



## Due Diligence Statement for 2025 Statement by the Board of Directors

# Transparency Act (Åpenhetsloven)

This statement describes how Scale Aquaculture Group AS ("ScaleAQ") has carried out due diligence assessments in accordance with the Norwegian Transparency Act (Åpenhetsloven) during 2025.

The purpose of the Transparency Act is to promote enterprises' respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services, and to ensure public access to information on

how enterprises address actual and potential adverse impacts in their value chains.

ScaleAQ is subject to the Transparency Act based on the statutory thresholds related to revenue, balance sheet total and number of employees. The Board of Directors has reviewed and approved this statement, which is published on the Group's website.

## Introduction

The Transparency Act entered into force on 1 July 2022 and applies to larger enterprises domiciled in Norway that offer goods and services both domestically and internationally. ScaleAQ operates globally through a diverse supplier base supporting marine operations, equipment manufacturing, logistics and technical services.

This statement describes:

- ▶ ScaleAQ's organization, policies and governance related to human rights and working conditions
- ▶ How due diligence is carried out in the value chain
- ▶ Key findings from supplier follow up activities in 2025, including identified risk areas
- ▶ Measures implemented and priorities going forward

## Executive summary

### No material changes in risk profile – no severe breaches

ScaleAQ's due diligence work in 2025 confirms a stable overall risk picture compared to previous years, with no identified severe or systemic violations of fundamental human rights or decent working conditions among assessed suppliers. Therefore overall, the company considers that the current organizational setup, combining contractual requirements, more audits, local presence, and the use of on-site inspectors provides a solid basis for identifying, preventing, and addressing risks related to human rights and decent working conditions in the supply chain.

### Clear and known key risks

The most material risks and main findings are:

- ▶ Limited transparency and follow-up beyond first-tier suppliers. Some suppliers demonstrate lower awareness of due diligence expectations towards their own suppliers (i.e our sub-suppliers)

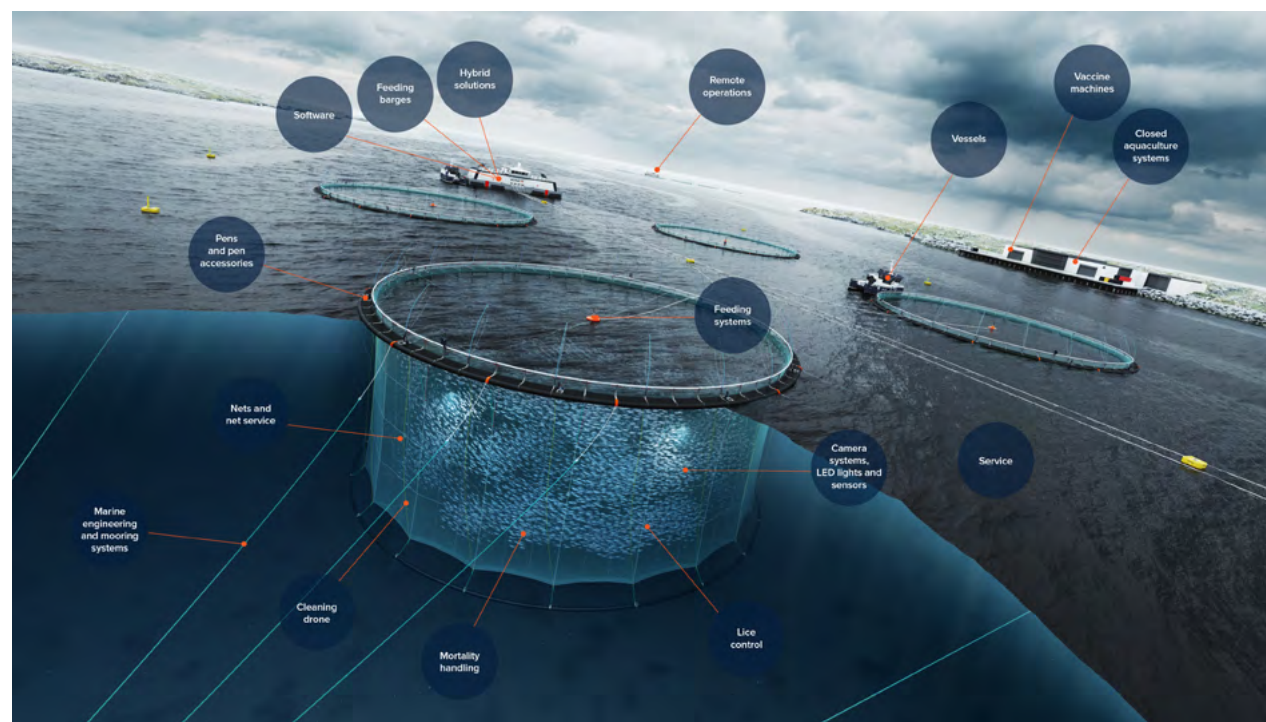


Figure: Overview of our product segments

## Supplier management:

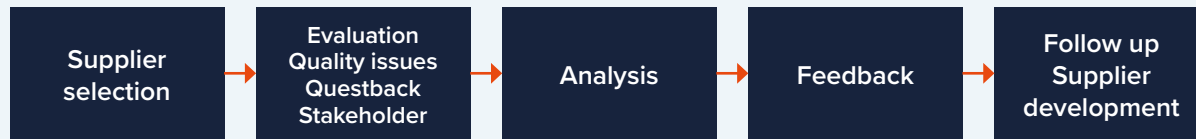


Figure: Supplier management process

- ▶ Various and some weaknesses in HSE practices
- ▶ Absence or weak implementation of formal policies and mechanisms for reporting of serious breaches
- ▶ Environmental management, including emissions measurement and target setting, remains limited among many suppliers

### 2025 measures have strengthened follow-up

Supplier follow-up has been improved through a more targeted model, increased on-site verification (particularly in Asia) combined with a shift towards regular dialogue rather than annual questionnaires.

Updated supplier pre-qualification tools (Supplier Audit Form and Factory Audit Form) incorporating Transparency Act requirements for the Vessel division improves the consistency of how fundamental human rights, decent working conditions, HSE and business ethics are assessed for new supplier approvals.

### Way forward

- ▶ Risk-based audits and follow-up: Continued focus on higher-risk suppliers through audits and on-site verification to ensure conditions and corrective actions.

- ▶ Stronger requirements and consistency: Clearer expectations in the Supplier Code of Conduct and better alignment of audit tools and processes across divisions.
- ▶ Improved input: Strengthening reporting mechanisms of serious breaches and using stakeholder input more systematically to improve due diligence.
- ▶ Enhanced supplier engagement and tools: Ongoing dialogue, focus on environmental impacts where relevant, and continuous improvement of digital and analytical support tools.

## Organisation and internal guidelines

### ScaleAQ's Own Operations

ScaleAQ is a global supplier of technical solutions to the aquaculture industry. The Group's operations involve design, engineering, production, production follow-up, marine operations and project execution, supported by an international supplier base.

Fundamental human rights, decent working conditions, and health and safety are integral parts of ScaleAQ's operational culture and are addressed through:

- ▶ Established HSEQ systems
- ▶ Internal audits
- ▶ Employee engagement and competence development
- ▶ Close operational presence at supplier sites (dedicated local rigs, inspectors and project managers)
- ▶ Contractual requirements that are increasingly standardized across the supplier base

### On a positive note:

Employee working conditions within ScaleAQ are monitored through an annual employee survey.

The most recent survey (November–December 2025) achieved an 81% response rate across 585 employees in Norway, with an average Group score of 4.19 out of 5, reflecting a positive and improving trend over the last three years.

In 2025, ScaleAQ provided support to employees and partners affected by flooding in Vietnam, reflecting the Group's commitment to responsible business conduct beyond contractual obligations.

### On the negative side:

In 2025, we see an overall increase for ScaleAQ Group in the number of recordable injuries from 28 in 2024 to 38 in 2025 (26% increase) and subsequently an overall increase of approximately 20% of the global Total Recordable Injury Frequency (TRIF). Even if we see a large disparity in the number of incidents as per location and businesses, our commitment to an injury-free working environment remains strong and actions have been defined and implemented.

### Internal Policies, Guidelines and Tools

ScaleAQ's commitment to human rights and decent working conditions is anchored in:

- ▶ Group Code of Conduct

- ▶ Supplier Code of Conduct
- ▶ HSEQ Policy
- ▶ Procurement and supplier follow-up procedures
- ▶ Whistleblowing procedures and reporting channels, including channels that may be used by external stakeholders

Responsibility for supplier follow-up is clearly assigned:

- ▶ The Operations organization holds overall responsibility for supplier agreements and requirements, while Supply Chain and Project functions are designated as key responsible functions
- ▶ Project managers, technical personnel and local inspectors play a key role in operational follow-up
- ▶ ESG, HSEQ and quality functions support risk assessments and audits

## Methodology – Due diligence process

### Scope and Risk-Based Prioritisation

ScaleAQ conducts due diligence in accordance with the Norwegian Transparency Act, the OECD Due Diligence Guidelines for Responsible Business Conduct, and international human rights and labour standards.

Findings from previous years were followed up in 2025 through supplier engagement, including questionnaires, meetings, audits and operational follow-up. Identified issues are addressed directly with suppliers, while broader improvement themes are discussed on a regular basis.

In general, due diligence assessments are subject to limitations, including access to information, data quality, geographic distance and limited visibility beyond first-tier suppliers. These constraints are reflected in prioritization and follow-up efforts.

In 2025, assessments focused primarily on few chosen suppliers. Particular attention and priority were given to supplier combining engagement in seabased operations

and industrial manufacturing, geographic risk factors, and potentially lower system maturity.

### Supplier Selection and Prequalification

All new suppliers related to the Vessel division are subject to prequalification using updated Supplier Audit Form (SAF) and Factory Audit Form (FAF) templates, which include requirements related to:

#### Human rights

- ▶ Working conditions.
- ▶ Health and safety.
- ▶ Ethical business conduct.

In 2025, no new suppliers were assessed as materially significant compared to the previous year.

#### Supplier Follow-Up and Audits

ScaleAQ applies a combination of tools to supplier follow-up:

- ▶ Physical site visits and inspections.
- ▶ Risk-based audits.
- ▶ Checklists and operational observations.
- ▶ Continuous dialogue through projects and operational cooperation.
- ▶ Supplier management programs.

A key strength in ScaleAQ's approach is the physical presence of project managers, technical personnel and local inspection resources at supplier sites, particularly in Asia. This provides early identification of potential issues and supports continuous improvement.

### Findings – Supply chain

As part of its due diligence work, ScaleAQ gathers input on human rights and decent working conditions through established dialogue channels with employees, managers, safety representatives and operational personnel. In

supplier follow-up, information is also obtained through site visits, engagement with supplier representatives and local inspection resources, as well as through whistleblowing and escalation channels. ScaleAQ recognises the need to further strengthen stakeholder involvement, particularly through more systematic inclusion of workers and affected groups in higher-risk parts of the value chain. The Group is also assessing how digital tools, including AI-enabled solutions, can support supplier follow-up, but so far practical limitations have been identified, particularly in parts of Asia, which may reduce the cost-benefit value of such systems.

ScaleAQ continues to grow, increasing the number of suppliers. To ensure effective oversight, measures are being implemented to strengthen approval processes for new suppliers and reduce the total number of suppliers where appropriate.

#### Supplier Follow-Up and Coverage

Over the last five years, information has been collected from nearly 200 suppliers representing more than 95% of the companies spend. Consequently, ScaleAQ did not conduct a broad annual survey this year. Instead, supplier follow-up was prioritised based on risk, materiality and operational relevance, providing more current and decision-useful information. ScaleAQ acknowledges that limited direct assessments do not eliminate risks further down the value chain. The 2025 approach has therefore focused on using first-tier supplier follow-up to identify where deeper supply chain assessments are needed, particularly in higher-risk geographies, industrial production environments and supplier categories with lower system maturity.

#### In 2025

Based on supplier follow-up activities conducted in 2025, ScaleAQ assessed a total of 18 selected suppliers, of which 15 provided responses (83%), supplemented by information obtained through audits, site visits and contractual follow-up. The assessments did not identify any

cases of severe or systematic violations of fundamental human rights or decent working conditions among the suppliers assessed (all responding suppliers achieved 88–100% overall satisfactory results).

However, the due diligence process identified a number of less severe actual findings and recurring improvement needs:

- ▶ 5 of 15 suppliers (33%) lacked complete or sufficiently formalised policies related to human rights, labour standards or HSE
- ▶ 4 of 15 suppliers (27%) showed gaps in documentation or record keeping related to working hours, overtime or HSE routines
- ▶ 3 of 15 suppliers (20%) demonstrated inconsistent implementation of personal protective equipment (PPE) or local safety practices
- ▶ 4 of 15 suppliers (27%) had limited availability or awareness of whistleblowing and mechanism for reporting of serious breaches for workers

The assessments further confirmed structural risk areas related to the broader value chain:

- ▶ 6 of 15 suppliers (40%) demonstrated limited due diligence processes towards their own sub-suppliers
- ▶ Only 3 suppliers (20%) were able to provide structured information about how risks are identified and followed up beyond first-tier level

These findings indicate that while the direct supplier base generally shows satisfactory performance, risk exposure is higher further down the supply chain, particularly in relation to transparency, traceability and supplier maturity.

### Health and Safety Observations

Health and safety conditions are generally satisfactory and consistent with previous years. At the same time, supplier follow-up in 2025 identified some recurring improvement needs linked to practical implementation

and documentation, rather than fundamental absence of HSE systems. Observations included variations in the use of personal protective equipment, differing quality of local routines and records, and a need for clearer and more consistent follow-up in some operational environments. These issues were handled through operational dialogue, on-site observations and requests for corrective improvement.

Observations confirm:

- ▶ Adequate facilities and compliance with local wage regulations.
- ▶ Variations in use of personal protective equipment, a challenge observed across regions and industries.

### Anti-Corruption and Business Ethics

No confirmed corruption or bribery incidents were identified. A previously reported case was clarified as a misunderstanding and closed without further action.

No suppliers were identified as sanctioned or listed by international sanction regimes.

### Environment

This statement focuses on fundamental human rights and decent working conditions under the Transparency Act. ScaleAQ nevertheless monitors certain environmental factors as part of broader supplier follow-up, particularly where such conditions may affect workers, local communities or other aspects of responsible business conduct.

- ▶ Most suppliers do not yet measure greenhouse gas emissions in a systematic manner.
- ▶ Few suppliers have established formal emission reduction targets.
- ▶ Environmental certifications are present among some suppliers, but overall maturity remains uneven.
- ▶ These observations do not in themselves constitute findings under the core scope of the Transparency Act

but may be relevant where environmental conditions are linked to impacts on people or working conditions.

### Overall assessment

No material adverse impacts requiring remediation were identified in 2025. No cases of child labour forced labour or other severe infringements were detected.

Some less severe findings were identified, including gaps in policies, documentation and awareness of reporting mechanisms. These will be addressed through supplier dialogue and follow-up in 2026.

ScaleAQ assesses therefore the overall risk level as manageable but requiring continued risk-based follow-up. Due diligence is supported by governance structures, contractual requirements and audits, although effectiveness depends on consistent implementation.

Key risk areas include:

- ▶ limited visibility beyond our suppliers (i.e sub-suppliers)
- ▶ varying health and safety practices
- ▶ weaknesses in policies, reporting and management systems

### Measures implemented and way forward

The measures prioritised for 2026 are intended to address the main material risks identified in 2025.

- ▶ Continued risk-based audits and on-site follow-up, particularly in higher-risk geographies and supplier categories, to verify working conditions and identify corrective actions.
- ▶ Further alignment of audit structures, questionnaires, and follow-up routines across divisions to improve comparability, consistency and documentation.
- ▶ Clearer expectations in the Supplier Code of Conduct regarding fundamental human rights, decent working conditions, and suppliers' due diligence in their own

supply chains, including stronger expectations that first-tier suppliers identify relevant sub-suppliers and can explain how they follow up material risks in their own supplier networks.

- ▶ Follow-up with selected suppliers on whistleblowing, mechanisms for serious breaches and escalation procedures to strengthen reporting channels and improve handling of concerns, including better communication of available channels to workers and other relevant stakeholder groups where appropriate.
- ▶ More systematic use of stakeholder input relevant to working conditions and fundamental human rights, including experience from employees, safety representatives, operational follow-up, supplier dialogue and other available channels, in order to improve the quality of future due diligence assessments and prioritisation.

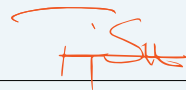
- ▶ Targeted dialogue with suppliers on environmental conditions where these may affect people, working conditions, local communities or other aspects of responsible business conduct.
- ▶ Continuous improvement of digital and analytical support tools, where they add value.

### Information requests

In accordance with the Norwegian Transparency Act, the public may request information about how ScaleAQ addresses actual and potential adverse impacts on fundamental human rights and decent working conditions. Such requests are handled in line with the Group's internal procedures for information requests under the Act and made available upon request at [apenhet@scaleaq.com](mailto:apenhet@scaleaq.com).

Kverva, 12<sup>th</sup> of June, 2026

The Board of Directors and  
CEO of Scale Aquaculture Group AS



Torgeir Johan Svae  
*Chair of the Board*




Geir Furberg  
*Member of the Board*



Mads Andersen  
*Member of the Board*



Morten Kristoffer Nordstad  
*Member of the Board*



Tor Jakob Ramsøy  
*Member of the Board*



Trine Lotherington Danielsen  
*Member of the Board*



Kjerstin Kleyne Braaten  
*Member of the Board*



Audun S. Fjeldvær  
*CEO, ScaleAQ Group*