

# Statement- The Transparency Act

## **Scan Tech's organisation and areas of operation**

Scan Tech AS was founded in 1995 and is headquartered in Stavanger. Scan Tech quickly became one of Norway's leading suppliers of bespoke ATEX products and related services to the energy sector. With over 70 employees, we supply offshore equipment and services to support the oil and gas industry at all stages within exploration, extraction and processing. Our goal is to deliver innovative and cost-effective solutions through integrated services based on high engineering expertise and a commitment to always deliver the highest level of quality and service.

We develop, design and manufacture equipment used in well services, offshore maintenance and modification, subsea, lifting and marine operations. In addition to these services, Scan Tech designs and delivers bespoke high pressure pump systems, lifting equipment and steam-based solutions. The Company has a strong technical team and can provide solutions to complex challenges through a broad product range of services both on and offshore.

The Company's business activities are based out of our premises in Stavanger.

The Company is owned by James Fisher & Sons Plc which is a listed Company on the London Stock Exchange.

Our largest market is in the Nordic region, but we have expanded our business globally to a greater extent 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 conduct 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 policy, as part of James Fisher & Sons, [Sustainability Policy](#) demonstrates our commitment to social sustainability within the company, but also that this should be reflected down our supply chains and with our business partners. We will ensure equality, diversity, social cohesion and equal pay. 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 and avoid discrimination. In addition, we will prevent modern slavery, human trafficking and child labour from taking place in our supply chains. Priority will also be given to the health and safety of employees, suppliers and local communities. Other policies of the company are [Health, Safety, Environment and Security Policy](#), [Modern Slavery Statement](#), [Anti-Bribery and Corruption Policy](#) and [Code of Ethics](#). Our compliance policies are followed up with training, risk assessments, monitoring, and internal and external audit processes. We will ensure that employees and suppliers are aware of the guidelines and that they understand and comply with them.

[Our mission](#) states, among other things, that Scan Tech should be an attractive workplace, with clear ethical guidelines for both employees, customers and suppliers. We will take our social responsibility very seriously and contribute to increased sustainability.

## Duty to inform

The Company will endeavour to respond openly and honestly to any written inquiry to Scan Tech regarding a request for information related to how we handle actual and potential negative consequences with regard to the implementation of the Transparency Act. This includes both general information and information related to a specific product or service that the enterprise 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 information request has been received. If the scope of the information requested makes it disproportionately laborious to respond to the information request within three weeks, the information must be provided within two months after the request has been received.

## Whistleblowing channels and complaint mechanisms

The company has AMU, union representatives and safety delegates in addition to senior management who are trained to handle inquiries from our employees, partners or suppliers. The company also has a whistleblower service, which can be used. This service can also be used anonymously, if desired.

## Follow-up of significant risks in 2024

Risk and focus areas	Planned measures 2024	Responsible	Status 2025	Long-term results
<b><i>Pay discrimination - not equal/fair pay for work of equal value</i></b>	A full survey of employees' skills and salaries has already begun, in addition to a review of the salary matrix for surgical personnel.	HR Manager	<b>Administration:</b> The process of mapping salaries for employees in the administration/management has been completed and our preliminary assessment is that there is no salary discrimination at Scan Tech. However, we are continuously working to obtain benchmarks. The benchmark is set by WTW and is based on the description and scope of the role and not the title. This is to ensure that compensation is fair and according to role/value and not based on gender or the like. In addition, a Job Architecture Program has been implemented where "job family groups" will be determined independently of organizational divisions, reporting lines and cost center structures. Job families will be created by grouping roles together based on similar skill sets.  Our owner company James Fisher is subject to "Gender pay gap" reporting in the UK, and this is therefore something that is also in focus for the subsidiaries outside the UK. Link to report:	Ensure equal/fair pay for work of equal value

			<a href="#">if_genderpaygap_2024_march2024_square_v7b.pdf</a>  <b>Workshop/purchasing and warehousing:</b> In addition to the above, work is also being done to launch an updated salary matrix by the end of 2025. This is to ensure that wages are aligned with the level of work and seniority.	
<b>Procurement and suppliers - Procurement of materials that are on the high-risk list with a high risk of violations of fundamental human rights</b>	Our suppliers where we purchase ICT products and chemicals should be contacted to obtain further information about the supply chain of these products.	HSEQ Manager	The suppliers have been contacted and requested information related to human rights assessments, freedom of association, forced labour and child labour, corruption including extortion and bribery, discrimination, labour rights and environmental responsibility. A focus was also placed on the risk of violations of fundamental human rights in raw material production. The suppliers respond that they carry out thorough due diligence assessments and one supplier responds that they are also a member of the RBA (Responsible Business Alliance), which means that the company carries out risk assessments and audits of its suppliers and sets clear requirements in the value chain. The supplier has also engaged in various initiatives against conflict minerals in the technology industry, including through the establishment of the Responsible Minerals Initiative with RBA.	Reduced risk that subcontractors in our supply chains do not have satisfactory human rights and/or do not have decent working conditions.
<b><i>Sourcing from suppliers in the UK and the US with a medium risk of breaches of decent working conditions; the right to freedom of association, the right to collective bargaining and the</i></b>	Our suppliers in the UK and the US should be contacted for further information about their working conditions	HSEQ Manager	The suppliers here have also been contacted and asked for the same information as above. In addition, with a particular focus on freedom of association, the right to collective bargaining and the right to strike. The supplier in the UK states that their workers have this right. We have not been able to get feedback from the supplier in the US regarding this. In 2024, we have not had many purchases from them. Therefore, they will not be prioritized for follow-up in 2025.	Subcontractors have satisfactory working conditions.

<i>right to strike;</i>				
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### Findings from due diligence assessments - actual negative consequences

No actual negative consequences have been identified either in our own organisation or with our suppliers and partners in 2024. However, several risks have been identified, see the next section.

### Risk assessment - guidelines

In 2024, the company revised its risk assessment to identify risks related to human rights and decent working conditions.

Factors that are emphasized in relation to the assessment of risk for employees at Scan Tech are:

- how many employees may be covered by the risk area
- what risks and consequences are associated with the risk area internally in our 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
- the risk area is an area in which there is potential for improvement, also in relation to the industry and national conditions

Factors that are emphasised when assessing the risk of suppliers and partners are:

- what risks and consequences are associated with the risk area in the country in which they operate
- what risks and consequences are associated with the product's supply chain, including raw material extraction, component manufacturing and final product composition.
- How much influence can we possibly have
- how easy/difficult is it to implement improvements in the area of risk.

The risk analysis has been carried out on the basis of risk-based prioritisation. This means that the scope of mapping and follow-up is adapted to the assessed risks as well as Scan Tech's ability to influence. When it comes to our suppliers and our opportunity for influence, it is limited to focusing on suppliers we have purchased for more than NOK 100,000 in 2024.

Based on the risk analysis, risk areas with significant risk have been prioritised for further mapping to obtain more information about labour and human rights.

In order to be able to make an assessment of our suppliers and partners and the risks involved, we have chosen to use Magnet JQS's solution for supplier assessment this year. All suppliers from whom we have made purchases in 2024 over NOK 100,000 have been added. These are assessed according to country risk by the following indexes:

[Global Slavery Index – Prevalence](#)

[Global Slavery Index – Vulnerability](#)

[Global Rights Index](#)

[Children's Rights in the Workplace Index](#)

[Corruption Perception Index](#)

[Global Human Rights Index](#)

[Environmental Performance Index](#)

[Freedom in the World Index](#)

With regard to the assessment of our products and associated risks related to the supply chain, we have looked at [DFØ's high-risk list](#) with an overview of "high-risk products". High-risk products mean that there is extensive evidence that there are systematic violations of the UN Universal Declaration of Human Rights, the ILO's core conventions (prohibition of child labour, forced labour, discrimination, right to trade union and collective bargaining) and national legislation in labour law and HSE in the product's supply chain. These violations can occur during raw material extraction, component manufacturing and final product composition.

### **Significant risk of negative consequences**

#### *Own organisation*

The risk assessment shows, as in previous years, that when assessing risk regarding Human rights and decent working conditions in our own business, discrimination, freedom of association and safe working conditions have a low risk with us. During 2024, we have identified a risk related to proper working hours and the use of overtime through our due diligence assessments. This applies in particular to certain departments where the staffing situation has led to an increased burden on existing employees.

To reduce this risk and ensure decent working conditions, we have decided to implement concrete measures. A key measure is to strengthen staffing. As of June 2025, we have advertised eight new positions to relieve existing employees and ensure that working hours are kept within statutory and prudent frameworks.

We will follow up the effect of the measures through ongoing dialogue with employees and managers, as well as by monitoring working hours data and overtime in the future.

#### *Suppliers and business partners*

The risk assessment of our suppliers and partners with regard to the indexes above shows that for most of them, there is little risk of unsatisfactory human rights and decent working conditions. Only 2 suppliers show a slightly higher risk and they are 2 suppliers outside of Norway. They are located in Japan and the Netherlands. For both, the risk is linked to the Global Rights Index. This index evaluates the state of workers' rights globally. It considers factors such as freedom of association, the right to collective bargaining, and the right to strike, and provides insight into the labor rights environment in different countries. We therefore plan to reach out to them to obtain more information about the working conditions and potentially arrange a physical visit. We want to contribute to good working conditions at our suppliers and therefore want to focus on these suppliers in the future.

### High-risk products

In our review of our suppliers regarding products on DFØ's high-risk list, we have prioritised looking at the products that we have had a reasonable number of purchases of. In the past, we have focused on the products metal, textiles/workwear, coffee, IT products (laptops, computer monitors and mobile phones) and chemicals. This year we see that we also have to incorporate electronics, since these are also on the high-risk list. In addition, for electro there is a national regulation for minimum wage, overtime and expenses for travel, board and lodging, ref. [Minimum wage - The Norwegian Labour Inspection Authority](#). We recognise that we need to continue to source these materials and use the services of electrical suppliers. They will therefore be contacted to obtain more information about the supply chain. It will also be considered whether an audit should be carried out at our largest supplier of metal, since this is a supplier from which we have had quite large purchases from.

### Action plan for following up identified risks and associated expected results

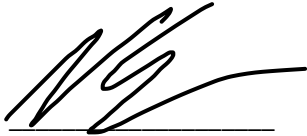
Risk and focus areas	Action	Responsible	Long-term results
<b><i>Decent working conditions – not proper working hours and use of overtime</i></b>	Strengthen staffing, ongoing dialogue with employees and managers, and monitoring of working time data and overtime	HR Manager	Ensure proper working hours and the use of overtime
<b><i>Procurement and suppliers - Procurement of materials that are on the high-risk list with a high risk of violations of fundamental human rights</i></b>	Our suppliers where we purchase electronics will be contacted to obtain further information about the supply chain of these products.  Consider conducting an audit with our largest supplier of metal	HSEQ Manager	Reduced risk that subcontractors in our supply chains do not have satisfactory human rights and/or do not have decent working conditions.
<b><i>Sourcing from suppliers in Japan and the Netherlands with a medium risk of breaches of decent working conditions; the right to freedom of association, the right to collective bargaining and the right to strike;</i></b>	Our suppliers in Japan and the Netherlands will be contacted for further information about their working conditions	HSEQ Manager	Subcontractors have satisfactory working conditions.

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

Stavanger, 25.06.2025

Board of Directors of

Scan Tech AS,

A stylized handwritten signature in black ink, consisting of several fluid, connected strokes.

Neil Ronald Sims

Chairman

A handwritten signature in black ink, written in a cursive style.

Andreas Fliss

Board Member / Managing Director