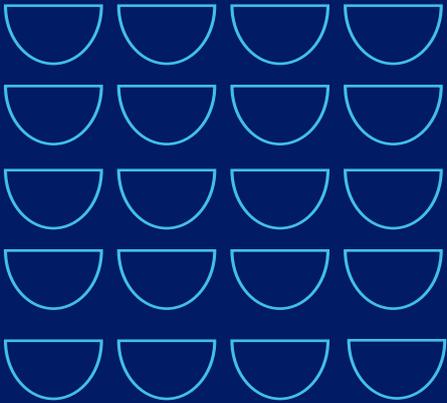
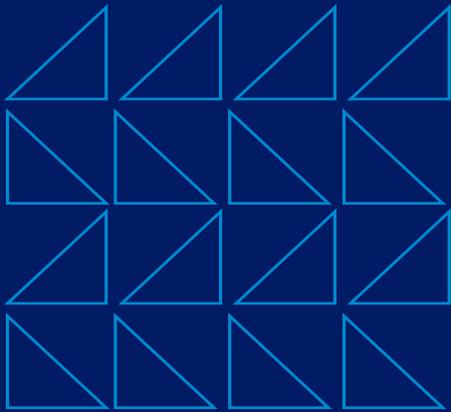




Austevoll Seafood ASA

POLICY FOR WHISTLEBLOWING



Policy for whistleblowing

Purpose

In any case involving people there is always a possibility that a situation arises that violates the agreed upon policies, procedures, laws and regulations or other governance principles. The principles outlined in this policy in conjunction with our Code of Conduct and whistleblower poster will aid us in preventing the need for whistleblowing as well as resolving situations if they may occur.

As a holding company exercising active ownership in its portfolio companies (the Group), AUSS has implemented a Code of Conduct setting ethical guidelines for employee conduct.

Whistleblowing means reporting unacceptable circumstances, non-compliance of suspected non-compliance with AUSS' Code of Conduct, internal policies or laws and regulations.

The policy for whistleblowing is an important part of our corporate social responsibility strategy and any reported circumstances, non-compliance and/or suspected non-compliance is followed up by the management in each portfolio company and reported to AUSS. Whistleblowing contributes positively to AUSS, the portfolio companies and society because it allows negative conditions to be corrected.

The whistleblowing function shall allow Group employees to speak out and criticise without the risk of any kind of punishment or negative reaction.

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

- **Whistleblowing** is defined as reporting censurable conditions to a person with the authority to do something about it. Employees who are willing to whistleblow represent an important resource for the Group.
- The term "**censurable conditions**" is defined as situations that violate rules of law and regulations, the Group's Code of Conduct or ethical standards and other internal policies

- Statements relating to issues that only apply to the employee's own working conditions, such as professional disagreements and terms, are not defined as whistleblowing.
- **The Group:** AUSS and its subsidiaries.

Relevant steering documents

This document is part of the AUSS's governance model.

In addition: Chapter 2A of the Norwegian Working Environment Act and AUSS's whistleblowing poster.

Risk tolerance

There will always be a risk of someone violating the agreed upon policies, procedures, laws and regulations or other governance principles. There is a zero tolerance for conscious violations. In the event the violation is an unconscious decision it is important to evaluate each situation to assess the appropriate response. We expect our portfolio companies to implement risk reducing measures that are effective and efficient. As well as take preemptive measures to control and monitor known risk factors.

Roles and responsibilities

All those who work at AUSS or its portfolio companies are responsible for positively ensuring whistleblowing. 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.

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 whistleblowing

WHISTLEBLOWING CHANNELS

The top management in each portfolio company is responsible for ensuring that the company has a whistleblowing channel and that all employees have information about and access to.

As a main rule employees shall be able to whistleblow orally or in writing, with their full name or anonymously. The whistleblowing report should contain relevant information, including persons involved, any witnesses and relevant evidence.

If an employee prefers to issue such reports orally, the employee

shall as a main rule contact the immediate superior. If for some reason this is difficult, the employee should contact their immediate superior's manager, the local HR Department or the local employee representative/safety representative. All whistleblowing reports shall be registered in a whistleblowing program whether it's done in writing, oral, with full name or anonymous.

Employees are encouraged to whistleblow with their full name, as anonymous whistleblowing may complicate management of the case and prevent clarification of and reaction to censurable conditions. Normally, whistleblowing with a full name will help improve proceedings and provide a better result for all parties involved.

FOLLOW UP OF WHISTLEBLOWING AND PROTECTION AGAINST RETALIATION

All parties involved in a whistleblowing case shall be protected. Retaliation against employees who whistleblow is prohibited. Any person who feels that they have been subject to retaliation after whistleblowing must report on this.

CONFIDENTIALITY

The whistleblower's identity and all information relating to a whistleblowing report are treated as confidential information throughout the process. It is important to note that anonymity cannot be guaranteed for whistleblowers and others if the case results in legal proceedings.

Case management will be carried out in accordance with the prevailing legislation covering personal data and privacy.

Risk indicators

Reports from the companies given on a regular basis that include whistleblowing indicators such as reported cases, status, consequences etc. For all extraordinary or precarious situations immediate reporting is mandatory.



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