

Risk assessment on human rights and decent work conditions

Company: Euro Trans AS

Year: 2024

Identified risk area	Applies to	Risk category	Risk description	Risk rating	Mitigating actions taken	Mitigating action planned
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	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	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).

			conditions/risk of incidents and accidents			
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	Suppliers	Industry risk	Gaps in the perception of business ethics with regard to employment, corruption, child labor, etc. Risk of corrupted business, exploitation of labour and poor working conditions.	2	Our exclusive bunker broker 'Bergen Bunker' are performing annual risk based analyzes of the supply chain based on the Global Slavery Index to identify human rights violations. All Port Agents are covered through our instructions in the Agency Appointment. Seatrans is an active member of Maritime Anti-Corruption Network (MACN). All payment to port agents are outsourced to DA-Desk (Marcura) who has an extensive audit programme covering, amongst other, money laundering and corruption.	Bergen Bunker is ISO 9001:2015 certified and the human rights and decent working conditions will be embedded in the Management System. Tugboats and barge companies will be the last suppliers for SCT to investigate in relation to the Transparency Act.
Harassment/brutal treatment	Offices, vessels, suppliers	Industry risk	Working conditions at sea and shore and between employees of suppliers of goods and services. Risk of violating working conditions.	2	Our exclusive bunker broker 'Bergen Bunker' are performing annual risk based analyzes of the supply chain based on the Global Slavery Index to identify human rights violations. All Port Agents are covered through our instructions in the Agency Appointment. Cultural awareness training performed	Bergen Bunker is ISO 9001:2015 certified and the human rights and decent working conditions will be embedded in the Management System. Tugboats and barge companies will be the last suppliers for SCT to investigate in relation to the Transparency Act.

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Business ethics	China, Phillipines, Greece, India, Mexico, Turkey, Brazil.	Geographical risk	Gaps in the perception of general business ethics with regard to employment, corruption, child labor, etc. Risk of corrupted business, exploitation of labour and poor working conditions.	2	Our exclusive bunker broker 'Bergen Bunker' are performing annual risk based analyzes of the supply chain based on the Global Slavery Index to identify human rights violations. All Port Agents are covered through our instructions in the Agency Appointment. Seatrans is an active member of Maritime Anti-Corruption Network (MACN). All payment to port agents are outsourced to DA-Desk (Marcura) who has an extensive audit programme covering, amongst other, money laundering and corruption.	Bergen Bunker is ISO 9001:2015 certified and the human rights and decent working conditions will be embedded in the Management System. Tugboats and barge companies will be the last suppliers for SCT to investigate in relation to the Transparency Act.
Business ethics	Bunker suppliers and agents	Products and services	Lack of business ethics. Risk of corrupted business, exploitation of labour and poor working conditions.	2	Our exclusive bunker broker 'Bergen Bunker' are performing annual risk based analyzes of the supply chain based on the Global Slavery Index to identify human rights violations. All Port Agents are covered through our instructions in the Agency Appointment. Seatrans is an active member of Maritime Anti-Corruption Network (MACN). All payment to port agents are outsourced to DA-Desk (Marcura) who has an extensive audit programme covering, amongst other, money laundering and corruption.	Bergen Bunker is ISO 9001:2015 certified and the human rights and decent working conditions will be embedded in the Management System. Tugboats and barge companies will be the last suppliers for SCT to investigate in relation to the Transparency Act.

HSE Culture	Ships, offices, terminals	Industry risk	Safety breaches and risk of incidents at shore, onboard and at terminals.	1	Continous evaluation of safety proceedures. External specialists hired to conduct safety training.	Working to obtain ISO standards for HSEQ for all terminals
Workload	Offices	Company specific	Excessive use of overtime may jepordize decent working conditions for office staff	2	Monitoring use of overtime to identify excessive use. New shiftrotations used at terminals were critical.	
HSE Culture	Terminals	Product and service	HSE culture at terminals not consistent. Risk of incidents and accidents	1	Substantial more focus on Aberdeen and Husøy as developing terminals.	Working to obtain ISO standards for HSEQ for all terminals