



Due diligence for responsible business conduct with regards to people, animals, society and the environment

Account reporting year 2023

for Pure Salmon Technology AS

Ethical Trade Norway has assessed the report of Pure Salmon Technology AS to meet the criteria of our Base Level. More information about our Base Level can be found [here](#).



SUSTAINABLE DEVELOPMENT GOALS



To Readers Of The Report

Enterprises and the public sector have a great impact on people, society, the environment, climate, and animals and can both contribute positively to development, or negatively by causing harm. Enterprises therefore hold a central role in achieving UN's Sustainable Development Goals (SDGs) and the Paris Agreement's 1,5-degree target.

This report can be used as an account for the Transparency Act, but it has a broader scope with climate and the environment, circular economy, and anti-corruption indicators also being included. Our members are obligated to carry out due diligence and report annually on their work. Base level1 members also meet the Transparency Act's due diligence duty, and partially the Act's information duty.

Ethical Trade Norway's concept of responsible business conduct equals OECD's terminology and due diligence methodology. This is the systematic effort that enterprises do to identify, prevent, or mitigate adverse impacts and explain how they manage their risks of negative impact, as well as provide remediation to people, animals, society, and the environment where this is required – is called due diligence. Norwegian authorities expect all enterprises, regardless of their size, to carry out due diligence on society, the environment, and animals in accordance with the UN's Guiding Principles for Business and Human Rights (UNGPs) and OECD's Guidelines for Multinational Enterprises. This applies to enterprises, the public sector, and organisations.

Ethical Trade Norway's Declaration of Principles (our Code of Conduct) for Responsible Business Conduct covers the areas of decent work, human rights, environment/climate, anti-corruption, and animal welfare. This report is done in full transparency and in line with UNGPs and OECD's guidelines. The reports of all members are publicly accessible on Ethical Trade Norway's website.

Heidi Furustøl

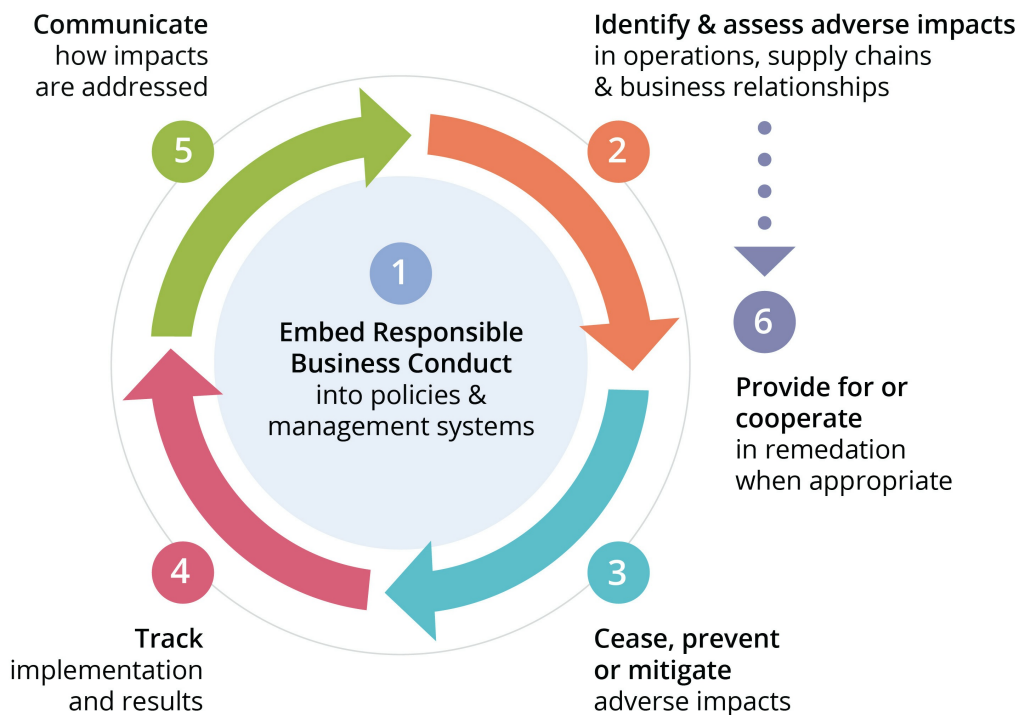
Executive Director

Ethical Trade Norway

Due diligence

This report is based on the UN Guiding Principles on Business and Human Rights and the OECD model for Due Diligence for Responsible Business Conduct.

The model has six steps that describe how companies can work for more responsible and sustainable business practice. However, being good at due diligence does not mean no negative impact on people, planet and the society. It means that the company is open and honest about challenges faced and shows how this is managed in the best possible way in collaboration with its stakeholders. This report is divided in chapters following the OECD model.



Preface From CEO

During the last years our world has changed considerably. We have been through a pandemic that was fatal to too many people, had major economic consequences, and changed the way we work. Then the geopolitical landscape was altered after the Russian/Ukraine war challenging global food and energy markets, and lately the Middle East has yet again become a zone of increased conflict. At the same time, the climate and nature crisis has become ever more real and urgent, and it becomes less likely that we will reach the Paris agreement objectives, to limit temperature rise to well below two centigrade temperature increase. In addition, the speed of loss of biodiversity is increasing globally.

Pure Salmon Technology is like most companies impacted by the major global uncertainties. Within our field of activities, our response to this challenge is to develop, design, and deliver sustainable land-based aquaculture solutions where healthy food, with low carbon footprint can be produced. Additionally, PST's business in Norway came last year to a halt with the introduction of the land-tax. All these issues also put pressure on our customers, suppliers, and other stakeholders. Our response has been to improve our products, always focusing on fish welfare. In the future we must keep reducing the footprint of our operations and our products further, and we must adapt to the challenges we face through business and product development and long-term positioning in line with the UN Sustainable Development Goals (UN SDGs) that our company is aligned with.

At Pure Salmon Technology we believe in transparent reporting, a stronger basis for dialogue with our stakeholders, and a better ability to make progress where it matters most. We are aiming to make sustainability an integral part of our strategy as a key value creation, and our daily operations in dialogue with suppliers and customers. Continuous improvement is at the core through setting business targets and KPIs, committing us to the UN SDGs that are most relevant to our activities. We believe it is more important than ever to continue to uphold our core values of Belonging, Integrity, Passion and Progressivity actively demonstrated through behaviours of trust, collaboration, accountability, initiative, and dedication, amongst others.


Our vision is to take leadership in the global aquaculture industry, being the preferred life-time partner, attracting and developing the best talents and ensuring sustainability. Sustainable aquaculture is a part of the global solution. However, there are challenges we must overcome, and this makes our company attractive for dedicated people who want to make a difference. There is no doubt that it is our employees that constitute our most valued asset. Each employee's competence and passion are critical to our success.

" By respecting, safeguarding, and promoting ethical values, human rights, and the protection of the environment I am confident that enduring changes can be accomplished, for the direct as well as indirect benefit of all our stakeholders "



Kent Kongsdal Rasmussen
CEO

Board Signature

Handwritten signature in black ink, appearing to read "C. M. Deid".Handwritten signature in blue ink, appearing to read "Paul Kaurer".

Sandefjord
06.02.2024

Enterprise information and enterprise context

Key enterprise information

Enterprise name

Pure Salmon Technology AS

Head office address

Hangarveien 21, 3241 Sandefjord, Norway

Main brands, products and services offered by the enterprise

Advanced Recirculating Aquaculture Systems (RAS) technology for land-based fish-farms

Description of enterprise structure

The 8F AQUACULTURE MASTER FUND PTE. LTD. (SINGAPORE) and 8F Aquaculture Designated Activity Company (Ireland) owns Pure Salmon Technology LLC, located in Abu Dhabi, which is the parent company of Pure Salmon Technology Holding AS. Pure Salmon Technology Holding AS owns Pure Salmon Technology AS in Norway and Pure Salmon Technology Denmark ApS in Denmark.

PSTech Norway and PS Tech Denmark works like one company, and collaborate as two equal departments. In Norway, PS Tech Norway have two offices (Sandefjord and Drammen), and in PS Tech Denmark have one office in Fredericia. While PS Tech is a matrix organization, employees also report in line. Employees work in departments, where the department manager has personnel responsibility, whereas they contribute to various projects where the project manager has overall responsibility. PS Tech have two management teams, the Strategic Management Team and the Department Management Team.

The Chief Quality Officer has the overall responsibility for Sustainability at PS Tech. The Chief Quality Officer and Procurement manager are responsible for ensuring that the company is compliant with the Transparency Act. The CEO, Business Support, Procurement, HSEQ, Aquaculture Competence Center, Research and Innovation, and Commercial & Business Development (Sales, Business Development Marketing & Communication, Tender) are all responsible for developing and implementing PS Tech's Sustainability and Transparency Strategy.

Turnover in reporting year (NOK)

Number of employees

95

Is the enterprise covered by the Transparency Act?

Yes

Major changes to the enterprise since last and current reporting period

In November 2023 the "front line" areas of our business have assembled under the structure called Commercial & Business Development. The objective is to increase the overall focus on and development of the Pure Salmon Technology business activities. The change is intended to further accelerate our overall offering and value proposition to our customers, and to a larger degree, to develop and implement synergies between Sales, Tender, Marketing, Communication, Aftersales, Research and innovation (R&I) as well as introducing business development to our platform. All the employees within Sales, Tender, Marketing, Communication, Aftersales and R&I will report to the Chief Business Development Officer heading Commercial & Business Development.

Contact person for the report (name and title)

Synnøve Helland, Chief Quality Officer (CQO)

Email for contact person for the report

synnove.helland@puresalmontech.com

Supply chain information

General description of the enterprise's sourcing model and supply chain

Specialising in Recirculating Aquaculture Systems (RAS), Pure Salmon Technology delivers engineering services and solutions to the fish farming industry globally. The company has an in-house procurement department which identifies required products and services, negotiates, executes, and procures equipment for projects to be delivered to clients. The process equipment is mainly procured from Tier 1 suppliers in Northern Europe. Suppliers range from small businesses to large global companies. More than 75% of Pure Salmon Technology's third-party costs can be attributed to the top 15-spend suppliers. Excluding costs for engineering services, banking, insurance and financial cost more than 90% Pure Salmon Technology's third-party costs can be attributed to the top 15-spend suppliers.

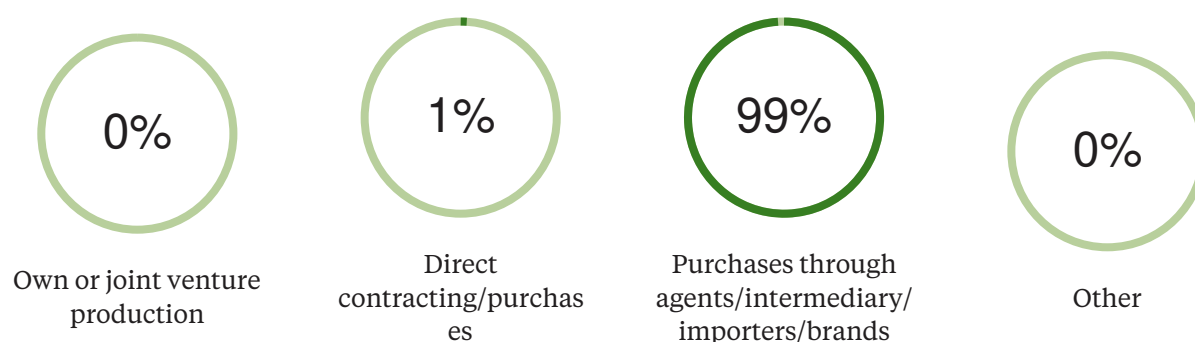
Number of suppliers with which the enterprise has had commercial relations in the reporting year

103

Comments

In 2023, the company's supply chain consisted of 386 suppliers in total. 103 of the suppliers provided equipment and services that are used directly in projects delivered to clients. The remaining 284 suppliers provided support and peripheral services and products, such as insurance, office supplies, etc.

Type of purchasing/ suppliers relationships



List of first tier suppliers (producers) by country

Norway :	90
Sweden :	2
Denmark :	5
Germany :	2
Czech Republic :	1
Japan :	1
United Kingdom :	1
USA :	1

State the number of workers at first tier producers that the enterprise has an overview of, and the number of suppliers this overview is based on:

Number of workers

2 300

Number of suppliers this overview is based on

15

Numbers of workers per supplier (calculated average)

154

Comments to number of workers

The number of workers mentioned above is based on our top 15-spend suppliers in 2023. We have only included the number of workers employed by the suppliers' entity in the country from which we acquire the products and/or services.

Key inputs/raw materials for products or services and associated geographies

PE Pipes	Germany
Pumps	China Hungary
Steel Structures	Denmark Finland
Drumfilters	Sweden
Glasfiber tanks	Norway
Heat Exchangers	Sweden
Electrical Equipment	Global

Is the enterprise a supplier to the public sector?

No

Goals and progress

Process goals and progress for the reporting year

1

Goal: All employees must undergo Code of Conduct training.

Status: 90% completed the training course in 2023.

2

Goal: All managers must complete a one-hour course in the Transparency Act/Diligence Assessments at Ethical Trade Norway.

Status: 15 managers have completed the course in 2023. The remaining 2 managers will take the course in February 2024.

3

Goal: During 2023 PSTech will define sustainability targets and indicators regarding on-site and in office activities, as well as transport of employees and goods.

Status: Work group has finished in December 2023. ESG targets adopted by SMT/org. in February 2024.

4

Goal: PSTech will establish framework for sustainability reporting.

Status: We have established sustainability strategy, goals and targets. In 2024 we will adopt more of the Global Reporting Initiative (GRI).

Goal for coming years

1

Work towards better understanding our supply chain. We want our suppliers to document that their workers have Freedom of Association (FoA) or Workers Representatives (WR). If that is not the case we will try to influence our suppliers to give the workers these rights.

2

Improve procedure for follow-up on suppliers in general, and implementing plan for supplier audits.

3

We will establishing working groups to look at different areas, such as;

1. How can we contribute to a circular economy, 2. Increase the proportion of more sustainable materials, 3. Exclude products with a negative impact on the environment.

4

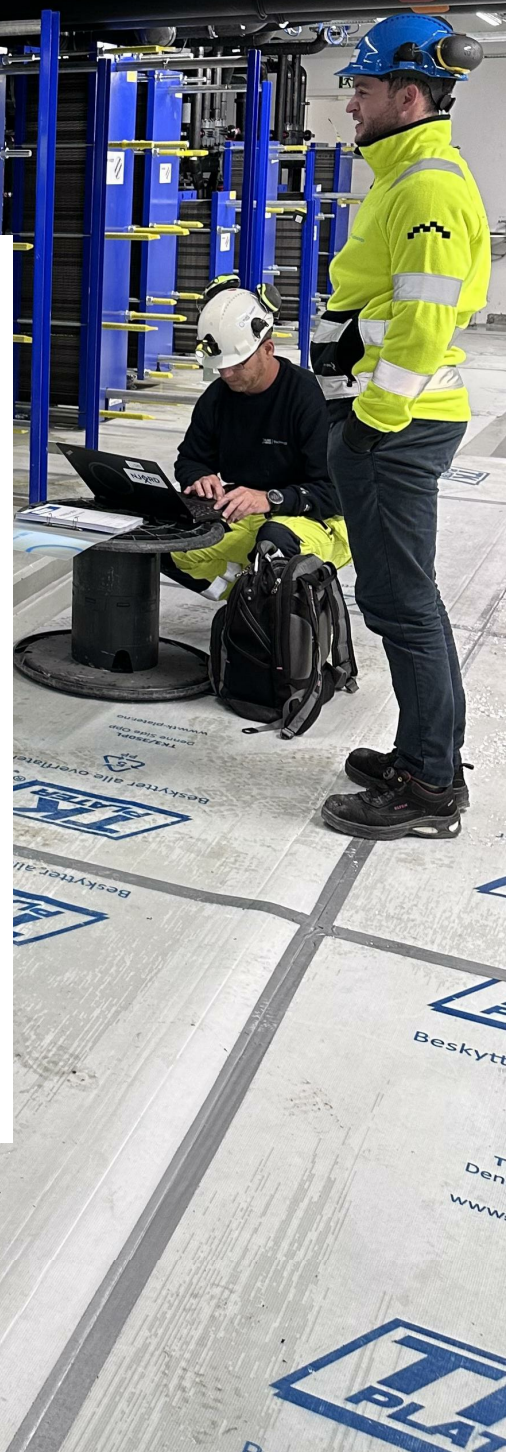
PSTech will report on greenhouse gass (GHG) emissions, in line with the GHG Protocol. We will collect data from suppliers on their CO2 emissions and natural resource footprint.



1

Governance and commitment to responsible business conduct

Embedding responsible business conduct means that the enterprise should have strategies and plan, as well as relevant policies and guidelines for due diligence for responsible business conduct (hereafter due diligence) which are adopted by management. These should comprise the enterprise's own operations, its supply chain and other business relationships. Effective management systems for implementation are key to success, and due diligence should be an integrated element in enterprise operations. Clear expectations from senior management are crucial, as well as clearly assigned responsibilities within the enterprise, for the implementation of the steps in the due diligence process. Those involved need to know how to proceed. Transparency about commitments the enterprise has for itself, challenges they are facing, and how these are managed is fundamental



1.A Policy for own enterprise

1.A.1 Link to publicly accessible policy for own enterprise

https://puresalmontech.com/wp-content/uploads/2023/10/PSTech_Policy-for-responsible-business-conduct-in-Pure-Salmon-Technology.pdf

1.A.2 What does the enterprise say publicly about its commitments to respect people, animals, society, the environment and climate?

PSTech strives towards responsible business conduct that respects people, society, and the environment . Safeguarding fish welfare is one of the company's key priorities .This is established in the Pure Salmon Technology Policy for Responsible Business Conduct . This policy applies to all PSTech employees and states that PSTech shall conduct due diligence for responsible business conduct, and that responsible purchasing practices are one of our most important tools for responsible business conduct.

The policy is based on the UN's fundamental human rights and the ILO's labour standards and accordingly, covers the following key points:

People and society

- There shall be no forced, bonded, or involuntary prison labour.
- Workers, without distinction, shall have the right to join or form trade unions of their own choosing and to bargain collectively.
- The minimum age for workers shall not be less than 15 and shall comply with the national minimum age for employment.
- There shall be no discrimination or harassment at the workplace in hiring, compensation, access to training, promotion, termination, or retirement based on ethnic background, caste, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.
- Physical abuse or punishment, or threats of physical abuse, sexual or other harassment and verbal abuse, as well as other forms of intimidation, is prohibited.
- The working environment shall be safe and hygienic, bearing in mind the prevailing knowledge of the industry and of any specific hazard.
- Wages and benefits paid for a standard working week shall, as a minimum, meet national legal standards or industry benchmark standards, whichever is higher. Wages should always be enough to meet basic needs, including some discretionary income.
- All workers shall be provided with a written and comprehensible contract outlining their wage conditions and method of payments before entering employment.
- Working hours shall comply with national laws and benchmark industry standards, and not more than the prevailing international standard.
- Obligations to employees under international conventions, national laws and regulations concerning regular employment shall not be avoided through the use of short-term contracting (such as contract labour, casual labour or day labour), sub-contractors or other labour relationships.
- Production and the use of natural resources shall not contribute to the destruction and/or degradation of the resources and/or of the income base for marginalized populations, such as in claiming large land areas, use of water or other natural resources on which these populations are dependent.

The environment and climate change mitigation

- Negative impact on the environment shall be reduced throughout the value chain. In line with this precautionary principle, measures shall be taken to continuously minimise the emission of greenhouse gas (GHG) and local pollution, the use of harmful chemicals and pesticides, and to ensure sustainable resource extraction and management of water, oceans, forest and land, and the conservation of biodiversity.
 - National and international environmental legislation and regulations shall be respected, and relevant discharge permits always obtained.
 - Animal and fish welfare shall be respected. Measures should be taken to minimize any negative impact on the welfare of livestock and working animals.
-

1.A.3 How has the policy/commitment been developed and how is it embedded in the enterprise?

Based on the Ethical trade Norway template, the content and first draft were prepared by the PSTech Chief Quality Officer. The draft was then sent to the Strategic Management Team (SMT) for anchoring and comments. The document was then presented to the PSTech Sustainability and Transparency (S&T) Strategy Group for further review, comments, and inputs before finalisation. The document was then formally adopted by the PSTech Board of Directors as the Pure Salmon Technology Policy for Responsible Business Conduct.

1.B Organisation and internal communication

1.B.1 How is the due diligence work organised within the enterprise, embedded in internal guidelines and routines, and why?

The CEO has overall responsibility and ultimate accountability to ensure that all aspects of our Sustainability Strategy are implemented effectively. The Chief Quality Officer (CQO) is responsible for the daily work regarding sustainability at PSTech. All matters regarding transparency and sustainability in the company is reported to the CQO. The CQO reports directly to the CEO. The Human Resources (HR) Manager is responsible for human capital on a corporate level and is responsible for all aspects of social performance within PSTech. The Procurement Manager is responsible for ensuring that all logistics activities are as sustainable and as socially responsible as possible. The Chief Business Development Officer is responsible for internal and external communication, including on matters related to social and environmental responsibility.

The responsibility to implement and comply with the Transparency Act has been allocated to a working group (**Ethical trade forum**) consisting of the Procurement and the Quality & HSE (QHSE) departments. The Procurement department knows the company's supply chains and is therefore best suited to monitor their activities and standards.

In addition, a **Sustainability and Transparency Strategy (S&T) Strategy Group** has been established. The S&T Strategy Group consists of the CEO, the CFO, the COO, the Procurement Manager, Head of R&I, Chief Business Development Officer, Managers of the Engineering departments, and the Chief Sustainability Officer (CSO) at Pure Salmon Ltd., and affiliated company. (please see Description of company structure section above). The S&T Strategy Group is led by the Chief Quality Officer (CQO).

The Chief Sustainability Officer at Pure Salmon Ltd. leads the Pure Salmon Global ESG and Sustainability Committee, of which the PSTech CQO is a permanent member. This "crossmembership" setup ensures that sustainability topics and initiatives are analysed and coordinated across PSTech and its affiliated entities, and provides guidance and support in line with our owners stewardship and engagement principles and objectives.

The Sustainability and Transparency (S&T) Strategy group

- Identifies the relevant United Nations Sustainable Development Goals (SDGs) where PSTech can contribute, based on risk and opportunity analyses and evaluations of where and how the company can achieve positive impact while minimising negative impact, both directly and indirectly.
- Ensures that PSTech has an active and dedicated commitment towards sustainability and transparency.
- Reports on sustainability in line with globally accepted standards and frameworks.
- Establish working groups targeting the most relevant sustainability related risks and opportunities. The working groups that are put together consist of employees that are selected from across different departments within PSTech as well as from PSTech's affiliated companies. These "cross-functional" and "cross-companies" team setups secure participation of those with the best and most relevant knowledge on each identified topic.
- The S&T Strategy Group is expected to meet on a bi-monthly basis, and report to the Strategic Management Team twice a year.

1.B.2 How is the significance of the enterprise's due diligence work defined and clarified for the employees through their job description (or the like), work tasks and incentive structures?

This starts at the recruitment stage; PSTech's dedication towards transparency and sustainability is clearly highlighted on our website and emphasised in all job advertisements and throughout the recruitment process. Our core values, including our focus on operating sustainably is addressed in all interviews.

Due diligence and work on the Transparency Act form an integral part of the Procurement department, the QHSE Coordinator's and the Chief Quality Officer's job descriptions. The significance of due diligence is clarified to these employees through emphasis in job descriptions. Due diligence is an everyday priority throughout the year.

1.B.3 How does the enterprise make sure employees have adequate competence to work on due diligence for responsible business conduct?

PSTech is a member of Ethical Trade Norway (www.etiskhandel.no) which has long and extensive experience and through which we can access a significant international network. All employees working with due diligence are required to complete the training courses from Ethical Trade Norway. All managers must complete the basic course "Transparency act".

We have access to Eco Online (www.econline.no) as an important sparring partner on chemicals and receive competence enhancement and continuous follow-up on our work with chemicals from advisors there.

We acquire external expertise and attend training courses when needed.

1.C. Plans and resources

1.C.1 How are the enterprise's commitments to respect people, animals, society and the environment embedded in strategies and action plans?

PSTech's Policy for Responsible Business Conduct commits the company to respect people, animals, society, and the environment.

The Strategic management team (SMT) has established The Sustainability and Transparency (S&T) Strategy Group. The S&T Strategy Group ensures that PSTech has an active and dedicated commitment towards sustainability and transparency. The Group is led by the Chief Quality Officer (CQO). In Q3 and Q4 2023 the CQO established a working group consisting of the Head of R&I, the Process Department Manager and a HSEQ Coordinator. The group discussed all the SDG goals and how PSTech could have an impact. ESG targets were identified and analysed further to establish KPIs on how an impact could be measured. Based on this analysis the Sustainability strategy was produced, and also the Targets and actions for 2024.

In addition, PSTech has also established a working group (Ethical trade forum) focusing on the Transparency Act and due diligence assessments. This group consists of the CQO, HSEQ coordinator and the Procurement Manager. The working group develops and implements action plans that are based on a template from Ethical Trade Norway on how to perform due diligence assessments and the Transparency Act. This work is implemented into the Sustainability strategy.

The company has established quality targets for 2024 one of the targets is to include all major suppliers (over 1 MNOK/year) in our extensive due diligence assessments.

1.C.2 How is the enterprise's strategies and action plans to work towards being responsible and sustainable followed up by senior management and the board?

The Strategic Management Team (SMT) will actively devise the strategy, set measurable goals, and define action plans to ensure effective implementation and achievement of PSTech's sustainability strategy and plan. This will normally be done on a yearly basis.

Different working groups reporting to the S&T Strategy Group, are assigned responsibility for specific and prioritised sustainability topics and related action plans by the S&T Strategy Group.

The S&T Strategy Group reports to SMT when required, and at least twice a year.

1.D Partnerships and collaboration with business relationships, suppliers in particular

1.D.1 How does the enterprise emphasise the importance of responsible and sustainable business conduct in its business relationships, particularly in the supply chain?

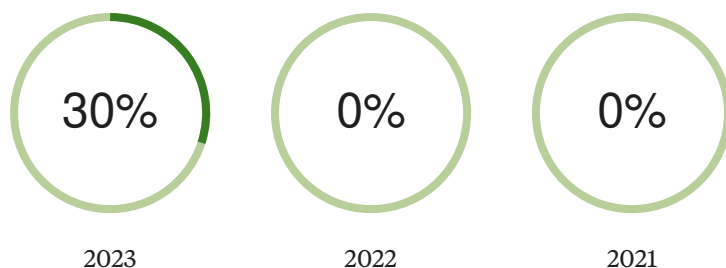
All purchase orders include our Policy Guidelines for Suppliers. When accepting and signing a Purchase Order the supplier is required to confirm compliance with The Supplier Code of Conduct (CoC).

Our internal supplier approval process describes the qualification requirements to be an approved PSTech supplier. All suppliers with expected procurement above 0.2MNOK/year need to consent to the supplier CoC and revert to a General supplier self-assessment questionnaire. As part of the supplier approval process for new suppliers' considerations shall be made regarding our minimum requirements for suppliers. Information provided by suppliers in this process shall be saved in relevant supplier files in the PSTech Quality Management System.

All suppliers with an anticipated spend above 1MNOK/year need to answer supplier questionnaire for labor and environmental standards. This questionnaire is comprehensive and enables us to map our suppliers and their supply chain. The feedback from this survey is assessed against our minimum criteria for suppliers. If the answers are not in compliance with criteria or the information is insufficient, we will engage in dialogue with the supplier. A common reason to go into dialog is more information about their supply chain, where we explain and emphasize why we search for this information and discuss how this can be shared with us.

Indicator

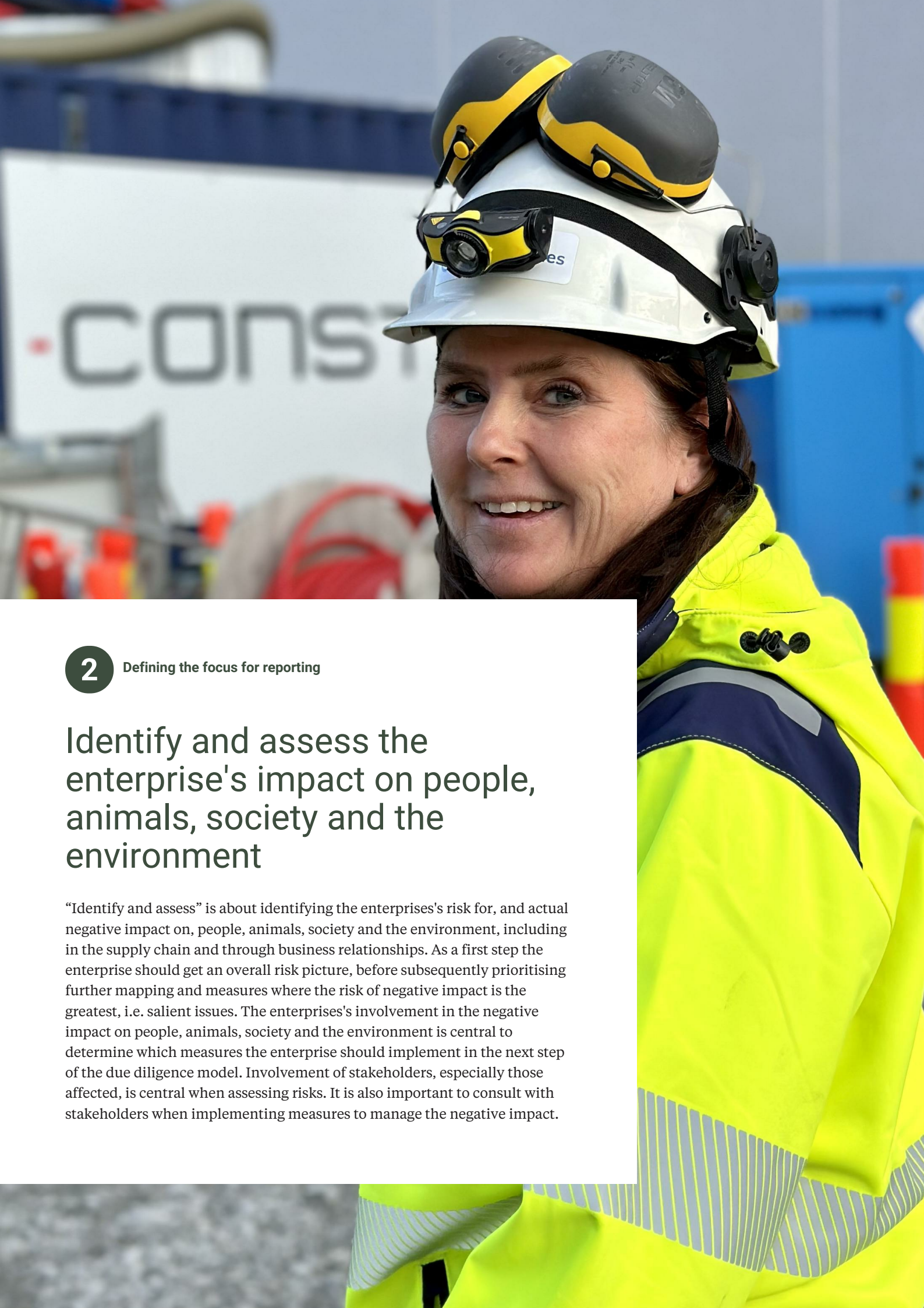
Percentage of the company's suppliers that have accepted guidelines for suppliers



1.E Experiences and changes

1.E.1 What experiences have the enterprise encountered during the reporting period concerning responsible business conduct, and what has changed as a result of this?

In 2023 PSTech has started systematically working towards transparency and increasing the level of knowledge in the company and suppliers. We have learned that a large portion of our supplier base is eager to be contacted with regards to sustainability and are willing to work with us. Most of our large suppliers have their own program for sustainable business conduct, while smaller suppliers with few employees have limited resources and need more focus from us. We continuously work with the suppliers for them to provide us with the requested information, to ensure their compliance with our code of conduct requirements and evaluate if there is a need for social audits. We have now started the work to acquire data from our suppliers on their carbon emissions and resource footprint.



2

Defining the focus for reporting

Identify and assess the enterprise's impact on people, animals, society and the environment

“Identify and assess” is about identifying the enterprises's risk for, and actual negative impact on, people, animals, society and the environment, including in the supply chain and through business relationships. As a first step the enterprise should get an overall risk picture, before subsequently prioritising further mapping and measures where the risk of negative impact is the greatest, i.e. salient issues. The enterprises's involvement in the negative impact on people, animals, society and the environment is central to determine which measures the enterprise should implement in the next step of the due diligence model. Involvement of stakeholders, especially those affected, is central when assessing risks. It is also important to consult with stakeholders when implementing measures to manage the negative impact.

2.A Mapping and prioritising

PRIORITISED ACTUAL OR POTENTIAL NEGATIVE IMPACT ON PEOPLE, ANIMALS, SOCIETY, AND THE ENVIRONMENT

Prioritising one or more risk areas on the basis of severity does not mean that some risks are more important than others, or that the company should not take action on other risks, but that risks with the greatest negative impact are prioritised first. Mapping and prioritisation are a continuous process.

2.A.1 List the enterprises's actual negative impacts and/or prioritized significant risks of negative impact/harm on people, animals, society and the environment. Take note that the prioritized risk that you list in the table below will be exported to step 3 of this report, where you will be asked to answer how you work with stopping, preventing, or reducing the negative impact.

Salient issue	Related topic	Geography
Freedom of association	Freedom of association and collective bargaining Working hours	China Hungary Turkey
Corruption	Corruption	Turkey
Environmental impact	Greenhouse gas emission Energy	Global

The risks listed above is based upon products and countries identified by using risk mapping tools developed by the Ethical Trade Norway. Our largest suppliers operating in these areas have systems and programs in place and work actively with human rights and sustainability. But the overview of their suppliers is in some cases limited. We assume that the greatest risk of negative impact/damage is lower in the supply chain. We prioritize our effort towards where we have significant spend, the highest influencing power, combined with salient risk.

We have a new supplier with an assembly factory (2 tier) in Turkey. Because of the country risk this supplier has been identified and further actions taken.

JUSTIFICATION FOR THE PRIORITISATION OF RISKS OF NEGATIVE IMPACT ON PEOPLE, ANIMALS, SOCIETY, AND THE ENVIRONMENT

2.A.2 Describe: a) the enterprise's routines for mapping and identifying risk and show how the negative impact was identified and prioritised in this period: b) eventual aspects of the enterprise that have not been covered in this report (product groups, own products, departments etc.) and why you not chose to prioritize these in the continued work: c) how information was gathered, what sources were used, and which stakeholders have been involved/consulted: d) whether you have identified areas where information is lacking in order to get an overview, and how you are planning to proceed to collect more information/handle this.

In addition to analysis of new suppliers, we do a risk analysis of the suppliers once a year. This is the basis for identifying risks and take further action where needed, we perform a supply chain risk analysis with the Salient Risk Tool provided by Ethical Trade Norway. The analysis has so far been performed on our current supplier base and potential new suppliers.

The following reference sources have been used for country risk: Global Slavery Index (Forced Labour) (www.walkfree.org), World Bank Children in employment, UNICEF Percentage of children in employment, Human Development Index (UNDP), Gender Inequality Index (UNDP), Global Gender Gap Index (World Economic Forum), wageindicator.org, Environment Performance Index (<https://epi.yale.edu>), Corruption Perception Index (Transparency).

The following reference sources have been used for product risk: DFØ Product Risk, MVO Risk Checker, U.S State Department, "Goods produced by child/forced labour".

This report does not cover non-project procurements such as office supplies. Products/raw materials that origin from western Europe (with low score in risk tool) have not been prioritized for further investigations with regards to social risk. This is to prioritize the best use of our resources.

Information collection needed to perform risk evaluation is performed with supplier's questionnaire / self-assessment, internal know-how, product documentation (CoO etc.) and meetings with suppliers.

We request a self- assessment questionnaire on social and environmental standards from our top 15 (by spend) suppliers, new suppliers with anticipated spend above 1MNOK/year plus suppliers identified with high risk in Risk Tool. The purpose of the questionnaire is to collect information regarding working conditions for the suppliers' employees as well as information about the second- third- and fourth- tier suppliers. This forms the foundation for handling the risk and prioritizing dialogue as well as further measures.

We use the requested information from the questionnaire to ensure that the suppliers are in compliance with our code of conduct requirements, in addition to identify the need for social audits.

Two of our main suppliers that are Norwegian companies have answered and send questionnaire to their sub suppliers/factories in Turkey and China. We have been in direct dialogue with these suppliers (2 tier). This gives us better control of our supply chain.

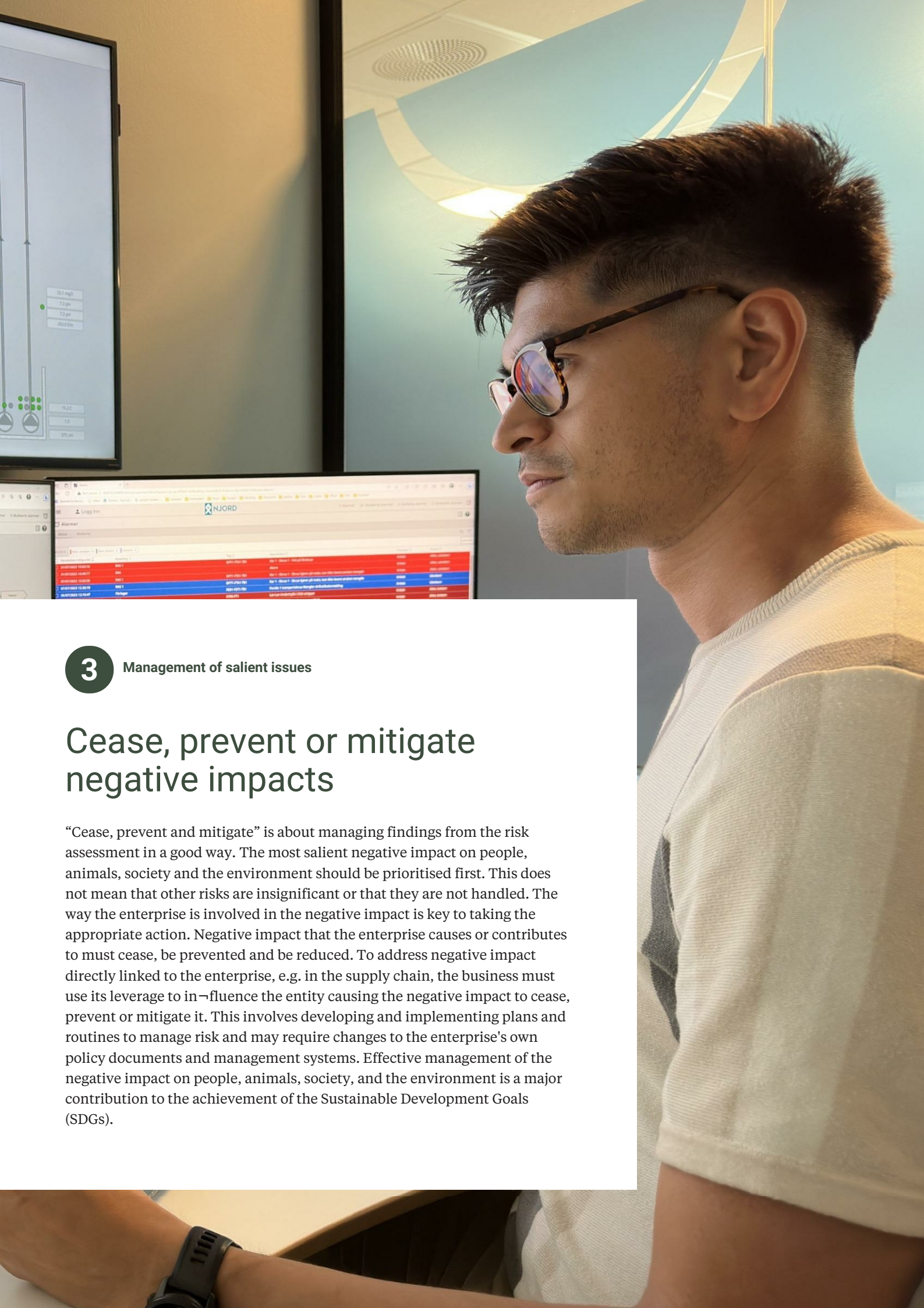
In November 2023 we made plans of conducting a social audit at suppliers' assembly factory (2 tier) in Turkey to verify information given and investigate and collect more information due to the country risk. We consulted and hired Bureau Veritas to conduct the audit. The information gathered from social audits forms an important basis for retrieving more information about the current situation and the improvements that need to be done. We are currently looking at new routines, increasing number of social audits, depending on risk identified at different facilities/factories.

One supplier with factories in China (2 tier) have replied that they have "full traceability to raw material extraction" but they did not give us detailed information about the factories and companies in China. Due to the country risk associated with China we are going into dialog with the supplier so we can retrieve more detailed information about the supply chain.

ADDITIONAL SEVERE IMPACTS

2.A.3 Describe any other negative impacts on people, animals, society and the environment that were identified in the mapping of the enterprise, supply chain or other business relationships during the reporting period and how these have been handled.

When we have personnel from our suppliers working at our construction sites, we consider the risk that they might receive too little pay/low compensation for the work they perform. This relates to both the hourly wage level and travel costs. Measures have been implemented to ensure a correct salary and compensation for travel. These measures include contractual terms with companies regarding their workers compensation and that their workers shall present their pay slips or their employment contracts for review onsite.



3

Management of salient issues

Cease, prevent or mitigate negative impacts

“Cease, prevent and mitigate” is about managing findings from the risk assessment in a good way. The most salient negative impact on people, animals, society and the environment should be prioritised first. This does not mean that other risks are insignificant or that they are not handled. The way the enterprise is involved in the negative impact is key to taking the appropriate action. Negative impact that the enterprise causes or contributes to must cease, be prevented and be reduced. To address negative impact directly linked to the enterprise, e.g. in the supply chain, the business must use its leverage to influence the entity causing the negative impact to cease, prevent or mitigate it. This involves developing and implementing plans and routines to manage risk and may require changes to the enterprise's own policy documents and management systems. Effective management of the negative impact on people, animals, society, and the environment is a major contribution to the achievement of the Sustainable Development Goals (SDGs).

3. A Cease, prevent or mitigate

3.A.1 For each salient risk, add a goal, progress status and describe the measures you have implemented to handle the enterprise’s prioritized negative impact on people, animals, society, and the environment

Salient issue	Freedom of association
Goal :	Contribute to workers right of association.
Status :	Ongoing
Goals in reporting year :	<p>Follow-up on new suppliers, where we identify risk of poor Labour Conditions and Rights & environment protection. We have therefore initiated a ‘Social Audit’ to be performed by a third party in Q1 2024 at a supplier in Turkey.</p> <p>All our suppliers must consent to our code of conduct and answer a supplier questionnaire that has been sent. Based on answers we will request information for further depth understanding and analysis.</p>

Describe already implemented or planned measures to cease, prevent or mitigate negative impacts and reasoning behind the selected measures :

In our risk assessment we identified three production facilities (tier 2) in Hungary, China, and Turkey with risk regarding freedom of association based upon country risk. We have prioritized our focus on these sites based upon the risk score. For the facility in Turkey, we are conducting a social audit to verify the answers provided in our questionnaire they have replied to. For the production facilities in Hungary and China, we are not satisfied with all the answers from the questionnaire we sent to them, particularly regarding their supply chain. Specifically, a) we need more information of whom their suppliers are and b) if procurement management/practice facilitate and prepare for freedom of association in areas where this is considered a risk. We are going to work closer, collaborate, and support the supplier towards finding positive solutions if we identify gaps.

Describe actual or expected results of measures mentioned above, as well as goals and activities for the coming reporting year :

Our goal is to better understand our supply chain. We want our suppliers to document that their workers have Freedom of Association (FoA) or Workers Representatives (WR). If that is not the case we will try to influence our suppliers to give the workers these rights.

Salient issue	Corruption
Goal :	Zero corruption
Status :	Ongoing
Goals in reporting year :	(New salient issue)

Describe already implemented or planned measures to cease, prevent or mitigate negative impacts and reasoning behind the selected measures :

All PSTech employees must read and sign the code of conduct, this is an action to reduce the risk of corruption. We are planning on producing internal CoC courses in our Academy. The course must be taken yearly by each employee. We are establishing a Whistleblower portal (<https://thommessen.neotalogic.com/a/pure-salmon-technology-whistleblower-portal>) that will be available on our website and intranet. The portal will make it possible to raise concerns anonymously.

The PSTech Policy for Responsible Business Conduct is established to promote our company's values and culture. The Policy is available on our website. All our suppliers must consent to PSTech Policy Guidelines for Suppliers. A supplier questionnaire has been sent to request information for further analysis. We have investigated whether our major suppliers (tier 1) have instructions, procedures, and training in place with regards to risks related to corruption.

We will build competence on how we can actively work to reduce corruption in the supply chain and in dealing with business partners e.g. by attending training courses and seminars by Ethical Trade Norway.

We will review and map our top 15 suppliers (by spend) plus one supplier scoring high in the risk evaluation (outside top 15) by their a) establishment and inclusion of anti-corruption clauses in their code of conduct b) demands for consent to anti-corruption in their supply chain. For suppliers with limited practice in place we will engage in dialog to emphasize the importance of anti-corruption in the supply chain and the possibility of collaborating.

We are looking into the possibility of a third party service to conduct Sanctions screening and regulatory compliance of our suppliers above 0,2 MNOK/year spend (approximately 100 suppliers).

Describe actual or expected results of measures mentioned above, as well as goals and activities for the coming reporting year :

We expect to document that our suppliers sub-suppliers have procedures in place to hinder corruption. If not, we will try to influence them to get procedures from their sub-suppliers where this is not available.

Salient issue	Environmental impact
Goal :	Reduce our GHG emissions
Status :	Started collecting data from our suppliers
Goals in reporting year :	(New salient issue)

Describe already implemented or planned measures to cease, prevent or mitigate negative impacts and reasoning behind the selected measures :

Our first measure is to attain more knowledge on carbon accounting. Four key employees are attending a two-day course on the topic at DNV (Klimaregnskap- ISO 14064). We will a) Raise knowledge and competence within our organisation, b) Start with GHG accounting for Scope 1 & 2 and c) Evaluate and map hot spots scope 3

We have started mapping our supplier's status and progress with carbon accounting. We have requested information of the CO2e emissions associated with the project related materials/goods and transportation of materials from our 15 top spend suppliers. The response is varied. Some are far ahead when it comes to carbon accounting, but most are not.

Our next step is to make a rough assessment of the "hot spots" for our CO2e emissions based on the production of materials (type of material) and the amount (tons) of materials we procure. The reason for this assessment is to be able to focus our resources on the suppliers associated with the "hot spots".

More information about our planned measures is described in chapter 3.B.1 and 3.B.2.

Describe actual or expected results of measures mentioned above, as well as goals and activities for the coming reporting year :

Establish a baseline for our carbon emissions and set actions to reduce our emissions, and also look into collaborative actions with our suppliers.

3.B OTHER ACTIONS RELATED TO MANAGEMENT OF NEGATIVE IMPACTS

Describe the enterprise's general measures to cease, prevent or mitigate negative impacts, including in the supply chain.

3.B.1 Reduction of nature- and environmental impact

Suppliers

Our suppliers have to agree to our Supplier code of conduct, to continuously minimize greenhouse gas emissions and local pollution, the use of harmful chemicals, pesticides, and to ensure sustainable resource extraction and management of water, oceans, forest and land, and the conservation of biodiversity.

On our construction sites our suppliers are expected to follow our procedures for waste sorting, chemical use and so forth.

In Q4 2023 we requested our biggest suppliers (15) to collect data and report to us on the issue below:

- Production/materials associated with major environmental impacts, such as large water consumption in production, impact on biodiversity, discharges of chemicals, etc.

In 2024 we will work to get a better overview on the environmental impact "hot spots" our suppliers have. And use our influence to reduce negative impact.

Offices

We have had 6 electric car chargers installed, to better facilitate for the use of electrical cars.

3.B.2 Reduction of greenhouse gas emissions

We have started collecting data and establishing framework for GHG accounting. In 2024 we will set targets for reduction of carbon emissions.

We have PSTech employees located in the Abu Dhabi office of Pure Salmon Ltd. These employees' activities and, office consumption of e.g. energy, will be included in the 2024 reporting.

GHG accounting

Scope 1. We are planning to report on tCO₂e from our 5 company vehicles in Sandefjord, and we are collecting data/reporting on tCO₂e from private and rented vehicles in Sandefjord, Drammen, Fredericia and Abu Dhabi.

Scope 2. We are planning to report on tCO₂e from energy consumption in our offices Sandefjord, Drammen, Fredericia and Abu Dhabi.

Scope 3. We have a lot of work ahead with data collection and reporting on Scope 3. In 2023 we have mapped what areas that are most relevant to include. The main and most complicated area is materials and transportation of materials for our facilities building sites.

In Q4 2023 we sent requests to our biggest suppliers (15) to collect data on the issues below:

1. Quantity (kg/ton) of materials with associated CO₂e emissions
2. CO₂ emissions from the transport of goods/materials

In 2024 we plan to collect data and start reporting on:

1. Equipment for our offices (mainly: office supplies, computer equipment and eatables).
2. Waste from our offices
3. Business travel
4. Employees commute

3.B.3 Adapting own purchasing practices (sourcing)

Our procurement procedures describe the process steps, required actions and responsibilities for procurement. This ensures a uniform way of working with the suppliers. One essential part of the procedure is our Project Procurement Plan (used to plan for procurement to projects). The plan gives important information regarding construction site need dates, estimated supplier lead times, and the required date for engineering input to the procurement department. This ensures better planning with regards to delivery lead times and gives suppliers more predictability in their planning of resources. It also gives us the opportunity to plan for more detailed and well-prepared technical specifications, minimising errors and work duplication for our suppliers as this can lead to negative impact on our supply chain.

3.B.4 Choice of products and certifications

For the major equipment in our supply chain, we monitor if the suppliers have DIN EN ISO 14001 and/or DIN EN ISO 50001 certification. We also look for other initiatives such as "Zero Pellet Loss". Whether a supplier holds one or more of these global certification standards is part of the overall assessment when selecting a new supplier.

3.B.5 Actively support free trade union organisation and collective bargaining, or where the law does not allow it, actively support other forms of democratically elected worker representation

Suppliers need to comply with PSTech Policy Guidelines for Suppliers. We continuously evaluate the risks in our supply chain, and consider if actions are needed, such as audits.

3.B.6 Contribution to development, capacity building and training internally and of suppliers and workers in the supply chain

PSTech has established an Aquaculture Academy. The purpose of the Academy is to carry out internal skills development, provide training for contracted employees, and provide training to our customers i.e. the companies that will operate the RAS facilities we build.

PSTech's Aquaculture Academy provides training with use of e-learning courses, classroom training and hands on training in the RAS facilities. The curriculum incorporates a wide range of different and relevant topics in courses such as Fish welfare, RAS technology, Sustainability, and other key topics.

PSTech's Aquaculture Academy also provides training courses based on Norwegian legislation regarding health, safety and work environment (HSE) at construction sites. We are implementing requirements in our contracts with contractors to complete the necessary courses.

The QHSE and the Project management departments work closely to monitor gaps in the health and safety procedures at construction sites. In our Tjuin project the project manager discovered that our subcontractor had a lack of knowledge with the use of fall protection equipment and scaffolding. The QHSE department arranged fall safety courses in the native language for the employees of the subcontractor. HSE training of subcontractor employees in use of scaffold and working in heights was provided by an external Polish speaking expert.

3.B.7 Combatting corruption and bribery in own enterprise and supply chain.

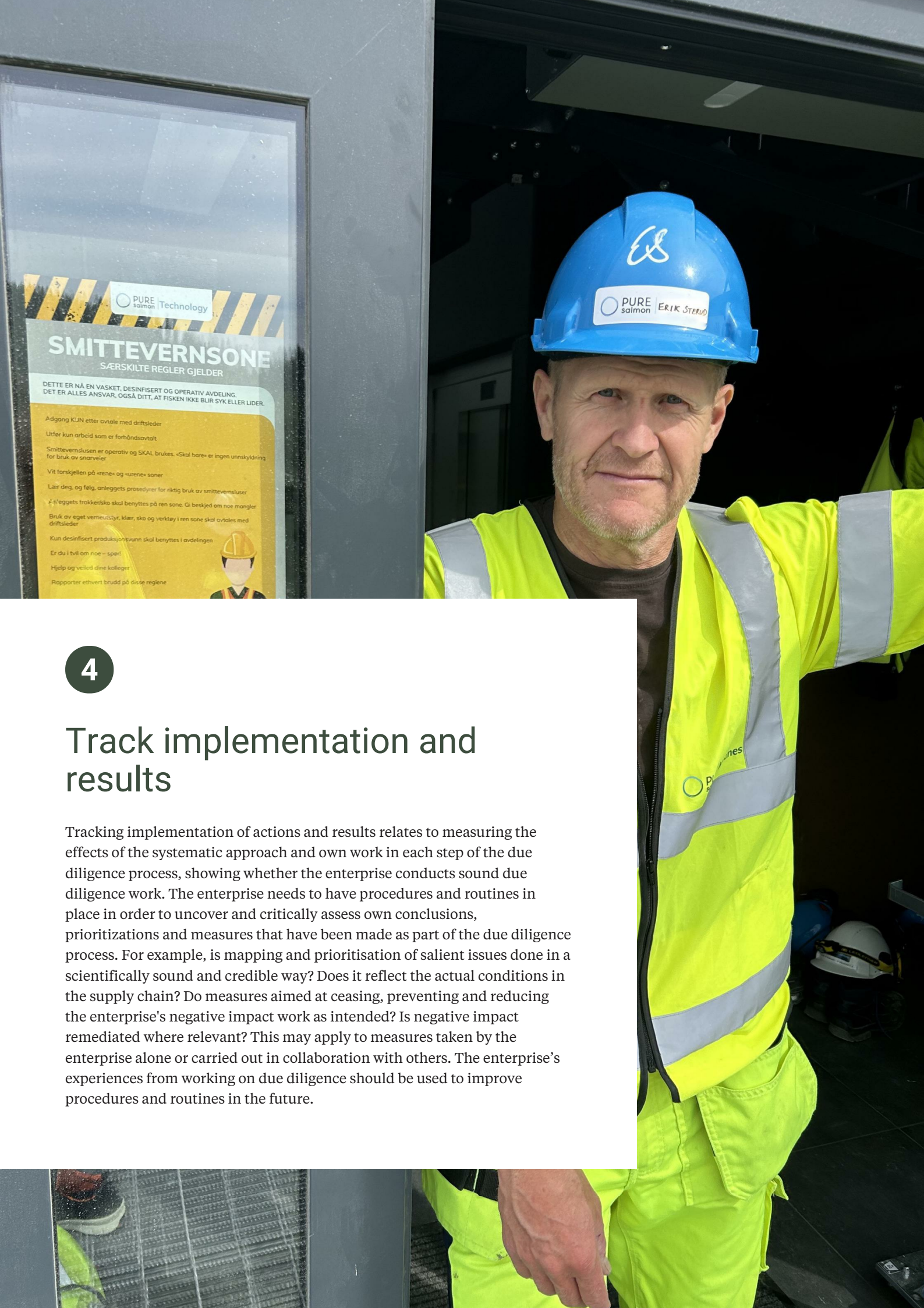
PSTech has established and implements the PSTech Code of Conduct. All employees must take a specific and mandatory e-learning course regarding the PSTech Code of Conduct through the Academy.

Suppliers shall consent to the PSTech Policy Guidelines for Suppliers that includes an anti-corruption clause which is referenced to in Purchase Orders.

3.B.8 Other relevant information concerning the enterprise's work to reduce, prevent, and manage negative impact on people, animals, society and the environment

PSTech employees who work on sites were, in 2023, given a new job rotation cycle. The work sites are often far away from our office locations, and our employees generally need to stay there during their assignment period. With the previous rotation cycle employees only spent 25% of the weekends at home. With the new rotation cycle, they are home 75% of the weekends; they get more time at home with family and friends, and this contributes to a much-improved work-life balance.

In addition, employees who work on sites, and who therefore must live away from home for extended periods, will now live in houses that we rent, instead of living in barracks. Living together in a house can contribute to mitigating loneliness and to a better psychosocial working environment. Employees can make and have dinner together, look out for each other, and have a better social life. These changes have been very well received by our colleagues.



4

Track implementation and results

Tracking implementation of actions and results relates to measuring the effects of the systematic approach and own work in each step of the due diligence process, showing whether the enterprise conducts sound due diligence work. The enterprise needs to have procedures and routines in place in order to uncover and critically assess own conclusions, prioritizations and measures that have been made as part of the due diligence process. For example, is mapping and prioritisation of salient issues done in a scientifically sound and credible way? Does it reflect the actual conditions in the supply chain? Do measures aimed at ceasing, preventing and reducing the enterprise's negative impact work as intended? Is negative impact remediated where relevant? This may apply to measures taken by the enterprise alone or carried out in collaboration with others. The enterprise's experiences from working on due diligence should be used to improve procedures and routines in the future.

4.A. Track and assess

4.A.1 Describe the a) assignment of responsibility for tracking the effect and result of measures implemented to cease/prevent/mitigate salient risks of negative impact on people, animals, society and the environment, as well as how the tracking is done in practice, b) who is responsible for evaluating the enterprise's implementation and work with due diligence, and how the evaluation is done in practice.

The Procurement manager and his department has the day-to-day responsibility of the follow-up on suppliers. If they discover that the supplier is not in compliance with our requirements a non-conformance is registered and tagged with the name of the supplier in the Quality management system (QMS).

The Ethical Trade Forum consisting of the CQO, Procurement manager and QHSE coordinator are responsible for monitoring the progress and implement actions to reach our targets. In the monthly meetings they discuss the results and the need for further actions.

The company is ISO 9001 certified, and during the yearly Management review meeting the Procurement manager presents the results from the supplier module in the QMS and status on reaching our targets. The management then evaluates if they are content with the results or if further measures must be taken.

The CQO is responsible for the progress regarding work on sustainability and transparency and reports monthly to the Strategic Management Team (SMT). The CEO keeps the board involved and updated. If SMT or the board are not pleased with the results, further actions will be implemented.

4.A.2 Describe how the enterprise ensures that measures taken to identify, prevent and reduce negative impact actually work

At PSTech the work on sustainability, transparency, and due diligence assessments are highly prioritized in the SMT Group. Progress on this work is reported on and discussed during monthly SMT meetings. When strategic goals and targets are implemented in 2024, it will be possible to see to which extent our actions have been effective, and this will give us the opportunity to correct and further improve our actions if needed.

Internal and external audits will also show the effectiveness of our measures.



5

Communicate how negative impacts are addressed

A prerequisite for good external communication on due diligence for responsible business conduct is that it builds on concrete activities and results. Enterprises should make relevant documents concerning due diligence publicly accessible, i.e. policies, codes of conduct, guidelines, processes and activities related to identifying and handling the enterprise's actual and potential negative impacts on people, animals, society and environment. Communication should include information about how the risks have been identified and handled, as well as the effect of the measures/activities. The Transparency Act (Åpenhetsloven) §5 requires companies to publicly account for their human rights due diligence on an annual basis.



5.A External communication

5.A.1 Describe how the enterprise communicates with affected stakeholders about managing negative impact

PSTech has an open dialog with its suppliers, especially if there is a need for handling negative impact. PSTech also fosters such open dialog internally together with the working environment committee, unions, and the workers safety service.

5.A.2 Describe how the enterprise publicly communicates its own work on identifying and managing negative impact/harm

We will openly communicate on our transparency and sustainability efforts as thoroughly as we can through information on our website.

We respond to authority, media, stakeholders, and to our customer's inquiries.

Our reporting to Ethical Trade Norway is available to the public, both on our website and at www.etiskhandel.no

5.A.3 Describe the enterprise's routines for maintaining and answering external inquiries related to the information requirement imposed by the Transparency Act

External enquiries on information requirements imposed by the Transparency Act can be made through our website, in the Sustainability and Transparency section and/or by contacting us by e-mail at the following address: postnorway@puresalmontech.com.

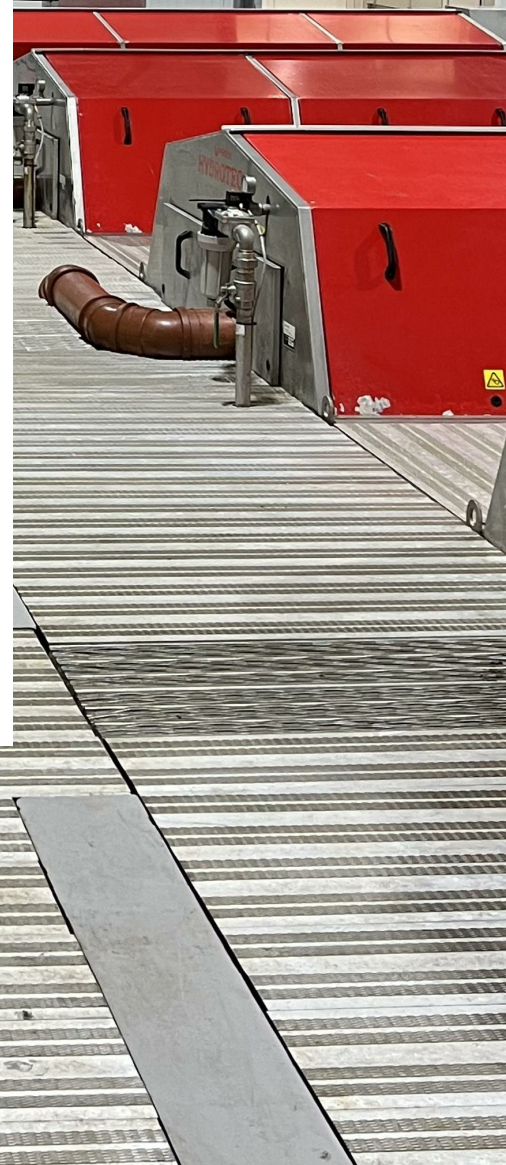
This e-mail is always to be checked by the Administration & Information Coordinator, and enquiries are sent directly to the CQO, the CFO, and the Sales Director who is also responsible for all external communication.



6

Provide for or cooperate to ensure remediation when appropriate

Once an enterprise has identified that it has caused or contributed to negative impact on people, animals, society or the environment, the enterprise must provide for, or cooperate in, remediation. Remediation may involve financial compensation, a public apology or other ways to remediate the negative impact. Another aspect of remediation is that companies should provide for, or cooperate with legitimate complaint mechanisms, to ensure that workers and/or local communities can raise complaints and be heard.



6.A Remediation

6.A.1 Describe the enterprise's policy for remediation of negative impacts on people, animals, society and the environment

If our activities are found to cause or contribute to negative impact on people, animals, society, or the environment, we will stop the activities and seek to provide remedy.

If any of our suppliers is found responsible for negative impact, depending on the severity, we will demand that the supplier provide remedy solutions and we will use our influence to reduce further negative impact. If a supplier does not take responsibility for a serious breach of rights, we will try to cooperate with the supplier in providing remedy. Ideally, the situation will be restored to the way it was before the injury occurred. We have established a PSTech_Remediation Procedure, to describe in detail how to proceed when remedy is necessary.

6.A.2 If relevant, describe cases of remediation in the reporting year

PSTech has paid extra remuneration to employees of a Polish staffing agency to make sure that employees of this company get paid for work travels. In Norway travel costs to and from work site are normally paid for by the company.

6.B. Ensure access to grievance mechanisms

6.B.1 Describe what the enterprise does to ensure that employees in own enterprise and other stakeholders, especially impacted workers and local communities have access to whistleblowing systems and grievance mechanisms when this is needed

Internal grievance mechanisms are described in the Employee handbook. The handbook is available for all PSTech employees on the Intranet. The PS_Tech Code of Conduct also describes Responsibility of Company Personnel to report a violation. The Code of conduct is available for all employees in the Quality management system (QMS).

The QHSE department conduct Internal and external audits where grievances can be addressed anonymously.

Management maintains a productive cooperation with the unions (Tekna and NITO), workers safety service, and the working environment committee.

Report as a «Non-conformance and Improvement» the Quality management system (QMS) as a «Non-conformance and Improvement». This mechanism is best suited for grievances regarding Health, Security, and Work Environment (HSE), quality and environmental issues (waste, pollution etc).

Internal and external grievance mechanism

Serious grievances should be reported through our Whistleblower portal available via the intranet, employee handbook or internet. The service is a secure electronic whistleblowing solution and is operated by Advokatfirmaet Thommessen AS. Reports can be made about employees at Pure Salmon Technology, persons with ties to Pure Salmon Technology or other circumstances which relates to Pure Salmon Technology if there are suspicions of censurable conditions.

Examples of censurable conditions include, but is not limited to:

- Corruption and influence trading;
- Embezzlement, fraud and other financial crimes;
- Violation of Pure Salmon Technology's policies and procedures;
- Harassment and bullying;
- Discrimination;
- Danger to life and health;
- Dangers to climate or environment (e.g. emissions, pollution, etc.)

The persons reporting can choose whether to be anonymous or not. But by providing name and contact information it enables further contact with the persons. It is often necessary to ask further questions about censurable circumstances that are reported. It is also possible to remain anonymous towards Pure Salmon Technology, even if providing Thommessen with your contact details.

Contact details:

Pure Salmon Technology AS
Synnøve Helland, Chief Quality Officer (CQO)
synnove.helland@puresalmontech.com