



The Transparency Act

Statement on Due Diligence Assessments for AquaGen AS

Introduction

On 1 July 2022, the Norwegian Transparency Act came into force, aiming to promote respect for fundamental human rights and decent working conditions in the production of goods and provision of services. The Act also seeks to ensure public access to information on how companies address potential negative impacts on human rights and working conditions.

The Act applies to large enterprises based in Norway offering goods and services domestically and internationally. AquaGen AS falls within the scope of the Act based on revenue, balance sheet, and number of employees. Below is our statement on due diligence assessments conducted during the period 01.07.2024 to 30.06.2025.

This statement is available at www.aquagen.no.

Organisation, Operations, Routines and Guidelines

Area of Operations

AquaGen AS is a research-oriented breeding company that develops, produces, and supplies genetic starter material for salmonids to the global aquaculture industry. The company's operations are based on more than 50 years of targeted breeding using material collected from over 40 rivers. The primary product is fertilised eggs. Secondary products include juveniles and harvested fish resulting from the breeding programme.

AquaGen AS is the parent company of the AquaGen Group, headquartered in Trondheim. In Norway, we have around 180 employees across production sites in Heim, Tingvoll, Ørsta and Steigen municipalities, as well as parts of our R&D department in Ås. Our Scottish operations are run through the subsidiary AquaGen Scotland Ltd, with approximately 15 employees in Stirling and Dumfries. Our Chilean operations are handled by AquaGen Chile SA, with about 150 employees in Puerto Varas and six production sites. Through the subsidiary AquaSearch Ova Aps, AquaGen also produces and sells rainbow trout eggs in Denmark. AquaGen AS is wholly owned by the German company EW Group GmbH.

AquaGen Norway is organised into management and departments for production, R&D, sales and marketing, finance, supply chain, HR, and business support.

This statement concerns AquaGen's Norwegian operations (hereafter referred to as AquaGen) for the 2024/25 financial year (our financial year runs from 1 July to 30 June).

Organisation and Responsibility

AquaGen systematically strives to be an attractive and safe workplace, and to ensure sound social practices throughout our value chain. Our work is anchored in our sustainability policy, declaration on good social practices, GLOBALG.A.P. certification, and processes within our management system:

- Management:
 - Process: Stakeholder management (especially relevant for suppliers)
 - Certification: GLOBALG.A.P. (Global Good Agricultural Practice)



- Procedure: Supplier assessment and management
 - Procedure: Due diligence – social practices of suppliers
 - Tool: Qualitative assessment of supplier criticality and risk
 - Contracts and/or other agreements with suppliers and partners
- HR og HSE:
 - Process: HR
 - Handbook: Personnel
 - Process: HSE
 - Procedure: Whistleblowing
 - Deviation system
- Corporate Responsibility and Sustainability:
 - Policy: Sustainability in AquaGen
 - Declaration: Good social practices

The CEO has overall responsibility for the due diligence procedure, while department directors are responsible for assessments of suppliers in their departments. The Head of External Relations and Sustainability compiles the assessments.

Our declaration on good social practices and GLOBALG.A.P. certificate are available at www.aquagen.no.

Routines and Guidelines

GLOBALG.A.P. is an international standard addressing food safety, environmental protection, fish welfare, and employee health, safety, and welfare (GLOBALG.A.P Risk Assessment on Social Practice – GRASP). AquaGen's critical suppliers are regularly audited as part of this certification.

The procedure on supplier assessment and management outlines how AquaGen continuously evaluates the criticality and risks associated with suppliers and partners. The due diligence procedure on social practices describes how AquaGen conducts assessments to identify, prevent, and mitigate negative impacts on human rights and working conditions.

Examples of risks evaluated include forced and child labour, discrimination and harassment, hazardous work conditions, forced overtime, low wages, health and safety issues, denial of union rights, and environmental pollution.

AquaGen conducts preliminary assessments based on:

1. Risk related to goods/services according to the Norwegian Agency for Public and Financial Management's high-risk list
2. Whether the supplier/partner is on the Oil Fund's exclusion list
3. Whether the supplier/partner is a UN Global Compact member or follows similar standards
4. Whether they hold a GLOBALG.A.P. certificate or a compliance letter from an accredited body
5. Other indicators of potential breaches of human and/or labour rights



Results of Due Diligence Assessments in 2024/25

During the 2024/25 financial year, AquaGen used 926 suppliers of goods and services. We distinguished between suppliers of critical goods/services essential to our production, and providers of support services such as facilities, catering, cleaning, auditing, etc.

The former category included 46 suppliers delivering equipment and services within IT, land- and sea-based fish production, transport, lab analysis, HR, HSE, accounting, and research, as well as partners responsible for contingency fish production. All 46 suppliers had recurring sales to AquaGen and underwent criticality and risk assessments. Most (approx. 90%) operated in Norway and complied with Norwegian laws.

None of these 46 suppliers were initially assessed as high risk, though 7 were medium risk – mainly linked to purchases of electronics.

Measures Implemented or Planned, and Results

Implemented and planned measures to follow up on our impact on human rights and decent working conditions:

Responsibility Area	Description and Outcome	Responsible Part
Regular audits of critical suppliers	As part of AquaGen's GLOBALG.A.P. certification, critical suppliers are regularly audited for employee safety and welfare (GRASP).	Quality Manager
Procurement of IT equipment	AquaGen sources from vendors also supplying public institutions, which have greater influence on addressing identified risks.	IT Manager
General procurement	AquaGen is developing a procurement procedure; all purchases over NOK 1 million must comply with it.	Finance Director

This statement is based on a template from dib.no and is available to all stakeholders, including employees, customers, and the public. Questions about AquaGen's compliance with the Transparency Act may be sent to our Head of External Relations and Sustainability, trina.galloway@aquagen.no.

Trondheim, 30.06.2025


Knut Kvitvang Røflo
Daglig leder