argentina after 2026, alongside an additional MKII FLNG, which is currently under construction.

We have offices in Oslo (technical and operations) and London (finance and commercial), with our executive headquarters located in Bermuda. We also have operations or projects in Italy, Croatia, Cameroon, Mauritania, Senegal and, more recently, in China.

Our supply chain is global and consists of various suppliers providing services, parts, consumables, equipment and supplies for the vessels, as well as shipyards. Due to the nature of our business, sourcing goods locally is not always possible. However, we continuously try to support local suppliers where we can by procuring goods and services where our FLNGs are located and by providing further support to develop these suppliers if we find room for improvement.



Our mission is to:

- Be recognised as a learning organisation with an outstanding reputation for safe, reliable and cost-effective operations.
- Employ and develop talented people who can see the impact of what they do.
- Develop a pipeline of new FLNG infrastructure opportunities and convert the best into world-class projects.
- Be a great business partner, where combining skills and resources make a big difference.

As required by the Modern Slavery Act, we have since 2017 focused on evolving and improving our approach to combatting modern slavery and obtaining greater assurance that it does not occur within our supply chains. Our compliance program includes:

- Raising awareness and providing training for all staff about Golar's stance on this issue, and the need for all staff to be vigilant and challenge practices which they are unsure of, particularly in higher risk areas of our supply chain.
- Requiring all suppliers to attest to not using child, forced or bonded labour within the goods or services they provide Golar, and agree to the terms of Golar's Supplier Code of Conduct (which was updated in 2023 to take into account the requirements of the Norwegian Transparency Act, in addition to the existing requirements under the Modern Slavery Act).
- Identifying, vetting and monitoring higher risk suppliers, based on the type of goods or services being provided and their geographical location. Regular reassessment of our high-risk criteria and higher risk supplier list.
- Requiring higher risk suppliers to provide additional information and evidence before they are approved for use.
- Engaging higher risk suppliers to understand their approaches and progress in ensuring that modern slavery does not occur and including human rights and decent working conditions in our supplier audits.

Our Commitment to Responsible Business Practices

Golar is committed to upholding high standards of governance, transparency, and ethical conduct wherever we operate. We are aware of the challenges within our industry and actively work to mitigate



risks that may affect our operations or supply chain. Central to our approach is respect for human rights and the promotion of decent working conditions throughout our value chain.

We have developed and implemented policies and systems designed to:

- Identify and address human rights risks across our operations and supply chain;
- Ensure compliance with anti-bribery and anti-corruption laws and regulations;
- Promote a culture of integrity, accountability, and legal compliance.

Our business operations are governed by a comprehensive set of policies and guidelines. These documents form a central tenet of the Golar Management System (GMS), which guides Golar's internal operations.

- [Corporate Code of Conduct](#),
- [Supplier Code of Conduct](#),
- [Anti-Bribery and Corruption Policy](#),
- [Speak Up Policy](#),
- [Environmental Policy](#),
- [Occupational Health and Safety Policy](#).

We take our responsibilities under the Modern Slavery Act, the Norwegian Transparency Act and other applicable legislations in the countries where we operate seriously and strive to continuously improve our due diligence processes. This includes assessing and addressing potential adverse impacts in high-risk jurisdictions and maintaining transparent, sustainable partnerships with suppliers and contractors.

Protecting human rights and decent working conditions in our supply chain is a high priority for Golar and we continuously seek to improve our procedures to ensure we accurately identify and address risks.

Supplier registration

Golar has an established registration process for new suppliers, which requires any prospective supplier to sign up to Golar's Supplier Code of Conduct, which includes specific requirements on human rights and modern slavery. They must also complete a questionnaire outlining their responses to key topics, such as their relevant accreditations, key policies and governance activities (for example health and



safety standards). The questionnaires are reviewed by our Supply Chain and Health, Safety, Security, Environment and Quality (HSSEQ) team. Depending on the nature of the services being provided and the responses to the questionnaire, further investigation and assessment may be required by the reviewing teams. This process includes specific reference to forced and involuntary labour and requires prospective suppliers to disclose the steps they have taken to ensure that human trafficking and modern slavery do not exist within their operations and supply chains.

Training

All employees receive annual refresher training in our Code of Conduct, which includes a refresher on our commitment to ensuring human rights are respected. In addition to this we aim to have specific training sessions for the Supply Chain team on supplier risk and social responsibility including how we can prevent modern slavery in our supply chain.

How we have worked with the transparency act

During 2024 we intensified due diligence efforts with our local suppliers. We screen all our suppliers using third party risk screening covering sanctions and adverse media relating to human rights, working conditions and other risks such as bribery and corruption. We use supplier self-assessments to help us identify gaps related to certifications, quality procedures or policies, occupational health and safety, human rights and decent working conditions. When risk areas have been detected, we address them in supplier audits.

Golar actively seeks ways to work together with our suppliers to eliminate or minimize risks.

To help us better monitor potential risks and identify whether further action is required, we have recently digitalized our self-assessment form for Ethical and Social responsibility. We are currently developing our Supplier Qualification form into a web-based solution, which we aim to complete by the end of the year. This will ensure appropriate level of due diligence and both of these initiatives will help us improve the processing of the data and information collected.

Performance internationally:

Our suppliers go through a thorough onboarding process before they are approved, which limits our risk of non-compliance with both the Transparency Act and the Modern Slavery Act. Most of our



international suppliers have robust policies, procedures and measures that further limit the risks of non-compliance with the Transparency Act and our internal requirements on human rights.

During 2024 we mapped out high risk and high spend suppliers and evaluated all documentation submitted by them. This mapping continues to guide our ways of working with suppliers in 2025. Our aim is to ensure all suppliers for our FLNGs are committed to our supplier code of conduct covering ethical governance, human rights, and decent working conditions. All new suppliers are required to sign the supplier code of conduct or show commitment to a code of conduct that exceeds our requirements as a prerequisite to working with us.

Performance locally

In 2024 we had a heightened focus on high spend suppliers together with suppliers in Cameroon. The results showed that most of our vendors comply with our requirements, although some still have room for improvement (as further discussed below). Golar is committed to working closely with those suppliers to help them improve.

This year we are rolling out online self-assessments for suppliers in Senegal and Mauritania. As our FLNG Gimi has entered operations, it is necessary to increase our due diligence efforts and collaboration with local vendors in Mauritania and Senegal to raise their awareness of respect for human rights and decent working conditions.

Vendor Risk Identification and Management

Why It's Important

In line with our commitments under the Modern Slavery Act and the Norwegian Transparency Act, Golar places significant emphasis on identifying and mitigating risks related to human rights and decent working conditions across our global supply chain. Given our geographically diverse operations and reliance on local vendors in high-risk jurisdictions, it's imperative we apply a robust methodology for identifying and managing vendor risk.

How We Identify High-Risk Vendors

Golar uses a risk-based approach, underpinned by internationally recognised indexes, to assess the risk level associated with vendors. A vendor may be classified as high-risk based on:



- **Geographical Location:** Countries are evaluated using:
 - **Global Slavery Index** (threshold score ≥ 45)
 - **ITUC Global Rights Index** (scores of 5 or 5+)
 - **Trace Bribery Risk Index** (scores ≥ 70)
 - **Transparency International Corruption Index** (scores < 40)
- **Nature of Services or Goods:** Through considering the nature of goods and services procured, we have identified the following categories of suppliers as high risk:
 - Yards (Asset construction / conversion)
 - Catering
 - Logistics Providers
 - Local personnel agents
 - PPE, specifically textiles
- **Spend and Procurement Volume:** High spend or frequent purchasing from a vendor increases our scrutiny level. This is because repeated or large-scale transactions increase our risk exposure, especially in high-risk regions.
- **Leverage Potential:** Where Golar has significant purchasing power or long-term engagement, we actively work with vendors to improve their practices, recognizing that leverage brings opportunity for positive influence.

How We Evaluate and Engage High-Risk Vendors

Once a vendor is identified as high-risk, our process includes:

- **Self-assessments:** Each year, selected high-risk vendors must complete self-assessments addressing human rights, working conditions, governance, and compliance practices.
- **Third-Party Screening:** We use tools that check for sanctions, adverse media, and red flags.
- **Targeted Audits:** Vendors in high-risk categories or locations may be subject to in-person audits, particularly focusing on contractual fairness, wage levels, and workplace policies.



- **Collaborative Improvement:** If gaps are identified, we prioritise working with suppliers to close them, rather than terminating the relationship. This includes capacity building and action plans for improvement.

Assessments and findings

We are committed to following both the UK modern slavery guidance and the requirements of the Transparency Act and agree with the notion that businesses denying the presence of risks to modern slavery in their supply chain are unlikely to have conducted sufficient due diligence assessments. As a responsible company, we recognise the risks and are committed to taking active steps to identify, mitigate and remediate harm.

As part of our commitment to protect human rights in our supply chain and address risks to modern slavery and child labour, Golar conducted 4 audits in 2024 with human rights as a highlighted focus area. Below are findings from these audits and measures taken to address those findings.

Cameroon:

These are the main findings from the audits in Cameroon:

- Differing contractual terms between men and women in one company has been resolved.
- A lack of procedures regarding ethical and social responsibility among a supplier has been addressed and the supplier has implemented structures to ensure worker's rights in the company (worker's syndicate and working environment committee), code of conduct, speak up policy, and anti-bribery policy.
- Low salaries at a supplier have been addressed and resolved, leading to raises for employees (tied to Golar operations).
- Deductions from salaries are being addressed and followed up by our compliance team in Cameroon and Oslo office. We expect this finding to be resolved and mitigated by the end of the year.
- The prohibition of strike action was included in some work contracts. This has since been resolved.

Golar recognises the risks involved with contractors connected to our operations and seeks to maintain close communication with this group. Open communication with contractors has been key to identifying



and addressing risks. Golar recognises the responsibility to influence and improve working conditions in our supply chain and takes pride in the results achieved so far.

Mauritania, Senegal:

As we start operations on the Greater Tortue Ahmeyim field offshore Mauritania and Senegal we recognise the risk to human rights, modern slavery and workers' rights in this region. Moving forward, we will work with strategic suppliers here to prevent these risks from materialising in our supply chains. This will happen through a strict onboarding process followed by regular assessments and in-person audits.

Norway, UK and Europe: In Norway and the UK there is already legislation in place pushing companies to strengthen their processes to prevent modern slavery and human rights abuses in their supply chains. Emerging legislation across the EU also encourages companies to strengthen their controls to ensure responsible supply chains.

Since the emergence of the above-mentioned legislation, we see our suppliers across Europe score highly on ethical and social responsibility assessments. While our human rights audits to date have focused on high-risk countries based on previously mentioned indexes, moving forward, responsible supply chains will be a heightened focus of our supplier audits in Europe.

Forward-looking statement

Golar takes the responsibility to promote human rights and decent working conditions seriously and will keep looking for ways to improve our systems and procedures with the aim of eradicating these risks in our supply chain.

Moving forward, Golar is confident that with our new self-assessment tool and additional resources used to analyse and identify risks, together with our competent auditing team, we will be well suited to navigate and effectively address risks in our supply chain.