

REPORT FOR 2025 REGARDING FUNDAMENTAL HUMAN RIGHTS AND DECENT WORKING CONDITIONS UNDER THE TRANSPARENCY ACT IN AUSTEVOLL SEAFOOD ASA

1. INTRODUCTION AND REPORTING STRUCTURE FOR THE GROUP

In accordance with the Norwegian act relating to enterprises' transparency and work on fundamental human rights and decent working conditions (Transparency Act), Austevoll Seafood ASA ("AUSS") has carried out human rights due diligence assessments in accordance with the OECD Guidelines for Multinational Enterprises. In this report AUSS will present its findings from the human rights due diligence assessment and the measures that have been implemented in 2025. Furthermore, the company will describe the achieved or expected results of these measures.

AUSS is a holding company and the parent company of the portfolio companies within the Group. AUSS is established and registered in Norway and subject to Norwegian law. The company is a public limited company listed on the Oslo Stock Exchange and has committed to comply with the applicable standards for corporate governance published by the Norwegian Corporate Governance Committee (NUES). AUSS together with its portfolio companies is hereinafter referred to as the "Group".

The following companies in the Group are subject to direct reporting requirements under the Transparency Act and will issue separate reports under the Transparency Act for their respective groups:

- (i) Lerøy Seafood Group ASA
[The Norwegian Transparency Act \(leroyseafood.com\)](https://www.leroyseafood.com)
- (ii) Br. Birkeland AS (endret navn til Bjånesøy Eiendom 09.01.2026)
[Åpenhetsloven - Br. Birkeland \(brbi.no\)](https://www.brbi.no)
- (iii) Kobbervik og Furuholmen Oppdrett AS
[Åpenhetsloven - KFO \(kf-farming.no\)](https://www.kf-farming.no)

In addition to the parent company Austevoll Seafood ASA the following companies are included in this report:

- (i) AUSS Shared Service AS
- (ii) Austevoll Eiendom AS
- (iii) Austevoll Pacific AS
- (iv) Austral Group S.A.A
- (v) A-Fish AS
- (vi) FoodCorp Chile S.A.

hereinafter referred to as "Disclosing Companies".

AUSS Shared Service AS is a Norwegian company wholly owned by AUSS. The company provides administrative services to some of the companies in the Group. The company has no subsidiaries and has ten employees.

Austevoll Eiendom AS is a Norwegian company wholly owned by AUSS. The company owns and rents out property. The company has no subsidiaries and has no employees. See also section 4.5 below.

Austevoll Pacific AS is a Norwegian company wholly owned by AUSS. The company is a holding company and has several subsidiaries all of which are holding companies with no activity or employees, except Austral Group S.A.A ("Austral"). Austevoll Pacific AS is the indirect majority owner of Austral and currently owns 90.12 % of the shares. Austral is listed on the Lima Stock Exchange. Austral owns its own fishing vessels, and produces fishmeal, fish oil and frozen fish from its own raw materials and raw materials purchased from third parties.

A-Fish AS is a Norwegian company wholly owned by AUSS. The company is a holding company and owns 74% of the shares of FoodCorp Chile S.A ("FC" / "FoodCorp"). FC is located in Chile. FC owns its own fishing vessels, and produces fishmeal, fish oil and frozen fish from its own raw materials and raw materials purchased from third parties.

This statement is provided by and signed by the Board of Directors and the Chief Executive Officer of AUSS and covers the period from January 1, 2025 to December 31, 2025 and is available on AUSS' website – (auss.no).

Please refer to our [annual report](#) for more information regarding:

- (i) AUSS business profile, page 25-34
- (ii) Sustainability governance, human rights policies and principles, page 50, 86, 87
- (iii) Due diligence, page 41-52
- (iv) Stakeholder engagement, page 56
- (v) Human right, working condition and whistleblowing channels
 - a. Own workforce, page 86-94
 - b. Whistleblowing policy, page 88 - 89
 - c. Consumers and end-users, page 95-98
 - d. Governance (anti-corruption), page 99-101

2 AUSS HUMAN RIGHTS DUE DILIGENCE PROCESS

AUSS has implemented guidelines for conducting human rights due diligence assessments applicable for the Group. This ensures an aligned approach across the Group and also includes quarterly compliance reporting regarding human rights and decent work conditions from its portfolio companies with direct reporting obligations under the Transparency Act.

The purpose of the due diligence process is to investigate whether there are any actual or potential adverse impacts on human rights and decent working conditions that any of the Disclosing Companies have caused or contributed toward, or that are directly linked with the AUSS' operations, products or services via the supply chain or business partners. AUSS will address any adverse impacts and track the results of implemented measures. The due diligence process also includes the Group's downstream value chain to the extent any of the Disclosing Companies may have caused or contributed to any actual or potential adverse impacts on human rights and decent working conditions.

3 ACTUAL AND SIGNIFICANT RISK OF ADVERSE IMPACT ON FUNDAMENTAL HUMAN RIGHTS AND DECENT WORKING CONDITIONS

3.1 Introduction and summary

No actual adverse impacts or significant risks of adverse impacts on human rights and decent working conditions has been identified in the human rights due diligence assessments relating to the Disclosing Companies covered by this statement.

While some alerts were confirmed in 2025, these were isolated cases that have been handled through established procedures and do not indicate a recurring or structural issue. The incidents have been assessed and not considered to be actual adverse impacts under the Transparency Act. These assessments have been based on the AUSS Group Guidelines for conducting human rights due diligence assessments under the Transparency Act in the AUSS Group and is based on the incidents' scale, scope, and irremediable character.

The Disclosing Companies have an ongoing follow-up of the risk status within fundamental human rights and decent working conditions with a focus on areas with increased risk from an industrial and geographical perspective in accordance with the risk mapping. This is further described in AUSS annual report under standard S1 own workforce (page 86-94) and S4 customer and end-users (page 95-98). The following areas have been prioritised in 2025:

- Working conditions and human rights for own workforce and workers in the value chain
- HSE risk for own workforce and workers in the value chain

Gender equality in management position is identified as an actual negative impact in AUSS' annual report under S1 own workforce (page 86-94). While this is not considered an actual adverse impact or significant risk of adverse impacts on human rights or decent work conditions under the Transparency Act, it is followed up as part of our broader effort to ensure continued focus and awareness on non-discrimination and equal opportunities.

Inherent risks of trafficking in people, drugs and other illicit substances via vessels or logistics are not addressed in AUSS annual report, but are included in this statement due to their relevance under the Transparency Act mainly based on the potential severity and irremediable character of this risk.

3.2 Working conditions and human rights for own workforce and workers in value chain

The global fishing industry faces several challenges related to human rights and decent working conditions. By the end of 2025, Austral operates 19 vessels, and FoodCorp operates 4 vessels. In addition, both companies purchase raw materials from third-party suppliers.

Purchase of raw materials from third-party suppliers entails a risk due to limited transparency in matters relating to the protection of human rights and working conditions on the vessels. This is especially related to primary processing of raw materials purchased from the smallest fleet and

medium-sized vessels and represents risks related to living wages, poor living conditions on board and excessive working hours.

Foreign workers are particularly exposed, as employment is often seasonal and their connection with the company is more remote. Seasonal workers are generally of a different ethnicity than the locals. Austral and FoodCorp have a culture of zero tolerance for any form of discrimination or harassment, which is specified in their Code of Conduct. It is the companies' procedures that foreign workers must have the same conditions as other employees, including wages, benefits and living conditions.

According to the risk mapping, there is an inherent risk of discrimination and harassment linked to both industry conditions and geographic factors. South America is considered a higher-risk region for such issues, based on international frameworks such as the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. The most likely consequence is unequal treatment of foreign workers compared to local employees.

In a region where mechanisms to identify and address such issues may be limited, the ability to report actual alerts and implement targeted follow-up measures reflects a proactive and responsible approach to human rights — not just in policy, but in practice. Both Austral and FoodCorp have whistleblowing mechanisms in place, enabling workers to report concerns related to discrimination, harassment, or other rights violations.

In 2025, the Group received seven confirmed alerts related to workers' rights. All of these cases are related to the Group's operation in Peru and concern workplace-related issues. These were isolated cases and have been addressed. No work-related incidents of discrimination on the grounds of gender, racial or ethnic origin, nationality, religion or belief, disability, age, sexual orientation have been reported in the reporting period. One additional case was reported to AUSS after the publication of the annual report (included in the assessment above). As a result, the number disclosed under ESRS S1-17 differs by one case.

The fact that such cases are reported and followed up demonstrates that our systems are functioning as intended. Since 2025, the Integrity Channel for Austral has been managed by Ernst & Young (EY) as an independent third party. This external oversight guarantees the full anonymity of whistleblowers and ensures that reports are handled free from conflicts of interest or retaliation. Further description of action taken is described in our annual report page 92 and onwards.

The Group has implemented several mitigating actions relating to material mitigating impacts relating to its own workforce. Please refer to the annual report (S 1-4).

The Group upholds strong human rights commitments, guided by international standards such as the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises. AUSS's policies are aligned with these international standards and focus on respecting labour rights, engaging with the workforce, and providing remedies for any human rights impacts, and specifically address issues such as human trafficking, forced or compulsory labour, and child labour. These policies apply to the Group's own workforce, including all employees, directors, officers, hired personnel, consultants and representatives, as well as any person conducting work on behalf of or otherwise representing AUSS globally. Additionally, the Group expects suppliers and business partners in the upstream and

downstream value chain to conduct themselves in line with these policies and the AUSS' Code of Conduct.

By taking a firm stand against unethical practices, AUSS ensures that the workforce is protected and that operations are conducted with integrity and respect for human rights. The Group have established mechanisms, such as whistleblowing channels, to monitor compliance and address any issues promptly, ensuring a respectful and fair workplace for all employees.

Austral enhanced its commitment to ethical conduct and human rights by delivering mandatory, in-person training to all employees, workers, and crew across its operations. The training covered key policies, including the code of ethics, anti-corruption, anti-money laundering, counter-terrorist financing, and human rights. Selected suppliers also received training through virtual workshops to reinforce adherence to the supplier code of conduct. FC has a "Crime Prevention Model" applied to their workers which includes training on the prevention of discrimination, violence and harassment.

These actions contribute to stronger labour rights protections and better working conditions throughout the value chain, demonstrating a responsible and active approach to addressing human rights risks.

For 2026, Austral will strengthen training mechanisms by introducing virtual programmes that include specific modules on the prevention of harassment and discrimination. The frequency of internal compliance audit will be increased in the operation of key suppliers. Awareness of reporting protocols will be reinforced through training sessions delivered by EY, acting as the independent manager of the Integrity Channel. FC will continue to strengthen their training process for mandatory training through digital platforms.

3.3 HSE risk for own workforce and workers in the value chain

Production and processing are essential components of the seafood value chain, and the industry is associated with inherent risks related to human rights and decent working conditions — particularly health and safety. Workplace health and safety (HSE) remain a key concern across both production sites and the wider supply chain. Actual negative impacts relate to individual workplace incidents, primarily affecting offshore workers and employees in processing facilities. Offshore workers face higher risk due to demanding environments and operational complexity

In 2025, the Group received six confirmed whistleblowing cases related to Health and safety. Five of these cases relate to a portfolio company which provides its own separate disclosure, see www.leroyseafood.no for more information. The remaining case concerned limited use of personal protection equipment. This was followed up locally by reinforced routines and the alert is not consider material.

Although no actual or significant risk of adverse impacts have been identified, incidents are reported through established channels, indicating a continued risk of workplace injuries. The Disclosing Companies recognise this as a material area and maintain a strong focus on preventive measures and continuous improvement.

The Health and Safety Policy is aligned with international standards and prevailing national HSE regulations and laws. The policy applies to the Group's employees and contract labour, with particular emphasis on high-risk roles at sea and in processing facilities. The policy outlines the commitment to a zero-injury goal by enforcing rigorous safety standards, conducting regular risk assessments, and providing comprehensive safety training. Each portfolio company's management holds responsibility for compliance, supported by designated HSE personnel who oversee implementation. Regular audits and monitoring performed by the portfolio companies ensure that health and safety practices are continuously improved.

Both FC and Austral have annual HSE training for their own workforce, and workers in their value chain, in addition to annual program for managing work related illness. FC performs annual risk mapping for each facility, while Austral also maintain their 45001 certification. Combining training, risk assessment and certified management systems is expected to strengthen awareness and reduce the likelihood of HSE incidents.

In addition to its own fleet, Austral has increased its focus on working conditions in the supply chain, and has run internal audits of selected supplier's operations to ensure compliance with human rights and decent working conditions. FC is further strengthening its follow-up of contractors and subcontractors through planned monthly meetings, aimed at monitoring performance and implementing improvement measures. As part of this effort, FC has initiated the implementation of a health and safety management system, with both internal and external audits planned from 2026.

3.4 Inherent risks of trafficking in people, drugs and other illicit substances via vessels or logistics

This is an inherent risk that is mainly associated with the areas of fisheries and primary processing in Austral and FC in connection with vessels in operation and other logistics operations. The risk is that illegal access is obtained by unauthorized personnel where vessels, trucks or other transport can be used for the illegal traffic of people, drugs or other illegal substances. The risk of human trafficking, drugs or other illegal substances is a high priority, as the potential impact of a violation will be very serious, even if the probability of this risk materializing is considered to be very low.

During 2025, neither Austral nor FoodCorp have had any known incidents related to human trafficking or drugs.

In accordance with the Access Control Policy, all employees and persons entering or exiting Austral's vessels, production facilities, and headquarters are checked and their identities validated by security personnel. Similarly, security personnel control the entry and exit of freight transport vehicles (internal goods and other vehicles). According to the BASC certification program, this control can be audited once a year. Austral also has procedures for unannounced inspections of the production facilities to identify any risks.

In accordance with the Access Control Policy, all persons entering or exiting FC's vessels, production facilities, and headquarters are identity verified by security personnel. This also applies to freight transport vehicles. According to the BASC certification program, this control can be audited once a year. FC has procedures for unannounced inspections of the production facilities to uncover any risks.

For 2026, Austral will strengthen access controls through periodic training of security personnel in the detection of risks to human trafficking and drug smuggling. In addition, supplementary internal compliance audit will be carried out alongside the BASC audit, and confidential reporting protocols

for all employees and suppliers will be reinforced. These measures aim to further reduce the inherent risk, ensuring security across vessels, plants and logistic operation.



Austevoll Seafood ASA

This statement is signed electronically by the members of the board and the general manager.

Storebø, 23.06.2026

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