

Statement
The Norwegian Transparency Act
For the financial year 2025



Background

A short introduction and implementation of The Transparency Act

The company, Kaldvik AS (hereinafter: the company) is covered by the Act relating to enterprises' transparency and work in fundamental human rights and decent working conditions (hereinafter the "Transparency Act") and is thus obliged to carry out and report on due diligence processes that must ensure fundamental human rights and decent working conditions.

The Transparency Act requires that Kaldvik AS must identify and assess adverse impacts in operations, supply chains and business relationships regarding violations of fundamental human rights and decent working conditions. The companies that are covered by the law must publicly report on the due diligence processes that are carried out. The statement must be updated and published on our website by 30 June each year and otherwise in the event of significant changes in the company' risk assessments.

The due diligence process is carried out in accordance with the OECD Guidelines for Multinational Enterprises, to align with UN Guiding Principles on business and Human Rights (UNGPs).

Kaldvik has carried out due diligence by implementing the Transparency Act in accordance with the OECD Guidelines for Multinational Enterprises.

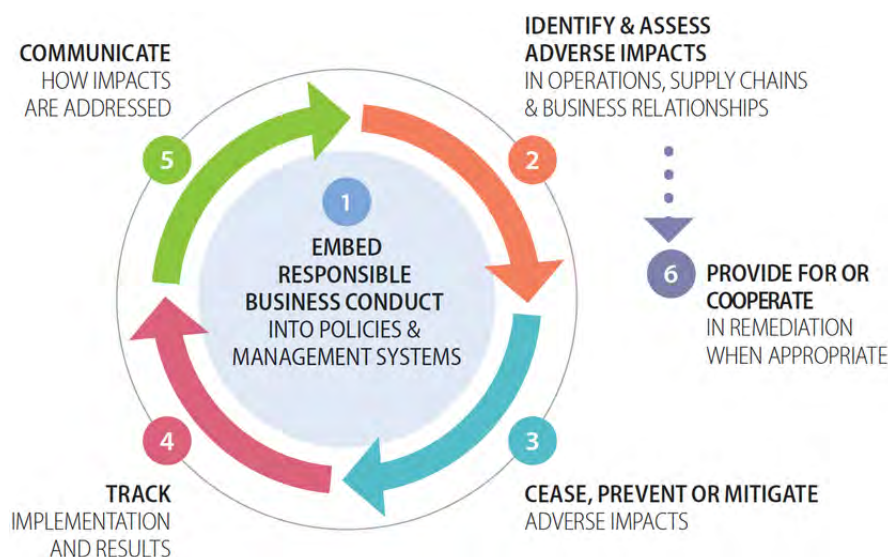
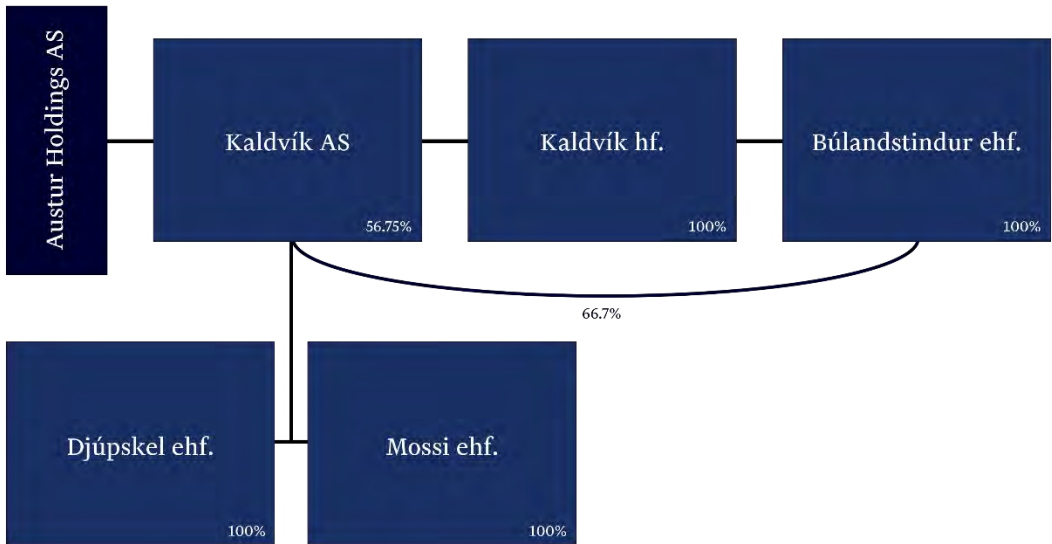


Figure: OECD (2018) Due Diligence Guidelines for Responsible Business Conduct

The due diligence process consists of six stages, that are adjusted to the factors of Kaldvik AS, such as the size of the company, the context of its operations, its business model, its position in supply chain, and the nature of its products or services.

Key information about Kaldvik AS and our supply chain

Name:	Kaldvik AS
Address:	Nordfrøyveien 413, 7260 Sistranda
About:	Kaldvik is one of the leading salmon farmers in Iceland. Kaldvik has a well-developed and fully integrated value chain controlling all steps from hatchery to sales, enabling the group to provide its customer with a sustainable premium product. Kaldvik is headquartered in Iceland.
Organizational structure:	Kaldvik is a limited company publicly listed on the Euronext Growth market, and the First North market in Iceland. The majority shareholder is Austur Holding AS (57% as at 31.12.25), owned by Heimstø AS. Kaldvik AS has 43% external minority ownership on Euronext Growth market and First North market in Iceland.
Total number of workers:	Per 31.12.2025 there were no employees in the parent company, while there were 204 employees in the Group.
Any material or organizational changes since last report:	As of 25 March 2025, Kaldvik AS completed the acquisition of the remaining shares in Búlandstindur ehf., as well as the acquisitions of Djúpskel ehf., which operates the Group's box factory, and Mossi ehf., the property company that owns the factory building used by Djúpskel ehf.
Contact person for the report:	Fjóla Ragnarsdóttir, Financial Expert transparencyact@kaldvik.is
Organizational chart:	<p>As of 31 December 2025, Kaldvik AS is organized like this:</p>  <pre> graph TD AH[Austur Holdings AS] -- 56.75% --> KA[Kaldvik AS] KA -- 100% --> KH[Kaldvik hf.] KA -- 100% --> BS[Búlandstindur ehf.] KA -- 100% --> DJ[Djúpskel ehf.] KA -- 100% --> MO[Mossi ehf.] BS -- 66.7% --> DJ </pre>

Method: Due diligence process

Embedding responsible business conduct into policies and management systems

In a board meeting, Kaldvik AS has embedded responsible business conduct, to ensure that the Transparency Act is implemented, taken care of, and complied with. In addition to the board taking executive responsibility for promoting and respecting fundamental human rights and decent working conditions, the following mandates have been assigned in the company:

- Vidar Teis Aspehaug, CEO

Mandate: The overall responsibility for safeguarding and remaining in compliance with the Transparency Act in Kaldvik AS.

- Fjóla Ragnarsdóttir, Financial Expert

Mandate: The overall responsibility for incorporating routines for handling information obligations and ensuring that these are complied with in Kaldvik AS.

The company has introduced a code of conduct for suppliers and business partners, included information regarding actual adverse impacts and significant risks of adverse impacts that the company has identified through its due diligence, and included information regarding measures the company has implemented or plans to implement to cease actual adverse impacts or mitigate significant risks of adverse impacts, and the results or expected results of these measures. It has also been decided that the board has planned to remain in compliance with the requirements of the Transparency Act, as well as how the company shall work with it.

The guidelines are introduced to identify how the company shall work with fundamental human rights and decent working conditions, and it shall facilitate how the company work in a systematic and effective:

- i. assessing, controlling and the follow-up of internal conditions and the supply chain,
- ii. compiling risk assessments and due diligence assessments, as well as
- iii. handling requests regarding the right to information.

It has been decided that the board, in accordance with the previously mentioned mandates, shall update the relevant routines and guidelines when necessary.

Identification and assessment of adverse impacts

Internally in our own organization

We have completed the work on assessing the internal conditions in Kaldvik AS, in order to identify the areas that pose a risk of negative impact on fundamental human rights and decent working conditions.

Based on our assessment and investigations of the internal conditions, we have identified that internally in our own enterprise, we neither cause, contribute to, nor are directly linked to actual or potential negative consequences on fundamental human rights and decent working conditions. There is generally low risk in our enterprise.

The areas that have been mapped and assessed in more detail in relation to violations of basic human rights and decent working conditions are areas that we believe have the highest risk of negative impact on human rights and decent working conditions in this specific business.

The list below is not complete, but illustrates examples of topics where we have carried out due diligence processes internally:

- Working environment – both physical and psychosocial.
- Working hours and diversity.
- Freedom of organization and labor rights.
- Collective bargaining agreements, wages, and holidays.
- Health, safety, and environment - Work with health, environment and safety.
- Forms of connection for the employment and use of hired labor.
- Code of conduct and systematic work with human rights.

We have embedded responsibility in our enterprise, as well as protecting fundamental human rights and decent working conditions internally in our Code of Conduct that our employees are obliged to comply with.

The company works continuously with health, environment, and safety to ensure that our employees have a safe physical and psychosocial working environment.

We have statutory schemes such as Safety Guard and Safety Committee, and we provide training for employees who ensure health, safety, and the environment (HSE) in its operations. The company has also required HSE documentation and a deviation system for HSE.

In relation to labour rights, the company has written employment contracts. The company is bound by collective agreements and the working conditions, such as working hours and pay conditions, of

full-time, part-time, and temporary employees are ensured by these agreements. We have a time registration system, and this is revised by site manager and the payroll officer.

The company also has policies, internal guidelines and collective agreement provisions that prevent child labour, discrimination and ensure equality and equal pay, as well as the right to report blameworthy conditions.

When it comes to reporting and complaint mechanisms, we have routines for reporting unacceptable conditions that are in accordance with Chapter 2A of the Working Environment Act. This assists to uncover actual or potential negative consequences on fundamental human rights and decent working conditions, which can be seen as a future risk.

We are aware of the strict rules that apply to protect personal data. We have control over the personal data we process and how they are mapped.

The final assessment and evaluation of the actual working conditions show a low-risk profile in the company. There is not a single area where a negative impact has been uncovered. No areas with actual or potential negative consequences have been identified.

There are only a few certain procedures that have been proposed to improve the work Kaldvik AS does to have a good working environment for all our employees.

First and foremost, we will inform our employees about our work on the Transparency Act.

Even though we know the strict rules that apply to the protection of personal data, and we have control over the personal data we process and how they are mapped, we will carry out a review on how we process personal data in our business. This will include a review of the purpose and basis of the processing of various personal data, do a risk assessment of information security in our enterprise and to create privacy procedures to ensure compliance with GDPR.

It is expected that our work with the Act will contribute to reducing additional risks.

In the supply chain

We have done an assessment of our suppliers to identify the areas that may pose a risk of negative impact on fundamental human rights and decent working conditions. The starting point for the assessment is the accounts from the financial year 2022, since this is the year, the company is covered by the Transparency Act.

Kaldvik AS mainly procures services from fishing, trapping and aquaculture, agency and wholesale trade and food production industries, which we assume have an industry risk for actual or potential negative consequences on human rights and decent working conditions.

In this process, we have conducted an analysis of our suppliers in all industries, regardless of the size of the contract as our starting point. In assessing which suppliers to carry out further follow-up under the Transparency Act, we have done a risk assessment of the supplier's country, industry, product, and other known business-specific risk. It is the risk assessment of the supplier's industry that forms the basis for rough sorting of the suppliers, but since many of the suppliers belong to the same industry, we have also used other parameters in the selection. This includes, among other things, whether the supplier has received the auditor's notes, and calculations that indicate the supplier's financial condition. Among those, the so-called z-risk, that determines the likelihood a business will file bankruptcy. Among these indicators, these may give an indication that the supplier does not behave loyally to the current rules, e.g., workers' rights, but does not have to do so.

Furthermore, we have used other indicators such as the amount of turnover from the individual supplier compared to turnover from the other suppliers to Kaldvik AS. In addition, to the ratio between the supplier's total turnover compared to our purchase. The latter gives an indication of the influence we at Kaldvik AS have on the individual suppliers if they find that e.g., the employees' rights are not adequately safeguarded.

Based on the procedure listed above, we have ranked a list of suppliers that we want to conduct further. The risk assessments have been conducted to rank the suppliers, and whether any of them should be given a lower priority or a higher priority. The method has resulted in a list of five suppliers selected for further follow-ups. These four suppliers are directly contacted with a quantitative questionnaire about topics that are industry-specific for the supplier. We have two approaches in such a questionnaire. The actual answers and documentation that our suppliers have naturally carry the most weight, but we also look at how the businesses respond and how they relate to such an inspection. This analysis results in an overall risk assessment through the quantitative analysis and the business' own risk.

Based on the abovementioned risk assessments, Kaldvik AS has not found actual or potential negative consequences for basic human rights and decent working conditions at our suppliers or business partners.

A summary and potential follow-up

As part of our work under the Transparency Act, we have continued to embed responsibility at Board level and to identify and assess actual and potential adverse impacts on fundamental human rights and decent working conditions within our own operations and throughout our supply chain. To date, we have not identified any actual adverse impacts or significant risks related to fundamental human rights or decent working conditions.

Our work under the Transparency Act is an ongoing process, and we will continue to carry out regular due diligence assessments. Going forward, we will follow up on identified areas for improvement and continue to review and assess responses received from our suppliers.

In addition, we will continue to raise awareness of the Transparency Act among both our employees and suppliers. One of our key measures to reduce the risk of engaging with unsuitable suppliers is to maintain effective systems and procedures to identify potential, actual, or significant risks that could adversely affect fundamental human rights and decent working conditions. By maintaining an ongoing dialogue with and monitoring our suppliers, we aim to reduce the risk of adverse impacts within both our own operations and our supply chain.

Signed by



Asle Rønning

Chairman of the Board
Kaldvik AS



Hege Dahl

Board Member
Kaldvik AS



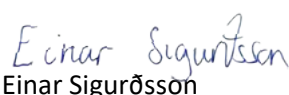
Martin Staveli

Board Member
Kaldvik AS



Renate Larsen

Board Member
Kaldvik AS



Einar Sigurðsson

Board Member
Kaldvik AS