

# Equality, non-discrimination and gender pay report

Lerøy Seafood Group ASA and subsidiaries

The Group's employees are Lerøy's most important resource, and diversity makes us better. Creating a fair, equitable, inclusive and engaging working environment, built on cooperation, competence, learning and continuous development, is essential for us at Lerøy.

It is particularly pleasing to see an increase in the number of women applying to the fishing industry, something we have actively worked on. Since 2020, we have doubled the number of women in Lerøy Havfisk. In schools, we see that the proportion of women studying for the fishing industry is now around fifty percent, so the development is moving in the right direction.

We are nevertheless aware that much remains to be done to ensure we have an equitable environment in all parts of the Group's operations. For this reason, training, clear goals and awareness-raising in the area of equality and diversity will remain an important strategic priority going forward. - Siren Grønhaug, CHRO Lerøy Seafood Group ASA

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Sacha Fernández

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## Introduction

Lerøy is committed to genuine equality, and all employees are entitled to the same opportunities regardless of gender.

Lerøy Seafood Group ASA has 6 194 employees in permanent and temporary positions, in addition to on-call substitutes. Of these, 883 are contract workers. At the end of 2024, the Group's workforce comprised 36% women and 64% men, based on our own employees.

We strive to ensure a safe, inclusive and empowering working environment built on the Group's core values. At Lerøy, diversity and inclusion mean that each employee is treated equally, irrespective of gender, origin, ethnicity, skin colour, language, religion or personal philosophy. One of Lerøy's priorities is to provide a workplace free of discrimination on the grounds of functional ability, and we will make the necessary individual adjustments wherever possible to accommodate employees and job seekers with functional disabilities.

The Group has always emphasised the importance of individual skills, performance and responsibility in its recruitment policy. Personal development is therefore one of our strategic priorities. Furthermore, the Group always ensures equal employment opportunities and rights for all employees, both women and men. Lerøy has an international working environment and employs people of many different nationalities. Several of our companies have multinational workforces. This Equality Report is divided into two parts and covers the Group's Norwegian entities:

- Part 1: The status of gender equality at Lerøy
- Part 2: Our work to promote equality and combat discrimination



#### Introduction

## Part 1

The status of gender equality in Lerøy's Norwegian companies

# Gender balance

Lerøy's Norwegian companies have 3 899 employees in permanent and temporary positions, of which 243 are contract workers.

At the end of 2024, the Norwegian companies' workforce comprised 30% women and 70% men.

The Group's target is to have 40% women in leadership positions by 2030. In 2024, women filled 25% of management roles with personnel responsibility in the Group's Norwegian companies. For the entire Group, the corresponding share was 24%.

## Gender balance in the Group's Norwegian companies

|                           |       | oyees | Temp<br>emple | oyees | Actual p |     | Involu<br>part- | time | <b>Parenta</b><br>Average i | numbers |
|---------------------------|-------|-------|---------------|-------|----------|-----|-----------------|------|-----------------------------|---------|
|                           | Num   | bers  | Numbers       |       | Numbers  |     | Num             | bers | of week <b>s</b>            |         |
| Company                   | Women | Men   | Women         | Men   | Women    | Men | Women           | Men  | Women                       | Men     |
| Lerøy Aurora AS           | 101   | 310   | 14            | 30    | 13       | 26  | 0               | 0    | 19                          | 13      |
| Lerøy Austevoll AS        | 72    | 121   | 11            | 9     | 10       | 11  | 7               | 2    | 0                           | 10      |
| Lerøy Bulandet AS         | 25    | 19    | 1             | 0     | 7        | 3   | 0               | 0    | 22                          | 0       |
| Lerøy Fossen AS           | 60    | 70    | 0             | 0     | 12       | 15  | 0               | 0    | 6                           | 11      |
| Lerøy Havfisk AS          | 38    | 373   | 0             | 0     | 4        | 0   | 0               | 0    | 0                           | 0       |
| Lerøy Midt AS             | 180   | 482   | 15            | 26    | 17       | 46  | 0               | 0    | 21                          | 13      |
| Lerøy Norge AS            | 13    | 87    | 0             | 0     | 4        | 17  | 0               | 0    | 15                          | 0       |
| Dragøy Grossist AS        | 2     | 11    | 0             | 0     | 1        | 4   | 0               | 0    | 0                           | 0       |
| Lerøy Havbruk Service AS  | 6     | 111   | 2             | 4     | 2        | 16  | 0               | 0    | 0                           | 7       |
| Lerøy Norway Seafoods AS  | 205   | 340   | 8             | 11    | 30       | 77  | 0               | 0    | 21                          | 13      |
| Lerøy Seafood AS          | 93    | 79    | 1             | 1     | 12       | 11  | 0               | 0    | 19                          | 9       |
| Lerøy Seafood Group ASA   | 98    | 120   | 11            | 5     | 2        | 3   | 0               | 0    | 20                          | 11      |
| Lerøy Sjømatgruppen AS    | 2     | 2     | 0             | 0     | 0        | 0   | 0               | 0    | 0                           | 0       |
| Lerøy Sjøtroll            | 139   | 356   | 54            | 66    | 43       | 47  | 0               | 0    | 26                          | 23      |
| Sirevaag AS               | 5     | 8     | 0             | 0     | 1        | 3   | 0               | 0    | 22                          | 0       |
| Sjømathuset AS            | 53    | 75    | 3             | 8     | 7        | 9   | 2               | 1    | 0                           | 12      |
| Total Norwegian Companies | 1 092 | 2 564 | 120           | 160   | 165      | 288 | 9               | 3    |                             |         |

### Parental leave

As an equitable employer, Lerøy aims to give women and men the same opportunities to take parental leave. We encourage our male employees to take parental leave in the same way as our female employees. The table above shows a breakdown by gender of the average number of weeks of parental leave taken in 2024 at our Norwegian companies.

As an initiative to promote equality, Lerøy has introduced two weeks of paid parental leave for fathers/co-mothers at all Norwegian companies. Lerøy has also introduced payment of parental benefits in advance, provides full pay compensation over 6G, and offers full holiday pay accrual for all those who take parental leave at its Norwegian companies. This embodies one of our core values, "responsible", and aims to ensure that no one suffers financially if they take parental leave.

# Use of part-time employment and involuntary part-time employment

At Lerøy's Norwegian companies, 12% of the workforce works part-time, of which 36% are women and 64% are men. Some part-time positions reflect a reduced need for full-time work or have been adjusted to accommodate the wishes and needs of the employees concerned. A large proportion of the part-time positions at Lerøy are auxiliary roles and are filled by students. This gives students an opportunity to gain practical work experience alongside their studies.

| Breakdown of part-time staff and<br>involuntary part-time employees<br>at Norwegian companies | Women | Men |
|---|-------|-----|
| No. of people working part-time   | 165   | 288 |
| No. of people working part-time involuntarily   | 9     | 3   |

Norwegian companies identified involuntary part-time work through conversations with employees in 2024, discovering that a small proportion of part-time work was involuntary. Every part-time employee who is available for and wants to work more hours has the opportunity to discuss the situation with their immediate manager or with a representative from HR. As a rule, all vacancies are also advertised internally in line with internal procedures. We encourage our employees to apply for internal career opportunities.

### Use of temporary employment

Temporary employees account for 8% of the Norwegian companies' workforce. Most of the temporary positions are seasonal and fluctuate with demand, such as the Norwegian Artic Cod fishing season. Lerøy also has a pool of on-call workers employed on an as-needed basis to cover fluctuating demand for resources throughout the year. In addition, some are employed temporarily in connection with leave, absence and specific projects.

| Breakdown of temporary employees<br>at Norwegian companies | Women | Men |
|--|-------|-----|
| No. of people in temporary position                        | 120   | 160 |

# Preferential right in case of downsizing in the Group

In connection with any reorganisation and restructuring, Lerøy's Norwegian companies have a duty and actively work to offer an alternative suitable position to our employees. This is in line with employee protection and preferential rights, which were further strengthened from 1 January 2024, pursuant to the Norwegian Working Environment Act. This extended preferential right applies correspondingly to temporary employees, except for those engaged as temporary replacements.

The preferential right to re-employment and the duty to offer suitable work in other Norwegian companies within the group are «secondary,» meaning that the right will only apply in cases where other suitable work cannot be offered within the employee's existing company.

In connection with the digital transformation, the Group has acquired a new shared HR and payroll system for all companies in Norway. The shared HR and payroll system has improved our opportunities for coordination and our procedures for calculating seniority across companies within the group.

# **Gender Pay Analysis**

# The pay analysis includes Norwegian companies in Lerøy Seafood Group ASA with more than 50 employees.

Lerøy has defined five job grades as part of our efforts to combat discrimination and promote equality. The individual positions have been allocated to the different job grades based on similarities in the positions' work content or value, pursuant to section 34 of the Norwegian Equality and Anti-Discrimination Act.

- Example of equal work: two operating technicians in the same or different departments/companies
- Example of work of equal value: head of a support function and a production manager
- Example of other considerations: former managers who have taken a lower position but retained their previous pay are counted as managers

The tables below show women's income as a percentage of men's earnings. To protect employee privacy, the number of job grades in the breakdown is set at five for companies with more than 100 employees, and three for companies with fewer than 100 employees.

## Description of job grades and pay

The definition of the job grades is based on existing job categories at Lerøy and an assessment of which job categories fit into the different grades. Some of the companies use additional grades, but five grades have been defined to ensure that the data is not identifiable and that there are at least five persons of each gender at each level. Employee representatives and/or safety representatives are involved in pay negotiations.

#### Job grade

Grade 0: Group management

- **Grade 1:** Company management, including general manager
- **Grade 2:** Heads of staff/department managers
- Grade 3: Other managers with personnel responsibility, technical specialists
- Grade 4: Administrative staff/functionaries
- **Grade 5:** Production workers, cleaning staff, positions that do not require higher education

### Main findings from the pay analysis

- A large proportion of the companies in the Group offer pay in accordance with collective bargaining agreements, under which men and women receive equal pay.
- There are significant difference in gender ratios across the companies and across different job grades. This makes it impossible to disclose pay data for grades where there are fewer than five persons of each gender.

- The pay analysis is reported at company level. Lerøy has a complex organisational structure, with many different types of jobs. Although some positions are grouped into the same grade, pay levels are not directly comparable because differences relating to specialisation, years of service, qualifications/certifications, shift work, responsibility etc. are not taken into account. The pay analysis would have given a more correct basis for comparison with respect to the differences in pay per gender and per job grade if it had been divided into trade specialisations within the Group's collective agreements and individually negotiated pay agreements, rather than by subsidiary company.
- Since the tables show women's share of men's wages as a percentage, the percentage will exceed 100% where women earn more than men, even if the ratios are small.

## Differences in pay and gender breakdown per job grade 2024

Women's earnings are presented as a percentage of men's earnings

#### Lerøy Seafood Group ASA

|         |                 |               |                        |                          | Cash benefit             | s       |                      | Benefits in kind                  |  |
|---------|-----------------|---------------|------------------------|--------------------------|--------------------------|---------|----------------------|-----------------------------------|--|
|         | No. of<br>women | No. of<br>men | Total cash<br>benefits | Agreed pay/<br>fixed pay | Irregular<br>supplements | Bonuses | Overtime<br>payments | Total taxable<br>benefits in kind | Comments on discrepancies  |
| Grade 0 | 1               | 4             | -                      | -                        | -                        | -       | -                    | -                                 | Too few employees at this level.   |
| Grade 1 | 8               | 10            | 79%                    | 79%                      | -                        | 78%     | -                    | 100%                              | Special expertise with different requirements for the position.                                  |
| Grade 2 | 19              | 18            | 76%                    | 84%                      | -                        | 73%     | 26%                  | 100%                              | Special expertise with different requirements for the position.                                  |
| Grade 3 | 20              | 26            | 92%                    | 100%                     | -                        | 84%     | 32%                  | 100%                              | Fixed salary is equal. Variations in salary are due to overtime and bonuses.                     |
| Grade 4 | 49              | 57            | 95%                    | 98%                      | -                        | 98%     | 60%                  | 100%                              | Fixed salary is approximately equal.<br>Variations in salary are due to overtime and<br>bonuses. |
| Grade 5 | 1               | 2             | -                      | -                        | -                        | -       | -                    | -                                 | Too few employees at this level.   |

#### Lerøy Seafood AS

|         |                 |               |                        |                          | Cash benefit             | S       |                      | Benefits in kind                  |  |
|---------|-----------------|---------------|------------------------|--------------------------|--------------------------|---------|----------------------|-----------------------------------|--|
|         | No. of<br>women | No. of<br>men | Total cash<br>benefits | Agreed pay/<br>fixed pay | Irregular<br>supplements | Bonuses | Overtime<br>payments | Total taxable<br>benefits in kind | Comments on discrepancies  |
| Grade 1 | 1               | 4             | -                      | -                        | -                        | -       | -                    | 100%                              | Too few employees at this level.   |
| Grade 2 | 8               | 13            | 79%                    | 86%                      | -                        | 69%     | 44%                  | 100%                              | Seniority.   |
| Grade 3 | 7               | 4             | 105%                   | 102%                     | 250%                     | 106%    | 71%                  | 100%                              | Fixed salary is approximately equal.<br>Variations in salary are due to overtime and<br>bonuses. |
| Grade 4 | 69              | 48            | 102%                   | 101%                     | 138%                     | 92%     | 92%                  | 100%                              | Fixed salary is approximately equal.<br>Variations in salary are due to overtime and<br>bonuses. |
| Grade 5 | 8               | 10            | 103%                   | 101%                     | -                        | -       | 124%                 | -                                 | Seniority.   |

#### Lerøy Norge AS

|                  |                 |                 |                        |                          | Cash benefit             | S       |                      | Benefits in kind                  |  |
|------------------|-----------------|-----------------|------------------------|--------------------------|--------------------------|---------|----------------------|-----------------------------------|--|
|                  | No. of<br>women | No. of<br>women | Total cash<br>benefits | Agreed pay/<br>fixed pay | Irregular<br>supplements | Bonuses | Overtime<br>payments | Total taxable<br>benefits in kind | Comments on discrepancies  |
| Grade<br>1, 2, 3 | 1               | 16              | -                      | -                        | -                        | -       | -                    | -                                 | Too few employees at this level.   |
| Grade 4          | 8               | 20              | 103%                   | 98%                      | 95%                      | -       | 172%                 | 100%                              | Affected by long-term sick leave of men and temporarily more overtime for women. |
| Grade 5          | 4               | 49              | -                      | -                        | -                        | -       | -                    | -                                 | Too few employees at this level.   |

#### Lerøy Aurora AS

The table below reflects employees in Lerøy Aurora AS and Lerøy Aurora Sjø AS.

|         |                 |                 |                        |                          | Cash benefit             | s       |                      | Benefits in kind                  |   |
|---------|-----------------|-----------------|------------------------|--------------------------|--------------------------|---------|----------------------|-----------------------------------|---|
|         | No. of<br>women | No. of<br>women | Total cash<br>benefits | Agreed pay/<br>fixed pay | Irregular<br>supplements | Bonuses | Overtime<br>payments | Total taxable<br>benefits in kind | Comments on discrepancies   |
| Grade 1 | 6               | 7               | 74%                    | 72%                      | -                        | 79%     | -                    | 24%                               | Different job descriptions and areas of responsibility.   |
| Grade 2 | 5               | 25              | 94%                    | 95%                      | 74%                      | 93%     | 0%                   | 54%                               | Different job descriptions and areas of responsibility.   |
| Grade 3 | 15              | 29              | 92%                    | 96%                      | 71%                      | 85%     | 13%                  | 54%                               | More men are employed in the business area and women in the support function.   |
| Grade 4 | 32              | 157             | 79%                    | 86%                      | 71%                      | 57%     | 34%                  | 35%                               | Pay according to collective agreements,<br>but men have longer seniority than women<br>and work more overtime. This level contains<br>several job categories where there have<br>traditionally not been many women. |
| Grade 5 | 52              | 106             | 102%                   | 96%                      | 172%                     | 97%     | 66%                  | 0%                                | Pay according to collective agreements, but<br>men have longer seniority than women and<br>work more overtime.  |

#### Lerøy Havbruk Service AS

|         |                 |                 |                           |                          | Cash benefi              | ts      |                      | Benefits in kind                  |                                  |
|---------|-----------------|-----------------|---------------------------|--------------------------|--------------------------|---------|----------------------|-----------------------------------|----------------------------------|
|         | No. of<br>women | No. of<br>women | Total<br>cash<br>benefits | Agreed pay/<br>fixed pay | Irregular<br>supplements | Bonuses | Overtime<br>payments | Total taxable<br>benefits in kind | Comments on discrepancies        |
| Grade 1 | 0               | 1               | -                         | -                        | -                        | -       | -                    | -                                 | Too few employees at this level. |
| Grade 2 | 0               | 4               | -                         | -                        | -                        | -       | -                    | -                                 | Too few employees at this level. |
| Grade 3 | 1               | 1               | -                         | -                        | -                        | -       | -                    | -                                 | Too few employees at this level. |
| Grade 4 | 4               | 103             | -                         | -                        | -                        | -       | -                    | -                                 | Too few employees at this level. |
| Grade 5 | 2               | 2               | -                         | -                        | -                        | -       | -                    | -                                 | Too few employees at this level. |

#### Lerøy Midt AS

The table below reflects employees in Lerøy Midt AS and Lerøy Midt Sjø AS.

|         |                 |                 |                           |                          | Cash benefi              | ts      |                      | Benefits in kind                  |  |
|---------|-----------------|-----------------|---------------------------|--------------------------|--------------------------|---------|----------------------|-----------------------------------|--|
|         | No. of<br>women | No. of<br>women | Total<br>cash<br>benefits | Agreed pay/<br>fixed pay | Irregular<br>supplements | Bonuses | Overtime<br>payments | Total taxable<br>benefits in kind | Comments on discrepancies  |
| Grade 1 | 2               | 8               | -                         | -                        | -                        | -       | -                    | -                                 | Too few employees at this level.   |
| Grade 2 | 10              | 46              | 90%                       | 91%                      | 0%                       | 95%     | 23%                  | 33%                               | Different job descriptions and areas of responsibility.  |
| Grade 3 | 31              | 63              | 97%                       | 103%                     | 56%                      | 93%     | 43%                  | 252%                              | Different job descriptions and areas of responsibility.  |
| Grade 4 | 88              | 290             | 92%                       | 97%                      | 71%                      | 98%     | 69%                  | 107%                              | Most at this level are paid according to<br>collective agreements. In addition, technical<br>personnel and some staff functions are<br>included. |
| Grade 5 | 62              | 81              | 87%                       | 94%                      | 19%                      | 91%     | 37%                  | 130%                              | Salary according to the collective<br>agreements. Differences due to seniority and<br>overtime.  |

#### Lerøy Sjøtroll AS

The table below reflects employees in Lerøy Vest AS, Sjøtroll Havbruk AS, Lerøy Sjøtroll Kjærelva AS, Lerøy Vest Sjø AS and Sjøtroll Havbruk Sjø AS.

|         |                 |                 |                           |                          | Cash benefi              | ts      |                      | Benefits in kind                  |  |
|---------|-----------------|-----------------|---------------------------|--------------------------|--------------------------|---------|----------------------|-----------------------------------|--|
|         | No. of<br>women | No. of<br>women | Total<br>cash<br>benefits | Agreed pay/<br>fixed pay | Irregular<br>supplements | Bonuses | Overtime<br>payments | Total taxable<br>benefits in kind | Comments on discrepancies  |
| Grade 1 | 3               | 5               | -                         | -                        | -                        | -       | -                    | -                                 | Too few employees at this level.   |
| Grade 2 | 6               | 29              | 93%                       | 93%                      | 0%                       | 225%    | 0%                   | 0%                                | Predominance of men. Variation in salary is due to seniority and type of position. |
| Grade 3 | 23              | 25              | 86%                       | 86%                      | 197%                     | 62%     | 189%                 | 54%                               | Variation in salary is due to seniority and type of position.                      |
| Grade 4 | 108             | 317             | 85%                       | 94%                      | 34%                      | 35%     | 47%                  | 20%                               | Predominance of men. Variation in salary is due to seniority and type of position. |
| Grade 5 | 12              | 19              | 93%                       | 92%                      | 99%                      | 123%    | 121%                 | 0%                                | Variation in salary is due to seniority and type of position.                      |

#### Lerøy Fossen AS

|         |                 |                 |                           |                          | Cash benefi              | ts      |                      | Benefits in kind                  |  |
|---------|-----------------|-----------------|---------------------------|--------------------------|--------------------------|---------|----------------------|-----------------------------------|--|
| _       | No. of<br>women | No. of<br>women | Total<br>cash<br>benefits | Agreed pay/<br>fixed pay | Irregular<br>supplements | Bonuses | Overtime<br>payments | Total taxable<br>benefits in kind | Comments on discrepancies  |
| Grade 1 | 2               | 2               | -                         | -                        | -                        | -       | -                    | -                                 | Too few employees at this level.   |
| Grade 2 | 1               | 4               | -                         | -                        | -                        | -       | -                    | -                                 | Too few employees at this level.   |
| Grade 3 | 1               | 1               | -                         | -                        | -                        | -       | -                    | -                                 | Too few employees at this level.   |
| Grade 4 | 3               | 7               | -                         | -                        | -                        | -       | -                    | -                                 | Too few employees at this level.   |
| Grade 5 | 57              | 60              | 107%                      | 104%                     | 0%                       | -       | 152%                 | -                                 | Seniority affects each employee due to<br>differences between women and men -<br>collective agreement/qualifications, etc.<br>Women work more overtime than men. |

#### Sjømathuset AS

|         |                 |                 |                           |                          | Cash benefi              | ts      |                      | Benefits in kind                  |  |
|---------|-----------------|-----------------|---------------------------|--------------------------|--------------------------|---------|----------------------|-----------------------------------|--|
|         | No. of<br>women | No. of<br>women | Total<br>cash<br>benefits | Agreed pay/<br>fixed pay | Irregular<br>supplements | Bonuses | Overtime<br>payments | Total taxable<br>benefits in kind | Comments on discrepancies  |
| Grade 1 | 3               | 2               | -                         | -                        | -                        | -       | -                    | -                                 | Too few employees at this level.                                       |
| Grade 2 | 2               | 2               | -                         | -                        | -                        | -       | -                    | -                                 | Too few employees at this level.                                       |
| Grade 3 | 1               | 1               | -                         | -                        | -                        | -       | -                    | -                                 | Too few employees at this level.                                       |
| Grade 4 | 11              | 16              | 44%                       | 99%                      | 3%                       | -       | 31%                  | 98%                               | Men work more shifts (3 shifts) and overtime at this level than women. |
| Grade 5 | 35              | 55              | 75%                       | 102%                     | 23%                      | -       | 96%                  | 100%                              | Men work more shifts (3 shifts) and overtime at this level than women. |

#### Lerøy Austevoll AS

|         |                 |                 | Cash benefits             |                          |                          | ts      |                      | Benefits in kind                  |  |
|---------|-----------------|-----------------|---------------------------|--------------------------|--------------------------|---------|----------------------|-----------------------------------|--|
|         | No. of<br>women | No. of<br>women | Total<br>cash<br>benefits | Agreed pay/<br>fixed pay | Irregular<br>supplements | Bonuses | Overtime<br>payments | Total taxable<br>benefits in kind | Comments on discrepancies  |
| Grade 1 | 2               | 3               | -                         | -                        | -                        | -       | -                    | -                                 | Too few employees at this level.   |
| Grade 2 | 1               | 5               | -                         | -                        | -                        | -       | -                    | -                                 | Too few employees at this level.   |
| Grade 3 | 3               | 4               | -                         | -                        | -                        | -       | -                    | -                                 | Too few employees at this level.   |
| Grade 4 | 9               | 29              | 79%                       | 90%                      | 38%                      | -       | 46%                  | 102%                              | The level includes the technical department<br>and team leaders. These employees work a<br>lot of overtime and weekends.   |
| Grade 5 | 55              | 71              | 95%                       | 101%                     | 69%                      | -       | 69%                  | 0%                                | The level has women with long seniority,<br>but there are fewer women than men<br>who take on other roles that provide<br>irregular allowances. The group also<br>includes industrial cleaners who have more<br>supplements. |

#### Lerøy Bulandet AS

|         |                 |                 |                           |                          | Cash benefi              | ts      |                      | Benefits in kind                  |   |
|---------|-----------------|-----------------|---------------------------|--------------------------|--------------------------|---------|----------------------|-----------------------------------|---|
|         | No. of<br>women | No. of<br>women | Total<br>cash<br>benefits | Agreed pay/<br>fixed pay | Irregular<br>supplements | Bonuses | Overtime<br>payments | Total taxable<br>benefits in kind | Comments on discrepancies   |
| Grade 1 | 6               | 2               | -                         | -                        | -                        | -       | -                    | -                                 | Too few employees at this level.  |
| Grade 2 | -               | -               | -                         | -                        | -                        | -       | -                    | -                                 | No employees.   |
| Grade 3 | -               | -               | -                         | -                        | -                        | -       | -                    | -                                 | No employees.   |
| Grade 4 | 2               | 2               | -                         | -                        | -                        | -       | -                    | -                                 | Too few employees at this level.  |
| Grade 5 | 19              | 15              | 89%                       | 96%                      | 122%                     | -       | 59%                  | 79%                               | Approximately equal fixed salary for women<br>and men. Men have more overtime, women<br>work more shifts. |

#### Lerøy Norway Seafood AS

|         |                 |                 |                           |                          | Cash benefits            |         |                      | Benefits in kind                  |  |  |
|---------|-----------------|-----------------|---------------------------|--------------------------|--------------------------|---------|----------------------|-----------------------------------|--|--|
|         | No. of<br>women | No. of<br>women | Total<br>cash<br>benefits | Agreed pay/<br>fixed pay | Irregular<br>supplements | Bonuses | Overtime<br>payments | Total taxable<br>benefits in kind | Comments on discrepancies  |  |
| Grade 1 | 5               | 10              | 99%                       | 100%                     | -                        | 86%     | -                    | 102%                              | Equal fixed salary for women and men.  |  |
| Grade 2 | 11              | 27              | 96%                       | 102%                     | 42%                      | -       | 39%                  | 98%                               | Different job categories, as well as men working more overtime.  |  |
| Grade 3 | 10              | 14              | 90%                       | 96%                      | 1%                       | -       | 28%                  | 81%                               | Different job categories, as well as men working more overtime.  |  |
| Grade 4 | 13              | 44              | 93%                       | 104%                     | 2%                       | -       | 11%                  | 83%                               | Different job categories, as well as men<br>working more overtime.   |  |
| Grade 5 | 233             | 417             | 100%                      | 102%                     | 43%                      | -       | 84%                  | 58%                               | Salary according to collective agreements.<br>Deviations in allowances and compensations<br>are due to additional qualifications, where<br>there are mostly men. |  |

# Main findings from the pay analysis for fishing vessels (2024)

Separate job grades have been defined for fishing vessels to facilitate a comparison between different positions on board the vessels. All crew members are paid in accordance with collective agreements between the Vessel and the Norwegian Seafarers' Union (Norsk Sjømannsforbund), the Norwegian Union of Marine Engineers (Norsk Maskinistforbund) and the Norwegian Maritime Officers' Association (Sjøoffisersforbundet). Men and women receive the same pay. Since few women work aboard fishing vessels, it is not possible to disclose pay details for the different grades.

#### Job grade - crew members fishing vessels

Grade 1: Skipper Grade 2: Officers Grade 3: Department heads Grade 4: Deputy department heads Grade 5: Trade certificate holders Grade 6: Support staff Grade 7: Employees in training

#### Lerøy Havfisk (crew members on fishing vessels)

The table below reflects employees in Finnmark Havfiske AS, Hammerfest Industrifiske AS and Lerøy Havfisk AS.

|         | No. of  | No. of | Cash benefits       | Benefits in kind   |  |  |  |  |
|---------|---------|--------|---------------------|--|--|--|--|--|
|         | women w |        | Total cash benefits | Comments on discrepancies                                  |  |  |  |  |
| Grade 1 | 0       | 20     | -                   | Too few employees at this level.                           |  |  |  |  |
| Grade 2 | 2       | 58     | -                   | Too few employees at this level.                           |  |  |  |  |
| Grade 3 | 2       | 58     | -                   | Too few employees at this level.                           |  |  |  |  |
| Grade 4 | 0       | 46     | -                   | Too few employees at this level.                           |  |  |  |  |
| Grade 5 | 3       | 130    | -                   | Too few employees at this level.                           |  |  |  |  |
| Grade 6 | 16      | 0      | -                   | Too few employees at this level.                           |  |  |  |  |
| Grade 7 | 8       | 42     | 100%                | Currently, more men are applying for thi type of position. |  |  |  |  |

#### Lerøy Havfisk AS (administration)

|         | No. of | No. of | Cash benefits       |                                  |  |  |
|---------|--------|--------|---------------------|----------------------------------|--|--|
|         | women  | women  | Total cash benefits | Comments on discrepancies        |  |  |
| Grade 1 | 1      | 5      | -                   | Too few employees at this level. |  |  |
| Grade 2 | 2      | 2      | -                   | Too few employees at this level. |  |  |
| Grade 3 | 4      | 5      | -                   | Too few employees at this level. |  |  |
| Grade 4 | 3      | 1      | -                   | Too few employees at this level. |  |  |





## Part 2

Our work to promote equality and combat discrimination

# Promote equality and combat discrimination

In our work on equality and non-discrimination, Lerøy has focused on the following personnel areas: recruitment, pay and working conditions, promotion and development opportunities, workplace adaptation and work-life balance.

# Principles, procedures, and standards for equality and against discrimination

Lerøy's equality work is embedded in the Group's various strategies, tools and guidelines. Detailed descriptions are available in the sustainability library at leroyseafood.com, as well as in internal documents, such as the Group's Code of Conduct, management handbook, personnel handbook and company regulations.

### Examples of principles, procedures and standards:

- Part 2, Chapter 3 of Lerøy's Code of Conduct concerns human rights and decent working conditions
- Policy for Diversity and Inclusion
- Policy for Human Rights
- Lerøy's whistleblowing policy, procedures and reporting channel have been communicated and made available to all employees within the Group
- Equality and non-discrimination considerations are included in the Group's personnel policy in general

# How we work to ensure equality and non-discrimination in practice

Lerøy is a major player in the seafood industry, which has historically been highly male-dominated. Lerøy has over several years worked actively to increase the proportion of women in the Group, as we believe that diversity has a positive impact on the workplace. An analysis of Lerøy's social reporting concludes that there has been a steady increase in the proportion of women in recent years, while there is still a clear majority of men in the Group's workforce. In 2024, women made up 36% of the Group's entire workforce and 30% in the Norwegian companies.

Equality and diversity are important parts of Lerøy's corporate culture and are prioritised in the Group's activities. As part of a digital transformation, the Group has acquired a new shared HR and payroll system for all its companies, starting with Norway. This will provide better underlying data and an opportunity to perform more detailed analyses than previously possible. The increased insights will enable us to reinforce our efforts with respect to equality and diversity going forward. In addition, the Group has chosen a new HR operating model, which will further increase our competence in prioritised areas of expertise, both through dedicated roles and through professional networks. Corporate culture, equality and diversity form one of these prioritised areas of expertise, and there are plans to focus further on this in 2025. Lerøy has started to standardise employee-related processes and is working constantly to improve and equalise practices. We see great value in standardising practices across companies as much as possible to ensure equal treatment.

### Code of Conduct

Lerøy's Code of Conduct incorporates a shared set of principles and rules that apply to all employees and contractors in Lerøy Seafood Group and its subsidiaries. The guidelines reflect the values of the Group and provide our employees with guidance on how to act and what to consider in the day-to-day work. The Code of Conduct are intended to give employees an understanding of what is right and wrong and provide them with knowledge of the channels to use in case of a potential breach of the Group's guidelines.

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Part 2, Chapter 3 of the Code of Conduct concerns human rights and decent working conditions. It states that "all forms of discrimination or harassment at work based on ethnicity, religion, age, language, disability, gender, marital status, sexual orientation, trade union membership or political beliefs are strictly prohibited."

All employees are responsible for familiarising themselves with the Code of Conduct. Every Lerøy company provides training in the Code of Conduct's provisions. In addition, a mandatory e-learning course has been developed for all employees in the Group's Norwegian subsidiaries. The principles set out in the Code of Conduct are included in the Group's leadership standard and management handbook.

### Whistleblowing

Lerøy's overarching goal is to maintain a corporate culture that fosters a good and constructive climate for freedom of expression. The whistleblowing regulations are designed to enable both employees and third parties to speak out and express concerns without risking any form of reprisals or negative reactions. Internal procedures have been drawn up for how reports received from third parties and employees are to be dealt with. These are available in the Group's internal control system.

### **Employee survey**

Lerøy conducts an annual survey of all employees across the group in partnership with Great Place to Work (GPTW). This anonymous and voluntary survey, available in 17 languages, includes targeted questions on equality and discrimination to assess workplace experiences. The most recent survey completed in mid-January 20251<sup>1</sup> achieved an 87% response rate across the Group.

The results of the survey can be filtered by demographics, such as gender, age and job grade, to identify disparities in employee experiences. The survey addresses workplace bullying and harassment, and discrimination based on age, gender, sexual orientation, culture and ethnicity. Open-ended questions allow employees to share additional feedback.

The employee survey is an effective tool for assessing workplace conditions and provides Lerøy with valuable insights for continuous improvements. Engaging employees in follow-up actions at both company and department levels has proven beneficial, and Lerøy remains committed to this approach.

### Attractive employer

Lerøy actively works to make the seafood industry a more attractive place to work. Part of this is done in collaboration with the seafood industry cluster, NCE Seafood Innovation. Recent initiatives include refining job advert language and imagery to appeal to a broader talent pool, showcasing workplace diversity in marketing materials, and increasing participation in educational fairs and student presentations to promote career opportunities in the seafood industry. In addition, Lerøy publishes employee interviews on leroyseafood.com with a special focus on highlighting women in traditionally male-dominated roles. Lerøy has been named the seafood industry's most attractive employer for two consecutive years, as voted by students across Norway.

The Group is committed to further enhancing diversity and inclusion by refining existing initiatives, improving recruitment training to eliminate bias and strengthening internal career mobility. A key focus going forward will therefore be to expand opportunities for in-house career growth to support employees at all levels.

1 The employee survey is sent out in January and measures employees' experiences over the past 12 months.

## Leadership development

Leadership is an important aspect of the Lerøy corporate culture and vital to realise the Group's equality and diversity ambitions. Lerøy focuses on value-based and future-oriented leadership based on the Group's values and business strategies. Our managers are expected to lead by example, set clear directions and focus on achieving results as a team. Being a manager in Lerøy is a vote of confidence that carries significant responsibility. The Group has created a management handbook, a leadership standard and leadership development programmes to ensure that our managers fulfil their roles in a responsible and proficient manner.

In 2024, 74 managers from the Norwegian companies and 10 managers from the international companies completed Lerøy's leadership development programme. In 2025, 80 managers will take part in the programme. We will also conduct the first pilot for a dedicated programme for frontline managers. It is our ambition that all managers complete our leadership development programme.

## Pay and working conditions

Lerøy aims to be an inclusive workplace for all our employees. Most of our employees in Norway have physical tasks related to industry, fishing vessels, or aquaculture. These positions often include shift work and fixed working hours, making it difficult to facilitate work-life balance to the desired extent. For employees in administrative positions, this is more easily facilitated through the use of home office, flexible working hours, and core time as much as possible.

The employee survey included several questions on this topic and providing us with valuable insights to work on. One of the initiatives will be to develop Lerøy's life phase policy and to raise awareness among leaders and employees about the different needs that may arise for employees through various life phases, from newly graduated to approaching retirement.

A large percentage of Lerøy's workforce is paid in accordance with collective agreements, ensuring equal pay regardless of gender. On average, men have more years of service than women in the Norwegian companies, reflecting the seafood industry's historically male-dominated history. The implementation of a new shared payroll system in 2023 has improved data consistency across the Group, strengthening efforts to ensure pay equity.

A preliminary project has introduced job levels in the new HR and payroll system, with similar categorisation underway in other segments. Standardisation of job titles and classifications will enable more detailed pay analyses across roles and disciplines, improving company and Group-level comparisons to support equal treatment.

Since 2022, the number of women in job levels 1-4 in the Norwegian companies in the Group has increased, as has female participation in vocational training for fishing vessel certifications. However, men still dominate management and senior positions, underscoring the need for continued efforts to improve gender balance both within Lerøy and the broader industry. Lerøy has set a goal to achieve 40% female representation in management positions by 2030.



|         |       |       | 2022    |     |       |       |       | Change in the number of women per grade |       |       |     |
|---------|-------|-------|---------|-----|-------|-------|-------|---|-------|-------|-----|
|         | Total | Women | Women % | Men | Men % | Total | Women | Women %                                 | Men   | Men % |     |
| Grade 0 | 5     | 1     | 20%     | 4   | 80%   | 5     | 1     | 20%                                     | 4     | 80%   | 0%  |
| Grade 1 | 71    | 25    | 35%     | 46  | 65%   | 91    | 38    | 42%                                     | 53    | 58%   | 7%  |
| Grade 2 | 179   | 40    | 22%     | 139 | 78%   | 236   | 63    | 27%                                     | 173   | 73%   | 4%  |
| Grade 3 | 319   | 119   | 37%     | 200 | 63%   | 295   | 113   | 38%                                     | 182   | 62%   | 1%  |
| Grade 4 | 916   | 211   | 23%     | 705 | 77%   | 1 486 | 396   | 27%                                     | 1 090 | 73%   | 4%  |
| Grade 5 | 1 216 | 470   | 39%     | 746 | 61%   | 1 427 | 540   | 38%                                     | 887   | 62%   | -1% |

#### Breakdown of gender balance per job grade in the Norwegian companies

#### Breakdown of gender balance per job grade in the fishing fleet

|         |       |       | 2022    |     |       |       |       | Change in the number of women per grade |     |       |     |
|---------|-------|-------|---------|-----|-------|-------|-------|---|-----|-------|-----|
|         | Total | Women | Women % | Men | Men % | Total | Women | Women %                                 | Men | Men % |     |
| Grade 1 | 24    | 1     | 4%      | 23  | 96%   | 20    | 0     | 0%                                      | 20  | 100%  | -4% |
| Grade 2 | 64    | 1     | 2%      | 63  | 98%   | 60    | 2     | 3%                                      | 58  | 97%   | 2%  |
| Grade 3 | 60    | 2     | 3%      | 58  | 97%   | 60    | 2     | 3%                                      | 58  | 97%   | 0%  |
| Grade 4 | 57    | 3     | 5%      | 54  | 95%   | 46    | 0     | 0%                                      | 46  | 100%  | -5% |
| Grade 5 | 138   | 6     | 4%      | 132 | 96%   | 133   | 3     | 2%                                      | 130 | 98%   | -2% |
| Grade 6 | 14    | 14    | 100%    | 0   | 0%    | 16    | 16    | 100%                                    | 0   | 0%    | 0%  |
| Grade 7 | 50    | 1     | 2%      | 49  | 98%   | 50    | 8     | 16%                                     | 42  | 84%   | 14% |

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# Lerøy wins award for equality and the working environment

Equality at Lerøy is about more than just gender. We are committed to ensuring diversity and inclusion also in terms of age, ethnicity and cultural background. With employees from over 80 different nations, we know that diversity is a strength for our business.

# Workwear adapted for women and pregnant employees

In 2023, Lerøy was named "Maritime Company of the Year" for challenge the supply industry to produce workwear suitable for women and pregnant employees, resulting in the supplier Ahlsell now offering workwear tailored to the female body. The reason given by the jury for the award was: "This year's award goes to one of Norway's largest seafood companies, Lerøy Seafood Group. The company receives the award for its efforts and commitment to creating a safe, inclusive and innovative working environment. Women will now be able to get workwear they feel comfortable in. This is a victory for equality and the working environment, which others in the industry can emulate." The initiative was created in connection with the "Women at Sea" event, where Lerøy held an internal workshop to identify potential barriers and create opportunities to strengthen efforts in equality and diversity, where employees and employee representatives from the entire Lerøy value chain participated. Several of the suggestions from the workshop have been included and implemented as measures to strengthen Lerøy's diversity and equality efforts.

#### Diversity business of the year

In 2021, Lerøy Norway Seafoods' Melbu facility was named "Diversity Business of the Year" at the annual conference of the Directorate of Integration and Diversity (IMDi). Around 120 people are employed at the factory where 70% are from

immigrant backgrounds and most of the team leaders are non-Norwegian. Management aims to enable all employees to have equal opportunities. The factory hosts Norwegian language courses and provides additional coaching by a dedicated teacher, to give as many as possible the language proficiency needed to obtain trade certifications. This is a benefit to both the company and the employee. Another initiative has been to increase the use of process visualisation, which makes training easier for those whose first language is not Norwegian. Similar activities were also carried out in other parts of the Group. Language is an important aspect of workplace and social inclusion and, as an employer, we see great value in helping our employees learn the local language. In 2024, 56 employees took language courses organised by Lerøy. Additionally, the Group has improved our internal communication channels with text in both Norwegian and English.

# Internal and external celebrations of equality and diversity-promoting activities

An important aspect of Lerøy's work is to communicate the Group's approach and ambitions for equality and diversity both internally and externally. Lerøy actively uses the Group's intranet, social media channels and website for such information. Some of the activities that have received particular attention in recent years include:

- Proud sponsor of Brann Kvinner, the first Norwegian women's team in the Champions League
- Article promoting women in business: "From apprentice to leader – with Lerøy's support"
- Winner of the "Maritime Company of the Year" in 2023
- Winner of the "Diversity Business of the Year" in 2021
- Pride
- International Women's Day
- Pink Ribbon Race
- The equality conference "Change at Sea"

- Annual National Telethon
- Articles featuring stories from Lerøy employees
- UN Sustainable Development Goals

# Action plan to promote equality and prevent discrimination

Lerøy is constantly working to promote equality and diversity throughout the Group. We still have a way to go to fulfil our ambitions and goals in this area level. One important aspect of the work going forward will consist of standardising processes and implementing measures at all the Group's companies based on best practices. So far, this effort has largely been driven by HR. Going forward, we aim to be more agile and involve the organisation, taking a more cross-disciplinary approach. This work will be intensified in 2025 with more dedicated resources and structures to ensure compliance.

#### List of measures and action plan

| Personnel<br>area  | Background for the measure   | Description of the measure   | Goal for the measure   | Responsibility                            | Status   | Result   |
|--|--|--|--|---|--|--|
| Recruitment  | Increased diversity<br>in all job grades<br>Objective<br>assessment of<br>candidates | Increased diversity in the career portal<br>Wording and requirements in job adverts<br>Standardised processes<br>Training in interview techniques and unconscious bias<br>Active participation in education and career fairs                   | Increase the percentage of female<br>applicants<br>Increase the percentage of women<br>called for an interview<br>Increase the percentage of minorities<br>called for an interview<br>Increase proportion of women on boards | HR and<br>managers                        | Ongoing<br>Planned<br>activities in<br>roadmap | Increased proportion<br>of women   |
| Promotion and<br>development<br>opportunities                  | Highlight internal<br>development<br>opportunities for<br>all employees              | Standardised processes<br>Competence mapping<br>Development plan<br>Internal mobility<br>Lerøy mentoring programme<br>Increased implementation of Lerøy Way <sup>2</sup>   | Increase level of internal mobility<br>Increase percentage of women applying<br>for management positions   | HR and<br>managers<br>Lerøy Way<br>Office | Ongoing<br>Planned<br>activities in<br>roadmap | Increased score on<br>GPTW3 <sup>3</sup><br>Increased percentage<br>of women in<br>management<br>positions |
| Pay and<br>working<br>conditions                               | Pay based on job<br>grade and job<br>category  | Standardised processes<br>Shared HR and pay system in Norway<br>Standardisation of job grades and job categories<br>Pay analysis in Norway   | Equal pay irrespective of gender   | HR and<br>managers                        | Ongoing<br>Planned<br>activities in<br>roadmap | Increased score on<br>GPTW   |
| Facilitate<br>and enable a<br>good work-life<br>balance        | Some differing<br>perceptions of<br>work-life balance in<br>the companies            | Standardised processes<br>Uniform life-phase policy<br>Workwear adapted to women (including pregnant women)<br>Flexitime for those positions where this is possible<br>Opportunities to work from home for positions where this is<br>possible | Facilitate inclusion where necessary<br>Ensure that we have workwear adapted<br>to women (including pregnant women)  | HR and<br>managers                        | Ongoing<br>Planned<br>activities in<br>roadmap | Increased score on<br>GPTW   |
| Bullying, sexual<br>harassment and<br>gender-based<br>violence | Certain unwanted<br>incidents related<br>to bullying and<br>harassment.              | Group-wide e-learning courses in:<br>- Code of Conduct<br>- Equality and diversity<br>- Whistleblowing procedures<br>- Standardised processes<br>- Leadership development<br>- Communication   | Mandatory training<br>Use of internal whistleblowing channel   | HR and<br>managers                        | Ongoing<br>Planned<br>activities in<br>roadmap | Zero unwanted<br>incidents   |
| Working<br>environment   | Difference<br>in employee<br>experience in the<br>companies                          | Employee survey<br>Standardised processes<br>Equality and diversity are a fixed item on the agenda at<br>Working Environment Committee (AMU) meetings<br>Information provided in Norwegian and English on the intranet                         | Reduction in the sickness absence rate<br>Increase employee satisfaction   | HR and<br>managers                        | Ongoing<br>Planned<br>activities in<br>roadmap | Increased score on<br>GPTW<br>Reduction in the<br>sickness absence rate<br>Reduced turnover                |

Lerøy Way is training, courses, and forums to promote uniform working methods and principles within the group.
Annual Lerøy Group employee survey among all employees in collaboration with Great Place to Work.



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