

Account of due diligence assessments in accordance with the Norwegian Transparency Act

Milarex is an international seafood company processing and delivering a large variety of safe and sustainable salmon products to the global retail scene. The Milarex group is headquartered in Oslo, Norway with its main activity linked to its state-of-the-art processing facility in Slupsk, Poland.

As a large global player in our industry with more than 2000 employees and 5 sales offices outside Poland, Milarex has a responsibility to take an active role in securing compliance with and protection of basic human rights and decent working conditions. This applies to our own business, our business partners, and our suppliers.

Milarex has a duty to comply with human rights and to follow the Norwegian Transparency Act to ensure transparency and accountability in our operations. We have based our commitment to respecting international human rights and labor standards, such as the [International Bill of Human Rights | OHCHR](#) and the Declaration on Fundamental Principles and Rights at Work [ILO Declaration on Fundamental Principles and Rights at Work](#)

This commitment is well established in the board and group management through their ownership of policies and governing documents highlighting our obligation to take a proactive role in complying with human rights.

The main risks in the salmon processing industry

Milarex has conducted a due diligence assessment to map the risk that Milarex may cause damage to people, society, or the environment, including HSE, working conditions and harassment. There are risks to human rights and decent work conditions in the business and value chain where we operate. The main risks areas identified are:

Third-Party labor services

Third-party labor risk is linked to topics like fair payment, at work training, living conditions, insurances, fair treatment, pension, holiday, food, etc. All aspects are linked to basic human rights.

Transportation services

In the trucking of fish from farmers' packing stations to Milarex processing facility and the trucking and shipping of finished goods to customer distribution centers around the world, there is a risk of poor working conditions ("social dumping") for drivers in the transportation industry.

Fish feed Ingredients

Fish feed is the largest input factor in the salmon farming industry. Fish feed ingredients have long and complex value chains, which can start in high-risk countries or in high-risk industries.

Wild caught salmon

Due to an opaque value chain, there are risks linked to working conditions, workers' rights, and fair payment on fishing vessels and in packing stations.



In the Milarex risk assessment, solid and recognized sources like [Freedom House](#), [Transparency.org](#), [ITUC Global Rights Index](#) etc. are used to assess risk. All sources update their assessments and data annually.

How we address our supply chain risks

To secure and maintain our Human Rights commitments, we have developed the following policies that define and explain our responsibilities and our corporate governance:

- Code of Conduct
- Anti-Corruption policy
- Supplier Code of Conduct
- Economic Sanction policy
- Data Protection Policy
- Supply chain Due Diligence assessment

We will yearly publish an account of due diligence according to the Transparency Act. This annual assessment will be published at our web page [Home page | Milarex](#)

In the case Milarex contributes to or causes negative consequences, we will cooperate to recover the situation and compensate where this is necessary and to our ability.

If you have any questions related to our work on human rights, please approach Milarex at office.hq@milarex.com.