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# **TRANSPARENCY ACT REPORT**

## **2022**

# Introduction

This report has been prepared in accordance with the Norwegian Transparency Act (the “Transparency Act”) section 5 and summarises the policies and procedures in Score Group (Score) with respect to safeguarding of human rights and decent working conditions, in addition to providing information on the implementation and results of due diligence checks.

## About Score Group

Score Group is an engineering service provider, primarily to the oil, gas, power and naval sectors. We provide product maintenance and servicing, field support and engineering procurement for flow control equipment in addition to providing precision manufacturing and coating services for the power and aeronautic sectors.

Score Group is headquartered in Peterhead, UK and has 30 facilities worldwide, employing over 2,000 staff at 31st December 2022.

Score Group operates from two facilities in Norway, in Stavanger and Sandnessjoen

# Our Commitment

Score Group acknowledges all internationally recognised human and labour rights standards as set out in the International Bill of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. We align our work with the United Nation's Sustainable Development Goals (SDG), with our supporting work for each SDG described in our annual Environmental, Social and Governance (ESG) report.

Score Group is committed to protecting human rights within our own operations and to ensuring that our supply chain partners demonstrate the same respect for human rights and working conditions.

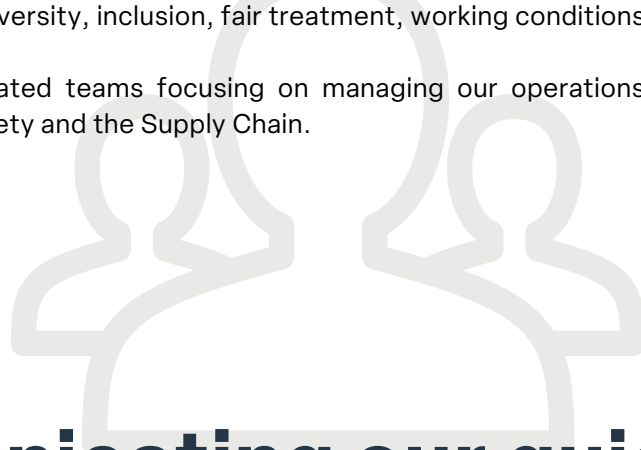
# Governance

## Responsibilities

Score Group's Board of Directors has oversight responsibility for the management of the group of companies and the setting of strategic direction, which is then furthered by the senior management teams. Strategies developed by the senior management teams give due consideration to social and governance factors, to ensure we protect human rights and provide decent working conditions.

Score Group's Board of Directors has established an Ethics sub-committee which brings together senior Legal and Human Resources staff, as well as Executive and Non-executive members of the Score Group Board. The Ethics Committee has oversight of our management of human rights within the Score Group organisation, with remit to investigate any areas of concern with regard to human rights issues including diversity, inclusion, fair treatment, working conditions and remuneration.

Score Group has dedicated teams focusing on managing our operations with respect to Human Resources, Health & Safety and the Supply Chain.



## Communicating our guiding principles

Score Group's expectations are defined within our internal Code of Conduct (the "Code") and our Supplier Code of Conduct (the "Supplier Code").

The Code has been communicated to all staff in both 2021 and in 2022. In 2022, this took the form of a compulsory e-learning course which all staff were required to complete. This e-learning course used fictional scenarios relevant to Score Group's operations to test whether learners had a good understanding of the contents and purpose of the Code.

The Code is available to staff on the company intranet and it is reviewed annually to ensure that it remains consistent with the expectations of the company.

The Supplier Code of Conduct has been issued to the suppliers of Score AS. A wider roll out to all of Score Group's suppliers globally is being conducted during 2023. By the end of 2023 all suppliers with which Score Group conducted more than £50,000 (GBP) of business in 2022 will have committed to complying with our Supplier Code. Score Group will disengage from relationships with suppliers who will not commit to the Supplier Code.

# Due Diligence

## In our own operations

Score Group's Human Resources and Health & Safety teams are tasked with on-going monitoring of our operations to ensure that we are protecting human rights and providing decent working conditions for our staff.

On-going monitoring includes measures such as internal auditing, inspections, staff surveys, exit interviews, staff meetings. In addition, these teams can be freely contacted by staff who have concerns.

The Ethics Committee serve as the body with oversight of how human rights and working conditions are managed internally. Serious concerns from internal due diligence activities such as audits, inspections, investigations or staff feedback will be reported to the Ethics Committee.



## In our Supply Chain

Score Group's Supply Chain team are tasked with on-going monitoring of our Supply Chain to ensure that we only work with suppliers who demonstrate the same commitments as Score Group to protecting human rights and providing the right working conditions.

The Supply Chain team reinforce our expectation during meetings and communication with suppliers, in addition to ensuring that the Supplier Code is being shared and is understood.

The Supply Chain team conduct supplier pre-qualification checks. We additionally use any site visits by our staff, for expediting, audits, product inspections or project meetings, as an opportunity to observe whether our suppliers are complying with the Supplier Code.

Serious concerns from due diligence activities conducted with the Supply Chain will be reported to the Executive Leadership Team (ELT). A member of the ELT has overall responsibility for Score Group's Supply Chain management and will report any such issues directly to the ELT.

The ELT will investigate the concerns and take an appropriate course of action, this may include:

- Communicating Score Group's concerns to the supplier and seeking assurances that the issues will be resolved;
- Suspending dealing with the supplier until the issues are resolved;
- Disengaging from the relationship with the supplier.

# Whistleblowing

Score Group provides the opportunity for any staff member to raise an issue with the Board of Directors through a confidential email address, which is promoted on the company intranet. A member of the board will respond to any issue raised through this method.

Staff can alternatively opt to email a specific email address for whistleblowing. Any emails received within this inbox are handled confidentially to preserve anonymity, whilst still ensuring that the concerns are appropriately investigated.

## Risk Analysis

Score Group did not identify any serious areas of concern within our own operations or those of our supply chain during 2022.

Score Group did not receive any complaints of external origin related to human rights or workplace conditions during 2022.

Score Group believes that mature management processes, workforce stability and high levels of transparency support our assertion that the risks of significant concerns related to human rights or working conditions in our own operations are currently low.

Within the supply chain, we are not aware of any major concerns related to human rights or working conditions at this time. We expect that the risk of adverse issues occurring is higher in the supply chain than in our own operations and will deploy further mitigating controls during 2023.

## Focus for 2023

Score Group has identified the following improvement actions for 2023.

- 1) Improve mechanisms for collation of observation reports from visits by Score staff to supplier facilities.
- 2) Provide e-learning to Score staff who make supplier visits to increase the likelihood that any concerns are identified and reported.
- 3) Provide diversity and inclusion awareness training for supervisory and management staff within Score.



# Further Information



If you require further information about the matters discussed in this Transparency Report please email:

[ethics@score-group.com](mailto:ethics@score-group.com)

