

List of Signatures

Page 1/1



Annual report - The Norwegian Transparency Act - Grøntvedt.pdf

Name	Method	Signed at
Grøntvedt, Alexander Borge	BANKID	2023-11-26 15:03 GMT+01
Grøntvedt, Bjørnar	BANKID	2023-11-24 15:59 GMT+01
Utne, Anne Sofie	BANKID	2023-11-24 08:37 GMT+01
Veiseth, Hege Aasen	BANKID	2023-11-23 14:15 GMT+01
Bengt Martin Thomas Brue	BANKID	2023-11-23 10:46 GMT+01
Gåsø, Helge	BANKID	2023-11-27 09:48 GMT+01



This file is sealed with a digital signature. The seal is a guarantee for the authenticity of the document.

External reference: AF15C493A34848BE87B9683B949E38A1



ANNUAL REPORT

THE NORWEGIAN TRANSPARENCY ACT

GRØNTVEDT AS

Last modified 23.11.2023



This file is sealed with a digital signature.
The seal is a guarantee for the authenticity
of the document.

Document ID:
AF15C493A34848BE87B9683B949E38A1

CONTENT

1. THE GROUP'S REPORT PURSUANT TO THE TRANSPARENCY ACT FOR 2023	3
1.1. Introduction	3
1.2. Contact information	3
2. ABOUT THE GROUP'S OPERATIONS	3
2.1. The Group's organisation and area of operations	3
2.2. Internal guidelines	4
2.3. Ambitions and progress.....	4
2.3.1. Overall ambitions and progress	4
2.3.2. Ambitions for the coming year	4
3. THE DUE DILIGENCE	5
3.1. Focus for the Group's due diligence	5
3.2. The due diligence assessments of the Group's own operations	7
3.3. The Group's supply chain and business partners.....	7
3.4. The due diligence assessments of the Group's products/services.....	8
3.4.1. Marinated category.....	8
3.4.2. Marinated product category	9
3.4.3. Frozen product category	9
3.4.4. Consumer packed category.....	9
3.4.5. Fishmeal and fish oil food grade quality.	9
3.5. The result of the due diligence assessment	10
4. MEASURES TO CEASE, PREVENT OR MITIGATE THE ADVERSE IMPACT.....	10
5. MONITORING OF THE MEASURES – IMPLEMENTATION AND RESULTS	11
5.1. Introduction	11
5.2. Procedures for monitoring.....	11
6. COMMUNICATION WITH AFFECTED STAKEHOLDERS AND RIGHTS-HOLDERS	12
7. REMEDIATION AND COMPENSATION	12



This file is sealed with a digital signature.
The seal is a guarantee for the authenticity
of the document.

Document ID:
AF15C493A34848BE87B9683B949E38A1

1. THE GROUP'S REPORT PURSUANT TO THE TRANSPARENCY ACT FOR 2023

1.1. Introduction

Grøntvedt AS and its subsidiaries (from now on called the Group) shall conduct due diligence in accordance with the Transparency Act each year and publish a report on the assessments and findings.

The purpose of the Transparency Act is to promote companies' respect for fundamental human rights and decent working conditions.

This report comprises the Group's duty to account for the due diligence assessments conducted by the Group in 2023. In the report, the Group also describes the measures that have been assessed and implemented to reduce the risk of adverse impact the Group's activities may have on fundamental human rights and decent working conditions.

The Group is headquartered at Uthaug and is resident in Norway.

For the fiscal year of 2022 the group had sales revenues of NOK 1.335.556.000 and a balance sheet total of NOK 2.053.727.000. In 2022 the Group has had an average of 214 full-time equivalents. Consequently, the Group is subject to reporting obligations.

1.2. Contact information

Any inquiries in connection with this report can be directed to:

Quality Manager Kenneth Dingen
Kenneth@grontvedt.no

2. ABOUT THE GROUP'S OPERATIONS

2.1. The Group's organisation and area of operations

The Group is one of the world's leading pelagic companies specializing in herring products customized to customer preferences. The Group has many years of experience in the industry and a strategic location close to the rich fishing grounds of the Northeast Atlantic. The production facility is located in Ørland municipality in Trøndelag county (Norway).

For generations Grøntvedt has made its living from processing fish from healthy and viable fish stocks, and we take pride in preserving the finest fish from these waters and transform them into quality food products for distribution to customers worldwide. The business is certified by MSC and aims to utilize 100 % of the raw material.

The by-products go to production of human grade protein meal- and oil processed by Grøntvedt Nutri.



The Group has a supply chain that delivers products and services to our core operations. The vast majority of suppliers have offices in Nordic countries.

The Group offers the following products:

- Human grade quality;
 - Frozen and marinated Herring
 - Frozen mackerel
- Food grade quality;
 - Fish oil and fishmeal
 - Keto 3 Fish oil

2.2. Internal guidelines

The Group has its own guidelines on how it embeds the work on human rights and decent working conditions

The guidelines also contain information about the Group's whistleblowing channels that are meant to uncover adverse impact on fundamental human rights and decent working conditions linked with the Group's activities.

2.3. Ambitions and progress

2.3.1. Overall ambitions and progress

The Group has ambitions to work continuously on risk assessment related to its activities and make use of its business contacts (suppliers and business partners) in this respect. Furthermore, the Group will work continuously on implementing measures to achieve the ambitions. See items 3 and 4 of the report for guidance on the work done in the reporting year.

2.3.2. Ambitions for the coming year

The Group has set several prioritised ambitions for the future.

Ambitions	Status
Send out and evaluate questionnaire forms regarding the transparency act to our 10 largest suppliers, no matter our own risk assessment.	Started
Send out and evaluate questionnaire forms regarding the transparency act to all suppliers that are classified as high risk regarding in our internal models	Started analysis and classification



Addressing suppliers who do not live up to an acceptable standard, and addressing changes needed to continue doing business	Not yet started.

3. THE DUE DILIGENCE

3.1. Focus for the Group's due diligence

The Group makes assessments of the risk of adverse impact on fundamental human rights and decent working conditions linked with the Group's activities and business relationships. The Group has ambitions for the future to continuously track any violations of human rights or violations of decent working conditions that is connected with the Group's activities. If any violations of human rights or violations of decent working conditions that is connected with the Group's activities is revealed, the Group will follow up by addressing requirements for improvement. The Group's activity refers to both the Group's own operations and the activities of its suppliers and business partners.

In the mapping work, the Group utilizes a digital platform developed by Ignite Procurement AS. The platform simplifies the implementation of due diligence assessments in accordance with the requirements of the Transparency Act. Through the platform, the group has obtained a systematic overview of first-tier suppliers and business partners. It has the ambition in the future to also get a systematic overview of other known subcontractors. Based on this overview, the platform has conducted initial assessments of the risk of negative impact on fundamental human rights and decent working conditions. The steps in this assessment are explained in the following:

1. Based on supplier data obtained from the Group's ERP system, a complete overview of the Group's first-tier suppliers is created. The Group has divided this into suppliers and business partners. The overview of the Group's first-tier suppliers will continuously be updated through the platform.
2. In the platform, supplier information is enriched through third-party collaborations with ENIN. The platform gathers information and financial details about the Group's suppliers, such as industry codes (NACE) and Group structure.
3. Through steps 1 and 2, the Group obtains an overview of first-tier suppliers, business partners, and will in the future get an overview of other known subcontractors, along with their corresponding supplier information.
4. The classification tool in the platform has conducted an initial risk classification of the Group's first-tier suppliers and business partners based on classification rules created within the platform. The Group has established the following classification rules



relevant to its supply chain: geography, industry, type of product and service, production process, previously identified risks, signed Code of Conduct, etc. Through the classification tool, suppliers that meet defined risk parameters are classified as having “high”, “medium”, or “low risk” of negative impact on fundamental human rights and decent working conditions.

5. As part of the risk assessment, the Group, through the platform, has sent customized questionnaires to defined business contacts to gather additional information. The Group has ambition in the near future to use the platform to request documentation and certifications from first-tier suppliers, business partners, and other known subcontractors.
6. Based on the findings in points 4 and 5, the Group will continually assess which actions should be taken to investigate potential negative consequences for fundamental human rights and decent working conditions. The Group will implement actions where the severity and likelihood of harm are highest and where the Group has the greatest influence for positive development. The prioritization is aligned with the Group's connection to and responsibility for the risk and should be proportionate to the size, nature, and context of the business.
7. The Group has the ambition to involve stakeholders, suppliers, and business partners in the implementation of actions.

In the analysis tool within the platform (interactive dashboard), analyses of the supply chain have been developed based on supplier data, the outcome of risk classification, and gathered information from the supply chain. In section 3.2, the following information generated by the analysis tool in the platform is provided:

- a. The number of first-tier suppliers and business partners.
- b. Overview of the Group's first-tier suppliers and business partners, who have been presented with and have responded to questionnaires relevant to the Group's due diligence assessment.
- c. Overview of the Group's first-tier suppliers and business partners who have indicated:
 - a. That their business is covered by the Transparency Act.
 - b. That a due diligence assessment of their business has been conducted in accordance with the requirements of the Transparency Act.
 - c. That the results of the due diligence assessment have been documented in a report in accordance with the requirements of the Transparency Act.
- d. Further classification of the Group's first-tier suppliers and business partners based on risk profiles “high”, “medium”, and “low”.



- e. Overview of first-tier suppliers and business partners where actions have been implemented, as described in step 6 above.

Relevant factors for the due diligence related to the Group's activities and business conditions include, among other things:

- The context of the Group's operations
- The Group's business model
- The Group's position in the supply chain
- The type of product and services

In the following, we will account for any significant risk of adverse impact on human rights or decent working conditions identified through the Group's due diligence assessments. The report also includes any uncovered violations of human rights or decent working conditions.

3.2. The due diligence assessments of the Group's own operations

Norway's Transparency Act requires certain companies to carry out due diligence activities to ensure they are operating responsibly, respecting both human rights and decent working conditions. For The Group this is ensured by internal control systems covering training, work conditions, including the physical working environment. Freedom of membership in different workforce organisations is founded in the Group's COC.

Code of conduct also include whistle blower regulative and reporting to third party. Wages, working conditions, freedom of association, banning of forced labour is governed in the document and regulated by the HSE system established and inspected by official representatives from the government.

3.3. The Group's supply chain and business partners

The Group has commercial relationships with 403 direct suppliers in the reporting year. The Group's suppliers are located in the following country/geographic area:



COUNTRY	Number of suppliers
NORWAY	354
DENMARK	14
POLEN	9
LITHUANIA	8
SWEDEN	8
NETHERLANDS	4
TURKEY	2
CURACAO	1
FINLAND	1
FRANCE	1
REPUBLIC OF SINGAPORE	1
TOTAL SUPPLIERS	403

The Group has commercial relationships with 63 business partners in the reporting year. The Group's business partners are located in the following country/geographic area:

COUNTRY	Number of business partners
NORWAY	60
SWEDEN	2
FINLAND	1
TOTAL SUPPLIERS	63

The classification tool in the platform displays the following classification of the Group's first-tier suppliers and business partners.

Number of first tier suppliers and businesspartners		
LOW	MEDIUM	HIGH
235	174	57

3.4. The due diligence assessments of the Group's product categories

3.4.1. *Marinated category*

Products are made from fileted herring. Products are conserved in brines consisting of salt, sugar and / or vinegar. The finalized products are stored in refrigerated warehouses before being packed into consumer packaging and shipped to the retailer.



The steps up until consumer packaging is done in Norway in compliance with domestic regulations and guidelines. This includes full freedom of association, no use of forced labour, covered by HSE and wages regulated by the workers union tariff wages.

3.4.2. *Marinated product category*

Products are made from fileted herring. Products are conserved in brines consisting of salt, sugar and / or vinegar. The finalized products are stored in refrigerated warehouses before being packed into consumer packaging and shipped to the retailer.

The steps up until consumer packaging is done in Norway in compliance with domestic regulations and guidelines. This includes full freedom of association, no use of forced labour, covered by HSE and wages regulated by the workers union tariff wages.

3.4.3. *Frozen product category*

Products are made from fileted or round fish, herring or mackerel. Products are conserved in brines consisting of salt. The finalized products are stored deep frozen in warehouses before thawed and packed into consumer packaging and shipped to the retailer.

The steps up until consumer packaging is done in Norway in compliance with domestic regulations and guidelines. This includes full freedom of association, no use of forced labour, covered by HSE and wages regulated by the workers union tariff wages.

3.4.4. *Consumer packed category*

The products origins from whole or pieces of herringfilet. Products are conserved in brines consisting of salt, sugar, vinegar and preservatives. The finalized products are stored refrigerated in warehouses in consumer packaging and then shipped to the retailer.

The steps up until consumer packaging is done in Sweden in compliance with domestic regulations and guidelines. This includes full freedom of association, no use of forced labour, covered by HSE and wages regulated by the workers union tariff wages.

3.4.5. *Fishmeal and fish oil food grade quality.*

The trimmings from food production is transported fresh from filet production. The products classed as marine ingredient are transported to refining. Protein fractions are dried to fish meal and oil fractions are stored in insulated stainless steel storage tanks.

Parts of the oil is then shipped to separation and refining.

Volumes of fishmeal and oil not intended as food supplements are separated and sent to the feed industry. The process steps are done in Norway in compliance with domestic regulations and guidelines. This includes full freedom of association, no use of forced labour, covered by HSE and wages regulated by the workers union tariff wages.



3.5. The result of the due diligence assessment

The due diligence has revealed the following findings that the Group has identified and prioritised in the reporting year:

Product	Identified violations of human rights/decent working conditions	Geography	How were the violations of human rights/decent working conditions uncovered?
Product described 3.4.1, 3.4.2, 3.4.3, 3.4.4, 3.4.5	None identified so far	N/A	N / A

Product	Significant risk of violations of human rights/decent working conditions	Country/geographic area	How were the risk of human rights violations/decent working conditions uncovered?
Product described 3.4.1, 3.4.2, 3.4.3, 3.4.4, 3.4.5	There has been identified risk of violations of human rights / decent working conditions for 57 suppliers, which will be subject to further investigation. The risk assessment is a work in progress.	Norway, Sweden, Denmark, Lithuania, Curacao, Republic of Singapore, Turkey	The risks were indicated from the algorithms built in our digital platform developed by Ignite Procurement AS as described under 3.1.

4. MEASURES TO CEASE, PREVENT OR MITIGATE THE ADVERSE IMPACT

We have implemented the following measures based on the Group strategy

Identified violation/risk of violation	There is no obvious risk observed needing special attention or preventative action, but the risk assessment is a work in progress.
--	--



Measures taken	As a general preventative measure as the Group (Grøntvedt AS) has applied to membership in UN Global compact.
Ambitions for the reporting year	Improve internal procedures and report to UN Global compact. Marine trust and MSC that all has a chapter in their standard covering elements in the transparency act. The Group also has ambitions to expand the due diligence work to include customers outside the Nordic region during 2024,
Status	In progress

5. MONITORING OF THE MEASURES – IMPLEMENTATION AND RESULTS

5.1. Introduction

We work continuously on monitoring the implementation of the measures and the outcome.

5.2. Procedures for monitoring

Director of Quality and HSE in Grøntvedt has the overall responsibility for monitoring the implementation and outcome of the measures taken. Grøntvedt has the following procedures for monitoring the implementation of following up the suppliers in accordance with The Transparency Act.:

- We monitor the implementation and the effect of the Group's internal obligations, activities, and goals for the due diligence.
- We aim to regularly carry out internal and/or third-party assessments or audits of the achieved results and communicate the results at relevant levels within the Group.
- We aim to receive regular feedback from our suppliers to confirm that the risk-reducing measures are being followed and/or to confirm that damage in fact has been prevented or reduced.
- We aim to receive feedback from work force via their representatives and trade unions of the affected employees regarding how they experience the work and the work environment.
- We learn from the experience and the feedback that the Group has acquired through our due diligence assessments and use it to improve the process and results in the future.



6. COMMUNICATION WITH AFFECTED STAKEHOLDERS AND RIGHTS-HOLDERS

The Group has not uncovered any violations of human rights or decent working conditions in the reporting year. Nor has the Group uncovered any significant risk of violations as mentioned.

7. REMEDIATION AND COMPENSATION

The Group has not uncovered any cases requiring remediation or compensation in the reporting year.

Uthaug, 23.11.2023

BJØRNAR GRØNTVEDT

CEO AND MEMBER OF THE BOARD

HELGE GÅSØ

CHAIRMAN OF THE BOARD

HEGE AASEN VEISETH

MEMBER OF THE BOARD

ANNE SOFIE UTNE

MEMBER OF THE BOARD

ALEXANDER BORGE GRØNTVEDT

MEMBER OF THE BOARD

BENGT MARTIN THOMAS BRUE

MEMBER OF THE BOARD

