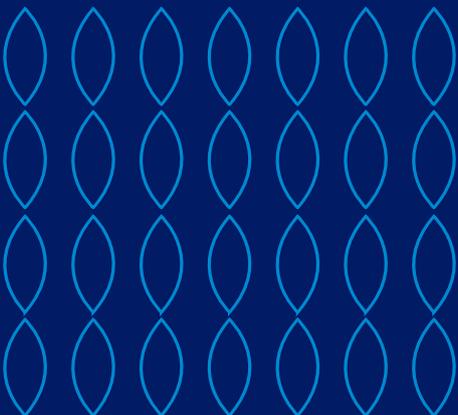
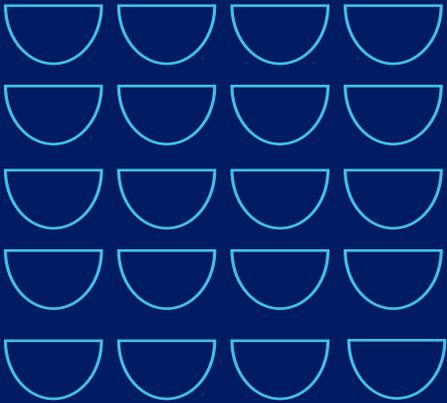




Austevoll Seafood ASA

POLICY FOR ANTI-CORRUPTION



Policy for anti-corruption

Purpose

Austevoll Seafood ASA's (AUSS) business conduct and corporate governance are always guided by our value *act with integrity*. AUSS has a zero-tolerance policy towards corruption, and we hold each other to a high ethical standard in all our business how we conduct our business.

AUSS opposes corruption in all forms – direct as well as indirect, active as well as passive, and in both private and public sector. We are committed to conduct our business with integrity and in accordance with the high ethical standards reflected in our Code of Conduct and this policy, applicable laws, rules and regulations, as well as internationally accepted guidelines, conventions or similar relating to corruption, money laundering, fraud, slavery, environment, human rights, or similar activities.

This policy applies to AUSS and all its portfolio companies.

Scope

Mandatory for all subsidiaries, all employees in the Group and all who operate on AUSS's behalf. We expect that our portfolio companies establish measures to achieve a responsible supplier chain and establish a system to ensure systematic audits and follow-up of suppliers.

All employees and contract labour shall comply with this policy.

AUSS expects our portfolio companies, suppliers and business partners to conduct themselves in line with the policy's purpose, and to respect all local legislations in their geographical area.

Definitions

- **Corruption:** Abuse of entrusted power for private gain, which can be instigated by individuals or organisations.
- **The Group:** AUSS and its subsidiaries
- **Bribery:** Bribery is defined by the OECD Convention as the offering, promising or giving of something in order to influence a public official in the execution of his/her official duties.

Relevant steering documents

This document is part of the AUSS's governance model. Reporting on corruption is a part of AUSS's policy on whistleblowing.

Risk tolerance

AUSS has zero tolerance for corruption. Business relations that are unwilling, or unable to comply with AUSS's Code of Conduct including this policy for anti-corruption shall be terminated.

Roles and responsibilities

All those who work at AUSS or its portfolio companies are responsible for positively ensuring anti-corruption. The top management in each portfolio company is responsible for ensuring compliance with this policy, and that the organisation has appointed personnel with competencies who are assigned the task of ensuring compliance with this policy.

Ownership and implementation

- The CFO at AUSS is the owner of this document and is responsible for updates.
- The policy has been developed by the corporate management at AUSS, presented to the ESG Committee and approved by the Board of Directors.
- The CEO of AUSS has overall responsibility for the policy.

Principles for anti-corruption

As a general rule corruption can be avoided by complying with AUSS's Code of Conduct and the content outlined in this policy. Each company in the group must implement appropriate measures to inform and educate employees on anti-corruption. As a holding company AUSS will not dictate how companies in the group should adapt their procedures to comply with this policy, but there are however some key elements that must be included:

- Never conceal corrupt or potentially corrupt activity
- Avoid activities that may facilitate any form for corruption.
- Stay clear of fraudulent or dishonest activity
- Never accept or offer something that can be perceived as bribery or kickback.

In case of uncertainty regarding the content of this policy or the Code of Conduct AUSS's representatives shall seek guidance. The first step always refers to the Code of Conduct and this policy. In the event the situation still remains unclear, seek answers from the management. All of AUSS's representatives are encouraged to ask questions.

Risk indicators

Reports from the companies are given on a regular basis that include human rights indicators. For all extraordinary or precarious situations immediate reporting is mandatory.





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