



Norwegian Transparency Act Statement 2024

This statement, made by Rolls-Royce Electrical Norway AS ("**RREN**") and Rolls-Royce Corporation ("**RRC**" and, together with RREN, the "**reporting RR companies**"), sets out the approach taken by the reporting RR companies in 2024 to identify and mitigate actual or potential adverse impacts to internationally recognised, fundamental human rights, and to ensure just and favourable working conditions, in their own operations and supply chains. The reporting RR companies make this statement for the financial year ending 31 December 2024 in accordance with the reporting requirements of the Norwegian Act on Business Transparency and Work on Fundamental Human Rights and Decent Working Conditions (the "**Transparency Act**").

Further details about the Rolls-Royce Group of companies ("**Rolls-Royce**", the "**Group**", "**we**" or "**our**") and the Group's approach to human rights and working conditions can be found in our 2024 Annual Report, our Modern Slavery Statement for 2024 and at rolls-royce.com/sustainability.

(I) Business structure and activities

Rolls-Royce develops and delivers complex power and propulsion solutions for safety-critical applications in three core divisions (Civil Aerospace, Power Systems and Defence) and in new markets. Our business divisions are supported by functions, business capabilities and our Global Business Services organisation. Our head office has responsibility for setting Group strategy, policy and governance, including those relating to human rights.

Headquartered in London, Rolls-Royce has production sites and office locations in 48 countries globally, with our largest sites in the UK, Germany, US & Canada. In 2024, we had 42,400 employees worldwide.

The reporting RR companies' business in Norway

RREN is a Norwegian subsidiary of Rolls-Royce plc ("R-R plc") and is headquartered in Trondheim. The company, which employed approximately 53 employees throughout 2024, is formed of dedicated departments for engineering, project management, production, quality and health, safety and environment ("HSE"), and is supported by functions and capabilities such as Finance, Human Resources and IT. RREN's management comprises a Managing Director and an executive management team, who work closely with other Group entities and report to the R-R plc Board.

RREN develops and delivers electric propulsion and energy systems for maritime, aviation, and industrial applications. The company's products include electric motors, generators, converters, energy storage systems and complete integrated propulsion systems. RREN also offers engineering, project management, installation, service, and



maintenance services for electric systems. The solutions are designed to enhance energy efficiency, reduce emissions, and promote sustainability.

RRC, incorporated under the laws of Delaware and headquartered in Indianapolis, develops and delivers complex power and propulsion solutions for safety-critical applications in the air, at sea and on land. In 2024, RRC had approximately 3,000 – 4,000 employees working in the United States in a range of roles.

RRC provides propulsion maintenance services and support, called MissionCare, to the Norwegian Air Force (“NAF”) in Norway and abroad. In order to perform its MissionCare obligations and support the NAF’s maintenance program, a Field Service Representative from RRC is based at Gardermoen Air Station in Norway.

(2) Policies related to human rights and working conditions

The reporting RR companies’ commitment to respecting fundamental human rights and to fair and safe working conditions is outlined in Rolls-Royce’s global (i) Human Rights Policy; (ii) Health, Safety and Environment Policy; (iii) Dignity and Respect Policy; (iv) Diversity and Inclusion Policy; (v) Code of Conduct (“Our Code”); and (vi) Supplier Code of Conduct (“Supplier Code”). Our Code and our policies can be viewed on our website (<https://ourcode.rolls-royce.com>).

Human Rights Policy

Rolls-Royce’s Human Rights Policy sets out the following principles and commitments by the reporting RR companies regarding fundamental human rights:

- We are committed to protecting and preserving the rights of our employees, those employed in our supply chain, and communities affected by our operations;
- We are committed to acting in a socially responsible manner, complying with applicable laws, and respecting the communities where we operate;
- We conduct our business in an environmentally, ethically and socially responsible manner and integrate sustainability considerations into decision-making at all levels of the organisation;
- We respect collective representation;
- We believe that all employment should be freely chosen and refrain from any form of forced or involuntary labour or human trafficking;
- We are opposed to the use of any form of child labour or practices that inhibit the development of children;
- We are alert to the risks vulnerable people may face and seek to ensure that this group is free from discrimination and exploitation;
- We pay fair and competitive wages and benefits; and
- We will only work with suppliers whose core values and commitment to ethical business conduct matches our own, and we require that their conduct always meets our standards.

Health, Safety and Environment Policy

Our Health, Safety and Environment Policy makes clear that the reporting RR companies are committed to maintaining safe and healthy workplaces that minimise environmental impact. The Policy sets out the following principles and commitments:

- We expect the highest standards of behaviour for protecting our own and others' health and safety and the environment in which we operate;
- We take personal and collective responsibility, along with our suppliers, contractors, joint ventures and other partners, to:
 - o operate safely in all our business activities and operations;
 - o create a working environment that supports employee wellbeing, with an aspiration towards zero work-related ill health, accidents or harm to people; and
 - o prevent or minimise any adverse environmental impact from our activities, products and services, support the sustainable use of resources, and strive for no environmental incidents
- We take accountability to reduce HSE risks and impacts throughout our activities, products and services;
- We integrate HSE into our business processes and decision making;
- We meet our high standards, ensure compliance with legal and other requirements and drive towards best practice;
- We speak up if concerned about an activity or decision, including stopping work that we think may be unsafe, and seek advice and support when necessary; and
- We commit to engaging and communicating openly with all key stakeholders and to driving continual improvement through appropriate targets and goals. We believe that high levels of HSE performance are fundamental to doing business with our customers, delivering value for our shareholders and supporting the sustainability goals, aspirations and expectations of the communities in which we work.

Our Code

Our Code underpins all that we do as a corporate Group by setting out our principles and how they apply to our business activities. It applies to all employees, subsidiaries (including the reporting RR companies and their employees) and controlled joint ventures, wherever they are located.

Our Code and Group policies are made available to employees in English and our core business languages. These can be accessed externally through Our Code and Group policies dedicated microsite (<https://ourcode.rolls-royce.com>) and supporting mobile application, and internally through our employee intranet.

RREN Guiding Principles



In addition to the above-mentioned Group Codes and policies, RREN employees are required to adhere to RREN's business-level Guiding Principles on Human Rights and Working Conditions (the "**Guiding Principles**"). The Guiding Principles set out RREN's guidelines and principles, and define organisational roles and responsibilities, relating to human rights and decent working conditions within RREN's operations and supply chain. The Guiding Principles are annexed to this statement as Appendix A.

(3) Our due diligence processes related to human rights impacts

In order to do business together, the reporting RR companies expect their suppliers to be ethical, responsible and to fully comply with all applicable laws and regulations. Our Group Supplier Code sets out the behaviours, practices and standards the reporting RR companies expect their suppliers to demonstrate and comply with, all of which are based on the Rolls-Royce Code, policies and standards. Selected suppliers are contractually required to adhere to the Supplier Code or a mutually agreed alternative. The Supplier Code is publicly available in multiple languages and is published on Rolls-Royce's website, as well as on dedicated supplier management and communication portals, including invoicing channels.

Partnering with a leading third-party provider, the reporting RR companies conduct sustainability screening and assessments to understand the inherent sustainability risks within our supply chain and take appropriate mitigating actions where required. Prioritised suppliers are requested to complete a comprehensive assessment of their sustainability risk management. Where risks are identified, suppliers are asked to put in place improvement plans and offered support and resources to help with this via our third-party partner.

In 2024, the reporting RR companies' due diligence approach included conducting external screening, internal checks on contracts for selected suppliers, certifications of the supplier, and specific examinations based on prioritised risks.

(4) Identifying, assessing and mitigating adverse human rights impacts

The Rolls-Royce Holdings Board has ultimate accountability for managing the risk of adverse human rights impacts within the Group's operations. The Nominations, Culture & Governance Committee, as a sub-committee of the Board, receives updates on our sustainability and ethics and compliance programmes from internal subject matter experts, including our General Counsel; Chief Compliance Officer – Group Strategy and Policy; Director of Risk & Internal audit; and Head of Sustainability. Our Human Rights Steering Group ("**HRSG**"), sponsored by the General Counsel, comprises representatives from our Ethics & Compliance, Sustainability, Procurement, Legal and Human Resources teams, and is responsible for managing actual or potential human rights impacts, including determining whether any issue needs to be escalated to our Executive Team.



The HRSG is supported and advised by business-level Human Rights Officers and other internal and external subject matter experts, as required.

In 2024, the reporting RR companies identified, assessed and mitigated the risk of adverse human rights impacts in their operations and supply chains through Rolls-Royce's human rights risk assessment framework. That framework includes:

- Due diligence policies and processes for identifying and addressing potential adverse human rights impacts;
- Implementation of Our Code, Supplier Code and Human Rights Policy;
- Processes, methods, and tools to regularly conduct risk analysis and mapping of our own operations and those of our suppliers;
- Speak Up channels for internal and external stakeholders to raise any concerns they may have about human rights issues or working conditions;
- Preventive measures to minimise and mitigate the risk of adverse human rights impacts;
- Processes and guidelines for specific corrective and remedial measures; and
- A governance structure to ensure accountability and processes for documentation and reporting.

In the reporting RR companies' business operations

The reporting RR companies' process of identifying, assessing and mitigating human rights risks and impacts in their business operations is embedded in their management systems and processes. Their management teams are responsible for ensuring compliance with local laws and regulations, including those relating to human rights and working conditions.

In 2024, another way the reporting RR companies identified and managed risk was through Speak Up channels. Rolls-Royce strives to create an environment where everyone feels valued and actively encouraged to speak up about questions or concerns without fear of negative consequences. This is a vital part of enhancing our culture of inclusion and belonging. Employees are encouraged to raise concerns or questions confidentially through 'Speak Up', an externally managed contact portal and phone line, operated in multiple languages, or to their local line management or leadership, our Ethics and Compliance teams and/or dedicated human rights officers. External parties, such as suppliers or customers, are also encouraged to raise concerns or questions via Speak Up, to their usual Rolls-Royce contacts or to a list of key roles whose contact details are made available via our website.

All concerns raised in relation to the reporting RR companies are reviewed by subject matter experts within the Head Office Ethics and Compliance function and/or relevant internal SMEs or accountable persons, with input from external counsel if required. The volume and nature of concerns raised is routinely monitored at Group-level to understand and respond to potential emerging or actual trends, which is discussed at the Nominations, Culture & Governance Committee. Key statistics are made available to all

employees at regular intervals to encourage speaking up and are also published externally via our website.

The reporting RR companies also engage with their people and their elected employee representatives, where appropriate, through consultative bodies such as European and National Works Councils and other formal and informal means in line with local best practice and legal frameworks.

We have considered the exposure of the reporting RR companies to the risk of adverse human rights impacts occurring in their operations, taking into account (i) the nature of their business activities; (ii) the application of Group and business-level policies, particularly procurement and recruitment practices; (iii) and the markets and geographies they operate in, and consider their exposure to the risk to be low.

In 2024, the reporting RR companies did not identify any instances of adverse human rights impacts occurring in their own operations.

In 2025, RREN carried out additional risk mapping and due diligence with respect to its own operations and its supply chain in order identify areas that could pose risks to fundamental human rights and decent working conditions. In respect of its own operations, RREN carried out an internal review of the following areas of potential risk to fundamental human rights and decent working conditions:

- Employment contracts and contractor agreements;
- Working hours, remuneration and holiday entitlement;
- HSE, including the physical and social working environment on site;
- Internal control systems and whistleblowing mechanisms;
- Freedom of association and employee participation rights;
- Internal procedures for human rights and decent working conditions;
- Ethical guidelines for foreign workers; and
- Processes and policies relating to privacy and security.

This risk mapping exercise has reconfirmed that RREN's own operations do not cause or contribute to any actual or potential adverse impacts on fundamental human rights or decent working conditions. Although the assessed level of risk of potential adverse human rights impacts within RREN's operations is low, and no actual adverse impacts have been identified, RREN has identified specific measures that it will implement in order to further strengthen its efforts to maintain a good working environment for its employees. Those measures include updating existing employment contracts and contract templates and strengthening business-level privacy protection and information security policies and processes.



The reporting RR companies' supply chains

The reporting RR companies rely on a global supply chain to design, develop and manufacture components of their product portfolios and to provide raw material for their own production activities, as well as to support their own operations, facilities and services network.

Rolls-Royce's Supplier Code is the foundation of the reporting RR companies' approach to managing the risk of adverse human rights impacts within their supply chains. Relevant principles in our Supplier Code include:

- Suppliers must not use any form of involuntary labour including, but not limited to, people who have been trafficked, forced, prison or debt-bonded labour;
- Suppliers must not employ anyone under the age of 15 years or, where it is higher, according to the applicable law, the mandatory national school leaving age;
- Suppliers must never use or support practices that inhibit the development of children in accordance with applicable ILO conventions; and
- Suppliers must ensure that all wages meet local minimum wage requirements as laid down by the applicable law and, in addition, as is determined in accordance with the regulations of the place of employment.

In addition, Rolls-Royce's Supplier Code contains requirements related to the responsible procurement of raw materials, an area recognised as being at higher exposure of human rights risk. The Supplier Code requires suppliers to provide the reporting RR companies with products and materials, including constituent minerals, that are sourced responsibly and verified as 'conflict free' in accordance with OECD guidelines.

Adherence with the Supplier Code is mandated for selected suppliers of the reporting RR companies through Rolls-Royce's General Conditions of Purchase and precedent contractual terms. This is in addition to all applicable laws and regulations in the country or countries where their suppliers operate. In the event that our Supplier Code sets out a higher requirement than applicable local regulations, suppliers are expected to adhere to that higher requirement. The Supplier Code requires the reporting RR companies' direct suppliers to disseminate these requirements throughout their own supply chains.

If a supplier's practices are found unsatisfactory or non-conformant to our Supplier Code, the issue is investigated and escalated appropriately. The reporting RR companies address these issues on a case by-case basis, seeking advice from subject matter experts and legal counsel where appropriate. In the event of significant non-conformance, the reporting RR companies retain the right to terminate any contractual agreement with immediate effect.

The reporting RR companies perform regular risk analysis to identify, prevent, mitigate and if required, remediate human rights risks, including the risks of forced labour and

child labour in our supply chain. In the event that a risk or violation is identified in their own operations or supply chain, the risk or violation is weighted and prioritised and appropriate steps taken to mitigate the risk or address the violation. The risk analysis process has multiple steps, beginning with a categorisation of suppliers and all main production and purchasing locations into different risk-categories according to the risk level (high, medium, low). For certain entities, this prioritisation is performed using an expert sustainability platform provider, EcoVadis. The categorisation is influenced by the risk level in countries where these companies operate, as expressed by recognised indices including modern slavery and human trafficking indices. Additional steps include external screening services and internal checks on contracts, certifications of the subsidiary or supplier, or specific examinations based on questionnaires. If necessary, the reporting RR company will perform in-depth evaluation of the situation locally and on the sites of subsidiaries or suppliers. In the event that an adverse impact to human rights is identified, and corrective or remedial measures are required, the reporting RR company will work with the relevant supplier to consider their appropriateness in light of the best interests and protection of the impacted individuals or groups.

In 2025, RREN carried out additional risk mapping in relation to its suppliers to identify any areas of risk to fundamental human rights or decent working conditions. In evaluating which of their suppliers should be subject to further due diligence, RREN considered country risk, sector/industry risk, product risk and any known company-specific risks, as well as the volume of parts and services being sourced by RREN from each supplier. Levels of country, sector and product risks were assessed by reference to relevant indices, including the Global Rights Index, Global Slavery Index, Children's Rights in the Workplace Index and the Transparency International Corruption Perceptions Index.

Through this risk mapping exercise, RREN identified risk exposure across several levels of its supply chain, particularly related to the production of goods involving rare earth elements, specialty metals, and electronic components. Certain suppliers have been identified by RREN for follow-up measures and further, ongoing due diligence. Further measures have also been implemented by RREN to mitigate identified risks in its supply chain, including the development of supplier questionnaires which are tailored to each supplier to enable RREN to gain a deeper insight into how and where its suppliers operate, and what due diligence the suppliers themselves carry out.

(5) How we measure the effectiveness of our processes

Rolls-Royce benchmarks its approach to human rights and our policies and processes, both formally (e.g. through corporate ESG assessments) and informally (e.g. through peer engagements) to help inform and continually develop our programme.

We work in partnership with customers and industry peers to seek to share and implement best practice ethical business practices. Rolls-Royce is a steering committee member of the International Forum on Business Ethical Conduct for the Aerospace and Defence Industry; the ADS Business Ethics Network; and the Institute of Business Ethics, and our General Counsel is co-chair of the Bingham Centre's (British Institute of International & Comparative Law) Business Network.

We also measure the effectiveness of, and compliance with, our policies and processes by reference to the number of adverse human rights impacts identified in our own operations and in our supply chain, or concerns about human rights impacts raised through our Speak Up channels each year.

On the ground in Norway, RREN conducts working environment surveys, pulse surveys, and holds monthly meetings with union representatives to ensure employee participation and early identification of potential issues. Employees are actively involved in changing processes, and we carry out monthly safety inspections and performance appraisals. We also organize "all-hands" meetings and regular team and departmental meetings to promote open dialogue.

(6) Training our people

At Group-level, Rolls-Royce makes clear to all employees the ethical standards we expect them to adhere to in Our Code and Group policy framework. All employees of the reporting RR companies are required to complete annual, mandatory training on a range of topics centred on our values, behaviours and legal obligations. Where appropriate, the reporting RR companies deliver additional training on the standards and principles referred to in our Human Rights Policy to parts of those areas of their businesses more likely to be exposed to human rights related risks, such as Procurement.

The reporting RR companies provide training and regular updates to their employees to ensure that they have the necessary competence to comply with health and safety requirements. They promote a culture that prioritizes safety and an inclusive and fair working environment, including through clear guidelines, mandatory training and specific initiatives, and by encouraging a 'speak up' culture where employees feel safe and valued.



This joint statement has been made by RREN and RR Corp on 27 June 2025 in accordance with the reporting requirements of the Transparency Act.

The Boards of RREN and RR Corp have reviewed and approved this statement.

Signed on behalf of Rolls-Royce Electrical Norway AS

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Steven Christopher Burrill

Chairman of the Board

Signed on behalf of Rolls-Royce Corporation

A handwritten signature in blue ink, appearing to read "K.C. Hicks", written over a horizontal dashed line.

Kimberly C. Hicks

General Counsel