

Scan Tech's organisation and operating areas

Scan Tech AS (Scan Tech) was started in 1995 and has its head office in Stavanger. Scan Tech quickly became one of Norway's leading suppliers of special products and services to the energy and marine sector. We develop and deliver solutions of high technical quality within installation, maintenance and modification, subsea, well testing and intervention, handling of materials, steam-based solutions, compressors, design and engineering, mud cooling, renewable industry and aquaculture.

Our largest market is in the Nordics, but we have expanded our business globally in recent years.

Guidelines and routines

The company strives for a culture of honesty, transparency, and accountability. Our commitment to the highest level of ethical behaviour is expected to be reflected in all of the Group's business activities, including, but not limited to, relationships with employees, customers, suppliers, competitors, the government and the public, including our shareholders.

Our policies [Slavery and Human Trafficking Policy](#), [Anti-Bribery and Corruption Policy](#) and [Code of Ethics](#) reflect our commitment to act ethically and with integrity in all our business dealings and to implement and enforce effective systems and controls to ensure as far as possible that slavery and human trafficking do not take place in the company or in our supply chains. Our guidelines are followed up for compliance with training, risk assessments, monitoring and internal and external audit processes. We must ensure that employees and suppliers are aware of the guidelines and that they understand and comply with them.

We are concerned with diversity in our organization and all employees must have equal opportunities, and everyone must treat each other with respect and dignity. As an employer, we must promote equal rights and opportunities, as well as prevent discrimination (race, skin colour, ethnic origin, nationality, national origin, religion or belief, gender, sexual orientation, marital status, age or disability). Senior management must carry out training programs focusing on diversity and inclusion, which includes training in various tools to promote diversity and inclusion.

[Our vision](#) states, among other things, that Scan Tech should be an attractive workplace, with clear ethical guidelines for both employees, customers and suppliers. We must take our social responsibility very seriously, contribute to increased sustainability, and do what we can to generate a good return for our investors.

Obligation to provide information

The company will endeavour to respond openly and honestly to any written inquiry to Scan Tech regarding a request for information about how we handle actual and potential negative consequences regarding the implementation of the Transparency Act. This includes both general information and information relating to a particular product or service that the business offers. Information will be provided in writing and be comprehensive and understandable. The information will be provided within a reasonable time and no later than three weeks after the request for information has been received. If the scope of information requested makes it disproportionately labour-intensive to answer the information request within three weeks, the information must be provided within two months of the request being received.

Notification channels and complaint mechanisms

The company has AMU, shop stewards and safety representatives in addition to senior management who are trained to handle inquiries from our employees, partners or suppliers. The company also has a whistleblower service that can be used if anonymity is desired.

Risk assessment - significant risk of negative consequences

The company has carried out a risk assessment to map risks related to human rights and decent working conditions.

Factors that are emphasized in relation to the assessment of risk are:

- how many employees may be covered by the risk area
- which risks and consequences are associated with the risk area internally in the own organisation
- what risks and consequences are associated with the risk area in relation to society in general, including other countries in which we operate and our subcontractors operate in
- is the risk area an area where there is potential for improvement, also in relation to the industry and national conditions
- how easy/difficult it is to implement improvements in the risk area.

The risk analysis has been carried out based on risk-based prioritisation. This means that the extent of mapping and follow-up is adapted to the assessed risk as well as Scan Tech's opportunity for influence.

Based on the risk analysis, risk areas with significant risk are prioritised for further mapping in order to obtain more information on labour and human rights.

The risk assessment shows that in relation to general discrimination, freedom of association, safe working conditions, reasonable working hours and wage discrimination, this has a low risk with us. We see that we also have some risks that we have assessed as medium risk. These are:

- Lack of diversity of employees
- Proportion of female employees in relation to the desired distribution

We have also taken a closer look at our suppliers and partners. In this assessment, we have looked at both country risk and assessment of products related to high-risk products. Here we have taken as a starting point the [updated overview of countries that have ratified the ILO's core conventions \(ilo.org\)](#), [Amfori BSCI's classification of countries at risk](#) and the [High Risk List | Anskafinger.no](#). The ILO's list shows an overview of the countries and whether they have ratified the ILO's core values or possibly which of the core values they have ratified. The core conventions are linked to Freedom of Association and protection of the right to organise, forced labour, discrimination, child labour, and safety and health in working life. The high-risk list for [anskaflinger.no](#) provides information on product categories with a high risk of violations of basic human rights in the supply chain.

Our review of our suppliers shows that 96% of our suppliers and partners are Norwegian and the remaining 4% come from Italy, France, Great Britain and the USA.

- Italy has ratified most of the core conventions, but has not ratified safety and health at work and not an additional protocol linked to one of the core conventions on forced labour.
- France and Great Britain have ratified almost all the conventions, but only one of the conventions relating to safety and health at work.

- The USA has only ratified one convention related to safety and health in working life and one on the abolition of forced labour.

However, none of these countries is on Amfori BSCI's list of countries at risk based on the country's governance system.

All suppliers go through a pre-qualification before they are approved as a supplier with us. Suppliers who are classified as collaboration partners or producers have a more thorough pre-qualification before approval. All our suppliers must confirm before approval that they are aware of our guidelines [Slavery and Human Trafficking Policy](#) and [Anti-Bribery and Corruption Policy](#) and that they understand and comply with them. In the event of non-conformities linked to suppliers, these are continuously registered in our quality system. Data from this is used to monitor trends and take action if this is required.

In our review of our suppliers, we have also taken a closer look at the high-risk list and whether we buy products that are on the high-risk list with a high risk of violating basic human rights. We have prioritised looking at the products of which we have a number of purchases and of these we find that three of our purchased products are on the high-risk list. These are metal, textiles/work clothes and coffee. We will continue to follow up these suppliers to obtain more information about their supply chain.

Actual negative consequences

Follow-up of identified risks

Risk 1: Lack of diversity of employees

It is our intention to ensure that we attract and retain the most qualified people and treat all job applicants and employees fairly and on merit. No one shall receive more or less favorable treatment or consideration because of race, colour, ethnic origin, nationality, national origin, religion or belief, sex, sexual orientation, marital status, age or disability. All employees must be treated fairly with equality, respect and dignity in the workplace. Nevertheless, we see that a lack of diversity among our employees is a risk with us and something we want to have extra focus on.

Risk 2: Proportion of female employees in relation to the desired distribution

Scan Tech has a 15% proportion of women in the administration, 33% in the senior management team and 43% in the operational management team. For the entire company, 14% of the employees are women. When we compare with the previous year, there has been an increase and the total increase from the previous year is 31%. And the number of women increased by 60%. The company as a whole shows a clear preponderance of men, but some departments have a preponderance of women. ScanTech operates in a typically male-dominated industry. For our workshop operation, we have arranged separate wardrobes for each gender and try to recruit women into this professional field as well. The company must work actively to become more attractive to female employees here.

Action plan to follow up discovered consequences and risks and associated expected results.

Risk and focus areas	Measures	Responsible	Long-term result
Diversity - lack of diversity among employees.	Awareness/special attention to diversity when recruiting for positions in the relevant department.	HR manager	Increase diversity among employees.
Purchasing and suppliers - purchase of materials that are on the high-risk list with a high risk of violation of basic human rights.	Our suppliers from whom we buy metal, work clothes and coffee must be contacted to obtain further information about the supply chain for these products.	HMSK manager	Reduce the risk that subcontractors in our supply chains do not have satisfactory human rights and/or do not have decent working conditions.
Wage discrimination - not equal/fair pay for work of equal value.	HR survey competence and positions, etc.	HR manager	Equal pay for work of equal value.
Discrimination.	Investigate and map risks of discrimination and obstacles to equality.	HR manager	No reported cases related to discrimination and obstacles to equality.
Gender discrimination - insufficient number of female employees.	Internal goal to increase the proportion of women. Women must be assessed on an equal basis with regard to competence and experience.	HR manager	Increase the proportion of female employees to 20% by 2025.
Gender discrimination - working time.	Map gender balance and gender differences in part-time, temporary and leave.	HR manager	No reported cases related to discrimination and obstacles to equality.
Wage discrimination. - not equal/fair pay for work of equal value.	Map wage differences and gender distribution at different levels/groups.	HR manager	No reported cases related to discrimination and obstacles to equality.
Discrimination - working time.	Map involuntary part-time.		No reported cases related to discrimination and obstacles to equality.

For further information, we refer to the company's annual report.