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## HUMAN RIGHTS AND MODERN SLAVERY STATEMENT

Our people are the heart of our business and our greatest asset. Respect for the individual is a cornerstone of our company values. As an international company, we see it as our responsibility to protect and respect human rights. Every human being is precious and must be treated with mutual dignity and respect when engaging with our company.

## **Modern Slavery Statement**

The Company is committed to ethical trading and has a zero-tolerance approach to any form of modern slavery, human trafficking, forced labor, bonded labor, or compulsory labor. We are dedicated to acting ethically, with integrity and transparency in all business dealings. We are also committed to implementing effective systems and controls to safeguard against any form of modern slavery, whether within our business or in our supply chain.

We provide sufficient remedial support in cases where Bakkafrost's operations may directly or indirectly cause or contribute to adverse human rights impacts on individuals, workers, or communities. We continuously work on improving our due diligence processes to identify potential or actual violations.

#### Anti-discrimination

We value the diversity of our people and aim to create equal opportunities for everyone. We follow the principle that nobody should be harassed or disturbed without reason while performing their job responsibilities.

The Company strictly prohibits any discrimination against employees, shareholders, management, customers, retailers, or suppliers. This applies to recruitment processes, terms of employment, working conditions, assignments, training, disciplinary practices, career opportunities, termination, and retirement.

#### Child Labour

We respect children's right to childhood and do not employ anyone under the age of 15. We consider youth between the ages of 15 and 18 to be a vulnerable workforce and enforce specific requirements to prevent them from being exposed to hazardous working conditions that could harm their physical or mental well-being.

#### **Health and Safety**

The health and safety of our employees is paramount. We are committed to providing a safe working environment for everyone and ensuring that work-related injuries and illnesses are prevented. This is achieved by fostering a culture of continuous improvement and adopting best practices. We take our responsibility for employee safety seriously and approach health, safety, and well-being proactively.



Managers are responsible for implementing our health and safety protocols and prioritizing safety above all other business activities. We promote a culture of ownership, where everyone is responsible for their own health and safety as well as that of those around them. Regular consultation with employees and their representatives on health and safety matters is essential, as is encouraging active participation. Our goal is to lead the industry in health and safety best practices and innovation.

#### Freedom of Association

We respect our employees' right to form, join, or not join trade unions. When employees are represented by a legally recognized trade union, the Company negotiates through the employers' association.

#### Grievance

We strive to maintain a healthy corporate culture that respects human rights. To ensure that employees' concerns are considered and treated fairly, we have a grievance procedure that allows employees to raise complaints without fear of retaliation. Any employee who feels there is a gap between the Company's policies and practices should report their concerns to their Manager, Managing Director, or Human Resources.

### Responsibilities

The statements in our human rights policy apply to the Board of Directors, Group Management, Key Executives, and every other employee working for Bakkafrost, including subcontractors working for the Company.

The Board of Directors holds the overall responsibility for ensuring these policies comply with legal and ethical obligations and that all those under our control adhere to them.

Managing Directors have the primary responsibility for implementing this policy, monitoring its use and effectiveness, and addressing any questions related to it. Managers at all levels must ensure that their teams understand and comply with these policies and receive adequate and regular training. They are also responsible for ensuring respect for human rights within their areas of operation and are required to escalate severe cases to the board.

#### Commitments

Bakkafrost Group respects the freedom and dignity of every individual and stands against all forms of slavery, child labor, and discrimination. As an international company, we view it as our duty to go above and beyond in contributing to positive human rights impacts. We are committed to complying with applicable laws and regulations in the countries where we operate to ensure human rights and decent working conditions.

We are dedicated to upholding the fundamental human rights recognized in the International Labour Organization's core conventions (29, 30, 87, 98, 99, 100, 105, 111, 138, 182, 190, 203) and the United Nations Guiding Principles on Business and Human Rights (UNGPs). Our policies and procedures are designed to mitigate modern slavery risks within our supply chain.



# **Suppliers**

It is important to us that our suppliers adhere to the same ethical standards as we do and maintain socially responsible practices and policies. We do not conduct business with suppliers who fail to respect internationally recognized human rights.

P/F Bakkafrost

Regin Jacobsen, CEO