

2022

Åpenhetsloven (Transparency Act)



Åpenhetsloven (Transparency Act)

- (1) Stamas Group will be subject to the Norwegian Transparency Act (Åpenhetsloven)
- (2) Stamas Group consist of two separate companies: Stamas Productions and Stamas Solutions. Stamas Solutions is located in Hammaren 9A, Tananger.
Stamas Productions has a workshop and offices at Klepp Stasjon. Both companies are using the same Quality, HSE and Environment (QHSE) system for general business and support services. Separate work procedures are prepared for each company when required.

The production is mainly aimed at the oil industry in which we are known for flexibility, with good capabilities to meet customer demands for quality combined with short delivery times. The company's QHSE management system shall contribute to deliver products and services that meet the customer's requirements, requirements in laws and regulations and take into account risks and opportunities that concern the organization's context and goals. The company's QHSE management system meets the requirements of ISO 9001, ISO 14001, ISO 45001, the Working Environment Act and have guidelines and Policies to ensure we comply with Human rights.

Stamas Group have mapped potential/actual adverse impacts and significant risks regarding Human Rights and have the following documents to ensure that we comply:

- Aktsomhetsvurdering menneskerettigheter (due diligence Human Rights)
- Analysis sustainable goals
- Strategy sustainability and Human Rights
- HSEQ and CSR Policy (including Social responsibility and Human Rights)
- Ethical Guidelines
- Employee handbook
- Procedure for Notification of unacceptable conditions (Varsling av kritikkeverdige forhold)
- Procedure for approval and evaluation of suppliers
- Supplier approval/evaluation form
- HSEQ Manual
- Compliance of laws and regulations register

(3 & 4) Stamas Group operates in Norway where Human rights are controlled by law and well implemented in the society. Based on our activities and size (40-50 employees) we have limited impact on the society other than our own employees and our suppliers.

Stamas do not have any conflicts related to UN Universal Declaration of Human Rights and shall respect the rights and local laws wherever we work.

We have performed a due diligence on the UN Universal Declaration of Human Rights and have mapped areas where we may have a risk or opportunity to influence and performed and planned the following actions:

Internal risks and opportunities:

- There is a risk that discrimination and racism may occur (HR1, HR2, HR18, HR29).

Implemented measures:

The company have implemented a Policy to include Human Rights.

Our ethical guidelines include discrimination religion and racism.

Work environment surveys, including questions related to discrimination and racism, are conducted annually. The results are analysed, communicated and necessary actions taken.

- There is a risk that personal injury may occur, and we continually work to ensure our employees safety (HR3).
Implemented measures:
We have a risk based HSE system and work according to the Norwegian law and ISO 45001. We have a stop- job philosophy and monitor in our annual Work environment survey whether people are comfortable stopping the job if it feels unsafe.
Further action planned: We continually work to improve and regularly perform risk assessments to prevent incidents and accidents to happen.
- There is a risk that employees feel that they cannot join work unions (HR23 and HR20).
Implemented measures:
The Norwegian law state that personnel are free to join whichever union they prefer. Stamas Productions have employees organized in Fellesforbundet.
- There is a risk that personnel do not receive equal pay for equal work (HR23).
Implemented measures: The company have salary matrix for the production workers who ensure equal pay regardless of gender, ethnicity, religion etc.
- There is a risk of breach of compliance with the law for working hours and vacation (HR24).
Implemented measures: The company have control of overtime and good conditions when overtime is necessary.
The company register all working hours and overtime. Working hours and overtime is continually monitored in new salary system.
- The company have the opportunity to participate in giving vocational training by having trainees and work-related training in cooperation with NAV (HR26).
Implemented measures: The company have trainees in machining and welding and has personnel who works via NAV`s work-related training.

Supplier risks:

- There is a risk that Logistic companies do not comply with driving and rest regulations and have a standard of living that is acceptable according to (HR24 and HR 25).
Implemented measures: The company have agreements with the logistic companies that confirms they are according to law and Stamas verify this.
The supplier evaluation has been updated to include requirements and to confirm that they do not have any conflicts to the UN Universal Declaration of Human Rights.
Further action planned: The updated version of the supplier approval/evaluation form needs to be sent to Logistic suppliers.

- There is a risk that suppliers of steel gets material and components that are bought in countries that do not comply to human rights .

Implemented measures: Our suppliers are mainly located in Norway, and in addition we have one steel suppliers in England, who also comply with Human rights. We have mapped that there might be a risk that these suppliers have raw material and components that may come from countries where we do not have control.

Implemented measures: The supplier evaluation has been updated to include requirements and to confirm that they do not have any conflicts to the UN Universal Declaration of Human Rights.

Further action planned: The updated version of the supplier approval/evaluation form needs to be sent to steel suppliers.

- There is a risk that suppliers of working clothing's get material and components that are produced in countries that do not comply to human rights.

Implemented measures: The supplier evaluation has been updated to include requirements and to confirm that they do not have any conflicts to the UN Universal Declaration of Human Rights.

Further action planned: Suppliers of working clothes needs to be evaluated and to complete the approval of evaluation form.

Business partners risk

There is not mapped any risk on Business partners related to Human rights.

Best regards



Pål Svanes

Stamas Group
Hammaren 9A