

## **BENCHMARK GENETICS NORWAY – TRANSPARENCY ACT STATEMENT**

Benchmark Genetics Norway (the “Company”) organisation and activities are described on our website: <https://www.bmkgenetics.com/services/genetic-services/norway>.

The Company is part of the Benchmark Holdings Group (the “Group”).

The Group has general requirements for human and labour rights in the following policy documents:

- Employee Code of Conduct
- Supplier Code of Conduct
- Modern Slavery Policy
- Health, Safety and Environment Statement

The policies can be found on the Group’s ESG centre located here: <https://www.benchmarkplc.com/sustainability/esg-download-centre/>.

The Group is extremely committed to supporting and respecting human rights and decent working conditions within its supply chain. The Group carry out targeted risk assessments to uncover possible violations of human and labour rights at our suppliers. We use the insights gained from these assessments to prevent and mitigate conditions that may have a negative impact on human and labour rights.

Since human and labour rights are integrated into the Group’s management and control system, it commits the entire Group and all employees, across all units and countries.

### **1. RELATIONSHIPS WITH OUR EMPLOYEES**

#### **FREEDOM OF ASSOCIATION**

All our employees have complete freedom to organise themselves in trade unions, and the trade unions have free access to recruit members among our employees. We will ensure that employees are not discriminated against for this freedom.

#### **HEALTH AND SAFETY**

We are committed to a working environment where health and safety is paramount in everything we do. Every employee has the right to go home unharmed and every one of us is responsible for ensuring that we do.

To that end, we ask every employee to sign up to our commitment to health and safety as follows:

- Nothing is more important than health and safety
- Nothing we do is worth being hurt for
- Nothing is so important we cannot take time to do it safely
- We will never witness an unsafe act or condition without taking action
- Working environment issues are checked in line with applicable laws and the Working Environment Act.

#### **EQUALITY AND DIVERSITY**

Research provides compelling evidence that diversity unlocks innovation and we strive to attract a diverse workforce and provide equal opportunities throughout the business. We aim to conduct our activities without discrimination and value everyone as an individual which is embodied through a dignity and diversity policy with respect to our employees. We aim to offer a competitive package of benefits that support and protect our people, that are valued by our employees and which are appropriate to our local markets.

## 2. RELATIONSHIPS WITH OUR SUPPLIERS

As noted above, the Group has recently introduced a Supplier Code of Conduct which outlines the integrity standards we expect our business partners to uphold. This is available on our website at the location above and is being communicated to our suppliers along with a due diligence questionnaire using a risk-based diligence approach: based on the product and geographical location of suppliers, we have sought to categorise and identify higher human rights and geopolitical risk suppliers in need of prioritised / enhanced diligence.

The Company buys services and goods from our suppliers. The Company's suppliers are mainly divided into three groups:

1. **Purchase of goods;** mainly consisting of salmon eggs, plant and machinery, fish feed, oxygen, and other production costs for our smolt facility at Lønningdal. Also, IT equipment and office furniture are part of goods purchased.
2. **Purchase of services;** mainly laboratory and fish health services, professional and legal services, marketing services and insurance.
3. **(Office) rentals and property licenses** are also part of our "suppliers chain"

### RESULTS OF OUR FOLLOW-UP OF SUPPLIERS IN 2022 / 2023 TO DATE:

The Group has a sanctions policy in existence which ensures that relevant suppliers are screened against sanctions and watchlists using a recognised compliance database.

The Company has, in addition, mapped the geographical locations of its suppliers and confirmed that none of its suppliers were located in a top 10 high risk geographical location pursuant to the 2022 ITUC Global Rights Index.


The Group is continuing its roll out of the Group's Supplier Code of Conduct and due diligence questionnaire, with a view to advancing the Group's human rights due diligence efforts and increasing the sustainability performance and visibility of our suppliers, with review of responses to the Supplier Code of Conduct also in process.

### COMMITMENTS IN FY23

- We are in the process of categorising our suppliers as high, medium or low risk based on risk criteria such as country, industry, product and known events. Furthermore, we have initially prioritised the suppliers we believe have the highest risk, and will be subject to a more thorough investigation in 2023.
- We are in the process of communicating our Supplier Code of Conduct and diligence questionnaire to our suppliers on a risk-based prioritisation as noted above, and continue to follow up with suppliers to ensure completion and visibility.
- No suppliers have so far been excluded as a result of screening, but we are continuing to monitor our suppliers based on risk prioritization and will set mitigating actions as we consider appropriate based on the findings of our ongoing diligence actions.

- In accordance with the provisions on due diligence in the Transparency Act, we have also started mapping and assessing the materiality and risk of our operations having a negative impact on fundamental human rights and decent working conditions in our supply chain.
- We will also work to improve our routines for monitoring suppliers' handling of human and labour rights, and for environmental impact.

This statement was approved and signed on behalf of the Company in June 2023.

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Geir Olav Melingen (Jun 26, 2023 06:38 EDT)

Geir Olav Melingen, CEO

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Trond Williksen, Chairman

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Jonathan Crowther, Director

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Septima Maguire (Jun 26, 2023 16:21 GMT+1)

Septima Maguire, Director