

# Equality, Non-discrimination and Gender Pay in Mowi ASA – 2023

## 1. Introduction

This Equality, Non-discrimination and Gender Pay is developed based on the requirements featured in the Norwegian Equality and Anti-discrimination act, including paragraphs §§ 26 and 34.

This report includes a gender pay analysis across roles and levels in Mowi ASA entities, shows the proportion of women and men employed in each job category, assesses the pay of employees performing the same and different types of work, and identifies gender pay gap in roles dominated by a specific gender. The report also includes an overview of parental leave, the status of part-time and temporary employment in the organization, and results of a mapping of involuntarily part-time work. The overall findings have been discussed with the labour union representatives.

Please also refer to Gender Pay report Mowi Group 2023 for additional information.

## 2. Mowi's equality and non-discrimination approach

### Code of conduct

Mowi is committed to high ethical standards in our business dealings worldwide. Abiding by the principles of Code of Conduct is an essential element in our ability to engender trust and is an integral part of the Mowi Way. Our Code of Conduct guides what we do and say each day, it provides direction and guidelines and sets the standards of behavior which we can expect from one another, and which external parties can expect from us.

The Code of Conduct includes a policy in chapter 5.2 on equality and non-discrimination, stating that All Mowi's activities shall be conducted without discrimination based on race, ethnicity, national or other origin, disability, age, gender, sexual orientation, gender identity and expression, language, religion, or any other characteristic where a person is not treated as an individual.

The Code of conduct includes in addition Policies and principles that may impact equality in separate ways, such as Safety, Fair Working Conditions, Culture, Human rights, Sustainability, and Whistleblowing. An example is the Code of Conduct chapter 6.1 stating that Mowi aims to be an open, positive, and supportive community, showing respect and support for individuals and our diverse cultures and chapter 7.1 on Human Rights stating that employees have the right to work in an environment that promotes diversity, equal opportunity, and non-discrimination.

Our Code of Conduct forms the overarching principles and framework of our OneMowi Operational Excellence program and Global policy framework.

### Policies

Our ethical standards and expectations are anchored in a framework of global policies with strong principles on equality that apply across our operations and supply chain, as well as local operating procedures. The policies and procedures guide our interaction with employees, suppliers, partners, and stakeholders.

Mowi has several policies and procedures covering and securing equality and non-discrimination. Our key policies are the policies of Human Rights, Health & Safety, Whistleblowing, Diversity & Inclusion, Recruitment, Salary, Bonus, Talent, and Performance Management. In addition, we have policies and

procedures securing the privacy and personal data of our employees. Our framework of policies may be found at [Mowi.com/ sustainability](https://mowi.com/sustainability).

### **Practical approach**

Our commitment to equal rights is expressed in our business conduct, in policies and procedures, training, communication campaigns, and other initiatives.

On ethical business conduct, we run annual, mandatory training and testing on the Code of conduct. In our Learning portfolio we also offer training on Human Rights, unconscious bias, equality and non-discrimination, leadership principles, values, and health and safety. In our Leadership programs, elements on ethical business conduct is included.

We have a Human Rights Program, based on Mowi's commitment and approach to secure fundamental Human rights and decent working conditions in connection with our business. We run a Diversity & Inclusion program, aiming to increase diversity, and a Health and safety program aimed at keeping people safe and protected in all parts of our business. We carry out gender pay analysis and have created a Job Architecture base on consistent Job grading across the group using a globally recognised method.

We safeguard our efforts through risk assessments, audits, job grading, employee surveys, and whistleblowing channels securing safe reporting of incidents and concerns.

### **Risk Management**

Mowi has an established risk management and internal control system, including ESG (Environmental, Social & Governance) risks. Risk management and internal control is an important enabler for the company to meet its strategic goals. In Mowi, the number of female employees and female managers is significantly lower than the number of male employees. It is an important target for Mowi to improve the gender balance, and we will continue our efforts in attracting and retaining female talents and female managers to the company.

Human Rights Due Diligence is a Risk Management tool applied by Mowi to identify, assess, and respond to the most significant risks and adverse impacts within our operation, supply chain and business relationships. Assessment of risk in relation to equality is part of this Due Diligence Process where we aim to review risks including but not limited to country, sector, product, nature of work, type of workers, indirect causes, etc.

The foundation in Mowi on quality is solid, with our strong approach on Ethical Business Conduct, our Policy framework, our Risk Management process, tracking and communication of metrics and results, our learning efforts, and the collaboration with external stakeholders. The elements of our approach are implemented and secured as described in this report, including our Code of Conduct and Global Policies, Global Employee Surveys, Health and Safety programs, Privacy program, Diversity and Inclusion Program, Whistleblowing channel, and tracking of Fair Working conditions. In addition, we put emphasis on keeping a close collaboration with our Labour Unions, developing our extensive Learning portfolio, and engaging with local Communities.

### **Approach going forward**

Our approach is dynamic as our dedication to continuous development enables us to learn from and improve our current direction. We continue our work to strengthen our policy framework, our risk assessment, our learning program development, communication and collaboration with stakeholders and external partners.

We track closely the development of our activities. We have set specific targets on Diversity, as an example, where we aim for an increase of female management to 30% in 2025. At the end of 2023, we were at 13%, which is not where we want to be. Gender balance in the workforce is 24% female.

Further, we aim to increase the number of female applicants to 30%, that at the time is at 34% and also 34% of our promotions are female.

The process is a continuous journey and results may take time to achieve. We believe, however, that we have the right approach and initiatives in place that will take us in the right direction.

### 3. Reporting methodology

The main methodology for the gender pay report has been to categorise jobs and job families, as a base for salary comparisons. The method has been applied for both individually negotiated salaries and collective negotiated salaries. There is a greater variety of job families within the individually negotiated salaries. Within a job family there may however be a span of level and responsibilities that impacts the ability to compare jobs of equal work or equal value.

Jobs with individually negotiated salaries are categorized into job families, and then into different jobs. The job families are categorized based on functions and jobs that are related to each other in terms of work content, value, skills, and competency needs. Job family and jobs categorization enables a comparison of salaries within the same job family, across different job families, as well between jobs and job level.

Jobs with collective negotiated salaries have been categorized into different collective agreements. Within the different agreements, different jobs, job families and seniority levels have been compared.

All jobs and job families in Mowi ASA have been mapped as part of the gender pay analysis, however, jobs and job families with less than 5 male and 5 female incumbents have been excluded in this report to ensure employee confidentiality and privacy.

On an overall level, the data are not affected by this reporting method. For some jobs, job families, and levels in the organisation, such as differences between management and non-management it affects however our ability to conclude and report, due to a lack sufficient data. The data is included and will be visible on an overall level, for the business unit.

A limitation in the data is that some job families contain a more mixed group of jobs, functions and organizational level, than others when it comes to level or responsibility, which impacts our ability to analyse gender pay within the family.

The numbers in this report are based on 2023 figures. Similar mapping and analytics were done in 2018 and 2021. We did not detect any salary differences based on gender in overall numbers at that time.

### 4. Employees, gender balance, parental leave, temporary and part time work

There are 24% female in Mowi in 2023, and we will continue to increase efforts to increase the gender balance in the company.

Mowi	Gender Balance	Temporary	Part time	Parental Leave
	/ Employees (all)	Employees	Employees	Average weeks*
Female #	455	40	32	20
Male #	1450	76	30	11
Female %	24%	34%	52%	n/a
Male %	76%	66%	48%	n/a

## 5. Gender pay analysis for Mowi ASA

Highlights and overall findings are presented below, with a more detailed presentation in section 5.2.

### 5.1 Overall findings

- The gender pay analysis of all salaries, including collective and individually negotiated salaries, show a female salary of male of 93%. As this figure is not weighted for managers/non-managers or seniority, it has limited informative value. Weighted for seniority, female salary of male salary is 99%, hence Mowi ASA has gender pay equality.
- For collective negotiated salaries in total, female salary of male is 97%. Split by Processing cleaning, processing and Sea & Freshwater, female salary of male weighted is 98%, 96% and 106%% respectively i.e. effectively gender equality.
- For individually negotiated salaries of managers, the female salary of male is 99%, and 107% weighted for seniority i.e. effectively gender equality.
- For individually negotiated salaries of non-managers, the female salary of male is 98% when not weighted for seniority, and 103% when weighted for seniority.

Salaries and jobs are categorised into job families where jobs are comparable. The categorization gives insight into areas of gender pay equality as well as gender pay differences, that will enable a targeted approach in following up on gender pay going forward.

In Mowi, the number of female employees and female managers is significantly lower than the number of male employees. This is a limitation in the data. It is still an important target for Mowi to improve the gender balance, and we will continue our efforts in attracting and retaining female talents and female managers to the company.

#### All employees

Manager / Non manager	Female employees	Male employees	Female average seniority	Male average seniority	Female salary of male in %	Female salary of male in % weighted for seniority
All employees	455	1450	8	11	93%	99%
Non-managers	421	1249	8	10	98%	103%
Managers	34	201	13	16	99%	107%

## 5.2. Collectively negotiated salary

Gender pay analysis has been done within each collective agreement. A equal pay comparison has in addition been made between 2 of the collective agreements where the work scope is considered to be of equal value.

### Finding 1

Gender pay equality within the specific collective agreements.

Collective agreement	Female employees	Male employees	Female average seniority	Male average seniority	Female salary of male in %	Female salary of male in % weighted for seniority
Processing cleaning*	9	30	9	10	97%	98%
Processing	139	153	11	9	100%	96%
Sea and Freshwater	165	793	5	10	95%	106%

\* Separate part of collective agreement "Processing"

## 5.3 Individually negotiated salary

The gender pay analysis of all salaries show a female salary of male of 92%. This figure is not weighted for managers/non-managers or seniority and has therefore limited value. In the analysis, jobs are weighted for management responsibilities and seniority as and when relevant. Weighted for seniority, Mowi ASA has gender pay equality with female salary on 102% of male salary.

In addition, salaries and jobs are categorised into job families where jobs are comparable.

### Finding 1 - Managers

For jobs with manager responsibility there is effectively gender pay equality, with female salary at 99% of male. When manager jobs are weighted for seniority, female salary of male salary is 107%. We will continue to track this.

### Finding 2 - Non-managers

For non-manager jobs, there is a difference with female salary at 97% of male. When non-manager jobs are weighted for seniority, female salary is 106% of male.

Female salary of male in %	Female salary of male in %	Female salary of male in % weighted for seniority
Non-managers	97%	106%
Managers	99%	107%

## 5.4 Job families – collective and individual

86% of employees in across job all families have gender pay equality (+/- 10%). There are some differences that we will follow up with local management.

### Finding 3 - managers per job family

When analyzing the different job families of managers, the analysis detected 1 job family with a gender pay difference, with female salary at 92% of male. However, when weighted for seniority, the female salary is 104% of male. However, within this job family there is a small number of female managers and large number of male managers, which are limitations in the data.

### Finding 4 - non-managers per job family

When analyzing the different job families of non-managers, the analysis detected 5 job families with a gender pay difference with 10% or more. See table below.

When controlling for level in the organization (org. level 5 and 6) and type of roles in the job family, the difference in pay is explainable: Within a job family there may be a span of level and responsibilities that impacts the ability to compare jobs of equal work or equal value. This is the case for job families such as:

- Admin/sup/serv: includes office cleaners, and senior administrative employees.
- Eng: includes automation engineers, mechanics, electricians, technical experts and apprentices.
- Heal & Env which is a job family that organizes jobs across different levels of the organization and hence level of responsibility.

Our analysis show that there is mainly a salary span between these roles and not between the gender in these roles.

All						
Position Family -	Female Count	Male Count	Female Average of Seniority	Male Average of Seniority	Female salary of male in % weighted	Female salary of male in % unweighted
ADMIN/SUP/SERV	23	21	14	14	76%	81%
ENG	13	108	2	10	84%	69%
FINANCE	8	19	10	7	75%	87%
HEAL & ENV	9	5	5	17	114%	85%
RD	14	7	8	7	76%	81%

Non-manager						
Position Family -	Female Count	Male Count	Female Average of Seniority	Male Average of Seniority	Female salary of male in % weighted	Female salary of male in % unweighted
ADMIN/SUP/SERV	20	13	13	12	73%	75%
ENG	13	108	2	10	84%	69%
FINANCE	7	11	8	7	84%	87%
HEAL & ENV	9	5	5	17	114%	85%
QA	16	5	13	3	67%	86%

### Action

Although there is a span of level and responsibility within each job family which makes it difficult to compare equal work or work of equal value, a few cases of gender pay differences have been identified and these will be followed up further with local management.

## 5.5 Bonus

There are different bonus agreements across levels and areas and we have therefore looked at them separately. Furthermore, bonuses are incentive scheme and pay-out is determined by financial results and individual performance.

Reviewing bonus pay out for employees in collective agreements there is equal pay. In Sea and freshwater female bonus of male bonus is 92%. Note that the company has introduced a new bonus agreement for employees in seawater with payout not annually but after completion of fish-generation. Possible payout is per 18-24 month, and not per 12 month. We will therefore review this over a longer period to get comparable data. For individual pay, female bonus % of male is 101% for non-managers and 107% for managers.

We see that within some of the job families for individual paid employees, there are some differences between the genders. We will continue to review bonuses from an equal pay perspective.

Collective agreement	Female bonus of male bonus %
Industry	99%
Cleaner Industry	100%
Sea and freshwater	92%

Individual paid employees: Manager / Non-manager	Female bonus of male bonus %
Non-manager	101%
Manager	107%

## 6 Mapping of involuntary part time

### 6.1 Methodology

Employees in all Norwegian Business Units with a permanent job less than 100% were invited to participate and give their feedback in the survey mapping involuntary part time.

The employees were invited to share their view on their current work situation as part-time workers, and if they wanted to work more than their current percentage and/or to work full time.

The survey was digital and anonymous, however, employees were provided an opportunity to state their name if they wanted local management or HR to look into their situation. The survey response rate was 55%.

As the employees were offered to respond anonymously, the results are reported for all Norwegian entities combined. The results of the survey will be followed up by local HR or Management as possible.

### 6.2 Findings

Questions	Female	Male	Unknown	Grand Total
Count of Are you employed in a part-time job (less than 100%)?	11	10	15	36
If you are employed part-time; would you want to increase your job percentage? No	5	7	12	24
If you are employed part-time; would you want to increase your job percentage? Yes	6	3	3	12
Count of Have you had dialogue with your manager or HR about increase in job percentage? Yes	4	0	1	5
Count of Have you had dialogue with your manager or HR about increase in job percentage? No	6	8	10	24
Count of Have you had dialogue with your manager or HR about increase in job percentage? Not relevant	1	2	4	7

### **6.3 Action**

12 employees currently working part time wish to increase their work percentage. These employees will be followed up by local management as relevant.

## **7 Summary of initiatives and actions**

Mowi's approach to ensuring equality also includes equality and non-discrimination based on age, background, gender, sexual orientation and ethnicity. This is founded in our Diversity and inclusion policy, Human Rights policy and Health and safety policy.

Through regular employee surveys, global and local surveys, Mowi track's employee wellbeing, wellness, discrimination and whether they feel safe at work. These results are discussed with employee representatives and safety representatives, and they are included in action planning.

In the global employee survey 2023 there are minor differences between the gender. Overall 66% reports positive responses on employee wellbeing, and 78% recommends Mowi as a good place to work. 82% says that they are treated with respect as an individual, and 78% says that Mowi values and promotes employee diversity. The survey shows that Mowi continues to have only minor differences on questions relating to respect, wellbeing, and discrimination controlling for tenure or for gender.

However, based on feedback from female networks in Mowi, and feedback from seminars and meetings with employees above 55 years old, we do see the need to track and implement actions in order to create and maintain a good and safe working environment for all employees regardless of gender, age and similar. One example here is wardrobe facilities at our sites. For 2024 we have a target to establish a common standard for how our wardrobe facilities have to be in order to meet the needs and demands of all of our employees. The employee safety representatives will take a key role in this.

In order to increase gender equality and diversity in the workplace, we are working on different types of recruitment campaigns, and managers have been through training in non-discrimination and unconscious bias. This is an ongoing focus, and we have therefore included these trainings as mandatory for all managers and staff functions.

There is a limitation in data with regards to discrimination based on ethnicity and sexual orientation, but all complaints will be handled according to our procedure, and we are simultaneously working to create a safe and good working environment for all employees.



Areas	Background	Initiatives	Targets	Responsible	Status	Results
	Risk and barriers	Initiatives taken	Measuring success	Responsible for implementation		Results achieved?
Recruitment	Selecting candidates based on objective criterias.	<ul style="list-style-type: none"> <li>Implementing testing when recruiting.</li> <li>Training to avoid unconscious bias</li> <li>Policy, templates, and guidelines for recruitment process</li> </ul>	<p>Female applicants &gt;30%</p> <p>Increase diversity when selecting candidates for interviews.</p>	HR and local management	<p>Implementation done.</p> <p>Continuous work in progress</p>	<p>Target for 2025:</p> <p>Gender balance</p> <p>Female managers &gt;30%</p> <p>Female applicants &gt;30%</p>
Talent management	Talent mapping tools that enable managers to identify talents objectively	<ul style="list-style-type: none"> <li>Talent program</li> <li>Talent mapping</li> <li>Testing in selection</li> </ul>	Gender balance in talent mapping	HR and local management	<p>Implementation of program done.</p> <p>Mapping continuously in progress.</p>	<p>Target for 2025:</p> <p>Gender balance</p> <p>Female management &gt;30%</p>
Compensation and benefits	Salary structures based on job, not on person.	<ul style="list-style-type: none"> <li>Implementantion and use of Kornferry grades and jobs</li> <li>Implementing a structured job architecture</li> <li>Gender pay analysis for group</li> </ul>	<p>Gender pay equality</p> <p>Female managers &gt;30%</p>	HR and local management	<p>Implementation done.</p> <p>Continuous work in progress</p>	Work in progress, results of 2023 gender pay analysis will be followed up with local management
Healthy work environment		<ul style="list-style-type: none"> <li>Brainsafe – health and safety program based on cognitive approach, raising awareness, and taking your 50%</li> <li>Employee Survey</li> </ul>	<p>Absence &lt; 4%</p> <p>Rolling LTI &lt; 3.1</p> <p>Engagement &gt; high performing</p> <p>Retention &lt; industry average</p>	HR and local management	<p>Implementation of program and survey done.</p> <p>Safety is a continuous work in progress.</p> <p>Survey: results communicated, actions in progress</p>	<p>Absence: 4</p> <p>Engagement: 79%</p>
Harrassment Gender based violence		<ul style="list-style-type: none"> <li>Code of conduct training</li> <li>Policy implementation</li> <li>Communication</li> <li>Whistleblower policy</li> <li>Learning programs</li> <li>Audits</li> <li>Human Rights due diligence</li> </ul>	<p>Manadatory training</p> <p>Incidents reported</p>	HR and local management	Continous work in progress	