

OUR WORK THE TRANSPARENCY ACT



INTRODUCTION



The Transparency Act came into effect in 2022. As of 2024, Fishglobe Technologies fall under the requirements for «larger enterprises that are domiciled in Norway that offer services in or outside of Norway».

The main objective of the Act is to promote companies' respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services, and to ensure public access to information on how companies handle negative consequences for fundamental human rights and decent working conditions.

The primary obligation under the Act is to carry out due diligence assessments, in line with the OECD Guidelines for Multinational Enterprises. Although Fishglobe Technologies is not a multinational company, the Act applies to the company.

Within the Havbrukskompaniet AS group, Fishglobe Technologies will be subject to the requirements of the Transparency Act. The routines and practices Fishglobe Technologies has in place to comply with the Act will largely be used in other parts of the group as well.

In Havbrukskompaniet AS and Fishglobe Technologies AS, several governing documents will support our efforts to meet the requirements of the Transparency Act. This includes documents and our work related to HSE&Q, ESG and Corporate Social Responsibility, ethical guidelines (Code of Conduct), risk management, procurement terms, contracts with subcontractors, etc.





OUR BUSINESS

Fishglobe Technologies main activities are related to the development, sales, project execution, and service/aftermarket activities associated with the globes we deliver in a global market (Norway, Scotland, Canada, Chile, Iceland, Middle East, etc.).

Since we started building our first facility in 2018, Fishglobe Technologies has focused on respecting fundamental human rights and ensuring decent working conditions for all involved—both internally and among our suppliers.

We build our business on strong partnerships with key suppliers. Currently, we have two main suppliers, both of which are Norwegian.

Both of our main suppliers procure materials and equipment from Norwegian and larger, reputable international subcontractors. Our supply chain is considered transparent and relatively uncomplicated.

There is always a risk associated with the purchase of goods and services; our work related to risk assessment is an ongoing process that will now also address the requirements of the Transparency Act. Fishglobe Technologies has previously conducted a qualification of our main suppliers and will ensure that the requirements of the Transparency Act are upheld in the supply chain going forward.

One of the most important tools we will use at Fishglobe Technologies is to focus on the Transparency Act and the requirements/expectations placed on ourselves and our suppliers. In dialogue with suppliers and in the work carried out in our projects, we will focus on human and labor rights.



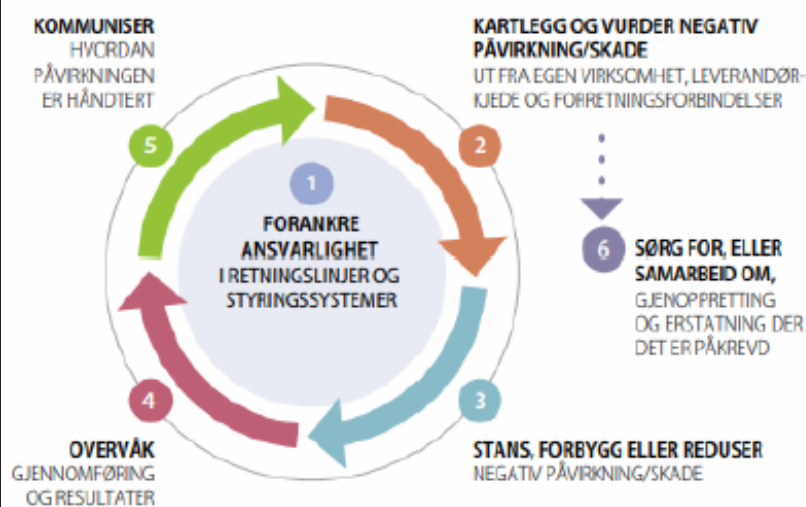
DUE DILIGENCE ASSESSMENTS, REPORTING, AND DISCLOSURE

The Transparency Act aims to ensure public access to information on how we at Fishglobe Technologies work with this topic.

Due diligence assessments follow a clear structure and sequence of six steps as defined in the OECD's guide for due diligence for responsible business conduct:

At Fishglobe Technologies, we will ensure that adequate due diligence assessments are conducted and updated as needed. We will publish our statement related to the Transparency Act annually by 30 June.

FIGUR 1. AKTSOMHETSVURDERINGSPROSESSEN OG STØTTETILTAK



DUE DILIGENCE — OUR APPROACH

1. Embed responsibility in our policies and management systems. The CEO is responsible for content, coordination, internal advisory, and reporting, while all management functions are responsible for compliance and follow-up.

2. Identify and assess risks: We will assess the risk of violations of human rights and decent working conditions internally and among our suppliers. Where the risk is assessed to be highest, we will prioritize these areas when conducting assessments.

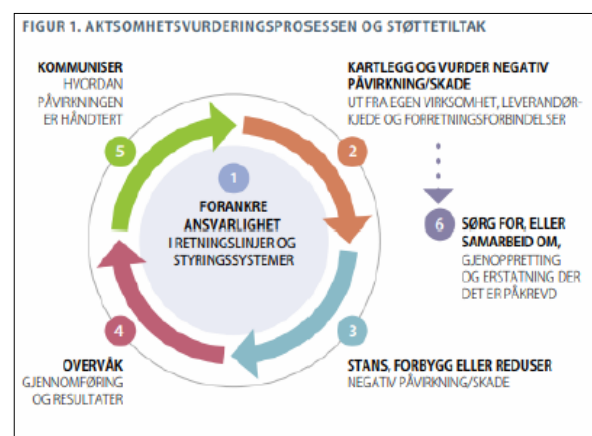
3. In the autumn of 2024, we began construction of three new globes. Over the past year, we have therefore prioritized the follow-up of our main supplier, who is currently building these globes at a site in Norway. The main focus has been on hiring resources by our main supplier. The supplier has documented systematic and well-established procedures for complying with the Transparency Act, with particular attention to their subcontractors.

4. Over the next year, we will establish operational activities for globes located outside of Norway. Therefore, risk assessment with associated activities related to this part of the business will be prioritized to ensure that the company meets the requirements of the Transparency Act in an appropriate and effective manner.

Special focus will be directed towards collaborators who provide services and materials related to our operations outside of Norway.

5. 5. Communicating with stakeholders: An annual statement will be published online by June 30. Any inquiries will be responded to on an ongoing basis in accordance with the law. Please contact the CEO; the email address is available at www.fishglobe.no.

6. Cooperation on remediation/compensation: We follow up on matters requiring remediation or compensation for harm. As of today, no such cases have been identified within our business or supply chain.





SIGNATURES

Tor M. Madsen

Managing Director
Tor Magne Madsen

Arne Berge

Chairman
Arne Berge

Petter Aanonsen

Board member
Petter Aanonsen

Sandnes, 13.06.25