



COOL COMPANY LTD. SLAVERY AND HUMAN TRAFFICKING STATEMENT MADE PURSUANT TO THE MODERN SLAVERY ACT 2015 AND NORWEGIAN TRANSPARENCY ACT Adopted on 27.06.2025

Cool Company Ltd. ("CoolCo") and the CoolCo Group (as defined below) are committed to the ethical and human rights principle that there should be no slavery or human trafficking and to respecting and promoting fundamental human rights and decent working conditions in our operation and supply chains. As such, the CoolCo Group is dedicated to ensuring transparency in its supply chains and business operations.

This Slavery and Human Trafficking Statement (the "**Statement**") is made on behalf of the CoolCo Group to provide transparency and disclosure of relevant information about the CoolCo Group's operations and practices in accordance with: (i) the UK Modern Slavery Act 2015 (the "**UK Act**"), which requires an annual statement on steps taken to ensure slavery and human trafficking are not taking place in business operations and supply chains; and (ii) the Norwegian Transparency Act, which requires companies to conduct due diligence assessments to identify and address adverse impacts on fundamental human rights and decent working conditions (the "**Norwegian Act**" and the Norwegian Act and the UK Act are collectively referred to as the "**Acts**").

1. OUR BUSINESS

The CoolCo Group owns, operates, and manages LNG carriers and manages FSRUs that provide supply chain support to the international energy industry. The CoolCo Group's primary objective is to offer customers worldwide with modern and flexible LNG transportation solutions, contributing to decarbonization efforts, economic growth, and improvements in quality of life. The CoolCo Group's integrated, in-house vessel management platform provides commercial and technical management services to the CoolCo Group and third parties.

CoolCo is a company incorporated in Bermuda and is also registered as a UK establishment.

Cool Company Management Ltd ("**CoolCo UK**"), a direct subsidiary of CoolCo, is a company registered in England and Wales with its office in London. CoolCo UK provides ship management services to the CoolCo Group and third parties, and provides corporate and management services to CoolCo.

Cool Company Management AS ("**CoolCo Norway**"), a direct subsidiary of CoolCo UK and an indirect subsidiary of CoolCo, is a company registered in Norway with its office in Oslo. CoolCo Norway provides technical and operational management services to the CoolCo Group. CoolCo Norway's operations are summarised as follows:

- (1) CoolCo Norway hires employees in Oslo and enters into contracts for office related services.
- (2) CoolCo Norway purchases parts, consumables, equipment, and supplies for the vessels managed by the CoolCo Group from a diverse range of suppliers. These suppliers are sourced globally, with a



majority of contracts being with European companies. Additionally, CoolCo Norway collaborates with selected shipyards to provide dry docking/maintenance services, as well as construction and conversion work.

- (3) CoolCo Norway, in their capacity as agents, employs seafarers for vessels managed and owned by the CoolCo Group and works with a network of international manning agents. These seafarers are employed in accordance with the Maritime Labour Convention.

CoolCo has a number of direct subsidiaries registered as UK establishments of overseas companies, as further set out in the table below (together, the **UK Establishment Companies** and CoolCo, CoolCo UK, CoolCo Norway and the UK Establishment Companies are collectively referred to as the **CoolCo Group**). Certain of the UK Establishment Companies own or bareboat charter LNG carriers which are chartered out to third parties.

UK Establishment Company	Place of incorporation
Felox Marine Ltd	Liberia
Pernli Marine Ltd	Liberia
Persect Marine Ltd	Liberia
Respent Marine Ltd	Liberia
Kool Panther I Corporation	Liberia
Kool Tiger I Corporation	Liberia
Kool Blizzard Corporation	Marshall Islands
Kool Crystal Corporation	Marshall Islands
Kool Frost Corporation	Marshall Islands
Kool Glacier Corporation	Marshall Islands
Kool Husky Corporation	Marshall Islands
Kool Ice Corporation	Marshall Islands
Kool Kelvin Corporation	Marshall Islands
The Cool Pool Limited	Marshall Islands

2. COOLCO POLICIES

CoolCo's Code of Business Conduct and Ethics (the "**Code**") serves as a foundation of the CoolCo Group's policies, procedures, and guidelines, setting forth the expected behaviours and promoting integrity while deterring wrongdoing. The Code sets out CoolCo's commitments on human rights, and to building and preserving a safe and healthy working environment, and respecting the rights, culture and dignity of our employees.

You can find the Code [here](#).

The CoolCo Group expects all representatives, including third parties acting on its behalf, to uphold the ethical standards, demonstrating honesty, integrity, and respect for others. The Code is approved by the CoolCo Board of Directors and is reviewed annually.



CoolCo's Code also reflects its dedication to acting ethically and with integrity in all business relationships. The Code includes provisions that address the conduct of suppliers and emphasizes the need to implement and enforce effective systems and controls to prevent slavery and human trafficking within the supply chains.

The CoolCo Group recognizes and acknowledges its responsibility when conducting business in countries with prevalence of modern slavery. The CoolCo Group's supplier registration processes emphasize this commitment, and the CoolCo Group has established a registration process for new suppliers. The vendor registration form includes inquiries on key topics, such as whether suppliers have programs in place to ensure that modern slavery does not exist in their operations and supply chains.

3. DUE DILIGENCE PROCESSES

Supplier qualification plays a crucial role in ensuring the success and sustainability of any organization. The CoolCo Group understands the significance of partnering with reliable and competent suppliers to deliver high-quality products and services to its customers. To achieve this, the CoolCo Group follows a comprehensive qualification process that enables us to assess and evaluate potential suppliers thoroughly. This includes conducting due diligence to identify, prevent, and mitigate adverse impacts on fundamental human rights and decent working conditions in the geographical locations where we operate and/or procure services and/or products.

This process involves multiple stages, from initial assessments and documentation reviews to site visits, performance evaluations, and risk assessments. By implementing a rigorous qualification process, the CoolCo Group can conduct due diligence on working conditions and how our suppliers implement human rights. This approach allows us to identify actual and potential adverse impacts on human rights and decent working conditions in our supply chains. For example:

- (1) **Pre-Screening Questionnaire:** Each supplier is asked to complete a pre-screening questionnaire, which includes requirements related to HSSEQ (Health, Safety, Security, Environment & Quality) information. These requirements cover aspects such as formal management systems, certifications, health and safety training, supplier qualification procedures, and whether the supplier has policies addressing drugs/alcohol abuse, anti-corruption, and modern slavery. These criteria help ensure suppliers meet the CoolCo Group's standards and practices. All suppliers must also accept the Code.
- (2) **Documentation Review:** The CoolCo Group examines relevant documentation provided by the supplier, such as certifications, licenses, permits, and insurance policies. These documents help evaluate the supplier's compliance with industry standards, legal requirements, and specific CoolCo Group guidelines.
- (3) **Site Visit/Assessment:** In some cases, the CoolCo Group may conduct due diligence by way of a site visit or assessment at the supplier's facilities. This visit allows CoolCo Group representatives to evaluate the supplier's operations, infrastructure, equipment, processes, and overall quality control measures. It also provides an opportunity to meet key personnel and discuss any specific requirements or concerns.



- (4) **Risk Assessment:** The CoolCo Group performs a risk assessment to identify any potential risks associated with engaging the supplier. This assessment includes the supplier's ability to meet CoolCo Group's ethical and sustainability standards (discussed further below).
- (5) **Supplier Audit:** In certain cases, the CoolCo Group may conduct a formal audit of the supplier's operations. This audit typically involves a comprehensive examination of the supplier's processes, quality management systems, and compliance with applicable standards or regulations. The audit may be conducted by the CoolCo Group's internal audit team or by third party auditors.

As mentioned above, the CoolCo Group adopts a risk-based approach when carrying out due diligence and assessing suppliers. The CoolCo Group considers data from various sources, including the Global Slavery Index, the ITUC Global Rights Index, Transparency International, and the U.S. Department of Labour List of Goods produced by Child Labour or Forced Labour to identify regions or industries with a higher risk profile. The CoolCo Group then uses this information to adopt a risk-based approach with regards to those regions and industries that require enhanced due diligence.

In addition, the CoolCo Group uses an online tool (the **"Platform"**) to screen our suppliers, which allows us to enhance our screening process and ensure better compliance with regulations. The Platform analyses and provides information on legal and regulatory violations related to various aspects of business conduct. It focuses on identifying instances where companies or individuals have been involved in illegal activities or have faced legal actions, and includes sanctions, anti-money laundering, anti-corruption and regulatory compliance.

4. SPEAK UP POLICY

The CoolCo Group has in place a speak up policy, which establishes procedures for confidential, anonymous reports by employees, representatives, associates of the CoolCo Group, and external stakeholders regarding accounting practices, auditing matters and any known or suspected violations of the Code or other corporate policies. This also serves as a grievance mechanism for reporting adverse impacts on human rights and decent working conditions. The CoolCo Group takes any allegations of wrongdoing, including those related to modern slavery, human trafficking and other human rights violations, seriously and is committed to providing or cooperating in remediation when appropriate.

You can find the Speak Up portal [here](#).

To date, the CoolCo Group has not received any reports or concerns regarding modern slavery, human trafficking or other human rights violations within its operations or supply chains.

5. 2025 UPDATE

In our Statement published in 2024, we indicated that we would undertake certain measures to combat slavery and human trafficking. Below is an update on the status of those measures as well as those to be implemented in 2025:

1. Enterprise Resource Planning ("ERP") Portal
We aimed to develop to a bespoke ERP-based supplier onboarding portal in 2024, however, after further consideration this project was discontinued, and the resources utilised in other areas such as the



enhanced due diligence of certain suppliers (as per point 3 below). We nevertheless remain committed to streamlining our supplier onboarding process and exploring platforms that can further enhance our procedures to comply with the Acts.

2. Integration of Human Rights into HSEQ Audits

As committed in 2024, audit protocols for both vessel and office operations now include human rights and working conditions criteria. These are aligned with the requirements of the Norwegian Transparency Act and support a more holistic audit process.

3. Enhanced Supplier Screening

Suppliers identified as operating in higher-risk countries or industries were subject to enhanced screening and documentation requests. This included clarifying their internal policies on working conditions, and prevention of forced labour.

4. Modern Slavery and Due Dilligence in Supply Chains – Training

A bespoke training module has been developed in-house to improve awareness of modern slavery and human rights, including due diligence in supply chains. All employees and contractors will be required to complete the training in 2025.

6. FURTHER STEPS

The CoolCo Group will continue to review the effectiveness of the steps taken to prevent modern slavery, human trafficking, and other adverse impacts on fundamental human rights and decent working conditions in its supply chains and business. Further, CoolCo will track the implementation and results of our due diligence measures. The CoolCo Group intends to take the following additional steps:

- (1) Continue to provide tailored training to staff members to ensure an understanding of the risks of modern slavery and human trafficking in its supply chains and business.
- (2) Continue to focus on suppliers in high-risk countries with a greater risk of modern slavery and human trafficking and other human rights violations, using the sources mentioned (in section C, paragraph 3).

This statement has been approved by the Board of Directors of Cool Company Management AS
in compliance with the Norwegian Act on 27.06.2025.

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Espen Sending
Director

A handwritten signature in black ink, appearing to read "Vivian Jeanette Børseth".

Vivian Børseth
Director