

# List of Signatures

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## Due Diligence report 2024 Tomma Laks.pdf

Name	Method	Signed at
Dahl, Dag Ivar	BANKID	2025-07-04 12:51 GMT+02
Olaisen, Aino Kristin L	BANKID	2025-07-01 14:46 GMT+02



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# Report on Due Diligence Assessments for Tomma Laks Drift AS



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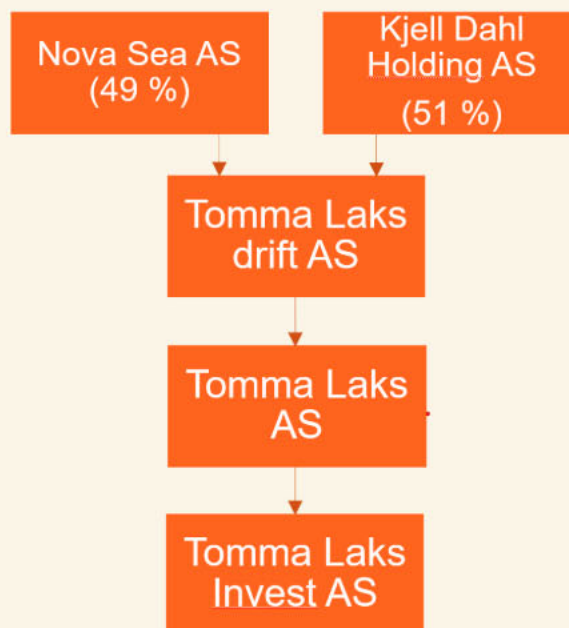
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## 1. Company information and management commitment

Tomma Laks Drift AS has anchored the executive responsibility for the transparency act and due diligence report in board meetings, to ensure that the requirements are implemented, maintained, and complied with. The board of the company has through its close cooperation with Nova Sea AS given its CEO overall responsibility for the due diligence, and delegated this to the Quality Manager, who is responsible for following up on requirements and suppliers, as well as reporting to the CEO and the board on progress and documentation.

Any request for access to information about our due diligence will be registered in our management system, answered in a reliable and understandable manner as soon as possible and at the latest three weeks from reception.

<b>Company name</b>	Tomma Laks Drift AS
<b>Address</b>	8723, Husby
<b>Products and services</b>	Producer of salmon through farming
<b>Description of Company Structures</b>	Tomma Laks Drift AS is 51 % owned by Kjell Dahl Holding AS and 49 % owned by Nova Sea AS. Nova Sea runs the company operations as a part of Nova Sea Havbruk AS.
<b>Number of Employees</b>	33
<b>Significant Organizational changes since last Report</b>	The company has changed its structure, separating its personnell and equipment into a operational company.
<b>Contact Person for the Report and questions related to due diligence</b>	Kari Marte Krane, Quality Manager, Nova Sea AS Email: kari.marte.krane@novasea.no





## 2. Background for the Report

Tomma Laks Drift AS is subject to the Transparency Act and the company's work on fundamental human rights and decent working conditions. According to the Transparency Act, the company is required to report on the due diligence assessments conducted in relation to its operations and engagement with supply chains and partners. Tomma Laks Drift AS seeks to treat this responsibility with the outmost respect and seek to ensure that there are no negative impacts to human rights or working conditions from our operations.

Below, the company reports on the due diligence assessments carried out during the period from January 1st - December 31st, 2024. The report is approved and signed by the members of the board.

As part of the organisations project to ensure compliance with legal and self-imposed obligations, including the requirements of the Transparency Act, we have developed internal ethical guidelines that guide the companies and employees. Additionally, guidelines for conducting due diligence assessments in accordance with the requirements of the Transparency Act have been developed. These guidelines are based on the principles of respect for human rights, decent working conditions, risk of child labour, environmental impact and responsible business practices.

## 3. The Norwegian transparency act

The Act relating to enterprises' transparency and work on fundamental human rights and decent working conditions (transparency act) is a Norwegian law that requires large Norwegian enterprises to work actively to avoid and address adverse impacts from their business endeavors to people and society, and to be transparent with this work to the public.

The definition of a large enterprise in the transparency act corresponds with the definition in the Norwegian accounting law, which states that the enterprise must exceed two out of three of the following thresholds:

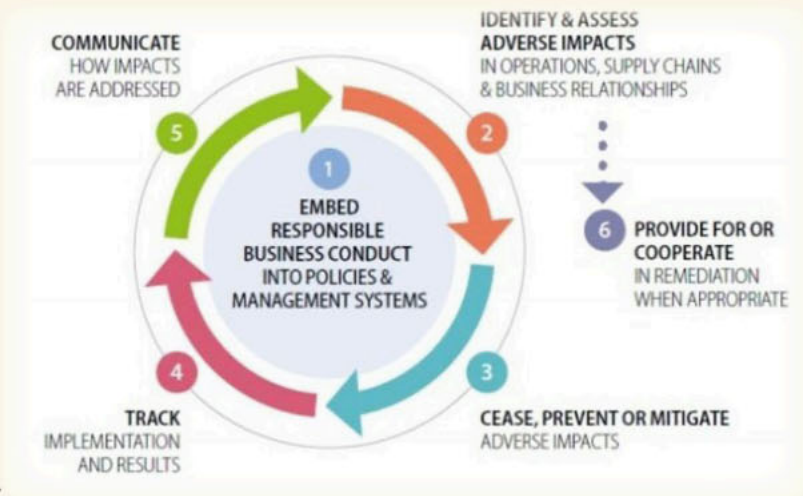
- Sales revenue of NOK 70 million
- Balance sheet total of NOK 35 million
- Average number of employees in financial year of 50 full-time equivalent

The three main duties of the transparency act for the enterprises are to carry out due diligence, publish an account of the due diligence and provide information upon request. Due diligence shall be carried out in accordance with OECD guidelines for multinational enterprises and responsible business conduct, also using the OECD due diligence guidelines for responsible business conduct.



The guidelines describe six steps in the OECD due diligence process:

- ☐ Embed responsible business conduct into policies and management systems and ensure management commitment.
- ☐ Identify and assess actual and potential adverse impacts that the company may cause or contribute to directly through operations, products and business rela-
- ☐ Develop and implement actions to stop or reduce negative impacts, proportionate to the company's size, risk-profile and the severity of the impact.
- ☐ Establish systems to monitor the effectiveness of the measures taken.
- ☐ Be transparent about due diligence processes and outcomes in a clear and accessible way tailored to relevant stakeholders.
- ☐ Provide for or cooperate in remediation when appropriate.



#### 4. Internal Conditions in Tomma Laks Drift AS

Tomma Laks Drift AS is a aquaculture company, located on the island Tomma in Nesna municipality, Nordland. The company is run by Nova Sea AS, with the primary purpose of producing and offering high-quality farmed salmon without compromising the environment or the fish welfare. Information about our sustainability commitment can be found in our sustainability report.

Nova Sea owns and co-owns the entire value chain, from broodstock, smolt production, sea farming, and processing to export and sales. The fully owned service boat company Nova Sea Aquaservice with daughter Nova Master, provides critical services, mainly through supporting operations on our sea sites through use of their boats and expertise.

The aquaculture industry is considered Norway's second most dangerous industry. From 1982 – 2022 there were 38 registered deaths on the job in Norway. Injuries from work accidents amounts to 3-4 out of every 1000 since 2015, with injuries related to falls, crush injury, impact injury and electrical voltage injuries. We acknowledge that these risks also apply to us. The operations carried out both on work boats, on the sea farms and in our processing plant are in some cases high risk and demand close attention, follow-up and training.



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We have conducted an extensive mapping of internal conditions to identify potential risk areas related to human rights and decent working conditions. We focus on a strong and common safety culture, proper training, access to the right and sufficient equipment, high competence, and sufficient support. Through these measures we reduce the risk in operations. In Nova Sea we reward our employees for their commitment to identifying HSE (Health, Safety, and Environment) risks through our company bonus goals and follow up identified risks with documented measures. HSE is a recurring topic in meetings and gatherings.

Through our management systems, we have tools to identify risks and conduct risk assessments in all relevant areas. Annual documented risk assessments are conducted for all our operations, and safety procedures are reviewed to maintain their effectiveness and increase awareness of the importance of following procedures. Our employees receive the necessary and certified training in high-risk areas. To increase awareness and promote a culture of shared responsibility, we involve employees in risk-assessments and risk-reducing activity. All work-related injuries are recorded and followed up in the management system, where we conduct root cause analyses and determine measures to reduce the risk of recurrence.

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Nova Sea has established a working environment committee (AMU) including union representatives and safety delegates, with meetings held six times a year. A safety committee with safety delegates has been established both at sea and at the processing plant. Safety inspections are conducted in every department according to a preset plan.

In 2024 we have developed courses in HSE and diversity and inclusion, which have been completed in all departments. We have also developed a program for colleague checks, which aims to help employees look out for each other's well-being, health and safety during daily activity and help each other to follow safety rules under the slogan "take care – you matter". The colleague checks will be presented and implemented in the first half of 2025. Nova Sea has, along several other aquaculture companies initiated a [website](#) that aims to share experiences and facilitate learning related to HSE in the aquaculture industry.

Nova Sea is committed to central agreements with relevant unions; Fellesforbundet, NNN, Handel og Kontor, Tekna, FLT, in addition to local agreements with Fellesforbundet, NNN and Sjøoffisersforbundet with expected 60-70 % of the employees being union members.





Where central agreements are not in place, agreements with the Norwegian seafood federation Sjømat Norge are followed. Annual local negotiations are conducted with all unions and all employees have a yearly salary adjustment after the negotiations are completed.

We have anchored the work on human rights and decent working conditions in our ethical guidelines. Nova Sea's whistleblowing routines ensure that all employees can responsibly and effectively express any concerns about any objectionable conditions in the company. The whistleblowing routines are documented in writing and available both in the employee handbook and on posters in all departments.

## 5. Due diligence – Suppliers, Sub-Contractors and Partners

A change from last years report is that the due diligence assessments are being done by in-house personnel with competence in supplier audits and broad knowledge about our supply chain. Assessing our suppliers is a complex task requiring involvement from many functions, both internal and external. We consider this a continuous task, and we will develop both our method and selection criteria continuously until we are satisfied. Having a pool of almost 1300 suppliers in 2024 it is necessary to categorize and prioritize which suppliers to focus on.

We have sorted all our suppliers into whether they are sub-contractors, critical suppliers or ordinary suppliers, based on criteria and definition in the GLOBALG.A.P.-standard, which we are certified under. A critical supplier regarding social conditions is defined as a supplier with high complexity in their value chain, poor traceability, supplier countries where child labour is used, risk of employees performing risky work, and an overall poor reputation.

All sub-contractors are subject to annual audits as the Global GAP standard dictates. These can consist of either physical audits on site or verification of third-party audits through external auditing companies (letters of compliance).






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All critical suppliers receive a questionnaire from our management system with detailed questions related to working conditions and due diligence. For critical suppliers who enter into agreements with Nova Sea and daughters, our [code of conduct for suppliers](#) apply. We reserve the right to audit any sub-contractor or critical supplier as needed.

In our due diligence assessment, we have chosen to include suppliers and partners from whom we have purchased products or services for more than NOK 1.000.000 in 2024. This includes almost 200 suppliers of which about 70 % have been assessed with regards to due diligence.



We have evaluated the suppliers against several potential risks in their value chain, and graded them using a traffic light system:

Risk	Index	Scoring method		Grading
Slavery	Global slavery index	Incidents per 1000 of population		> 5,0 2,6 - 5,0 0,0 - 2,5
Environment	Environmental performance index	Weighted score on 58 indicators in 3 main categories; climate change, environmental health and ecosystem vitality		< 46 46 - 60 > 60
Human rights/ working conditions	Global rights index	Rating from 1-5 on 97 indicators derived from labour standards of the International Labour Organization		> 3 2 - 3 1
Corruption	Corruption Perceptions index	Ranking of perceived levels of public sector corruption for 180 countries		< 50 50 - 69 > 69
Child labour	Unicef child labour data 2015-2023	Main sources from Multiple Indicator Cluster Surveys (MICS) and Statistical information and monitoring programme on child labour (SIMPOC)		> 9,6 % > 0 - 9,6 % 0 %

We also consider industry risk, product risk, and company-specific risk based on knowledge, and lack of knowledge.

Most of our suppliers is either Norwegian or has a Norwegian branch company. Many of these are considered big companies and have due diligence reports based on the same criteria as us. These form the basis of our assessment of the suppliers, but we also evaluate them based on the perceived quality of their due diligence reports. If they are lacking information or assessment of important factors for certain industries are missing, this will affect their rating and follow-up.





Based on the type of supplier and the identified risk in their value chain we categorize each supplier as:

Green - no need for further investigation

Yellow - follow-up through questionnaire or other information retrieval

Red - mark for supplier audit or retrieve necessary information to ensure compliance.

11 companies have been identified as red so far. These include feed suppliers, transporters, shipping and boats and aquaculture. The reason they have been categorized as red is mostly related to missing or lacking information in due diligence reports and due to the countries of operation and possible impact. They are being followed up on documentation requirements. We believe that by pushing our suppliers to improve their own supplier assessments we contribute to raise the quality of due diligence, and with that our ability to impact human rights and working conditions across the board. We have not uncovered documented negative impacts to working conditions and human rights by any of our supplier so far, and in the cases where our suppliers have uncovered such non-conformities in their value-chain we are confident that their described measures are adequate.

In 2024 Nova Sea conducted 5 critical supplier audits 3 sub-contractor audits, in addition to third party document audits of all remaining sub-contractors as defined by GLOBALG.A.P. The audits focused on high-risk suppliers with regards to safety during operations, working conditions and risk of escapes. No major risks to working conditions or human rights were uncovered.

## 6. High risk industry

The company's procurements and services come mainly from industries closely linked to aquaculture, such as wellboats, service boats, equipment production, and feed producers. In addition, we have major suppliers in the shipyard industry, transport industry, staffing services, packaging, and agency and wholesale trade. We consider several of these industries to have an inherent risk of negative impacts on human rights and decent working conditions.

Transportation on road has been identified as one of the industries with the highest inherent risk of violations against human rights and working conditions. Nova Sea has during 2024 used only two suppliers on transportation services by road, but these have used several sub-contractors. We have a responsibility to ensure that our suppliers operate in a responsible manner, which includes having knowledge about how our suppliers' suppliers are operating.



Nova Sea has for several years been a driving force for the establishment of, and an active participant in an industry network, aiming to facilitate a joint audit program where transportation companies operating in the Nordic countries are the main goal. The network identifies high-risk suppliers which are then audited by a third party. During 2024, 9 transportation companies were audited and several of these were found to have non-conformities of varying degree. The findings were mainly related to lack of formalized supply chain management and lack of policies regarding requirements in the transparency act. No direct negative impacts to human rights or working conditions were uncovered.

In general, suppliers who do not comply with requirements in the transparency act and our code of conduct for suppliers and/or do not work towards complying with them will not be used by Nova Sea.

## 7. The way forward

The work on compliance with the Transparency Act is well underway, with mapping and assessment of both actual and potential negative consequences for fundamental human rights and decent working conditions internally in the company and concerning our suppliers and partners. Going forward, we will continue to raise awareness among our employees and suppliers about the importance of the Transparency Act.

One of our most important tools to ensure that we do not interact with non-serious actors is to have solid systems and routines for identifying actual and significant risks of negative impacts on human rights and decent working conditions among our suppliers or partners. We believe that this is achievable through knowledge about our suppliers, their value-chains and their industry. This helps to reduce the risk of violations of fundamental human rights or decent working conditions.

Even though Nova Sea has not identified specific negative impacts on fundamental human rights or decent working conditions in our due diligence assessments, this does not mean that there is no risk associated with our business, and we will ensure to prevent or limit negative impacts of our business through the development and improvement of our own system and close follow-up of our partners and suppliers. Our efforts to comply with the Transparency Act are an ongoing process, where we will continuously update our due diligence assessments.

All employees are informed about this report, and it is made available on our website.

Signatures (Must be signed by the board and published on the website by the end of June).

*Going forward, we will continue to raise awareness among our employees and suppliers about the importance of the Transparency Act.*

