

	Annual report 2026		
	SUBJECT: THE TRANSPARENCY ACT		
	DOCUMENT NO: HSEQ-Q-QP-0003	AUTHORIZED AAR	DATE: 14.09.2026

Introduction

This report has been prepared in accordance with Section 5 of the Transparency Act. It covers Scanmudring AS and the company's subsidiaries in Canada and the UK and applies to due diligence assessments carried out for the financial year 1 January – 31 December 2025. The report was revised on 14 September 2026 to reflect documented improvements in the management system. Board consideration and signing are carried out prior to publication.

Organisation of work with the Transparency Act

The work on the Transparency Act is integrated into Scanmudring Business Management System (BMS), the company's certified management system in accordance with ISO 9001, ISO 14001 and ISO 45001. The board has the overall responsibility for ensuring that the requirements are complied with, while the general manager ensures that the work is anchored and carried out in the business. The HSEQ department coordinates methodology, compliance follow-up and reporting. The HR department follows up internal working conditions and whistleblowing cases. The procurement function conducts supplier evaluations and follows up on contractual requirements, while relevant process owners identify and follow up risks and measures within their areas of responsibility. Management follows up status, risks and measures through risk registers, the non-conformance and improvement system, audits and management reviews.

Scanmudring supports freedom of association, collective bargaining, non-discrimination and decent working conditions. These expectations are incorporated into the company's *Code of Conduct* and are applied to employees, suppliers and business partners.

Mapping of actual and potential negative impacts

Scanmudring has continued mapping and risk assessment of its own operations, subsidiaries, suppliers and business partners. The assessment includes country, industry and activity risk, responses from suppliers, certifications, audit findings, incidents, notifications and other documented follow-up. Risk is prioritised according to severity and probability, and measures are registered with responsibility and follow-up in the management system.

Significant risk areas in own operations and subsidiaries:

- Personal injury and health impact in connection with offshore work, workshop work, travel and project-based work.

	Annual report 2026		
	SUBJECT: THE TRANSPARENCY ACT		
	DOCUMENT NO: HSEQ-Q-QP-0003	AUTHORIZED AAR	DATE: 14.09.2026

- Working hours, overload and psychosocial working environment conditions during periods of high activity.
- Different local practices and inadequate access to governing documentation in international units.
- Discrimination, harassment or other censurable conditions that are not reported or handled.
- Limited knowledge of the Transparency Act and the risk of lack of reporting.

No internal audit has been carried out of the subsidiary in Canada about routines and practices intended to protect the business against negative impact, internally or in the supply chain.

Scanmudring has established systems for risk management, but the risk of personal injury cannot be eliminated. Residual risk must be reduced and followed up through risk assessments, preventive measures, reporting and verification of effect.

There is limited knowledge about the requirements of the Transparency Act in the organisation. Lack of information can lead to employees not reporting observations of negative influence, which are thus not dealt with.

Activity in new geographical regions may entail different local norms, working methods and framework conditions. This may increase the risk of negative impact on employees' working conditions, particularly in the case of travel and work that is not carried out from vessels.

Significant risk areas for suppliers and business partners:

- Suppliers and subcontractors in high-risk countries or industries, where supply chain visibility is limited.
- Limited visibility into subcontracting chains and inadequate documentation of working conditions.
- Suppliers who do not respond satisfactorily to evaluations or will not commit to Scanmudring's *Code of Conduct* and standard purchasing conditions.
- Inadequate risk-based prioritisation and documented follow-up of suppliers.

Overall rating

The risk is not considered to be uniformly low. The highest exposure is related to the physical and psychosocial working environment, international growth and supply chains with elevated country, industry or transparency risk. The absence of reported non-conformities is not in itself sufficient documentation that negative consequences do not occur. The remaining risk is therefore followed up

	Annual report 2026		
	SUBJECT: THE TRANSPARENCY ACT		
	DOCUMENT NO: HSEQ-Q-QP-0003	AUTHORIZED AAR	DATE: 14.09.2026

through ongoing due diligence assessments, risk-based prioritisation, documented measures and assessment of the effect of the measures.

For the supply chain, this entails risks related to the following factors:

- Compliance with procurement routines that ensure proper evaluation of suppliers prior to entering into contracts.
- Inadequate emphasis on human rights and working conditions when prioritising suppliers.

Priorities

Priorities for further work:

1. Conduct risk-based supplier evaluations and prioritise audits of suppliers and subcontractors in high-risk countries or industries, particularly where supply chain visibility is limited.
2. Complete and document internal control and auditing of international entities, including Canada and the UK, against relevant requirements and Scanmudring's governing documents.
3. Document the follow-up of suppliers who give insufficient answers or do not accept Scanmudring's *Code of Conduct* and standard purchasing conditions.
4. Integrate the work with the Transparency Act into Scanmudring's corporate governance to ensure clear responsibility, including risk-based purchasing routines, documented supplier evaluations and systematic follow-up through, risk registers, audits and management review.
5. Strengthen training and awareness of the Transparency Act, whistleblowing and reporting channels.
6. Continue English as a common language for governing documentation that is used internationally.
7. Follow up measures, effect and remaining risk through BMS, risk registers, the audit program and management review.

Follow-up

Findings and measures are registered with a responsible role, deadline and requirements for documented follow-up. EG Maintenance (EGM) is used to register and process incidents, observations, deviations, improvements and measures. Sensitive whistleblowing cases are handled separately in HaileyHR with access control. The effect of measures is verified through status reviews, updated risk assessments, audits and management reviews. Identified system limitations and open audit findings are registered and followed up as part of the improvement work.

Information and access requirements

	Annual report 2026		
	SUBJECT: THE TRANSPARENCY ACT		
	DOCUMENT NO: HSEQ-Q-QP-0003	AUTHORIZED AAR	DATE: 14.09.2026

For further information or if you wish to gain insight into our work with the Transparency Act, inquiries can be sent to:

 post@scanmudring.no

The enquiry is often marked "The Transparency Act". Written information requests are answered within a reasonable time and no later than three weeks, unless the Act's exemption rule for particularly burdensome requests applies.

Signatures

Helge Orstad
Chairman of the Board

Kristian Holth
Board member

Arild Ariansen
CEO

	Annual report 2026		
	SUBJECT: THE TRANSPARENCY ACT		
	DOCUMENT NO: HSEQ-Q-QP-0003	AUTHORIZED AAR	DATE: 14.09.2026

Appendix 1: Due diligence

In accordance with the Transparency Act, Scanmudring AS has carried out a thorough mapping of the risk of violations of human rights and decent working conditions, both internally in the business and in the supply chain.

Method:

- Traffic light rating (green – no risk identified, yellow – potential risk, red – real risk)
- Industry and geographical risk assessment
- Evaluation of certifications and compliance

A. The business – Internal mapping

Scope: Scanmudring AS and subsidiaries/international units, with operations in Norway, Canada and the UK.

Status of identified risk areas:

- **Personal injury:**
Work offshore and in workshops entails risk. HSE focus and reporting are effective.
- **Subsidiaries:**
Potential risk due to geographic location and local conditions. Monitored.
- **Overload and overtime:**
Project-based work has led to some/minor violations of working time rules. Monitored.
- **Discrimination**
A gender equality and anti-discrimination report has been prepared.
- **Freedom of expression:**
Routines for safe whistleblowing and transparency have been established.
- **Awareness in the organization:**
The work of implementing the Transparency Act in daily activities is ongoing.
- **Work in new geographies:**
Our approach to work in new geographical areas is preferably done with well-known vessel operators who have ethical guidelines. Identified risk areas are work that is not carried out from vessels, including voyages.

	Annual report 2026		
	SUBJECT: THE TRANSPARENCY ACT		
	DOCUMENT NO: HSEQ-Q-QP-0003	AUTHORIZED AAR	DATE: 14.09.2026

B. Suppliers and business partners – External mapping

Scope: All vendors and partners used during the reporting period.

Status of identified risk areas:

- **Subcontractors from risk countries:**
Difficult overview of supply chains and lack of certifications.
- **Suppliers:**
Suppliers are evaluated by means of questionnaires, supplier audits, document control and other risk-based follow-up. Protencon is used to obtain available business-related information. Re-evaluation is carried out at intervals determined based on country, industry and supplier risk, criticality and results from previous follow-up.

	Annual report 2026		
	SUBJECT: THE TRANSPARENCY ACT		
	DOCUMENT NO: HSEQ-Q-QP-0003	AUTHORIZED AAR	DATE: 14.09.2026

Appendix 2: Further work and measures

The survey has identified several areas for improvement related to human rights and decent working conditions. This forms the basis for the implementation of the following measures, which are followed up through our management system.

A. Internal measures:

- Internal control and auditing of international units are not documented as completed in the audit documentation. The measure is continued with a defined scope and criteria, as well as documentation of findings, responsibilities, deadlines, corrective measures and closure.
- HSE and improvement reporting:
EGM is used for incidents, observations, deviations, improvements and measures. Follow-up must include risk prioritisation, responsibility, deadlines and verification of effect.
- Awareness-raising:
The Code of Conduct and the whistleblowing procedure have been updated. Targeted training on the Transparency Act and the distinction between whistleblowing cases and HSE non-conformities will be continued.

B. Supply chain measures:

- Purchasing routines:
Standard purchasing conditions are established in Norwegian and English. Supplier requirements must include responsible business conduct, documentation and acceptance of Scanmudring's Code of Conduct.
- Supplier evaluation:
New suppliers are evaluated, and existing suppliers are re-evaluated on a risk-based basis. Country, industry, criticality, documentation and previous follow-up must be included in the prioritisation. Protencon is used for supplier screening.
- Follow-up in the event of deviations:
Inadequate responses, lack of documentation or rejection of claims must be risk assessed and may result in corrective measures, audits, alternative suppliers or termination of cooperation.
- Auditing:
Supplier audits are prioritised risk-based and integrated into the audit programme. Implementation, findings, measures and verification must be documented.

	Annual report 2026		
	SUBJECT: THE TRANSPARENCY ACT		
	DOCUMENT NO: HSEQ-Q-QP-0003	AUTHORIZED AAR	DATE: 14.09.2026

Audit basis (governing documents and registrations):

HR-Q-GP-0002 Code of Conduct
 HR-Q-GP-0010 Whistleblower policy / Whistleblowing routine
 FIN-B-QP-0001 Standard terms and conditions for purchase of goods and services
 HSEQ-Q-FC-0014 Observations & Improvements handling
 HSEQ-Q-OV-0004 Risk Management Process
 HSEQ-Q-OV-0009 Compliance Assurance
 HSEQ-D-MDR-0001 Master Document Register
 HSEQ-Q-RA-0001 Risk Register
 ADM-Z-RA-0001 Business Risk Register
 Audit program, supplier evaluations and relevant audit reports