

Risk assessment on human rights and decent work conditions

Company: Seatrans AS

Year: 2024

Identified risk area	Applies to	Risk category	Risk description	Risk rating	Mitigating actions taken	Mitigating action planned
Resources and workload	Office	Company specific	Excessive workload on employees.	2	(1) Regular meetings concerning capacity and resource needs.	(1) Monitoring use of overtime to identify excessive use, for employees that are entitled to overtime pay. (2) Monitoring of use of vacation days. (3) Update the development talk form to include workload.
Safe working conditions	Shipyards, ship owners (crewing contracts)	Industry risk	(1) Working conditions for work force at ship yards. (2) Safety culture at yards	2	Yard specification includes provisions to request HSE information from yard, for use in assessing the yard as an approved supplier.	(1) Introduce the SCoC to the yard specification. (2) Update yard comparison tool to include risk evaluation and comparison of yards' QHSE performance.
Decent working conditions	Shipyards, crew agencies, ship owners, suppliers	Industry risk	(1) Fair income that provides a decent standard of living (2) Security in the workplace, including safe working conditions and protection against discrimination (3) Social protection for workers and their families (4) Better prospects for personal development and social integration (5) Freedom for workers to express their concerns, organize, and participate in decisions that affect their lives (6) Equal opportunity and treatment for all workers, regardless of gender	1	(1) SCoC (2) Compliance assessment by use of screening tools.	(1) Revision of process for supplier evaluation, to include a provision for self-assessment for the supplier. (2) Make provisions for Customer self-assessments

Child labor	Shipyards, crew agencies, ship owners, suppliers	Industry risk	Use of child labor in production of services and products, and in the downstream value chain (customers).	1	(1) SCoC (2) Compliance assessment by use of screening tools.	(1) Revision of process for supplier evaluation, to include a provision for self-assessment for the supplier. (2) Make provisions for Customer self-assessments
HSE Culture	Offices, vessels	Company specific	Dangerous working conditions/risk of incidents and accidents	1	(1) Introduced a program for safety culture (four cornerstones). Distributed in the organization through officers seminars and sustainability report.	(1) Leadership training revitalization. (2) simplification of SMS.
HSE Culture	Shipyards, crew agencies, ship owners, terminals, suppliers	Industry risk	Perception and understanding of a good HSE culture differs among cultures. May lead to dangerous working conditions/risk of incidents and accidents	1	(1) Cultural awareness training performed during officers conferences, with focus on internal cultures.	(1) General cultural awareness training, with focus on more than internal culture. (2) Bridging processes (e.g. bridging safety cultures between ship and terminals/yards/etc).
Whistleblowing mechanism	All units	Company specific	Risk of not receiving justified important information through whistleblowing	2	(1) Acquired a new reporting portal.	(1) Complete rollout of reporting portal.
Business ethics	Vessels	Geographical risk	Corrupt practices during port stays: Facilitation payments and bribery.	1		(1) Corruption risk assessment for corrupt practices on-board ships is in process to be released.
Business ethics	Offices	Geographical risk	(1) Gaps between our company policies and local practise. Risk of violating Labor rights, i.e. jepordized through non- legitimate ways of advancing in employment/promotion processes. (2) Gaps in the perception of business ethics with regard to employment, corruption, child labor, etc. Risk of unfair employments and violations of labour rights.	2	(1) ESG audit of crew agent conducted. (2) BoD have instructed general managers in Bulgaria, Romania and Poland concerning expectations towards ESG.	(1) Use internal audit as a tool to assess internal offices with respect to ESG.