The background of the entire page is a photograph of a smiling man, likely a fisherman, wearing a white helmet with a headlamp, a bright yellow high-visibility jacket with reflective stripes, and a black communication device. He is standing in front of a body of water with a large, rocky island in the background under a clear sky. The image is partially framed by a dark vertical bar on the left side.

# Transparency Act Report 2024

Lerøy Seafood Group ASA  
and subsidiaries

## Report regarding Lerøy Seafood Group's work to promote fundamental human rights and decent working conditions under the Transparency Act.

**HONEST  
OPEN  
RESPONSIBLE**

*Creative*

### 1. Introduction and background

The main purpose of the Transparency Act is to promote businesses' respect for fundamental human rights and decent working conditions. The Act shall also ensure that the public has access to information about how businesses manage their human rights risks.

The Transparency Act obliges Lerøy Seafood Group («Lerøy») to:

- carry out due diligence in accordance with the OECD Guidelines for Multinational Enterprises,
- describe how Lerøy's work with due diligence assessments related to human rights and decent working conditions, and
- respond to requests for information from the public.

Lerøy Seafood Group ASA is a public limited company listed on the Oslo Stock Exchange and is committed to complying with the prevailing corporate governance code issued by the Norwegian Corporate Governance Board (NUES). The term «Lerøy» refers to Lerøy Seafood Group ASA together with its subsidiaries, as further defined in Section 1-3 of the Norwegian Accounting Act.

This report relates to the period 1 January 2024 to 31 December 2024 and includes the following:

- A general description of Lerøy's organisation, business operations, guidelines and procedures for dealing with any actual and potential negative consequences for fundamental human rights and decent working conditions.
- Disclosure of actual negative consequences and any material risk of negative consequences uncovered by Lerøy's due diligence assessments.
- Disclosure of measures that Lerøy has initiated or plans to initiate to halt actual negative consequences or limit any material risk of negative consequences, and the outcome or expected outcome of these measures.

The report is a group-wide report on behalf of all companies in Lerøy with reporting obligations (see table 1).

The report has been issued and signed by the Board of Directors and the CEO of Lerøy Seafood Group ASA and is available at [leroyseafood.com](https://leroyseafood.com). Corresponding signatures have been performed by the Boards and General managers in all the Group's reporting companies.

#### 1.1 The Lerøy Group

Lerøy is a global seafood enterprise with roots going back to 1899. The Group's core business is farming of salmon and trout, wild catch of whitefish and shellfish, as well as secondary processing, product development, marketing, sales and distribution of seafood.

An important part of Lerøy's strategy is to be a fully integrated supplier of its main products. The Group conducts its business through a number of subsidiaries in Norway and internationally. Lerøy's head office is located in Bergen, but the Group's operations are distributed along the entire Norwegian coast. Lerøy has operations in 14 countries.

We offer a wide range of healthy products, which are supplied to supermarkets, restaurants, canteens and hotels. Every day we deliver the equivalent of five million seafood meals to 80 different countries.

Our vision is to be the leading and most profitable global supplier of sustainable, high-quality seafood.

In 2024, the Group had 5 311 employees and 883 contractors, for a total of 6 194. Of these, 2 295 worked outside of Norway.

The Group reports on three business segments. The segment breakdown below shows the subsidiaries for which Lerøy had a duty to report under the Transparency Act as of 31 December 2024.

**Table 1**

Lerøy Seafood Group ASA		
Farming	Wild catch	Value-Added Processing, Sales & Distribution
Lerøy Aurora AS	Lerøy Havfisk AS	Lerøy Seafood AS
Lerøy Aurora Sjø AS	Nordland Havfiske AS	Lerøy Fossen AS
Lerøy Midt AS	Hammerfest Industrifiske AS	Sjømathuset AS
Lerøy Midt Sjø AS	Finnmark Havfiske AS	Lerøy Norge AS
Lerøy Vest AS	Lerøy Norway Seafoods AS	Lerøy Bulandet AS
Lerøy Vest Sjø AS		Lerøy Austevoll AS
Sjøtroll Havbruk AS		
Sjøtroll Havbruk Sjø AS		
Lerøy Sjøtroll Kjærelva AS		

## Farming

The Farming segment comprises the Group's three farming regions in Norway: Lerøy Aurora, located in Troms and Finnmark; Lerøy Midt, located in Nordmøre and Trøndelag and Lerøy Sjøtroll, located in Vestland. In 2024, the operation had around 1 800 employees and harvested about 170 000 tonnes gutted weight (GWT) of salmon and trout.

## Wild Catch

The Wild Catch segment consists of Lerøy Havfisk and Lerøy Norway Seafoods (LNWS). Lerøy Havfisk has licences to fish just under 10 per cent of the total Norwegian cod quotas in the zone north of 62 degrees latitude. Lerøy Havfisk owns several processing plants, which are mainly leased out to its sister company LNWS on long-term contracts. The trawler licenses of Lerøy Havfisk have activity obligations related to the LNWS facilities in five counties.

LNWS's primary business is processing wild-caught whitefish. The company disposes a total of 10 processing plants and purchasing stations in Norway, five of which are leased from Lerøy Havfisk. Significant investments have been made in recent years, both to make operations more efficient and to expand the product range.

Lerøy Havfisk has around 450 employees and LNWS has 550 employees.

## Value-Added Processing, Sales & Distribution (VAPS&D)

The VAPS&D segment is the downstream operation of Lerøy's fully integrated value chain. It includes not only the harvesting, processing, sales and distribution of the Group's own-produced products, but also significant business interactions with third-party suppliers. Lerøy distributes products to more than 80 markets globally and has operations in 14 countries. The segment has around 3 200 employees in all.

## 2. Basis for responsible business practice

### 2.1 Protection of human rights and decent working conditions at Lerøy

Lerøy has pledged to respect internationally recognised standards for human rights and decent working conditions,

and strives to comply with all applicable laws and regulations – including internationally recognised conventions on the protection of human rights and decent working conditions.

In particular, Lerøy undertakes to comply with the following international conventions and standards:

- The International Bill of Human Rights and other relevant human rights conventions
- The ILO's Fundamental Principles and Rights at Work
- The UN's Guiding Principles on Business and Human Rights
- The OECD's Guidelines for Multinational Enterprises, where applicable





In addition to complying with the above-mentioned standards and principles, Lerøy has drawn up its own ethical guidelines, codes of conduct and policy documents relating to human rights and decent working conditions. The areas on which Lerøy has a particular focus are:

- Forced labour
- Child labour
- Permanent employment
- Fair pay and regulated working hours
- Trade unions and free collective bargaining
- Discrimination and harassment

Lerøy expects its suppliers and business partners to do the same.

## 2.2 Board of Directors and Group management

Both Group management and the Board of Directors fully support the Group's efforts to protect fundamental human rights and decent working conditions. The Board has approved the guidelines (codes of conduct) and policy documents described below. As well as Lerøy's Group management and Board of Directors, the General managers of the reporting subsidiaries have also been involved in processes relating to the Norwegian Transparency Act.

## 2.3 Guidelines and policies

The core principles of protecting human rights and decent working conditions are set out in the Group's Code of Conduct and other [policy documents](#) that are applicable to all subsidiaries within the Group.

- [Code of Conduct](#)
- [Supplier Code of Conduct](#)
- Human Rights policy
- Health, Safety and Environment policy
- Diversity and Inclusion policy

- Whistleblowing policy
- Procurement policy
- Fish Feed Raw Materials policy

## 2.4 Responsibility and operationalisation

Responsibility for the implementation, operationalisation and continuous improvement of the due diligence process is distributed as follows:

- Lerøy Seafood Group ASA's Board of Directors has the overall responsibility.
- Group management and the managements of each business area (segment) attend to the entire due diligence process on behalf of the Group.
- The General managers of the reportable subsidiaries are responsible for performing and following up due diligence assessments in their own operations.

The purpose of the above-mentioned codes of conduct and policy documents is to establish a set of shared principles and rules that are applicable to all Lerøy employees, suppliers and business partners. The Group's codes of conduct reflect Lerøy's values and provide guidance on the principles that employees and partners must abide by with respect to human rights and decent working conditions.

All employees must be engaged on lawful terms and conditions, which includes a specific written contract, correct pay, sufficient training and follow-up during the employment period, and the freedom to form or join a trade union. Lerøy focuses on equal rights for men and women. More information about the Group's endeavours to promote equality and combat discrimination may be found in the [Group's Equality Report 2024](#).

Each individual employee is responsible for complying with Lerøy's Code of Conduct. The Group communicates constantly with its employees and encourages openness and engagement.

The Group has established an internal mechanism whereby employees may anonymously report suspected wrongdoing and censurable conditions. A group-wide committee has been established to deal with incoming reports. The committee coordinates the administrative steps involved and the implementation of necessary measures.

Companies in the Lerøy Group submit quarterly reports to the head office in the form of a "compliance certificate". The compliance reporting contains information on several areas relevant for the protection of human rights and decent working conditions. These include health, safety and environment (HSE), ethical conduct and whistleblowing reports.



The Board of Directors reviews the codes of conduct and policy documents annually.

An annual cycle has been developed to ensure the implementation of various activities.

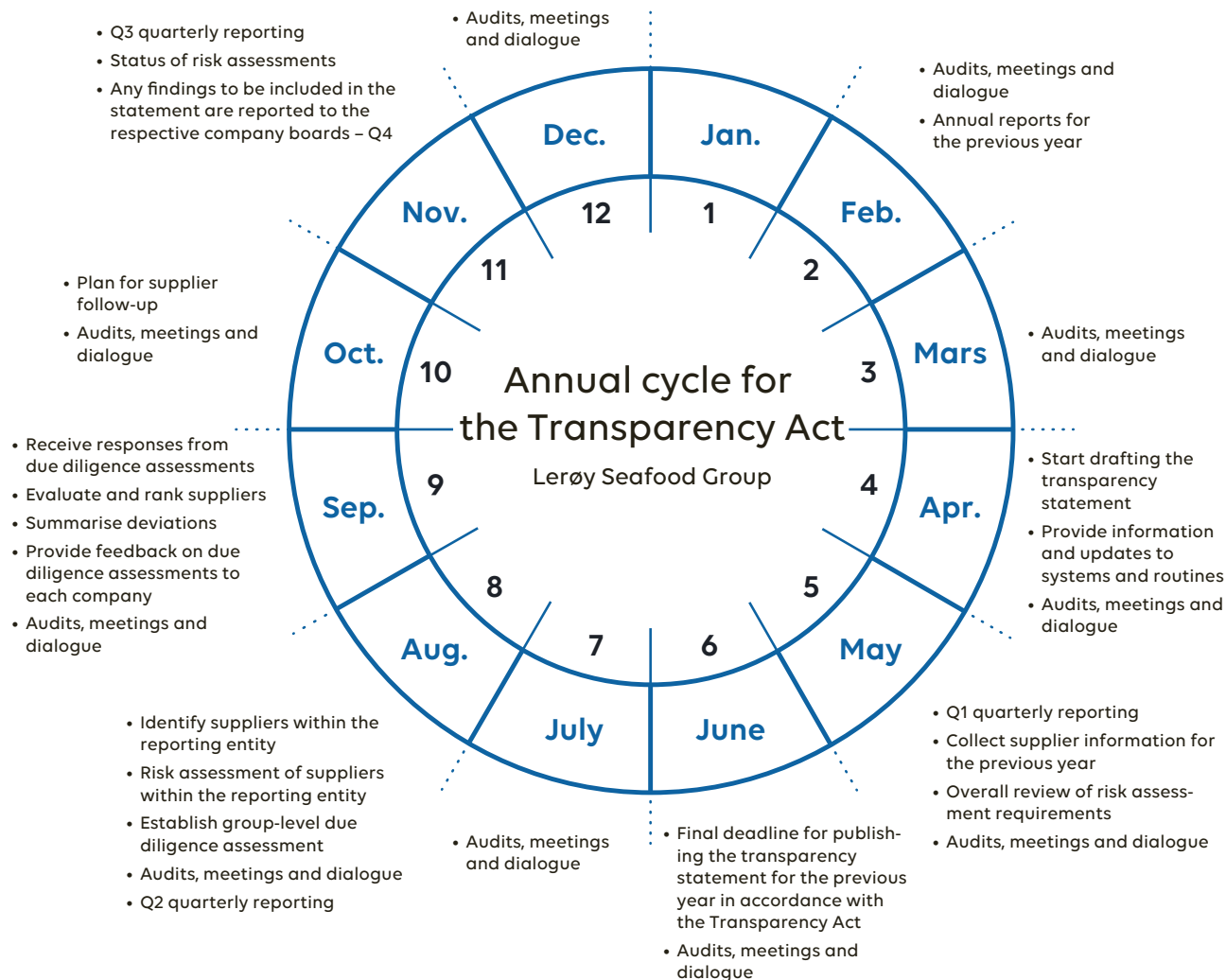
The Group has established a website for suppliers, where existing and new suppliers can find information about the Group's expectations of them. The website includes ethical guidelines as well as a declaration form for suppliers, aimed at ensuring that suppliers develop in a more sustainable direction. The documents place particular emphasis on clarifying the Group's respect for human rights and decent working conditions, as well as the measures the Group has implemented to combat corruption and money laundering.

Those interested can obtain information about the Transparency Act by contacting the Group via a contact form available on the Group's website at [leroyseafood.com](http://leroyseafood.com).

The Group has facilitated external whistleblowing through its website, where reports can be submitted anonymously if desired.

## 2.5 Communication with stakeholders

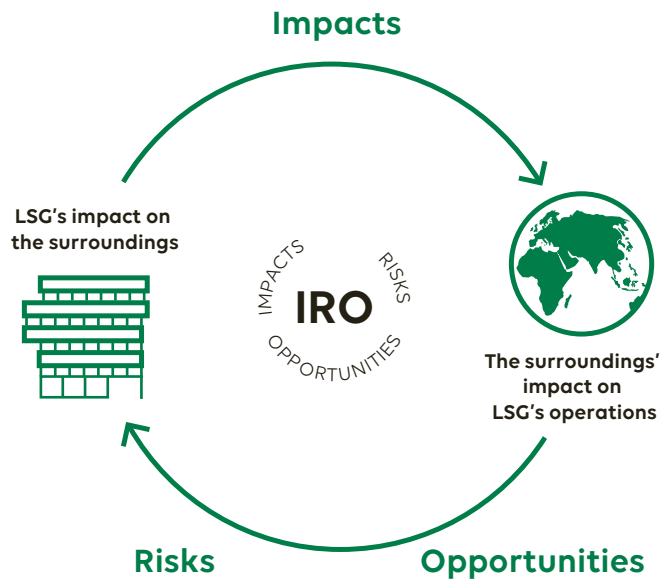
Lerøy communicates continuously with its stakeholders through quarterly reports and other communications in accordance with the Oslo Stock Exchange's guidelines. Lerøy is also actively involved in various industry organisations, such as Seafood Norway and Fiskebåt. More detailed information regarding the Group's stakeholder dialogue can be found in the Group's annual report on pages 52–53.

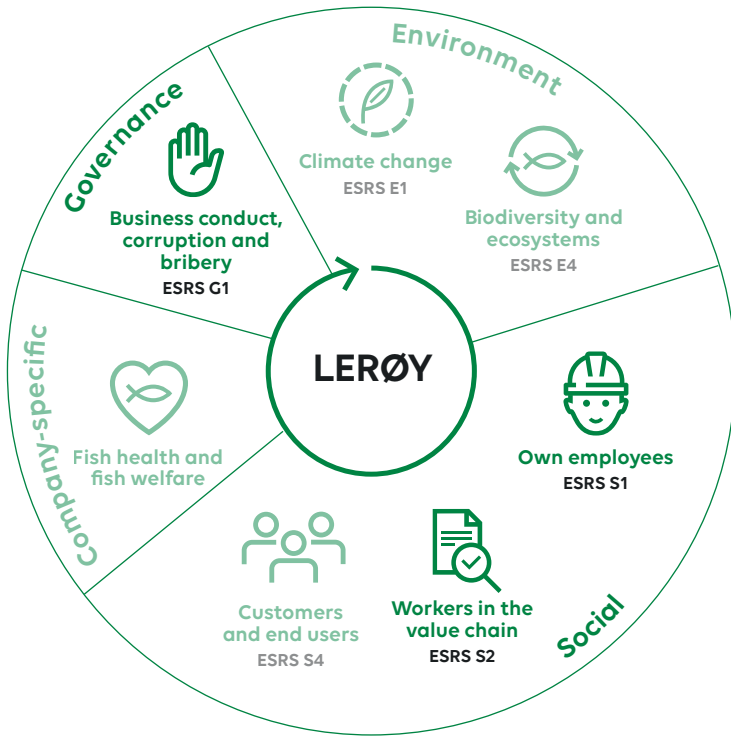


### 3. Due diligence assessments and relevant measures

#### 3.1 Description of the due diligence process

In 2024, the Group conducted a double materiality assessment for the first time. The purpose of this analysis was to identify the material areas where we as a Group have, or may have, an actual or potential, positive or negative, impact on people and/or the environment across the entire value chain. In addition, the analysis aimed to identify areas that could represent a potential or actual financial risk or opportunity for the Group based on external influences. The double materiality analysis yielded the following results:





**Material topics for Lerøy based on the double materiality assessment**

The areas in bold relate to the Transparency Act, and for these areas, IROs (Impacts, Risks and Opportunities) have been defined – see table.

Pursuant to the Norwegian Transparency Act, the following overarching goals have been set in relation to the due diligence process:

- Ensure the business or operation does not have a potential or actual adverse impact on fundamental human rights or decent working conditions.
- Provide information to the public annually in the form of a report.
- Provide information upon request.

### 3.2 Identification of risk

Risk mapping has been carried out both within our own operations and in the Group's supply chain. In the risk mapping of the supply chain, we have based our approach on the OECD guidelines, with a focus on industry risk, geographical risk, product/service risk, turnover and company-specific risk.

Material topic for Lerøy	Activities – IROs *	I	R	O	Time horizon**			Value chain***			Description
					S	M	L	OO	U	D	
<b>Sosiale forhold</b>											
<b>S1 Own employees</b>	IRO 10 Hazardous work operations	●			●	●	●	●			Lerøy has a high injury frequency among its own employees. In addition to the direct harm this causes to individuals, it also affects the company's overall sick leave rate.
<b>S2 Workers in the value chain</b>	IRO 8a Decent working conditions in the value chain	●			●	●	●		●	●	Significant deficiencies related to decent working conditions can lead to increased injury frequency within the value chain.
	IRO 8b Protection of human rights for workers in the value chain	●			●	●	●		●	●	Failure to uphold human rights can contribute to labour exploitation and increase the risk of human rights violations.
<b>Governance aspects</b>											
<b>G1 Corporate governance</b>	IRO 12 Breach of ethical guidelines and company policies	●			●	●	●	●	●	●	The fishing industry is considered high-risk regarding money laundering and corruption. Since Lerøy operates within this industry, there is an inherent risk that money laundering and corruption may occur.

\* IRO: I = Impact, R = Risk, O = Opportunity

\*\* Time horizon: S = Short-term (<1 year) M= Medium-term (1-5 years) L=Long-term (more than 5 years)

\*\*\* Value chain: OO = Own operations, U = Upstream, D = Downstream

● Actual negative impact ● Potential negative impact

**Risk mapping / due diligence assessment has been carried out as follows:**

- General managers of entities subject to the reporting obligation have conducted risk mapping within their own operations as well as in the supply chain, based on severity and likelihood.
- Suppliers with elevated risk have been identified within each company and reported to the Group. Lerøy has centralised management systems across companies and has therefore chosen to carry out a consolidated due diligence assessment at the group level to avoid multiple Lerøy entities following up the same suppliers. The assessment is conducted through a desktop review, with a focus on questions related to HSE (health, safety and environment), human rights and decent working conditions.
- The Group has reviewed the due diligence assessments and provided feedback to each company based on the results of the review.
- Each company, along with the responsible supplier managers, is tasked with following up with suppliers where necessary.
- The Group's suppliers are monitored for sanctions, any violations of human rights and decent working conditions, as well as negative media coverage. The process is expected to be implemented for all suppliers during 2025.

Together, this forms the basis for further follow-up work within the individual companies and toward the supplier network. All new suppliers and customers are screened against sanctions lists and negative media coverage as part of the approval process before any trade takes place.

For major suppliers, regular meetings are also held where human rights and decent working conditions are on the

agenda. Physical audits are conducted as well, both by third-party companies and by the Group's own employees.

As mentioned earlier, Lerøy has established a dedicated landing page for suppliers on the Group's website. Here, suppliers can find the necessary information about the requirements we as a Group set for our suppliers.

A purchasing policy and various procedures for how procurement is to be carried out within the Group have been developed. These documents apply to all our companies across segments.

Lerøy has a complex value chain with over 9 000 suppliers from more than 30 countries. This generally implies that there will be risks associated with our supply chain. Due to the large number of suppliers, the due diligence assessments are risk-based.

**Through a risk-based approach, suppliers were assessed based on various risk criteria:**

- **Supplier category**
  - Aquaculture services
  - Fish feed
  - Construction services\*
  - Shipbuilding and shipyard industry\*
  - ICT
  - Transport\*
  - Cleaning services\*
  - Food products
  - Rights to land and resources
  - Staffing services\*
  - Equipment
  - Other

\* Recommended for special focus according to the Norwegian Labour Inspection Authority

- Revenue
- Country of origin
- History

### 3.3 Summary of due diligence assessments and measures

Below is a summary of the key risks that have been identified, as well as the implemented and planned risk-reducing measures to stop, prevent or reduce such adverse impacts.

When assessing potential measures, consideration is given to Lerøy's specific involvement in the actual or potential adverse impacts identified, to determine appropriate action. This means assessing whether Lerøy (a) caused (or would cause) the negative impact; (b) contributed (or will contribute) to the negative impact; or (c) whether the negative impact is (or would be) directly linked to operations, products or services through a business relationship.

Other identified risks will be followed up in the same way by reviewing current controls and evaluating recommended actions. Risks are assigned to a responsible person, and for any planned risk-reducing measures, a completion deadline and residual risk are defined.

The due diligence assessment conducted in 2024 for our own employees revealed a continued high injury frequency, with varying degrees of severity. The Group's ongoing efforts to reduce the injury frequency are described in section 3.3.1.

Findings in the value chain related to suppliers were mainly linked to insufficient documentation. However, two cases were also uncovered in which suppliers had discovered human rights



violations in their own supply chains, as well as one case where a subcontractor had violations related to excessive working hours. These violations have been followed up by our suppliers.

The Group's four focus areas for 2024 will be continued:

- Health, safety and environment (HSE) in our own operations
- Discrimination and harassment in our own operations
- Supplier governance
- Customer governance

### 3.3.1 Health, safety and environment (HSE) in own operations

Lerøy maintains a strong HSE focus across all areas of the business and works continuously to reduce HSE risk through various measures.

Our injury frequency remains higher than desired, and we are working systematically to reduce our H1 value by implementing measures that prevent incidents from recurring. (H1 value = number of lost-time injuries × 1 000 000 / total hours worked). Lerøy's goal is to achieve zero lost-time injuries.

People are Lerøy's most important resource, and we aim to provide the best possible working conditions for our employees. We place strong emphasis on both the prevention of accidents and unwanted incidents, as well as on close follow-up if and when incidents occur. Lerøy strives to be a learning organisation that constantly works toward becoming a better version of itself.

Lerøy's operations involve various shift and rotation work, as well as seasonal fluctuations. These are followed up through close dialogue with employee representatives and structured monitoring of working time regulations.

#### 3.3.1.1 Measures and expected impact

Several measures have been implemented across the Group, resulting in a reduction in injury frequency and increased reporting of unwanted incidents. We are also seeing positive changes in the company's safety culture. Lerøy will maintain a strong HSE focus throughout 2025 as well.

Some of the measures that have been implemented:

- Strong HSE focus from management, including strategy and concrete goals
- HSE teams coordinated at the Group level working systematically on improvements across companies
- Clear definition of responsibilities and authority
- HSE gatherings conducted across companies and segments
- Increased awareness around reporting unwanted incidents
- Systematic monitoring of HSE KPIs (measured monthly via H1 value and Reported adverse incidents [RUH] per company)
- Established a Group-wide HSE introduction in Lerøy's e-learning system
- Carried out a Group-wide HSE week
- Established routines for shared learning across the Group

In 2025, the Group will continue building on the measures implemented in 2024, while focusing on:

- Reporting of undesirable incidents
- Safe work analysis and safety talk
- Developing Group-wide HSE training
- Conducting regular risk assessments
- Supporting the digitalisation of risk assessments
- Holding an HSE gathering for the entire Group
- Establishing a common HSE standard for the Group
- Establishing investigation teams to facilitate shared learning

The Group will also clarify roles and responsibilities related to emergency preparedness plans. Lerøy expects these measures to reduce the number of injuries and the Group's H1 value.

### 3.3.2 Discrimination and harassment in own operations

At Lerøy, genuine gender equality shall prevail, and all employees are to be ensured equal opportunities regardless of gender. Lerøy consists of 6 194 employees in permanent and temporary positions, in addition to on-call substitutes, of which 883 are hired contract workers. At the end of 2024, the gender distribution across the Group was 39% women and 61% men. The gender balance at Lerøy has been relatively stable for several years, but we have seen a positive development in the proportion of women across all our segments in recent years. The Group has set a goal for women to hold 40% of leadership positions by 2030. In 2024, 24% of leaders with personnel responsibility were women.

Lerøy works to create a safe, inclusive and development-oriented working environment based on the Group's core values. Diversity and inclusion at Lerøy mean that every employee is treated equally, regardless of gender, age, skin colour, origin, ethnicity, language, sexual orientation and religion. A dedicated HR expert network for diversity and inclusion has been established to help increase the focus on this area.

#### 3.3.2.1 Measures and their expected impact

Continuous development work is ongoing around fundamental human rights and decent working conditions in all parts of our operations. The Group's double materiality assessment, conducted in accordance with the EU Corporate Sustainability Reporting Directive (CSRD) in 2024, identified "Own workforce" as a material topic for the Group. As a result, the Group and its companies will have an increased focus on the follow-up of employees in the coming years. See the Group's annual report, page 96.

Further ongoing initiatives include leadership training through development programmes, a leadership handbook, professional gatherings, and increased HR support to help identify and manage unwanted incidents. For all our employees, ongoing improvement efforts focus on communication and information about the Group's ethical guidelines and values, as well as regular training in policies and procedures. The Group has e-learning courses covering ethical guidelines, whistleblowing, equality and diversity.

Work on equality and diversity is embedded in Lerøy's overall strategy. Increasing the share of women in the companies and in leadership roles is one of the KPIs monitored by Group management. Measures are underway to promote greater diversity at all position levels. For more information on Lerøy's work to combat discrimination and harassment, see [Group's Equality Report 2024](#).

Norwegian fisheries organisations have entered into an agreement to prevent and eliminate all forms of harassment in the fishing industry. The Wild Catch segment has a particular focus on industry findings related to harassment and, as a result, has increased efforts in this area within its own operations and through industry collaboration.

Lerøy Havfisk has actively worked to recruit more women to our trawlers. It is positive that the proportion of women is increasing steadily, and that we have employed more skilled women with high expertise into Lerøy Havfisk. Diversity provides great value in several areas, and something we actively work on when advertising positions and promote ourselves at career fairs.

Lerøy conducts an annual employee survey for Group employees, organised by Great Place To Work.

In this survey, specific questions address topics such as discrimination, bullying and harassment to identify employees' experiences in the workplace. The survey provides Lerøy with important insights into working environment, culture and trust-based leadership. Structured follow-up is carried out across the Group based on the survey results.

Results from the surveys show a positive trend year over year, and we expect that the measures implemented will further contribute to a safe, inclusive and development-oriented work environment in line with the Group's values.

### 3.3.3 Supplier governance

Through the due diligence assessments conducted in recent years, we have observed that certain suppliers have had somewhat insufficient risk-based assessments within their own value chains. Some suppliers have also lacked policy documents and updated ethical guidelines.

The 2024 assessment revealed, among other things, that several suppliers lack policies related to social issues, such as human rights, anti-corruption, anti-competitive behaviour, etc. Many also lack procedures and risk assessments of their own suppliers, as well as HSE routines. The suppliers lacking HSE routines are office-based and have a low risk of workplace accidents.

The due diligence assessment uncovered two cases in which suppliers discovered human rights violations within their own supply chains, and one case of a breach related to working hours by a supplier. These cases have since been followed up by the relevant suppliers, who provide raw materials and IT services, respectively.

Based on this year's due diligence assessment, seven suppliers have been categorised with a high risk status, and eight suppliers with a medium risk status. Suppliers with medium and high risk are followed up by the respective companies that use their services.

#### 3.3.3.1 Measures and their expected impact

In the Group's double materiality assessment, "Workers in the value chain" was identified as a material topic. This means that the Group and its companies will place increased emphasis on following up the supply chain in the years to come. See the Group's annual report, page 108.

Procedures have been established across departments and segments, but we will continue working on the development and implementation of new routines in 2025. For example, e-learning courses have been developed to ensure that employees and contractors are able to recognise risk factors that require enhanced control measures.

We expect that closer collaboration between suppliers and Lerøy will yield the desired effects over time. Strengthening internal competence and maintaining close dialogue with individual suppliers is expected to gradually lead to proper implementation of routines both internally and externally.

### 3.3.4 Customer governance

Lerøy engages with customers in more than 80 countries. The work to ensure decent working conditions and prevent human rights violations is a challenging but important effort. Lerøy is in the early stages of this work and is focusing on ensuring that the organisation has sufficient competence.

### 3.3.4.1 Measures and their expected impact

The Group has established a routine for screening all customers. This screening also aims to uncover negative media coverage related to decent working conditions and human rights. Any findings are handled according to a defined procedure.

E-learning courses have been developed to ensure that employees and contractors are able to recognise risk factors that require enhanced control measures.

Lerøy expects that these tools will provide the Group with better information and insight, contributing to sound decision-making in its efforts to ensure decent working conditions and prevent human rights violations in the Group's value chain.

## 3.4 General measures to stop, limit or prevent harmful impacts

To reduce identified risks, Lerøy has implemented the following general measures:

- Annual revision of its Code of Conduct
- Annual revision of its Human Rights policy
- Annual revision of its Supplier Code of Conduct
- Whistleblowing channel for employees
- Whistleblowing channel for third parties
- Continuous learning and development for managers and employees

The Group's digital whistleblowing channel allows employees to report anonymously. Whistleblowing cases are registered, investigated and handled in accordance with the whistleblowing policy and internal procedures. Account shall be taken of the fact that all reported cases are different.

Depending on the nature, scope and seriousness of the case, investigations are carried out by local management, the business segment's COO, the CEO, or, in special cases, the Board of Directors. The measures implemented will depend on the nature and seriousness of the deviation.

The Group's internal whistleblowing committee reports the status of whistleblowing cases quarterly to the Group management and Board. The Group has also established an external whistleblowing channel on the Group's website. All cases reported here are registered, investigated and handled according to the Group's internal procedures. Reported cases follow the same process as internal whistleblowing cases, where they are managed by local management, the business segment's COO, the CEO, or in special cases, the Board, depending on the nature, scope and seriousness of the case. Whistleblowing cases are reported quarterly to the Group management and Board via our compliance reporting. Of the cases received in 2024, none were related to violations of decent working conditions or human rights.

Over the past year, the Group has implemented several new routines for following up with suppliers. The Group's procurement organisation is working systematically with initiatives that are expected to be important going forward to prevent and limit harmful effects in the supply chain.

## 4. Information requests

The Group has not received any information requests in 2024 regarding how Lerøy handles actual and potential negative consequences for fundamental human rights and decent working conditions in accordance with the Transparency Act.

## 5. Further follow-up by the Lerøy Group

Lerøy will follow up on the due diligence assessment and the measures described above in accordance with its own procedures and guidelines, and will ensure implementation and operationalisation through both short-term and long-term initiatives. This includes communication with stakeholders about how any negative consequences are handled, as well as ensuring or cooperating on remediation and compensation where required.

Lerøy will ensure the implementation and follow-up of the risk register in the Group companies through quarterly compliance reporting, annual risk assessments and semi-annual board updates.

Due diligence assessments will be conducted annually, as well as in the event of significant changes in the risk landscape or material changes in the Group's risk assessments. Lerøy has guidelines for the performance of due diligence assessments in segments and in all group companies. These are intended to ensure that due diligence assessments are performed uniformly throughout the Group.

Lerøy will respond to information requests from the Group and subsidiaries as described [here](#).

Lerøy Seafood Group ASA will issue an annual statement on behalf of the Group. The statement is signed by the members of the Board and the CEO. Similarly, the Group's reporting subsidiaries have signed the statement electronically.

Bergen, 13 June 2025

The Board of Directors of Lerøy Seafood Group ASA



**Arne Møgster**  
Chairman



**Didrik Munch**  
Board member



**Karoline Møgster**  
Board member



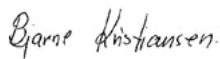
**Linda Kidøy Pedersen**  
Board member



**Are Dragesund**  
Board member



**Britt Kathrine Drivenes**  
Board member



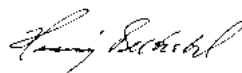
**Bjarne Kristiansen**  
Employees' representative



**Silje Elin G. Butt**  
Employees' representative



**Tor-Ivar Ingebrigtsen**  
Employees' representative



**Henning Beltestad**  
CEO Lerøy Seafood Group ASA



## Lerøy Seafood Group ASA subsidiaries with a statutory duty to report under the Transparency Act

### Lerøy Aurora AS

Kurt-Einar Karlsen (General manager)  
Bjarne Reinert (Chairman)  
Sjur Svenningsson Malm  
Tor-Ivar Ingebrigtsen

### Lerøy Aurora Sjø AS

Kurt-Einar Karlsen (General manager)  
Bjarne Reinert (Chairman)  
Sjur Svenningsson Malm

### Lerøy Midt AS

Harald Larssen (General manager)  
Bjarne Reinert (Chairman)  
Sjur Svenningsson Malm  
Helene Bergsli  
Bjørn Saga Østensen  
Ingun Næve  
Beate Skillingstad

### Lerøy Midt Sjø AS

Harald Larssen (General manager)  
Bjarne Reinert (Chairman)  
Sjur Svenningsson Malm

### Lerøy Vest AS

Morten Egenæs Fjæreide (General manager)  
Bjarne Reinert (Chairman)  
Sjur Svenningsson Malm  
John Andre Njåstad

### Lerøy Vest Sjø AS

Morten Egenæs Fjæreide (General manager)  
Bjarne Reinert (Chairman)  
Sjur Svenningsson Malm

### Sjøtroll Havbruk AS

Morten Egenæs Fjæreide (General manager)  
Helge Singelstad (Chairman)  
Frode Møgster  
Nils Arve Eidsheim  
Bjarne Reinert  
Karoline Møgster  
Nina Møgster

### Sjøtroll Havbruk Sjø AS

Morten Egenæs Fjæreide (General manager)  
Helge Singelstad (Chairman)  
Frode Møgster  
Nils Arve Eidsheim  
Bjarne Reinert  
Karoline Møgster  
Nina Møgster

### Lerøy Sjøtroll Kjærelva AS

Morten Egenæs Fjæreide (General manager)  
Bjarne Reinert (Chairman)  
Sjur Svenningsson Malm

### Lerøy Havfisk AS

Eldar Kåre Farstad (General manager)  
Helge Singelstad (Chairman)  
Henning Kolbjørn Beltestad  
Britt Kathrine Drivenes  
Sjur Svenningsson Malm  
André Steffensen  
Mona Didriksen

### Nordland Havfiske AS

Ronny Vågsholm (General manager)  
Eldar Kåre Farstad (Chairman)  
Tone Utseth Myklebust  
Pål Krüger  
Evelyn Lundanes Rørvik

### Hammerfest Industrifiske AS

Ronny Vågsholm (General manager)  
Eldar Kåre Farstad (Chairman)  
Elisabeth Rønning  
Evelyn Lundanes Rørvik  
Vidar Gulseth Holmgren

### Finnmark Havfiske AS

Ronny Vågsholm (General manager)  
Eldar Kåre Farstad (Chairman)  
Tone Utseth Myklebust  
Sigurd Kvammen Rafaelsen  
Evelyn Lundanes Rørvik  
Andreas Bye Paulsen

### Lerøy Norway Seafoods AS

Børge Soleng (General manager)  
Helge Singelstad (Chairman)  
Britt Kathrine Drivenes  
Bjarne Egil Kristiansen  
Nina Katrine Hanssen  
Henning Kolbjørn Beltestad  
Sjur Svenningsson Malm  
Mikael Johansen  
Evelyn Lundanes Rørvik

### Lerøy Seafood AS

Ivar Wulff (General manager)  
Henning Kolbjørn Beltestad (Chairman)  
Sjur Svenningsson Malm  
Kjersti Selvik  
Linda Larsen  
Fredrik Kristensen

### Sjømathuset AS

Nikolai Thorstensen (General manager)  
Ivar Wulff (Chairman)  
Vidar Egil Olsen  
Eirik Fosse  
Kristine Høiesen Hartviksen  
Lene Fammestad

### Lerøy Fossen AS

Endre Kristensen (General manager)  
Ivar Wulff (Chairman)  
Knut Hallvard Lerøy  
Kjersti Selvik  
Tove Camilla Ruud Olsen  
Toralf Tufta

### Lerøy Norge AS

Tom Nordby (General manager)  
Ivar Wulff (Chairman)

### Lerøy Bulandet AS

Per Arild Tysse (General manager)  
Knut Hallvard Lerøy (Chairman)  
Ivar Wulff  
Owen Jarvis Westergård  
Ruth Landøy  
Ragna Sofie Hillersøy

### Lerøy Austevoll AS

Ivar Helge Melingen (General manager)  
Ivar Wulff (Chairman)  
Henning Kolbjørn Beltestad  
Kim Fjellheim

(Signed electronically)



**SAFETY  
FIRST.**  
always