

Account of due diligence assessments in accordance with the Transparency Act

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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 1500 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 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 in Poland and the trucking and shipping of finished goods to customer distribution centers, there is a risk of poor working conditions ("social dumping") among 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.

Raw material Coho/Chile and Trout/Bulgaria

There is risks related to informal and undocumented labor, particularly among seasonal and migrant workers. Common concerns include poor contract conditions, low wages, limited labor protections, and inadequate access to healthcare and safety standards.

In the Milarex risk assessment, solid and recognized sources like [Freedom House](#), [Transparency.org](#), [ITUC Global Rights Index](#) etc. are used to assess risk. The sources quantify the degree of risk in an objective way. All sources update their assessments and data annually, which coincides with Milarex policy of annual due diligence assessment.

Milarex has not received any reports of concern in 2024, nor have any actual consequences for violations of fundamental human rights been uncovered in the due diligence assessments.

We have implemented risk mitigating actions within high-risk areas of operation. All new Milarex suppliers must sign Milarex' Supplier Code of Conduct, areas of responsibility within high-risk services have been clearly defined and we are implementing auditing measures.

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
- Sourcing of certified raw material (GGN, ASC, MSC, BIO etc)

Important risk reducing topics to monitor and develop going forward will be:

- Widen and deepen the auditing in the defined supply chain risk areas
- Clarify the role of ESG in purchasing decisions

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 contact Milarex at hq@milarex.com.