

Rev: 1	Date: 23 August 2024	Type: Policy
Owner: General Counsel		
ID: SLAVERY AND HUMAN TRAFFICKING STATEMENT		



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

Adopted 23 August 2024

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. 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**"); and (ii) the Norwegian Transparency Act (the "**Norwegian Act**" and the Norwegian Act and the UK Act are collectively referred to as the "**Acts**").

A. OUR BUSINESS

The CoolCo Group owns, operates, and manages LNG carriers and 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 registered 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.

Rev: 1	Date: 23 August 2024	Type: Policy
Owner: General Counsel		
ID: SLAVERY AND HUMAN TRAFFICKING STATEMENT		



- (3) CoolCo Norway directly 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

B. 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, diversity 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.

Rev: 1	Date: 23 August 2024	Type: Policy
Owner: General Counsel		
ID: SLAVERY AND HUMAN TRAFFICKING STATEMENT		



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.

C. 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, and this includes evaluating the risks of modern slavery and human trafficking 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 evaluate working conditions and how our suppliers implement human rights. 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 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.

Rev: 1	Date: 23 August 2024	Type: Policy
Owner: General Counsel		
ID: SLAVERY AND HUMAN TRAFFICKING STATEMENT		



As mentioned above, the CoolCo Group adopts a risk-based approach when 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.

D. SPEAK UP POLICY

The CoolCo Group has in place a speak up policy, which establishes procedures for confidential, anonymous submissions by employees, representatives and associates of the CoolCo Group regarding accounting practices, auditing matters and any known or suspected violations of the Code or other corporate policies. The CoolCo Group takes any allegations of wrongdoing, including those related to modern slavery and human trafficking, seriously.

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

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

E. 2024 UPDATE

In our Statement published in 2023, we indicated that we would undertake certain measures to combat slavery and human trafficking. To that end:

- (1) **New enterprise resource planning (“ERP”) system:** The Company implemented a new ERP system, which will streamline the process for ensuring suppliers have policies and procedures in place to combat slavery and human trafficking.
- (2) **Updated Prequalification Questionnaire:** The Company has revised the Prequalification Questionnaire to include a section requesting information from suppliers on the steps they take to prevent human trafficking and modern slavery. Suppliers that do not adequately respond to this section will undergo enhanced due diligence, and final acceptance will be subject to Legal and Compliance approval. Suppliers without relevant policies or procedures are encouraged to review their practices and implement such measures.

Rev: 1	Date: 23 August 2024	Type: Policy
Owner: General Counsel		
ID: SLAVERY AND HUMAN TRAFFICKING STATEMENT		



F. FURTHER STEPS

The CoolCo Group will continue to review the effectiveness of the steps taken to prevent modern slavery and human trafficking in its supply chains and business. The CoolCo Group intends to take the following additional steps to combat slavery and human trafficking:

- (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, using the sources mentioned (in section C, paragraph 3).
- (3) Integrate the requirements of the Norwegian Act into our HSEQ audits.

This statement has been approved and adopted by the Board of Directors of Cool Company Ltd. on 23 August 2024

Cyril Ducau

Cyril Ducau
Cool Company Ltd.
Chairperson

This statement has been approved by the Board of Directors of Cool Company Management Ltd in compliance with section 54(1) of the UK Act on 23 August 2024

Richard Tyrrell

Richard Tyrrell
Director

Christopher Bergsland

Christopher Bergsland
Director

Rev: 1	Date: 23 August 2024	Type: Policy
Owner: General Counsel		
ID: SLAVERY AND HUMAN TRAFFICKING STATEMENT		



This statement has been approved by the Board of Directors of Cool Company Management AS
in compliance with the Norwegian Act on 1 July 2024

Espen Sending

Espen Sending
Director

Vivian Borseth

Vivian Borseth
Director

This statement has been approved by the Board of Directors of each of
Felix Marine Ltd, Pernli Marine Ltd, Persect Marine Ltd, Respent Marine Ltd, Kool Panther I Corporation,
Kool Tiger I Corporation, Kool Blizzard Corporation, Kool Crystal Corporation, Kool Frost Corporation,
Kool Glacier Corporation, Kool Husky Corporation, Kool Ice Corporation, Kool Kelvin Corporation and
The Cool Pool Limited in compliance with section 54(1) of the UK Act on 23 August 2024

Richard Tyrrell

Richard Tyrrell
President