

# 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 tailor-made ATEX products and associated services to the energy sector. With over 80 employees, we provide offshore equipment and services that support the oil and gas industry in all phases of exploration, production and processing. Our goal is to deliver innovative and cost-effective solutions through integrated services based on high engineering expertise and a strong focus on quality and service.

We develop, design and manufacture equipment used in well service, offshore maintenance and modification, subsea, lifting operations and marine operations. In addition to these services, ScanTech designs and delivers tailor-made high-pressure pumping systems, lifting equipment and steam-based solutions. The company has a strong technical team and can provide solutions to complex challenges through a wide range of products and services, both onshore and offshore.

The company's operations are run from our premises in Stavanger.

The company is owned by James Fisher & Sons Plc, which is listed 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, openness 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 [Sustainability Policy](#), as part of James Fisher & Sons, 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 prevent 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 Conduct](#). 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 of information**

The company will 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 regards 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 2025**

Risk and focus areas	Planned measures 2025	Responsible	Status	Long-term results
<i><b>Decent working conditions – not proper working hours and use of overtime</b></i>	Strengthen staffing, ongoing dialogue with employees and managers, and monitoring of working time data and overtime	HR Manager	Improved control and follow-up of working hours and overtime has been established through increased management transparency and systematic monitoring of working time data. The business has been unionised, which means that the need for extended overtime is handled in dialogue with union representatives. Overtime and working hours	Ensure proper working hours and the use of overtime

			are regularly discussed in AMU meetings (quarterly), where developments and trends are followed up at group level. Overall, the measures are considered to have strengthened control and reduced the risk of breaches of requirements for proper working hours.	
<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>	<p>Our suppliers where we purchase electronics should be contacted to obtain further information about the supply chain of these products.</p> <p>Consider conducting an audit with our largest supplier of metal</p>	HSEQ Manager	<p>A survey of suppliers in the field of electronics has been carried out by sending out a questionnaire. As of the end of 2025, responses have been received from 2 out of 9 suppliers, limiting the complete risk assessment of the supply chain. The responses received show that the suppliers have established guidelines and systems for human rights and due diligence assessments.</p> <p>A lack of response from</p>	Reduced risk that subcontractors in our supply chains do not have satisfactory human rights and/or do not have decent working conditions.

			<p>other suppliers represents a residual risk related to a lack of transparency in the supply chain. Follow-up of suppliers who have not responded has been initiated and will continue.</p> <p>No audit has been carried out at the metal supplier in 2025, but will be considered in 2026.</p>	
<p><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></p>	<p>Our suppliers in Japan and the Netherlands should be contacted for further information about their working conditions</p>	<p>HSEQ Manager</p>	<p>Suppliers in Japan and the Netherlands have been contacted, and responses have been received from selected suppliers. The feedback indicates that guidelines have mainly been established for human rights and working conditions, but with some variations in the degree of formalisation and implementation.</p> <p>Some risk factors related to working hours have been identified (e.g. risk of long working hours</p>	<p>Subcontractors have satisfactory working conditions.</p>

			<p>in periods) and a lack of formalised guidelines for freedom of association at some subcontractors. At the same time, the suppliers state that measures have been implemented, such as strengthened follow-up of working hours and the development of internal guidelines.</p> <p>Overall, the risk is assessed as moderate.</p>	
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**Findings from due diligence assessments - actual negative consequences**

No actual negative consequences or violations of human rights and decent working conditions have been identified in the company's own operations or with suppliers in 2025. However, some risk factors and areas of limited transparency have been identified, particularly in relation to the supply chain. In the company's own business, risks related to proper working hours and the use of overtime in parts of the business have been identified in previous assessments. This risk has been followed up through measures in 2025, including increased monitoring, management follow-up and the involvement of union representatives. The risk is now considered to be reduced and better controlled, but is still being followed up. Furthermore, variations in maturity and implementation of human rights guidelines have been identified by some international suppliers.

**Risk assessment - guidelines**

In 2025, 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 risk as well as Scan Tech's ability to influence. When it comes to our suppliers and our opportunity to influence, it is limited to focusing on suppliers we have purchased for more than NOK 100,000 in 2025.

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 also this year. All suppliers from whom we have made purchases in 2025 over NOK 100,000 have been added. These are assessed according to country risk using the following indices:

[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 business*

The risk assessment for 2025 shows that the risk related to discrimination, freedom of association and general working conditions is still considered low.

The risk associated with working hours and the use of overtime, which was previously identified as an area for improvement, has been followed up through specific measures. Systematic monitoring of working hours, increased management transparency and strengthened dialogue between employees and management have been established. The enterprise has also been unionised, which strengthens the employees' participation, for example in the handling of extended overtime.

Overtime and working hours are followed up regularly in the AMU. On the basis of the measures implemented, the risk is considered to be reduced and better controlled, but the area will continue to be followed up as part of the company's internal control.

### *Suppliers and partners*

The risk assessment still shows that the majority of suppliers have low risk, but that some suppliers abroad have moderate to high risk based on country indices above related to labour rights and corruption.

In 2025, the supplier base has been updated as a result of new suppliers where purchases above NOK 100,000 have been made. Whereas the previous survey mainly included suppliers in the Netherlands, Japan and the UK, the assessment now also includes suppliers in Belgium, Finland, France, Italy and Spain, in addition to Japan, the Netherlands and the UK.

This means that the risk assessment now covers a broader geographical scope, and that the supply chain as a whole has increased in complexity and the need for follow-up.

In 2025, supplier surveys were carried out via questionnaires for suppliers in the originally identified risk countries (the Netherlands, Japan and the UK). The results show that several of these suppliers have established policies on human rights, anti-corruption, non-discrimination and labour rights, but with some variation in maturity and implementation.

For suppliers in other countries that are included in the assessment basis for 2025, similar information has been obtained to a limited extent. This entails a residual risk associated with a lack of transparency in parts of the supply chain and a limited basis for a complete risk assessment.

Further follow-up and collection of information from these suppliers will be prioritised in 2026.

### *High-risk products*

When it comes to products on DFØ's high-risk list, in 2025 we have had a particular focus on electronics, where the supply chain is often complex and global. Previously, we have focused on

metal, textiles/workwear, coffee, IT products (laptops, computer monitors and mobile phones) and chemicals.

In 2025, questionnaires were sent out to suppliers of electronics. Responses have been received from 2 out of 9 suppliers, which results in a limited degree of transparency and increased uncertainty in the risk assessment.

The suppliers that have responded state that they have established systems for handling human rights and due diligence assessments.

Failure to respond from other suppliers is considered a significant residual risk, and further follow-up of these will be prioritised. It will also be considered whether an audit should be carried out at one of our critical suppliers of electronics, since this is a supplier from which we have had large purchases.

For other high-risk products (metal, etc.), supplier mapping has been carried out previously, but a planned audit at the largest supplier has not been carried out. This will be considered to be carried out in 2026 when prioritisation of revisions is to be assessed.

**Effect of implemented measures**

Overall, the measures implemented in 2025 have contributed to:

- increased control and transparency in our own organisation, especially in relation to working hours
- better structured follow-up of suppliers through systematic mapping, while at the same time identifying a need for further follow-up where information is lacking
- increased awareness among suppliers of requirements for human rights and working conditions

At the same time, the work shows that there is still a need for improvements, particularly in relation to the collection of information from suppliers and follow-up of high-risk suppliers.

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

The measures for 2026 are based on due diligence assessments carried out in 2025 and are prioritised based on identified risks and the enterprise's potential for impact.

Risk and focus areas	Measures 2026	Responsible	Long-term results
<i><b>Decent working conditions</b></i>	Continue systematic monitoring of working hours and overtime. Continue dialogue between management and employees, including the involvement of union representatives. Regular reporting and follow-up in the AMU, with an assessment of the need for additional staffing measures if necessary.	HR Manager	Ensure proper working hours and the use of overtime, as well as a permanent reduction of the risk of overload.

<p><b>Procurement and suppliers</b> - Procurement of materials that are on the high-risk list with a high risk of violations of fundamental human rights</p>	<p>Follow up suppliers of electronics that have not responded to a questionnaire in 2025. Gather additional information about the supply chain (including subcontractors). Carry out or schedule audits at the largest supplier of metal. Assess the need for more structured requirements for documentation from suppliers (e.g. policies and due diligence).</p>	<p>HSEQ Manager</p>	<p>Increased transparency in the supply chain and reduced risk of human rights and labour violations.</p>
<p><b>Purchases from suppliers in countries with medium to high risk on country indices related to labour rights and corruption.</b></p>	<p>Carry out supplier mapping (questionnaire) for suppliers in new countries (Belgium, Finland, France, Italy, Spain, etc.). Prioritise follow-up based on risk level (risk-based approach). Establish a more holistic view of the supply chain for higher-risk suppliers.</p>	<p>HSEQ Manager</p>	<p>Reduced residual risk related to a lack of transparency and a better knowledge base for further due diligence assessments.</p>
<p><b>Procurement and suppliers</b></p>	<p>Follow up on identified areas for improvement at suppliers (e.g. freedom of association, formalisation of policies). Assess the need for additional documentation or dialogue meetings with selected suppliers. Integrate follow-up of human rights into existing supplier follow-up (e.g. annual evaluations).</p>	<p>HSEQ Manager</p>	<p>Subcontractors have satisfactory working conditions and comply with fundamental rights.</p>

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

Stavanger, 25.06.2026

Board of Directors of

Scan Tech AS,



Neil Ronald Sims

Chairman



Andreas Fliss

Board Member / Managing Director