



The Transparency Act
Greencarrier Liner Agency Norway AS
2023

1. INTRODUCTION

The Transparency Act (Åpenhetsloven) came into effect on July 1, 2022, with the first reporting deadline set for July 1, 2023.

The purpose of this act is to promote Norwegian enterprises' respect for fundamental human rights and decent working conditions in connection with the production of goods and provision of services. The Act applies to two areas:

- Suppliers and partners
- Internally within the organization

This report addresses how Greencarrier Liner Agency Norway AS complies with the Transparency Act.

2. THE TRANSPARENCY ACT

The Transparency Act covers labor and human rights. The most central paragraphs of the Transparency Act are reproduced below:

§ 4. *Obligation to conduct due diligence assessments*

Enterprises shall conduct due diligence assessments in accordance with the OECD Guidelines for Multi-national Enterprises. By due diligence assessments, it means to:

- a. Embed accountability in the enterprise's policies.
- b. Identify and assess actual and potential adverse impacts on fundamental human rights and decent working conditions that the enterprise has caused or contributed to, or that are directly linked to the enterprise's business operations, products, or services through supply chains or business partners.
- c. Implement appropriate measures to prevent, mitigate, or remedy adverse impacts based on the enterprise's priorities and assessments under point b.
- d. Monitor the implementation and results of measures under point c.
- e. Engage in communication with affected stakeholders and rights holders regarding how adverse impacts have been addressed under points c and d.
- f. Ensure or cooperate in remediation and compensation where required.

Due diligence assessments should be conducted regularly and be proportionate to the size of the enterprise, the nature of its activities, the context in which the enterprise operates, and the severity and likelihood of adverse impacts on fundamental human rights and decent working conditions.

§ 5. *Obligation to account for due diligence assessments*

Enterprises shall disclose a report on the due diligence assessments according to § 4. The report shall include, at minimum:

- a. A general description of the enterprise's organization, scope of operations, policies, and procedures for addressing actual and potential adverse impacts on fundamental human rights and decent working conditions.
- b. Information on actual adverse impacts and significant risk of adverse impacts identified by the enterprise through its due diligence assessments.

c. Information on measures implemented or planned by the enterprise to stop actual adverse impacts or mitigate significant risk of adverse impacts, and the results or expected outcomes of these measures.

The report shall be updated and disclosed annually and also in the event of significant changes in the enterprise's risk assessments.

Duty to provide information (The Transparency Act § 6 and § 7)

Any individual has the right to receive information, upon written request, about how the enterprise handles actual and potential adverse impacts concerning the implementation of the due diligence assessments. This includes both general information and information related to a specific product or service offered by the enterprise. The information shall be provided in writing and be comprehensive and understandable. The information shall be provided within a reasonable timeframe and no later than three weeks after the information request is received. If the scope of information requested makes it unreasonably burdensome to respond within three weeks, the information shall be provided within two months from the receipt of the request.

3. PROCEDURES FOR HANDLING THE TRANSPARENCY ACT

3.1 Risk Assessment

Based on experience and knowledge of suppliers, industries, geography, and specific risk considerations, the following risk and focus areas have been identified as the most significant:

- Gender equality, including equal pay for work of equal value.
- Non-discrimination on any grounds.
- Right to social security.
- Increasing the proportion of female managers.
- Good and safe working conditions, health, environment, and workplace safety.
- Reasonable limitations on working hours.

3.1.1 Risk Analysis

A risk analysis shall be conducted to identify the most significant risks for selected risk focus areas. The risk assessment is based on quantitative and qualitative evaluations. Factors emphasized in relation to significant risks include:

- The number of employees potentially affected by the risk area.
- The internal risks and consequences associated with the risk area within the organization.
- The risks and consequences associated with the risk area in relation to society at large.
- The potential for improvement within the risk area, considering industry and national conditions.
- The ease or difficulty of implementing improvements in the risk area.

The risk analysis will be conducted based on a risk-based prioritization. This means that the extent of assessment and follow-up will be tailored to the assessed risks and the organization's capacity for influence. Based on the risk analysis, risk areas with significant risks will be identified for further follow-up regarding labor and human rights.

A more thorough analysis shall be conducted for risk focus areas identified as presenting a significant risk. Risk focus areas assessed as posing a significant risk of potential adverse impacts or violations of labor and human rights shall be closely monitored, and measures shall be implemented. Risk focus areas assessed as not posing a significant risk of potential adverse impacts or violations of labor and human rights shall be followed up through monitoring and annual risk analysis.

3.1.2 Further Follow-up and Measures

Risk areas assessed as posing a significant risk of potential adverse impacts or violations of labor and human rights shall be closely monitored with regards to repairing, reducing, or eliminating the risk.

When such issues are identified, Greencarrier Liner Agency Norway AS shall:

- Implement appropriate measures to stop, prevent, or limit negative consequences.
- Monitor the implementation and results of the measures.
- Communicate with affected stakeholders and rights holders about how negative consequences have been addressed.
- Ensure or collaborate on restoration and compensation where required.

Greencarrier Liner Agency Norway AS carries out a range of improvement measures in relation to labor and human rights, including selected risk focus areas, even when there is no risk of negative consequences or violations of labor and human rights. The purpose of this is to maintain a continuous focus on improvements.

4. REPORT

4.1 Risk Mapping

Labor and human rights are important topics for Greencarrier Liner Agency Norway AS.

The table below shows a risk analysis of Greencarrier Liner Agency Norway AS.

Risk and focus area	Actions	Responsible for actions	Risk
Risk of gender equality violations, including equal pay for work of equal value.	<ol style="list-style-type: none"> 1. Policy on labor and human rights 2. Policy on equality and diversity 3. Key Performance Indicators (KPIs) and objectives 4. Assess/categorize the different positions within the staff environments based on the premise of equal pay for work of equal value. 	HR	Low risk
Risk of discrimination on any grounds.	<ol style="list-style-type: none"> 1. Health, Safety, and Environment (HSE) manuals/procedures 2. Whistleblowing channel 3. Key Performance Indicators (KPIs) and objectives for discrimination 4. Employee satisfaction survey 5. Risk assessment 	HR	Low risk

Risk of violation of the right to social security	-	HR	Low risk
Risk of inadequate number of female leaders	1. Recruitment strategy/procedures 2. Goal for gender distribution in leadership positions	HR	Medium risk
Risk of violating good and safe working conditions, health, environment, and workplace safety.	1. KPIs, action plans, and improvement goals 2. Annual safety inspections 3. Training in handling threatening situations	HR	Low risk
Risk of violation of reasonable limitations on working hours	Overtime statistics are regularly discussed in the Work Environment Committee	HR	Low risk
Risk of violations of fair wages	Policy on labor and human rights Collective bargaining agreement Introduce a fixed equal pay fund in local negotiations Salary statistics	HR	Low risk

The results from the analysis show that Greencarrier Liner Agency Norway AS has a low risk of violating labor and human rights.

In a few areas, such as the proportion of female managers the company has a moderate risk.

4.2 Mapping of significant risks and violations

Greencarrier Liner Agency AS has not had any violations of labor and human rights.

4.3 Thorough analyses

It is not relevant to conduct further assessments and analyses.

4.4 Summary and assessment

Based on an overall assessment, the risk of violations of labor and human rights is considered low. No violations have been identified thus far. Although the risk is low, there is always room for improvement, and the work on labor and human rights is an ongoing effort. Further analysis will be conducted based on a risk-based approach. This means that the scope of mapping and follow-up will be tailored to the assessed risks and the organization's capacity for influence.

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Följande handlingar har undertecknats den 29 juni 2023



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