

MOWI[®]

Human Rights Due Diligence Report 2023



Reporting of Assessment Results

Supply Chain Due Diligence – Policy Statement

Introduction

The Transparency Act was put into force on July 1st 2022. The purpose of the act is to promote businesses' respect for basic human rights and decent working conditions and ensure the public's access to information.

The Transparency Act imposes a duty to conduct a due diligence assessment on human rights and working conditions. Information found in this assessment then needs to be made available in a report on the company's website or provided in response to requests for information.

The due diligence assessments must be carried out regularly and be in relation to the size of the business, the nature of the business, the context within which the business takes place, and the severity and likelihood of negative consequences concerning basic human rights and decent working conditions.



Mowi's commitment – Policy statement

Mowi's commitment

Mowi has been concerned with social sustainability for a long time. We have a strong focus on human rights and decent working conditions within our own company and our suppliers. In 2021 we initiated our own [human rights program](#). Mowi has measures in place to comply with the requirements of The Transparency Act and are working systematically to identify and mitigate any adverse impact our business has on human rights and decent working conditions. Mowi's Code of Conduct is also an important framework we use to secure compliance with the Transparency Act. There is still work to be done, however Mowi is committed to implement the processes of The Transparency Act and secure basic human rights and decent working conditions in its business operations.

Links to relevant elements of Mowi's human rights framework:

- [Code of Conduct](#)
- [Mowi Human Rights Policy](#)
- [Human Rights Program](#)

Human Rights Due Diligence – Policy Statement

Human Rights Due Diligence Process

Mowi is committed to our efforts to ensure human rights and decent working conditions in our supply chain and within our operations. We recognize however, that this is a continuous process.

Mowi's Human rights program aims to create a strong framework for ethical conduct with Human rights at the core. Through our Human Rights Due diligence process, we aim to identify, assess and respond to most significant risks and adverse impacts of our operation and supply chain. The Due Diligence process is based on industry best practice and is aligned with the OECD Due Diligence Guidance for responsible Business Conduct.

The Due diligence process is visualized in the figure below and describes the process of identifying, assessing and mitigating risk, as well as tracking and communicating results.

This process forms basis for the Supply chain due diligence we are performing in the Mowi Group.

Human Rights Due Diligence



Supplier Relationship Management System

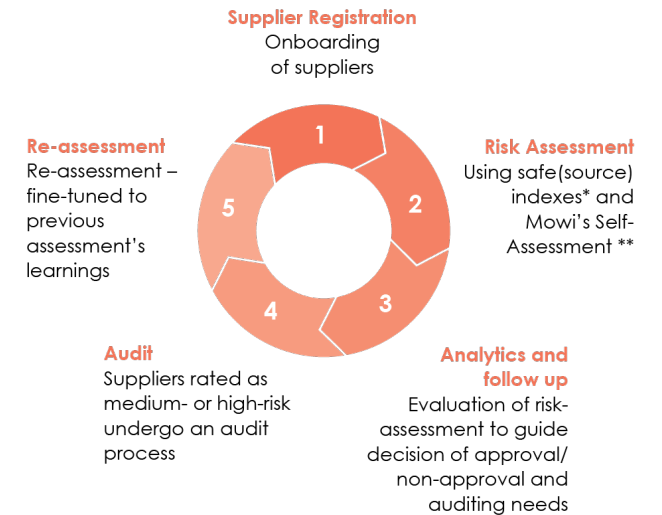
Human Rights Due Diligence and Implementation of the Transparency Act

A key part of the Human Rights Due Diligence process is performing risk assessments of our supply chain, concerning human rights and decent working conditions. To secure our ability to perform efficient risk assessments we utilize a partly automated system, analyzing several key factors.

All critical suppliers have to perform a self-assessment, based on principles underpinning the Mowi Code of Conduct. The self-assessment poses specific and detailed questions regarding, among other topics, human rights and decent working conditions.

All suppliers are assessed in this process and given a risk rating. Based on the rating we prioritize our efforts towards the relevant suppliers. Mowi has an internal governance system in place to evaluate and handle adverse impact and potential risks detected in the due diligence process. This helps ensure that we are able to implement appropriate measures and track both the process and the results.

Supplier Relationship Management Platform



* includes indexes on Human Rights (e.g. Human development Index), Labor Rights (e.g. Ratification of ILO's 8 Fundamental Conventions), Business Ethics & Anti-Corruption (e.g. Anti-corruption Index), Political Stability & Rule of Law (e.g. World-wide Governance Index), Environmental Performance (e.g. Water Risk Index), Economic Stability (e.g. Economic Volatility), Currency (e.g. Currency Volatility) and Tradability (e.g. Resolving Insolvency)

** includes surveys on topics related to management, quality management, supply chain, health & safety, human rights, business ethics and anti-corruption and environmental impact

Supply Chain Due Diligence Process

Global Risk Ratings of Mowi's Suppliers

- Mowi has implemented a standardised due diligence process for suppliers, which consist of 2 different Risk Assessments, the Country Assessment and the Mowi Risk Assessment.
- All suppliers are included in the Country Risk Assessment in the 2023 Due Diligence Process.
- The Mowi Risk Assessment was in 2023 used to assess the group defined as Critical Suppliers or suppliers with a high-risk profile on other indexes (such as human rights or labor rights)
- The split into the two categories of suppliers was done to enable a step wise implementation, follow-up and supplier engagement process.

Definition of a critical supplier:

- A critical supplier is defined as a supplier where there is a significant business risk, meaning a unique dependency where the supplier cannot be easily replaced and may lead to business disruption and/or highly impact customers. For critical suppliers a business continuity and disaster recovery plan is needed.



Results and Follow-up from Mowi's Supplier Due Diligence Process

- Based on the risk rating Mowi **prioritize the efforts** towards the relevant suppliers.
- Mowi has defined a **supplier engagement process** to follow up the results of the risk assessment.
- Adverse impacts and potential risks detected in the due diligence process are evaluated and handled in Mowi's **internal governance system**.
- Suppliers rated lower than «Good» (>75%) are followed up according to the agreed supplier engagement procedure in the relevant Business Unit.
- The risk assessment, evaluation and governance process ensures our ability to implement **appropriate measures**, and **track** both the process and the results.
- Going forward, Mowi aims to increase the number of suppliers to be assessed in the Mowi Risk Assessment



Supply Chain Due Diligence Process

Critical and non-critical suppliers 2023

Global Country Risk Ratings of Mowi's Suppliers

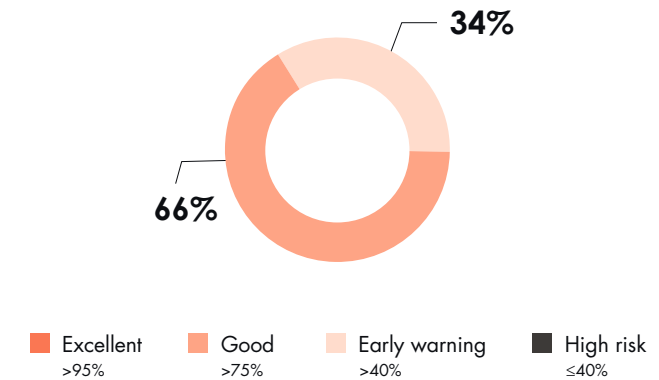
Risk Assessment Results

- All Mowis suppliers are risk assessed in the Country Risk Assessment.
- More than 65% of Mowis suppliers are rated «Good». (>75%)
- 34% of the suppliers are rated in "Early Warning" category.
- No suppliers are rated "Excellent".
- 0% of suppliers are rated "High Risk".

Follow Up

- Suppliers rated in the Early warning category are followed up according to the defined procedure in the relevant Business Unit.

All suppliers – Country risk rating



Follow-up Initiatives and Next Steps – Highlights

- Mowi aims to increase the total of suppliers assessed in the Mowi Risk Assessment, to ensure a comprehensive overview of the Human Rights risk in the supply chain.
- Mowi will include suppliers in high risk and early warning ratings in the defined supplier engagement process in the relevant business unit.
- Mowi will address the adverse impact risks seen in the high-risk areas of our Country Risk Assessment, through our defined steps of our Due Diligence process, including mitigation, remedy and tracking of progress.



Human, Labor and Health & Safety Risk Assessment

Supplier Human Rights Due Diligence Assessment – Introduction Highlights

Introduction

- All Mowi's suppliers are risk assessed on Human Rights in the Country Risk Assessment.
- All critical suppliers are risk assessed in the Mowi Risk Assessment.
- The Risk Assessments gives the suppliers a risk rating and place them in different risk categories.

Risk categories:

- Excellent: > 95%
- Good: > 75%
- Early Warning: > 40%
- High Risk: ≤ 40%

The Human Rights Due Diligence include elements of Risk Assessments on:

- Health and safety
- Labor rights
- Human rights



Supplier Human Rights Due Diligence Assessment – Results Highlights

Country Risk Assessment:

- 83% of Mowi's total suppliers are rated "Good" on Human rights (> 75%)
- 93% of Mowi's suppliers are rated "Good" (> 75%) or "Excellent" (>95%) on Labor Rights

Country Risk Assessment vs. Mowi Risk Assessment:

- The results of the Mowi Risk assessment in **high-risk countries** shows a significantly lower risk / reduction of risk compared with the Country Risk Assessment, in relation to Human Rights and Labor Rights .

Mowi Risk Assessment:

- 55% of Mowi's suppliers assessed on Human rights are rated "Good" on Human rights (> 75%)
- 79% of Mowi's suppliers on Labor Rights are rated "good" (> 75%) or "Excellent" (>95%) on Labor Rights

Adverse Impact Risk:

- High-risk ratings on **Human rights** are related to access to education, freedom of association and gender development.
- High-risk ratings on **Labor rights** are related to working hours and gender inequality.

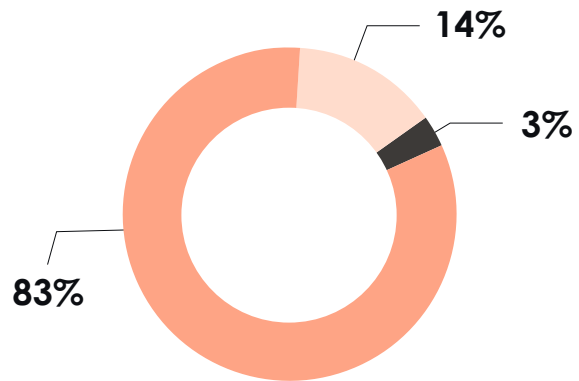
Follow-up Initiatives and Next Steps – Highlights

- Mowi aims to increase the total number of suppliers assessed in the Mowi Risk Assessment, to ensure a comprehensive overview of the Human Rights risk in the supply chain.
- Mowi will include suppliers in high risk and early warning ratings in the defined supplier engagement process in the relevant business unit.
- Mowi will address the adverse impact risks seen in the high-risk areas of our Country Risk Assessment, through our defined steps of our Due Diligence process, including mitigation, remedy and tracking of progress.

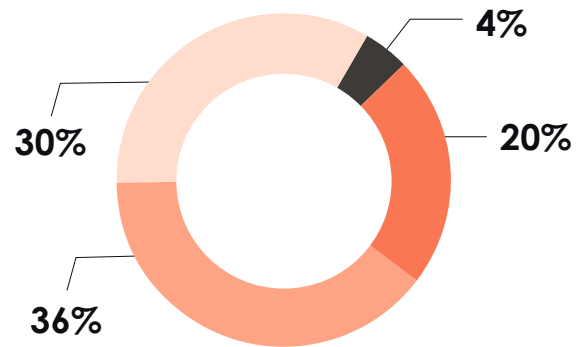


Human Rights Risk Assessment: Risk Rating of all Suppliers – In Categories

Country Risk Assessment
Human Rights risk in %



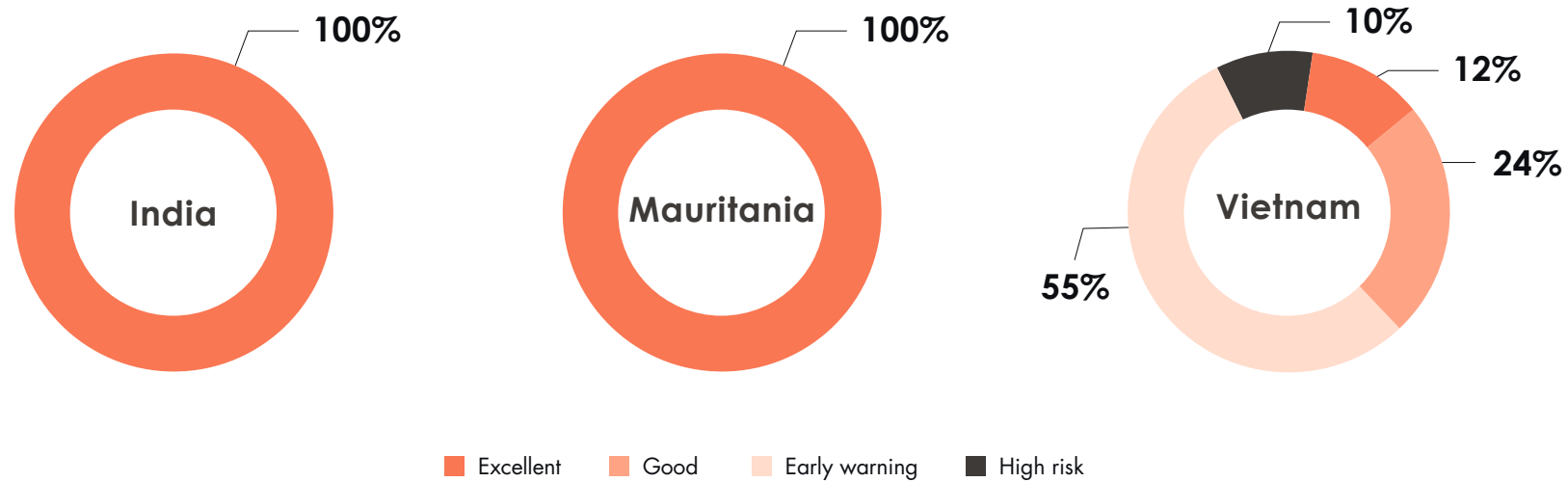
Mowi Risk Assessment
Human Rights risk in %



■ Excellent ■ Good ■ Early warning ■ High risk

100% of Mowi's suppliers are rated in a Country risk assessment. A total of 2.7% of all suppliers are rated in the Mowi Risk Assessment

Human Rights Risk Assessment: Risk Rating of suppliers in the identified high risk countries



100% of Mowi's suppliers are rated in a Country risk assessment. A total of 2.7% of all suppliers are rated in the Mowi Risk Assessment

Average Score on Human Rights Risk Assessment – High Risk Countries

Country Risk Assessment:

- 3 supplier countries have a high-risk rating on Human Rights Risk compliance (Score <40% or no rating available)
- The average rating on Human Rights is 32%.
- A total of 3% of our suppliers are located in countries with a high-risk rating.

Mowi Risk Assessment:

- All **critical suppliers** in the high-risk countries have been risk assessed in the Mowi risk assessment.
- The average rating on Human Rights is 79%.
- **The results from the Mowi Risk assessment shows a significantly lower risk than in the Country risk assessment on Human Rights compliance.**

100% of Mowi's suppliers are rated in a Country risk assessment. A total of 2.7% of all suppliers are rated in a Mowi Risk Assessment

Summary – Human Rights Due Diligence Details – High Risk Countries

Country Risk assessment – Human Rights:

- 3 supplier countries are classified as high risk countries on Human Rights based on the Country risk assessment.
- High-risk means a score below 40%.
- 3% of our suppliers are located in high risk countries in relation to human rights.
- The risks in high-risk countries are specifically related to access to education, freedom of association and gender development.

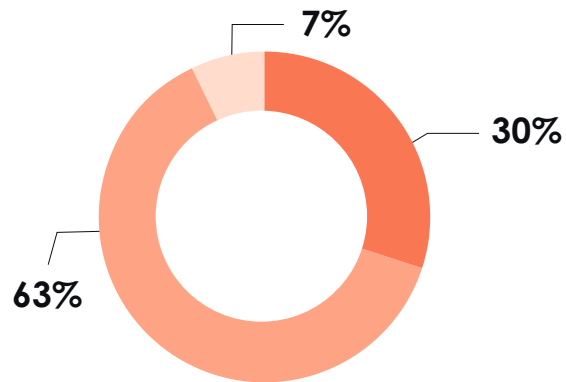
Mowi Risk assessment – Human Rights:

- 100% of Mowi's **critical** suppliers in high-risk Countries have been risk assessed in the Mowi risk assessment.
- A total of 3 % of **all suppliers** in high-risk countries have been risk assessed in the Mowi risk assessment in relation to Human Rights.
- The Mowi risk assessment completed by these suppliers shows an average score of 82% on Human Rights.
- The results from the Mowi Risk assessment shows a **significantly lower risk** than in the Country risk assessment.
- Mowi aims to increase the total number of suppliers in high-risk countries assessed in the Mowi Risk Assessment.

Labor Rights Risk Assessment: Risk Rating of all Suppliers in Categories

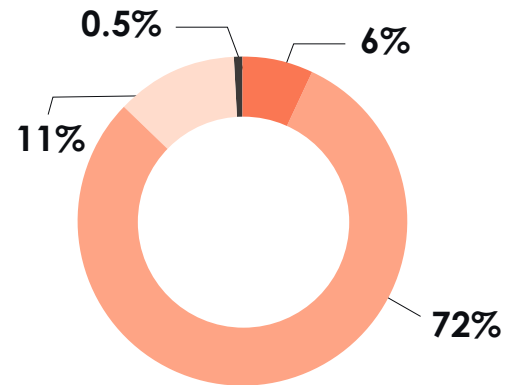
Country Risk Assessment

Labor Rights risk in %



Mowi Risk Assessment

Labor Rights risk in %



■ Excellent ■ Good ■ Early warning ■ High risk

100% of Mowi's suppliers are rated in a Country risk assessment. A total of 0,6% of all suppliers are reted in a Mowi Risk Assessment

Summary – Labor Rights Due Diligence Details – High Risk Countries

Country Risk assessment – Labor Rights:

- 100% of Mowi's Suppliers have been risk assessed on Labor Rights in the Country Risk Assessment.
- 0 of our supplier countries have a high-risk profile on Labor Rights in the Country Risk assessment.
- 0 of Mowi's suppliers are located in high-risk countries in relation to Labor Rights.
- A high-risk profile: a score below 40% / no rating available.

Mowi Risk assessment – Labor Rights:

- 100% of Mowi's **critical** suppliers have been risk assessed in the Mowi risk assessment including risk assessment in Labor Rights.
- The suppliers in high-risk countries that has been assessed in the the Mowi Risk Assessment, shows an average score of 82% (“Good”) on Labor Rights.
- Mowi aims to increase the number of suppliers in high-risk countries assessed by the Mowi Risk Assessment.

Average Score on Labor Rights Risk Assessment – High Risk Countries

Country Risk Assessment:

- 0 supplier countries have a high-risk profile on Labor Rights compliance. (score <40% or no rating available)
- A total of 0% of all our suppliers are in countries with a high-risk rating.
- Average rating on Labor Rights for all risk categories is 65%.

Mowi Risk Assessment:

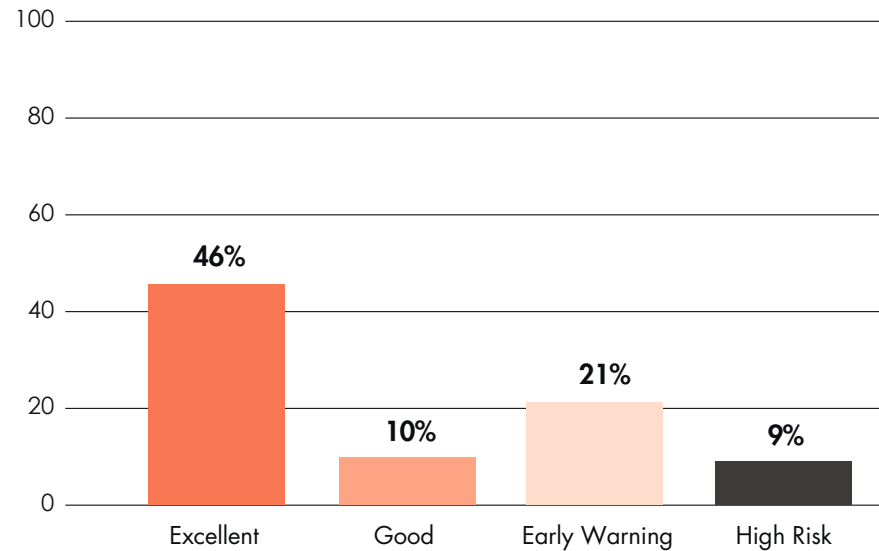
- 100% of the Critical suppliers in high-risk countries have been assessed in the Mowi risk assessment.
- Average rating on Labor Rights is 82%.
- **The results from the Mowi Risk assessment shows a significantly lower risk than in the Country risk assessment related to Labor Rights.**

100% of Mowi's suppliers are rated in a Country risk assessment. A total of 2.7% of all suppliers are rated in a Mowi Risk Assessment

Health and Safety Compliance

- All Critical suppliers have been risk assessed on Health and safety Compliance in the Mowi Risk Assessment*.
- The Country risk assessment does not include Health and safety risk rating elements.
- A total of 55% of the suppliers are rated “Excellent” (>95%) or “Good” (>75%) in the Mowi Risk assessment on Health and Safety Compliance.

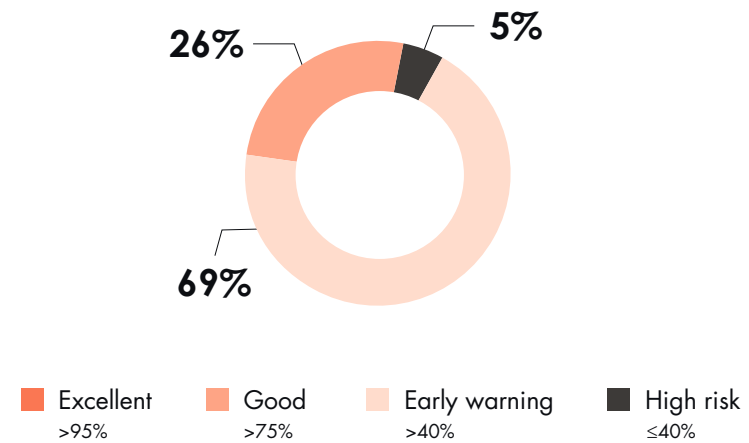
Mowi Suppliers Rating on Health & Safety Mowi Risk Assessment



Freedom of association Compliance

- All Critical suppliers have been risk assessed on the index freedom of association.
- 14 countries have a high risk score on the freedom of association index
- Below 5% of our suppliers are located within these 14 countries.
- A total of 69% of the suppliers are rated "Good" (>75%) in the Mowi Risk assessment on freedom of association compliance.

Suppliers' rating on country risk assessment All suppliers





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