

VSS Seafarers

Human rights due diligence statement 2024

Public statement in accordance with the Norwegian Act relating to enterprises’ transparency and work on fundamental human rights and decent working conditions (Transparency Act)

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About this document

Due to significant restructuring of the group's operations in 2024, involving the full outsourcing of the ship management services, VSS Seafarers AS is as of 31 December 2024 not in scope for the Norwegian Transparency Act thresholds. However, the act states that companies in scope must be below the thresholds for two consecutive balance days, in order to be out of scope. Therefore, for the year end 2024, VSS Seafarers remain in scope of the transparency act. Any information relevant to the thresholds of the Company in relation to the Act's scope is publicly available.

The following information accounts for VSS Seafarers activities from January 1st 2024, to December 31st 2024, subject to the Norwegian Act relating to enterprises' transparency and work on fundamental human rights and decent working conditions. The act requires larger business enterprises to undertake due diligence to prevent and address potential and actual negative impacts on human rights and international decent work standards in their own activities and in the supply chain.

The due diligence requirement of the Transparency Act is based on the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Due Diligence Guidance for Responsible Business Conduct. To meet this standard, business enterprises are required to:

- a. embed responsible business conduct into 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 either caused or contributed toward, or that are directly linked with the enterprise's operations, products or services via the supply chain or business partners
- c. implement suitable measures to cease, prevent or mitigate adverse impacts based on the enterprise's prioritizations and assessments pursuant to (b)
- d. track the implementation and results of measures pursuant to (c)
- e. communicate with affected stakeholders and rights-holders regarding how adverse impacts are addressed pursuant to (c) and (d)
- f. provide for or co-operate in remediation and compensation where this is required.

The law specifies that "due diligence shall be carried out regularly and in proportion to the size of the enterprise, the nature of the enterprise, the context of its operations, and the severity and probability of adverse impacts on fundamental human rights and decent working conditions."¹

To support the objective of greater awareness and openness, the Transparency Act requires that enterprises subject to the law publishes an account on their due diligence. The minimum requirements for the published account, which must be made easily accessible on the enterprise's website, include:

- a general description of the enterprise's structure, area of operations, guidelines and procedures for handling actual and potential adverse impacts on fundamental human rights and decent working conditions
- information regarding actual adverse impacts and significant risks of adverse impacts that the enterprise has identified through its due diligence
- information regarding measures the enterprise has implemented or plans to implement to cease actual adverse impacts or mitigate significant risks of adverse impacts, and the results or expected results of these measures.

¹ [Act relating to enterprises' transparency and work on fundamental human rights and decent working conditions \(Transparency Act\) - Lovdata](#)

About VSS Seafarers

About VSS Seafarers

VSS Seafarers is a Norwegian subsidiary of the company Viking Supply Ships AB, whose core business operates within offshore and offshore/icebreaking on a worldwide basis. The main areas of operations are the North Sea and Arctic Waters. Viking Supply Ships AB offers unique offshore industry expertise, dating back to the establishment of the company in 1974.

Since 2000, Viking Supply Ships AB has also operated state-owned icebreakers for the Swedish Maritime Administration. The icebreakers were returned to the owner on 2024-06-30. In October 2024 Viking Supply Ships transferred the fleet of 5 AHTS vessels to other managers, and thereafter Viking Supply Ships act as shipowner only.

The Group head office is in Stenungsund, Sweden. Viking Supply Ships AB is listed at Nasdaq First North Growth Market Stockholm.

As a subsidiary, VSS Seafarers has functioned as employer for mainly offshore personnel, related to the group's operations. The changes in the group's operations, outsourcing the management of the ships and now only acting as shipowners, also affected VSS Seafarers, meaning that as of October 2024 the company is no longer operational. Given that the nature of VSS Seafarers operations has been limited to employing crewmembers and the financial commitments were limited to salary obligations, there are few value chain concerns related to purchase of products.

The total number of offshore employees in 2024 up until October were 178. From November 2024 the number of employees at VSS seafarers is 0. For the group the numbers of employees is 7, whom all are shore based.

Guidelines and procedures for handling actual and potential adverse impacts on fundamental human rights and decent working conditions

In the reporting period, VSS Seafarers, through the consolidated group, was committed to respecting human rights, treating people with dignity, ensuring the safety and well-being of our employees and individuals affected by our business.

VSS Seafarers complied with relevant national and international laws, rules, regulations and norms in our daily business and operations. As part of this recommitment, we worked to implement our corporate responsibility to respect human rights in line with the UNGP and the OECD Guidelines for Multinational Enterprises throughout our operations and promote respect for human rights across our business relationships.

VSS Seafarers committed to respecting all internationally recognized human rights including the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. All vessels operating in international waters comply with the Maritime Labour Convention (MLC).

We developed a dedicated human rights policy in line with the UNGPs applicable for all our employees. The human rights policy was approved by the board of directors, and our CEO was responsible for overseeing its implementation across the company. The policy commitment was integrated in our management system.

The human rights policy applied both to our own activities and the company's value chain. It was complemented by other policies and procedures, particularly our:

- Code of conduct
- HSEQ Policy
- Bribery and anti-corruption policy
- Supply chain human rights due diligence procedure
- Whistleblower policy

The human rights policy and other related policies and procedures applied to the entire Viking Supply Ships Group.

Adverse impacts and significant risks identified through our human right's due diligence

Risks to people in the maritime sector are well-known. Globally, the risk of labour exploitation and hazardous working conditions remain a key challenge for the sector across the value chain. During the reporting period, VSS Seafarers operations were not related to ship recycling. The group were not involved in building or recycling of ships. Consequently, we were not exposed to the most common human rights risks linked to shipping.

For VSS Seafarers, operations were mainly conducted in Scandinavian waters and The North Sea, with a majority of Swedish and Norwegian crew members. Our suppliers were primarily based in Norway and Sweden, with a few also in other OECD countries.

Our human rights due diligence and the risk assessment carried out in preparation of our due diligence account did not uncover any actual significant adverse impacts in our own activities or directly linked to our operations or services via business partners.

The process identified a number of potential adverse impacts that might arise in the context of our own activities.

Focus areas for our own activities and operations

Health and safety

During the reporting period, the most salient "people risk" in the context of our activities was health and safety onboard our vessels. Operating offshore in harsh environments involves several potential hazards to crew members. Safeguarding employees was therefore highly prioritized, and our commitments to health and safety were clearly stated in the company vision, values and HSEQ policy.

Gender, diversity and anti-discrimination

We recognize that shipping is a male-dominated industry. SDG 5 to promote gender equality was therefore a key goal for our own efforts as a responsible and sustainable shipowner.

During the reporting period, the majority of VSS Seafarers' workforce was Swedish and Norwegian. We also had employees on board the vessels from the UK, the Faroe Islands, Denmark, Poland, Croatia and Ukraine. The risk of labour exploitation in shipping contributed to by irresponsible recruitment practices, which especially place vulnerable individuals such as migrant workers at risk, is receiving growing attention. We were conscious of this challenge for our industry, although our typical crew member is not among those at higher risk of exploitation.

Decent working conditions and labour rights

VSS Seafarers committed to eliminating all forms of forced and compulsory labour, including child labour, modern slavery, and human trafficking, and to eliminating discrimination in respect of employment and occupation. In 2024, we did not conduct any operations in countries with heightened risk of human rights abuse.

We ensured that all our employees, onshore and offshore, were working under conditions that met the decent work requirements set out in core international labour conventions (ILO conventions) and the MLC. The various regulations cover conditions of employment, work and rest hours, medical care, social security protection as well as standards for accommodation, recreational facilities, food and catering on board.

All seafarers were covered by collective bargaining agreements between the Norwegian Shipowners' Association and the seafarers' unions. These agreements were binding and ensure equal treatment in relation to wages and working conditions.

Whistleblowing

Our whistleblower procedure provided a mechanism for raising concerns related to these areas as well as other safety and ethical issues. The whistleblowing policy interlinked with our human rights policy as well as other key governing documents such as our code of conduct and supplier code of conduct.

In 2024 there was no concern reported through our whistleblowing channel.

Key issues for our value chain

Supply chain

During the reporting period, the most significant human rights and labour rights risks in the shipping supply chain were typically linked to shipbuilding as well as the production of components and extraction of metals and minerals further upstream. Since this is not relevant to VSS Seafarers operations, we had no orders for shipbuilding but were aware of the challenges in the industry. Given the nature of VSS Seafarers operations as employer of seafarers/crewmembers, there were no further adverse value chain issues.

Measures to mitigate significant risks of adverse impacts and expected results

General approach

During the reporting period, VSS Seafarers were committed to providing a safe and healthy work environment for our employees. We worked to ensure that our employees enjoy decent working conditions regardless of gender and background.

To ensure responsible business conduct that prevented and addressed adverse impacts on planet and people, in own operations and across the company's value chain, VSS Seafarers was committed to the UN Sustainable Development Goals, the UN Global Compact's Principles on human rights, labour standards, environment and anti-corruption and IMO's standards for safety, the marine environment and maritime labour.

Our commitment was set out in our human rights policy. The policy was based on the UNGP and the OECD Guidelines, with human rights due diligence as a key component.

If we were made aware of or identified breaches or potential breaches relating to human rights and decent working conditions, a follow-up was carried out through the relevant procedures (health and safety, harassment, ethical concerns, etc.). We identified no breaches throughout the reporting period.

Responsibility and accountability

Viking Supply Ships Chief Executive Officer was accountable for the human rights policy at VSS Seafarers. Its implementation was coordinated by the HSEQ function with involvement by all relevant functions, including human resources, operations, procurement, and finance. The board reviewed and approved the company's annual human rights due diligence report, as required by the Transparency Act.

Grievances and whistleblowing

The whistleblowing channel provided by the group to all employees and external stakeholders with a secure channel to report violations of laws and our own policies and guidelines. Our whistleblowing channel enabled all employees of VSS Seafarers, business partners, and stakeholders to report any serious concerns or offenses in a confidential manner, and without risk of retaliation.

Managing salient risks

The following section describes our efforts to address the most salient risks to people in the context of our operations and value chain:

- Health and safety
- Gender equality, diversity and anti-discrimination

Gender, diversity and anti-discrimination

During the reporting period, we were committed to ensuring that all our employees were working under the same conditions, regardless of nationality and background. When relying on external crew and placement companies, we undertook due diligence to ensure that their services were in compliance with the Maritime Labour Convention (MLC), through required MLC Certification, instructions and audits.

Responsible supply chain


The group has due diligence process that are risk-based, where the risk assessments accounted for the type of supplier, the area in which they operated, and the type of work they performed. However, given the nature of VSS Seafarers operations, value chain due diligence is not of relevance.

Contact

We handle information requests in line with the Transparency Act.

If you have any questions about VSS Seafarers's work relating to human rights during the reporting period, please contact us on info@vikingsupply.com.

Approved by the CEO and the board: 28 May 2025

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Signed by:

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