

BENCHMARK GENETICS NORWAY AS & BENCHMARK GENETICS SALTEN AS – TRANSPARENCY ACT STATEMENT

Benchmark Genetics Norway AS and Benchmark Genetics Salten AS (the “Company”)
organisations and activities are described on our website:

<https://www.bmkgenetics.com/>

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

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

The Company is extremely committed to supporting and respecting human rights and decent working conditions within its supply chain. The Company 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 Company’s management and control system, it commits the entire Company 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.

TRAINING AND AWARENESS

The Company promotes openness, accountability, and respect for human rights. By supporting all employees with training in our policies, we encourage awareness and empower our employees to identify and address risks. Through our Modern Slavery policy and training we encourage employees to recognise and identify any human rights violations such as slavery, child labour, forced labour or poor working conditions. This applies within the Company environment and also within our external procurement and supply chain. The employees are also supported to understand their Whistleblowing Policy and rights, ensuring they feel confident and secure with reporting any violations without concerns over their employment or retaliation.

2. RELATIONSHIPS WITH OUR SUPPLIERS

The Company's Supplier Code of Conduct outlines the integrity standards we expect our business partners to uphold. This is available on our website at the location above and has been communicated to our suppliers along with a due diligence questionnaire/ self-assessment form. Using a risk-based approach, the Company considers 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 is committed to working with suppliers who share our standards with regards to human rights, working conditions, environmental stewardship, and business integrity. Company's suppliers are 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"

ONGOING DUE DILIGENCE OF OUR SUPPLY CHAIN:

The Company 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 2024 ITUC Global Rights Index.

COMMITMENTS AND STRATEGY IN FY25

- The Company categorises the suppliers based on their self-assessment response to the Supplier Code of Conduct questionnaire and determine whether they are a high,

medium or low risk based on risk criteria. This is based on location, industry, product and known events. Any individual supplier that has been identified as high risk is required to undertake a more thorough based investigation.

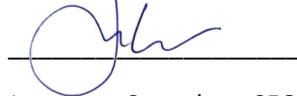
- No suppliers have so far been excluded as a result of screening, but we are continuing to monitor our suppliers based on risk prioritization and will set mitigating actions as we consider appropriate based on the findings of our ongoing diligence actions.
- Our focus within the supply chain continues to monitor regulations and ensure that suppliers and sub-contractors meet the requirements.
- In accordance with the provisions on due diligence in the Transparency Act, we map and assess the materiality and risk of our operations having a negative impact on fundamental human rights and decent working conditions in our supply chain.
- We are committed to training our employees on a regular basis to ensure awareness on how to spot modern slavery in the workplace and encourage employees to actively check on suppliers as they are being onboarded through KYC.

We continue to work to improve our routines for monitoring suppliers' handling of human and labour rights, and for environmental impact.

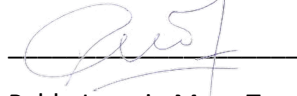
This statement was approved and signed on behalf of the Company in June 2025.



Geir Olav Melingen, CEO



Jonathan Crowther, CFO



Pablo Ignacio Mazo Traversi, GM