Whistleblower Policy

1. Objective

Transparency and good communication throughout the organization promotes a better workplace culture in Mowi. Mowi acknowledges the risk of violations of Mowi Code of Conduct and depends on the employees' (and other stakeholders) willingness to raise concerns on such to uphold high ethical standards.

All employees have the right and responsibility to report concerns. All external stakeholders have the right and opportunity to report concerns. Anyone reporting concerns can do so without fear of reprisals, according to the Mowi Code of Conduct and legal requirements, cf. Norwegian Working Environment Act chapter 2A and EU Directive 2019/1937 on the protection of whistleblowers.

It is of utmost importance for Mowi to ensure predictability and confidence for all those who raise a concern.

The Policy provides information and guidelines on whistleblowing in Mowi. It further ensures predictability and confidence for those who want to speak up, by stating principles on how to proceed.

Whistleblowing is raising concerns about employees violating Code of Conduct (CoC), ethical standards or any law or regulation in the Mowi organisation.

Our end goal is a culture of openness and constructive leadership in dealing with whistleblower cases.

2. Risk and Opportunities

A whistleblowing channel can enhance ethical culture, enable early risk detection, empower employees and external stakeholders, and ensure regulatory compliance. However, there are also possible risks such as potential retaliation, false reports, legal exposure, and

confidentiality breaches. Strong adherence and follow up of whistleblower reports, handled according to policy will be important to mitigate risks.

3. Governance and Implementation

3.1 Roles and Responsibilities

All Line/Group Managers and Union Representatives shall guide employees, non-employees and external stakeholders who want to raise a concern or have questions about whistleblowing in Mowi.

They are responsible for acting properly and in accordance with law, regulations and Mowi's governing documents when receiving and managing whistleblower situations. This includes principles of anonymity, confidentiality, and protection against retaliation.

When receiving a report of concern, Line/Group Managers and Union Representatives shall handle such according to this Whistleblowing Policy and principles.

To increase the likelihood of identifying unethical behaviour, all managers shall work to facilitate a culture of openness and show constructive leadership in dealing with whistleblower cases.

3.2 Governance and Monitoring Process

It is the responsibility of the local managing director to ensure that the policy is implemented, and that the grievance mechanism is regularly discussed and consulted with relevant stakeholders.

4. Scope

The scope of Mowi`s Whistleblowing policy applies to all employees. This includes own employees (including third-party staff, internal and non-employees), workers in the value chain and management in the Mowi Group. This also includes the consolidated structure of Mowi or where Mowi is lead operator.

Our Whistleblower targets are relevant to a number of our stakeholders, including all employees, public policy officials (governmental bodies), local communities, investors, and suppliers.

5. Actions

5.1 How to Blow the Whistle

5.1.1 Reporting Channels

Reports of concerns can be made verbally or written. They can be addressed to a Manager, Next Level Approver, Union Representative, to Group Management, Human Resources or directly to Mowi's independent Whistleblower Channel (link).

5.1.2 Whistleblower Channel

The Whistleblower Channel may be relevant where reporting to Line Management is impossible or difficult, or where such reports have not been handled adequately.
Whistleblowers may seek advice from anyone he/she wishes.

The channel gives the whistleblower the possibility to make a report anonymously. When doing so, the whistleblower must be aware that the receiver may not give feedback on the case or ascertain whether the disclosure was made in good faith.

Furthermore, proper investigation may prove difficult if the information provided cannot be tested or verified. The investigator may then be unable to obtain further information from the whistleblower.

The whistleblower decides what information to be provided. To perform adequate follow-up actions, the reports should contain as much details as possible, including supporting evidence.

The Whistleblower Channel is managed by Pricewaterhouse Coopers (PwC).

5.1.3 Report

When receiving a Whistleblower report, PwC shall perform a risk assessment on whether to investigate or refer the issue to Group Director HR. He/she shall, in accordance with internal procedures, refer the matter to management for a decision.

5.1.4 Investigation

If investigation is required, this will be carried out by a provider selected by management. The provider will determine the investigation process and propose whether to engage external and/or internal resources.

In investigation cases the Board of Directors shall be informed without delay. Investigations shall be fair, open, and objective. Focus shall be on facts and appropriate follow-up.

Investigations shall be initiated within 7 days of the receipt of the report. It should be completed within 28 days unless the extent and complexity require longer investigation.

5.1.5 Logging and Reporting in the Whistleblower Channel

When Management, Union Representative, Group Management or Human Resources receive a report, the receiver shall immediately log the issue in the Whistleblower Channel.
Depending on the content, it shall be logged either as an issue of information or as a Whistleblower issue to be followed up in accordance with the procedure.

Group Director HR and the Audit Committee shall receive a quarterly summary report from PwC. The report shall include category, geographical location and performed follow-up actions of all issues reported. If applicable, the report shall be forwarded to the relevant local management.

5.2 Handling Principles

5.2.1 Procedures

Mowi has implemented procedures for the handling of reports of concern. The procedures pay respect to both the whistleblower and to the individuals who is the subject of the report.

Mowi's basic principles for the handling of reports are:

- All reports are taken seriously
- Fair, open and objective follow-up
- Protection of anonymous whistleblowers
- Confidentiality and information security
- Whistleblowers in good faith will not be subject to reprisals
- Non-anonymous whistleblowers will get timely feedback and information about the process

5.2.2 Protection Against Retaliation

Whistleblowers who report in good faith will not face any retaliation or unfavourable treatment, even if they are mistaken. A whistleblower that nevertheless experiences reprisals is urged to report this to Line Management, Group Director HR, and/or the Whistleblower Channel as soon as possible.

Disciplinary action can be taken against any employee who is found to have made a disclosure maliciously that they know to be untrue.

5.2.3 Confidentiality

All reports of concern and information related shall be treated confidentially. All personnel shall maintain confidentiality about all information received.

All investigations will be conducted confidentially. The information will be disclosed only as needed to facilitate review of the investigation or otherwise as required by law.

5.2.4 Protection of Sources

The identity of the whistleblower shall not be disclosed unless permission in writing has been obtained from the reporting party. The protection of identity shall be taken into consideration during the initial evaluation and the subsequent risk assessment.

This includes when scoping the investigation and the risk exposure without disclosing the notifying party.

5.2.5 Personal Data

Handling of reports of concern will be done in accordance with the Norwegian Personal Data Act, General Data Protection Regulation and, Regulations on the Processing of Personal Data.

5.2.6 Complaining

The whistleblower and the individual(s) the concern refers to, may file a written complaint on the process and treatment they have received during the proceedings. Only issues regarding receiving and handling of notifications will be regarded. The complaint shall be sent to Group Director HR and processed by him/her

6. Targets and KPI`s

Targets	KPIs
• No breach of human rights principles or policy identified. • 100% of all cases are investigated and handled in compliance with policy	• Number of breaches related to human rights principles or policy identified • Number of all cases investigated and handled in compliance with policy

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Appendix

Definitions

Whistleblowing

Whistleblowing is to speak up about concerns of possible illegal actions or violations of Mowi`s Code of Conduct. This definition also includes any laws and regulations applicable in Norway and countries where Mowi operates.

It also includes violations of ethical commitments included in the Code of Conduct in areas like environment, human and labour rights, equality and diversity, health and safety, business ethics, anticorruption, conflict of interest and professional behaviour.

Violations include, but are not limited to:

- Suspicion of fraud, corruption, and accounting offenses
- Error reporting or manipulation of information
- Harassment or bullying, discrimination and racism, poor working environment
- Damage to the environment