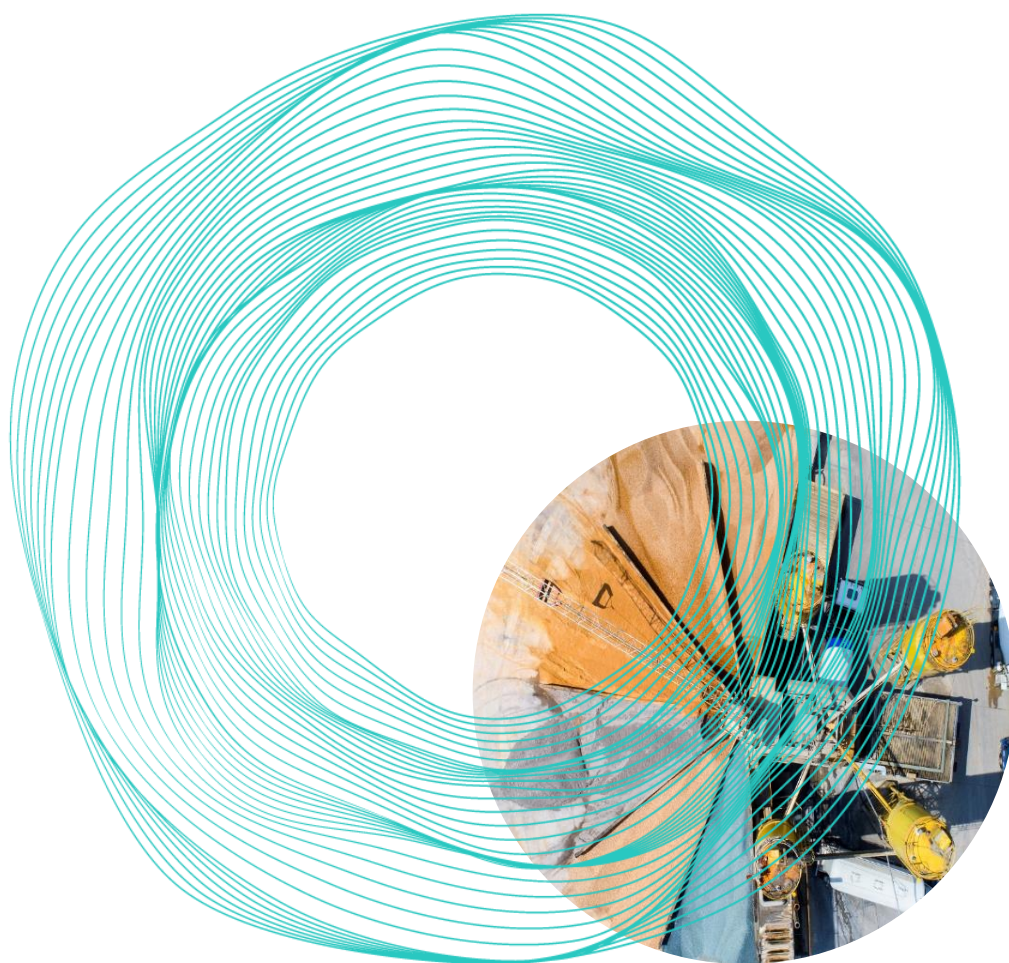


Transparency Act 2026

Report



30.07.2026

Rosenberg Worley AS
Bangarvågsgata 15, 4077 Hundvåg
P.O. Box 54, 4086 Hundvåg
Norway

Telephone: +47 5193 1000
VAT: 984 329 075

* This document has been revised on 02.11.2025 to include our subsidiaries Instefjord Services AS and Origo Process AS.

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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 Rosenberg Worley AS 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 with Section 5 of the Transparency Act, this report provides an account of our work with the legislation for the fiscal year 2026 (1 July 2025 – 30 June 2026). The scope of this report includes Rosenberg Worley AS, and our subsidiaries, Instefjord Services AS and Worley Origo Process AS hereinafter collectively referred to as “Worley Rosenberg”.

This includes:

- A general description of the company's 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 identified through its due diligence.
- Information regarding implemented measures, 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 and subsidiaries, 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.

Rosenberg Worley AS 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.

Worley Origo Process AS, founded in 2002, provides highly experienced process competence to the petroleum and renewable energy industry. Their services include process safety, process simulations and operational- and engineering support.

Instefjord Services AS, founded in 2007, operates as a staffing agency, delivering workforce solutions to Rosenberg Worley AS. The agency supplies highly qualified personnel across various disciplines, including electrical, surface treatment, piping, quality control, structural, mechanical, and engineering roles.

3. Task force

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

The task force is responsible, for supporting implementation of the Transparency Act across the organization and monitoring related activities to help Worley Rosenberg to meet the obligations under the Act. The local task force consists of representatives from the following departments:

- Human Resource Department
- Legal
- Risk & Sustainability
- Supply Chain Management

4. Implemented process

The task force uses a step-by-step due diligence process, guided by OECD's (Organisation for Economic Co-operation and Development) guidelines for multinational companies, to ensure that the Transparency Act is enforced.

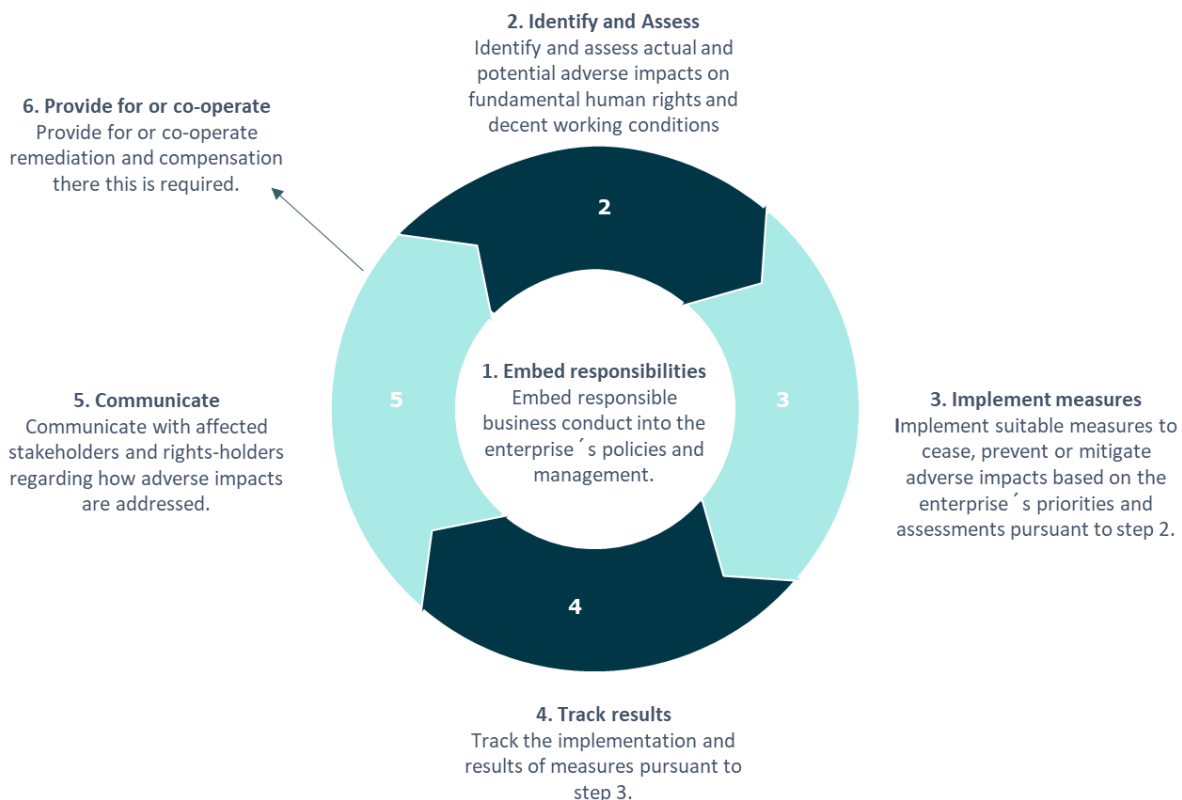


Figure 1: Step-by-step process.

4.1 Step 1 – Embed responsibilities

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

Rosenberg Worley AS and Worley Ltd operate in accordance with their established and comprehensive quality management systems that is certified according to the ISO 9001:2015 Standard. The Quality 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.



Our Code of Conduct sets out what we must do, our responsibilities, and the ethical standards we uphold. It includes our commitment to respecting human rights and preventing human rights abuses such as modern slavery.

Our Human Rights and Modern Slavery policies are aligned with international human rights principles and outline our commitment to maintaining the highest standard of business conduct and ensuring people are treated with dignity, respect, and fairness.

Our policies and standards, which are reviewed and updated every two years, set out our standards for professional behavior, ethical conduct, and compliance with all laws and regulations. They include:

“Code of Conduct” - sets out what we must do, our responsibilities, and the ethical standards we uphold. It includes our commitment to respecting human rights and preventing human rights abuses such as modern slavery.

“Supply Chain Code of Conduct” - Our expectations of ethical conduct of suppliers and contractors aligned with our Code of Conduct and policy commitments.

“Human Rights Policy” – Our commitment to respecting and protecting the fundamental human rights of the people we engage and interact with.

“Modern Slavery Policy” –Our commitment to the prevention of modern slavery and ensuring people are treated with dignity, respect and fairness.

“Whistleblower Policy” – Our commitment to ethical business practices and investigating and reporting any unethical conduct, including assurance that a reporter will be protected against adverse actions.

“Safety, Health, and Wellbeing Policy” – Our commitment and application of laws related to providing a physically and psychologically safe, healthy, and respectful environment.

“Diversity, Equity, and Inclusion Policy” – Our commitment to a diverse, equitable and inclusive workplace where everyone can fully participate and maximize their potential and affirms our stance against discrimination of any kind.

“Respectful Workplace Behaviour Policy” – Our commitment to creating a safe and respectful workplace where harmful and disrespectful behaviors are not tolerated.

“Anti-Bribery and Corruption Policy” - Our commitment to honest and ethical conduct in compliance with all applicable anti-bribery and corruption laws.

“Sustainability Policy” - Our commitment to support progress towards achieving the United Nations Sustainable Development Goals and upholding the principles of the UNGC.

Our Code of Conduct policy is available in 16 languages, including English. We communicate and make all of our policies available to our employees via our knowledge management system, internal intranet, and are also available for external stakeholders on our corporate governance website ([LINK](#))

4.2 Step 2 – Risk identification and assessment

As part of our continued work with the Transparency Act, Rosenberg Worley AS performs ongoing identification and assessment of actual and potential adverse impacts on fundamental human rights and decent working conditions.

Worley Rosenberg's risk assessment is supported by established governance processes and is further strengthened through the due diligence measures and systems described in Step 3.

When assessing our own operations in Norway, the overall risk level is considered low. This assessment is based on our established management systems, mandatory policies, and internal controls governing employee conduct and working conditions. Approximately 80% of the Worley Rosenberg's total procurement spend is related to suppliers based in Norway, and less than 10 % of the procurement spending is from outside EU. This contributes to a generally lower exposure to high-risk jurisdictions.

However, we continue to recognize that the primary risk exposure remains within the supply chain, due to its size and complexity. While the overall structure of the supplier base has not materially changed during FY2026, Worley Rosenberg has sought to improve our ability to identify, assess, and monitor risks through improved systems, data quality, and governance processes as a part of our measures to mitigate risks of actual and potential adverse impacts on fundamental human rights and decent working conditions in our supply chain.

Key risk areas

Statistical Risk of Non-Compliance - The more suppliers we engage, the higher the probability that one or more may breach human rights or labor standards. Even if the majority of suppliers comply, the volume alone increases the statistical likelihood of non-compliance.

Limited Oversight and Monitoring - Despite improvements in systems and governance, the scale and spread of the supplier base continues to present challenges in ensuring full and continuous oversight of all suppliers.

Lack of Transparency in Lower Tiers - The use of subcontractors and complex supplier structures may reduce visibility into lower-tier suppliers, where the risk of adverse impacts on human rights and working conditions may be higher.

Development in risk assessment capability

During FY2026, Rosenberg Worley has sought to improve our capability to identify and assess risk through a more structured and consistent due diligence processes within our supply chain operations with the aim to:

- Improve availability, quality, and traceability of supplier data
- Strengthened governance, escalation, and follow-up of identified findings
- Increased focus on risk-based prioritization of suppliers

These improvements seek to enhance our ability to identify high-risk suppliers and ensure a more targeted and effective risk-based approach to due diligence as further described in Step 3 “*Implemented measures*”.

Overall assessment

Worley Rosenberg assesses that the inherent risk exposure within the supply chain remains broadly unchanged, as it is largely driven by the scale and complexity of the supplier base.

Based on the identified risk areas and improved assessment capabilities, we have implemented targeted measures to prevent, mitigate, and manage identified risks, as described in Step 3.

4.3 Step 3 – Implemented measures

Modern Slavery e-Learning module. As a part of our continuous modern slavery prevention program to proactively prevent modern slavery, Worley has implemented a global Modern Slavery e-Learning module. This new module is mandatory component of onboarding all new employees and will equip our people with the knowledge and skills needed to proactively identify and report any concerns related to modern slavery within our operations and supply chain.

Annual Code of conduct refresher

Our people must complete an annual Code of Conduct refresher training to stay informed and aware. In FY2026, the refresher training included content on modern slavery. This section of the training module examines risks that may be associated with third parties, including anti-bribery and corruption, sanctions, and modern slavery. The training covered the different forms of modern slavery, our expectations of our people, indicators of heightened risk, reporting mechanisms, and access to further resources. For the Norwegian location we obtained a 100% completion rate.

Supply Chain Code of Conduct

In FY2026, we updated our Supply Chain Code of Conduct to strengthen and clarify expectations of suppliers and contractors who work with Worley, including aligning with our commitments to human rights and modern slavery prevention including complying with our worker welfare principles, sustainability expectations, and information security requirements. The updated Supply Chain Code of Conduct also supports onboarding by consolidating these minimum requirements into one document that suppliers and contractors are required to accept as part of the onboarding process.

Implementation of EB360 (Due Diligence Tool)

In FY2025, we lifted our ethical business practices by adopting a risk-based approach to due diligence and implementing a new due diligence platform. This system is being integrated into our third party onboarding processes to enhance transparency and identify potential modern slavery risks across our supply chain and business relationships. The due diligence of all third

parties now involves completion of a standardized onboarding questionnaire designed to assess potential exposure to modern slavery risks. Upon submission, the platform generates an initial risk rating based on three broad risk categories, one of which specifically addresses modern slavery. The platform's modern slavery risk rating draws on multiple indicators, including geographic, sectoral, and operational factors. These factors are weighted and applied based on the nature of the third party's engagement and the inherent risks associated with that type of entity. The new platform also incorporates data from reputable sources, including the Global Slavery Index (GSI) country-level prevalence score. This enhanced due diligence process allows us to proactively identify, assess, and manage modern slavery risks in a consistent and data-driven manner.

In FY26 the EB360 platform was introduced as a part of Worley Rosenberg's Supply Chain operations.

Contract lifecycle monitoring in our Enterprise Resource Planning system

A new process for tracking supplier contracts has been established within our Enterprise Resource Planning ("ERP") system, including; a defined validity period (maximum of 3 years) and full history tracking of contract renewals.

This ensures that supplier relationships are regularly reassessed and aligned with updated due diligence requirements.

Integration of staffing suppliers into Supply Chain governance

All external workforce suppliers are now formally incorporated into the supply chain function and subject to the same due diligence requirements and controls as other suppliers.

Quarterly supplier governance process

A new routine has been introduced to review and assess the supplier base on a quarterly basis. This strengthens control over active suppliers and supports continuous risk management.

Review and follow-up of insufficient supplier responses

All suppliers identified in FY2025's work with the transparency act with insufficient or missing responses in the targeted risk-based due diligence process have been systematically reviewed by our Supply Chain team.

Follow-up actions include:

- Requests for additional information
- Reassessment of supplier risk
- Consideration of contractual or commercial measures if required

4.4 Step 4 – Track results

During FY2026, Rosenberg Worley AS has further strengthened its ability to monitor, evaluate, and document the effectiveness of its due diligence processes and implemented measures in accordance with the Transparency Act.

Worley Rosenberg has improved traceability and consistency in its due diligence work through the implementation of structured systems and enhanced governance processes, as described in Step 3. This has resulted in increased transparency in supplier assessments and improved documentation of how risks are identified, evaluated, and followed up.

In addition, improved lifecycle management of suppliers has been introduced through defined contract durations and systematic tracking of renewals. This ensures that supplier assessments are regularly updated and remain relevant throughout the supplier relationship. Periodic reviews of the supplier base further support maintaining an accurate and controlled overview of active suppliers.

Follow-up of suppliers previously identified with insufficient or missing responses in the risk-based due diligence process has been conducted in FY2026. These suppliers have been subject to further review, including requests for additional information and reassessment of risk where necessary, strengthening the overall quality and completeness of the risk picture.

Overall, the measures implemented during FY2026 have enhanced our ability to track and evaluate the effectiveness of its due diligence efforts. While the inherent risk exposure remains linked to the scale and complexity of the supply chain, Rosenberg Worley now has a stronger foundation for systematic monitoring, documentation, and follow-up of identified risks, supporting a more proactive and risk-based approach to preventing and mitigating adverse impacts.

4.5 Step 5 – Communicate

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

4.6 Step 6 – Cooperate

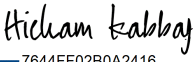
Our due diligence within the chosen suppliers has not revealed any actual impacts on fundamental human rights and decent working conditions within our supply chain. If the due diligence had revealed any adverse impact, required remediations would be addressed.

5. Conclusion


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.

6. Signatures

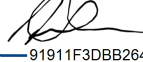
Signatures according to the Transparency Act § 5 (4):

Signed by:

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Hicham Kabbaj
Chair of the Board

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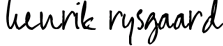
Erwin Geene
Board member

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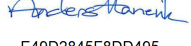
Paula Shepherd
Board member

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Nina M. Stene
Board member

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Henrik Rysgaard
Board member

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Anders Hanevik
Board member