

Transparency Act - 2024



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Introduction

Bergen Tankers is a private, family-owned company, with head office at Askøy, just outside Bergen, Norway. The company's main activities are transportation of refined oil products, chemicals, LNG and bunkering services.

Bergen Tankers main activities are transportation of refined oil products, chemicals, LNG and bunkering service. The main trading areas is along the Norwegian coast, in the North Sea/Continent/UK and Baltic Sea.

The company has a modern and specialized fleet of 2 medium-sized coastal tankers, 2 bunkering vessels for CCP and 1 LNG vessel. The Company has ordered 2 (+1+1) stainless steel newbuilding's that will be delivered from China in 2027.

The company has a strict policy and follows Norwegian, European and China regulations. Shipbuilding has in the latest years occurred in Norway, Eastern Europe, Turkey and now China.

Our main task is to transport refined oil products, LNG and renewable products. Mainly we do not engage in buying and selling products to 3rd parties. The products being transported are mainly acquired directly from the company that requires transportation services. Thus, our primary suppliers are the companies with whom we have transportation contracts, primarily from Norway and Northwest Europe.

Our other suppliers, providing ship equipment, ship service, operative service, are also mainly from Norway, other EU countries and China for the newbuilding's.

The transparency act

The transparency act came in June 2022 and includes working conditions and human rights. Within the transparency act we have a focus on the most central paragraph in the law. Bergen Tankers is committed to transparency, accountability, and ethical business conduct in accordance with the Norwegian Transparency Act. This report outlines the company's efforts in 2024 to ensure respect and fundamental human rights and decent working conditions throughout our operations and supply chain.

Bergen Tankers has established a comprehensive due diligence process to assess labor conditions prior to selecting shipyards for vessel newbuilding or repair activities.

Duty to carry out due diligence §4

Within this paragraph it is embedded in responsible business conduct into the enterprise's policies.

Duty to account for due diligence §5

In this paragraph there is a general description of the enterprises structure area of operations, guidelines, and procedures for handling actual and potential adverse impacts on fundamental human rights and decent working conditions.

Right to information § 6

Upon written request, any person has the right to information from an enterprise regarding how the enterprise addresses actual and potential adverse impacts pursuant to Section 4.

For more information, contact Bergen Tankers by email.

This process incorporates the "Eksportfinans – Guideline for Labor Rights Assessments at Shipyards" and includes the integration of contractual clauses that mandate adherence to human rights and acceptable working conditions. It also involves conducting on-site audits and inspections, as well as active oversight by Bergen Tankers personnel throughout the yard stay. These measures are designed to safeguard workers' rights and facilitate early identification and resolution of any potential labor-related concerns.

Bergen Tanker's human rights due diligence process is centered on risk-based assessments of the company's potential impact on human rights. This approach makes sure that the actions taken to reduce risks match how serious and how likely the potential problems are.

Where risks are assessed as both high in probability and severity, correspondingly rigorous measures are required. Human rights risk assessments are reviewed annually as part of the corporate management review and are updated as necessary when significant organizational or operational changes occur.

This includes extending assessments to second-tier suppliers where relevant risks are identified, in alignment with the OECD Guidelines and the requirements of the Norwegian Transparency Act.

Bergen tankers routines

Bergen tankers have established routines related to reporting, forms and terms and conditions. These measures are not only the working conditions for our own employees but also related to the conditions and handling of employees by our suppliers.

In accordance with §4 and §5 we have taken proactive steps within our company to ensure that we do not engage in contracts with companies that violate human rights. To accomplish this, we conduct thorough background check on the companies with medium risk and high risk (In the risk analyses). These background checks involve assessing their compliance with our terms and conditions, including the reporting systems for the employees and safety procedures.

For the well-being of our own employees, we have implemented a reporting system aimed at preventing accidents and providing safe working conditions. Our employees have yearly conversations about their well-being, fostering open communication and addressing any concerns they may have. Reporting incidents is made simple and accessible, with multiple channels available. Employees can report directly to their supervisors, the designated person (DPA), or even direct to the leadership. Every report is treated seriously, and appropriate actions are taken to address the reported issues. We actively encourage our employees to report on any conditions that do not meet their expectations or satisfaction.

By implementing these measures, we believe that Bergen Tankers is an ethically responsible company.

Risk analysis

The 2024 due diligence process identified the following main risk areas: - Labour practices in upstream suppliers of marine fuel - Working hours and rest time compliance for seafarers - Occupational health and safety standards in maintenance and repair yards - Subcontractor transparency and traceability challenges.

To address these risks, Bergen Tankers has implemented the following measures: Conducted supplier audits and self-assessment surveys, updated contractual clauses to include human rights and labour standards requirements, provided training for procurement staff and vessel managers, Established feedback and complaint procedures for employees and contractors.

The table below shows the risk assessment of some of the contexts. With this map we aim to create a visual representation of potential risks, and their potential impact.

Risk factors and focus areas	Assessment	Risk
Violation of gender equality	In our culture we have a focus of having an open and including environment, as well as good reporting opportunities.	Low risk
Shipbuilding	We do shipbuilding mainly in Europe, and Norway, but now also in China. We realize there is a higher risk outside Europe.	Low risk
Violation of safety onboard	We have systems for reporting near miss and accidents. The use of PPE is of paramount importance for us. We also have a good company culture of taking care of our co-workers.	Low risk
Violation of discrimination	Violation of discrimination to be reported in our reporting system.	Low risk
Loss of opportunities for learning and development	We support our employees with courses required for their career development and personal needs and wishes.	Low risk

Violation in working hours	We comply with IMO, STCW and ILO. Rest hours are registered in an approved computerized program and verified by the office.	Low risk
Violation of human rights by our suppliers	<p>We mainly operate in EU, but we realize that outside this area there might be a link in the supply chain that may violate human rights. Thus, we have this policy in place.</p> <p>A thorough audit assisted by external companies to be conducted.</p>	Medium risk

The most significant risk within our operations lies within our supply chain, particularly with shipyards. We perceive a lower level of risk within our company and suppliers inside the European Union due to the presence of regulations and controls. However, the higher-risk portion is associated with locations outside of Europe or within Eastern Europe. Although the supply for this area is relatively limited in our supply chain, we do employ some seafarers from Eastern Europe and the Philippines, and certain shipyard processes are carried out in China, Turkey or Eastern Europe. To ensure proper disposal of ships at the end of their lifetimes, we are committed to select approved yards for green recycling.

Follow- up

In our shipbuilding contracts, we prioritize human rights by including specific terms and conditions. We have created an approval form that addresses human rights concerns. When evaluating suppliers, we consider their reporting systems and their ability to function effectively. We prioritize suppliers who have reliable reporting mechanisms and demonstrate a commitment to ethical practices.

These measures reflect our commitment to maintaining human rights standards and reducing risks in our supply chain and create a safe and ethical work environment.

In Bergen Tankers we value open communication and have established a reporting system and channels for employees to have conversations about any issues they may face. Every year, we conduct evaluations to ensure compliance. Reporting can take place directly to the employers superior or outside the hierarchy to the designated person (DPA), or direct to the leadership who handles these evaluations confidentially and acts independently to ensure that messages are received and forwarded appropriately.

We take deviations or incidents seriously and follow up on them diligently, taking necessary actions to address them. Safety meetings are conducted onboard to discuss safety matters and foster a secure working environment.

Conclusion

Countries that are members of the European Union are bound by a comprehensive set of ethical rules and regulations to maintain their membership. This adherence to ethical standards makes them more trustworthy, thereby reducing the likelihood of human rights violations.

In Europe, there are stringent laws in place that make it challenging to bypass human rights regulations. Despite these legal safeguards, Bergen Tankers maintains its own policies and principles to ensure the protection of human rights throughout our operations.

This report was prepared in accordance with the Norwegian Transparency Act (Åpenhetsloven) and based on Bergen Tankers' internal policies, supplier data, and stakeholder input.

In 2025 and beyond, Bergen Tankers aims to further enhance transparency by:
Expanding due diligence coverage to smaller suppliers, strengthening monitoring of working conditions at subcontractor sites, publishing updated assessments annually, increasing training for both internal staff and external partners.