



CapeOmega's Human Rights policy statement

June 2023

Evvy Glørstad, CEO



CapeOmega's Human Rights policy statement

- CapeOmega is an energy infrastructure group focusing on infrastructure solutions that enable the energy-transition. CapeOmega is the largest private gas infrastructure owner in Norway, which includes 26% in Gassled JV, 28% in Polarled JV and 18% in Nyhamna JV.
- Further, the group is engaged in the shipping of energy transitioning fuel and carbon capture solutions. We currently are invested in ten LNG vessels under construction. The newbuilds are expected to be up to 40% more fuel efficient than traditional LNG tankers and are on long term charters with energy majors.
- The group is backed by Partners Group a leading global infrastructure investor with USD 127 billion in asset under management.
- The group aims to invest in energy transition infrastructure with ongoing projects in both Hydrogen production & transport and Carbon Capture & Storage (CCS).



Evy Glørstad

CEO, CapeOmega AS

20 June 2023

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- CapeOmega promote respect for fundamental human rights and decent working conditions in connection with our management of assets and hence the provision of services associated.
- CapeOmega address adverse impacts on fundamental human rights and decent working conditions through embedded Company policies.
- If you are ever in doubt if a decision upholds the principles set out in the Code, you should not hesitate to ask and seek guidance. Your first point of contact should always be your line manager. Management acknowledges that most employees will face ethical

dilemmas in the course of their employment. We encourage you to raise these dilemmas so that they can be dealt with. Open and honest discussions are needed to ensure that we are all on the same track.

- To protect the interest of the company we expect you to speak up if you ever see someone acting in breach of the Code. Talk to your manager or use the whistleblowing channels described in our whistleblowing policy if you have concerns. You will never experience negative reactions from the company if you report an issue in a proper manner and in good faith.



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- Fundamental human rights and decent working conditions, safety, health and security of people involved in our business is a priority for CapeOmega. This is emphasised by our Code of Conduct and Human Rights Policy. Strong focus on compliance, transparency and responsible business conduct is essential in our company.
- The Code of Conduct, or "the Code", sets out the rules and standards that we must follow in our company. We have developed ten core principles that describe our expectations with respect to business conduct. We expect you to study these principles and adopt them as your own guiding principles when you make decisions, and we expect

you to always act safely within the limits set out in the Code. Our overall ambition is to make ethical, responsible and profitable decisions

- The Code applies to all employees. It also applies to the members of the board of directors, representatives for the owners, independent contractors/consultants, temporary staff and hired staff. Whenever we engage someone to perform services on our behalf, we will request the service provider, agent or consultant to comply with our Code, or with a business ethics policy sufficiently strict to ensure ethical, responsible and profitable decisions also by our service providers.

Code of Conduct

- The ten principles in this Code are:

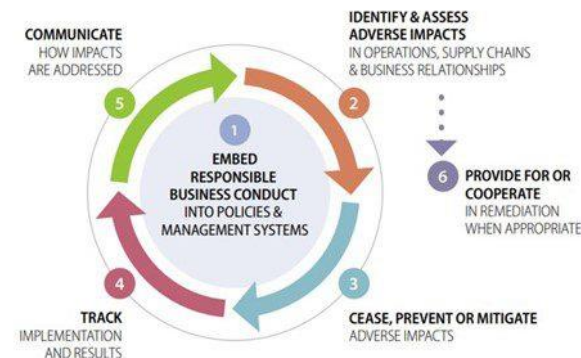
1. **We comply with laws.**
2. **We respect our colleagues.**
3. **We ensure healthy and safe working conditions.**
4. **We protect our assets and confidential information.**
5. **We respect fundamental human rights.**
6. **We never make illegal payments.**
7. **We select our business partners carefully.**
8. **We avoid conflicts of interest.**
9. **We ensure Anti-trust compliance and compete fairly.**
10. **We operate in an environmentally responsible manner.**

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- CapeOmega address adverse impacts on fundamental human rights and decent working conditions through Audits and working meetings with our partners, colleagues and suppliers.
- We perform due diligence of suppliers and other business partners. Such due diligence is conducted on a regular basis and is risk based, proportionate and in accordance with UN's Guiding Principles for Business and Human Rights and the OECD Procedure for Multinational Enterprises.
- As a result of our due diligence process, including background checks and various follow-up measures as

audits/physical inspections and supporting policies, we have not identified any actual nor potential adverse impacts on fundamental human rights and decent working conditions that CapeOmega's value chain has either caused or contributed toward.

FIGURE 1. DUE DILIGENCE PROCESS & SUPPORTING MEASURES



Policies supporting the Human rights policy statement and Transparency Act

1. Vision and Mission Statement.
2. Core Values.
3. HSSEQ Policy.
4. Code of Conduct.
5. Anti-Corruption.
6. Integrity Due Diligence (IDD).
7. Business Hospitality.
8. Sanction Compliance.
9. Whistleblowing.
10. Procurement Process.
11. Evaluating and Assessment of Suppliers.
12. Audit and Risk Management

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- With this statement, we share how we work, what actions we take, creating transparency in our ongoing efforts to respect the rights of people we work alongside and depend on across our operations.

On behalf of the Board of Directors

Holm Tore, Board Chairman

On behalf of the Company

Glørstad Evy, CEO

A modern glass-fronted building at night, illuminated from within, with a marina in the foreground containing several sailboats. The sky is a deep blue twilight. The building has multiple levels with balconies and large windows reflecting the sky. The marina has a stone pier with small lights and a yellow bollard. The water reflects the lights from the building and the pier.

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