

A fisherman wearing a white helmet and a dark blue and white raincoat with the "LERØY" logo on the back is seen from behind, standing on a boat. A large, rectangular metal net is being hoisted by a crane hook suspended from above. The background shows a body of water and a distant shoreline under an overcast sky.

# Transparency Act Report 2023

Lerøy Seafood Group ASA  
and subsidiaries

## Report concerning Lerøy Seafood Group's endeavours to promote fundamental human rights and decent working conditions, pursuant to the Norwegian Transparency Act.

**HONEST  
OPEN  
RESPONSIBLE**

*Creative*

### 1. Introduction and background

Norway's Transparency Act came into effect on 1 July 2022. The primary purpose of the Act is to promote enterprises' respect for fundamental human rights and decent working conditions. The law is also meant to provide the public with information about how companies are managing their human rights risk.

The Norwegian Transparency Act obliges Lerøy Seafood Group (Lerøy) to:

- perform due diligence assessments in accordance with the OECD Guidelines for Multinational Enterprises,
- describe how Lerøy performs its due diligence assessments relating to human rights and decent working conditions, and
- respond to requests for information by members of the public.

Lerøy Seafood Group ASA is a public limited liability company listed on the Oslo Stock Exchange. It has undertaken to comply with the prevailing Norwegian Code of Practice for Corporate Governance issued by the Norwegian Corporate Governance Board (NUES). In this report, the term "Lerøy" means Lerøy Seafood Group ASA

and its subsidiaries, as defined in section 1–3 of the Norwegian Accounting Act (regnskapsloven).

This report relates to the period 1 January 2023 to 31 December 2023 and includes the following:

- A general description of Lerøy's organisation, business operations, guidelines and procedures for dealing with any actual and potential negative consequences for fundamental human rights and decent working conditions.
- Disclosure of actual negative consequences and any material risk of negative consequences uncovered by Lerøy's due diligence assessments.
- Disclosure of measures that Lerøy has initiated or plans to initiate to halt actual negative consequences or limit any material risk of negative consequences, and the outcome or expected outcome of these measures.

The report is a group-wide report structured in accordance with the business segments in which the subsidiaries are organised (see table 1).

The report encompasses the entire Group and has been issued and signed by the Board of Directors and the CEO of Lerøy Seafood Group ASA. The same applies to subsidiaries

with a statutory duty to report. This report is available at [leroyseafood.com](https://leroyseafood.com).

#### 1.1 The Lerøy Group

Lerøy is a global seafood enterprise with roots going back to 1899. The Group's core business is the farming of salmon and trout, the wild catch of whitefish and shellfish, secondary processing, product development, marketing, sales and distribution of seafood.

An important part of Lerøy's strategy is to be a fully integrated supplier of its main products. It conducts its business through a number of subsidiaries in Norway and internationally. Lerøy's head office is located in Bergen, but the Group's operations are distributed along the entire Norwegian coast. Lerøy has operations in 14 countries.

We offer a wide range of healthy products, which are supplied to supermarkets, restaurants, canteens and hotels. Every day we deliver the equivalent of 5 million seafood meals to 80 different countries.

Our vision is to be the leading and most profitable global supplier of sustainable, high-quality seafood.

In 2023, the Group had 6 013 employees, 2 081 of whom worked outside of Norway.

The Group reports on three business segments. The segment breakdown below shows the subsidiaries for which Lerøy had a duty to report under the Transparency Act as of 31 December 2023.

**Table 1**

Lerøy Seafood Group ASA		
Farming	Wild Catch	Value Added Processing, Sales & Distribution (VAPS&D)
Lerøy Aurora AS	Lerøy Havfisk AS	Lerøy Seafood AS
Lerøy Midt AS	Nordland Havfiske AS	Sjømathuset AS
Lerøy Midt Sjø AS	Hammerfest Industrifiske AS	Lerøy Fossen AS
Lerøy Vest AS	Finmark Havfiske AS	Lerøy Norge AS
Lerøy Vest Sjø AS	Lerøy Norway Seafoods AS	Lerøy Bulandet AS
Sjøtroll Havbruk AS		
Lerøy Sjøtroll Kjærelva AS		
Lerøy Austevoll AS		
Norsk Oppdrettsservice AS		

## Farming

The Farming segment comprises the Group's three farming regions in Norway: Lerøy Aurora, located in Troms and Finnmark; Lerøy Midt, located in Nordmøre and Trøndelag;

and Lerøy Sjøtroll, located in Vestland. In 2023, the operation had around 1 800 employees and harvested about 160 000 tonnes gutted weight (GWT) of salmon and trout.

## Wild Catch

The Wild Catch segment consists of Lerøy Havfisk and Lerøy Norway Seafoods (LNWS). Lerøy Havfisk has licences to fish just over 10 per cent of the total Norwegian cod quotas in the zone north of 62 degrees latitude, corresponding to around 30 per cent of the total quota allocated to the trawler fleet. Lerøy Havfisk also owns several processing plants, which are mainly leased out to its sister company LNWS on long-term contracts.

Lerøy Havfisk owns trawler licences with an operational obligation linked to LNWS plants. LNWS's primary business is processing wild-caught whitefish. The company has 10 processing plants and purchasing stations in Norway, five of which are leased from Lerøy Havfisk. Significant investments have been made in recent years, both to make operations more efficient and to expand the product range.

Lerøy Havfisk has around 400 employees and LNWS has 600 employees.

## Value Added Processing, Sales & Distribution (VAPS&D)

The VAPS&D segment is the downstream operation of Lerøy's fully integrated value chain. It includes not only the processing, sales and distribution of the Group's own-produced products, but also significant business interactions with third party suppliers. Lerøy distributes to more than 80 markets globally and has operations in 14 countries. The segment has around 3 000 employees in all.



## 2. Basis for responsible business practice

### 2.1 Protection of human rights and decent working conditions at Lerøy

Lerøy has pledged to respect internationally recognised standards for human rights and decent working conditions, and strives to comply with all applicable laws and regulations – including internationally recognised conventions on the protection of human rights and decent working conditions.

In particular, Lerøy undertakes to comply with the following international conventions and standards:

- The International Bill of Human Rights and other relevant human rights conventions
- The ILO's Fundamental Principles and Rights at Work
- The UN's Guiding Principles on Business and Human Rights
- The OECD's Guidelines for Multinational Enterprises, where applicable

In addition to complying with the above-mentioned standards and principles, Lerøy has drawn up its own ethical guidelines, codes of conduct and policy documents relating to human rights and decent working conditions. The areas on which Lerøy focuses particularly are:

- Forced labour
- Child labour
- Permanent employment
- Fair pay and regulated working hours

- Trade unions and free collective bargaining
- Discrimination and harassment

The company expects its suppliers and business partners to do the same.

### 2.2 Board of Directors and Group Management

Both Group Management and the Board of Directors fully support the Group's efforts to protect fundamental human rights and decent working conditions. The Board has approved the guidelines (codes of conduct) and policy documents described below. As well as Lerøy's Group Management and Board of Directors, the chief executives of the reportable subsidiaries have also been involved in processes relating to the Norwegian Transparency Act.



### 2.3 Guidelines and policies

The core principles of protecting human rights and decent working conditions are set out in the Group's Code of Conduct and other policy documents that are applicable to all subsidiaries within the Group.

- Code of Conduct
- Supplier Code of Conduct
- Human Rights policy
- Occupational Health and Safety policy
- Diversity and Inclusion policy
- Whistleblowing policy
- Procurement policy
- Fish Feed policy

## 2.4 Responsibility and operationalisation

Responsibility for the implementation, operationalisation and continuous improvement of the due diligence process is distributed as follows:

- Lerøy Seafood Group ASA's Board of Directors has overall responsibility.
- Group Management and the managements of each business area (segment) attend to the entire due diligence process on behalf of the Group.
- The chief executives of the reportable subsidiaries are responsible for performing and following up due diligence assessments in their own operations.

The purpose of the above-mentioned codes of conduct and policy documents is to establish a set of shared principles and rules that are applicable to all Lerøy employees, suppliers and business partners. The Group's codes of conduct reflect Lerøy's values and provide guidance on the principles that employees and partners must abide by with respect to human rights and decent working conditions.

All employees must be engaged on lawful terms and conditions, which includes a specific written contract, the correct pay, sufficient training and follow-up during the employment period, and the freedom to form or join a trade union. Lerøy focuses on equal rights for men and women. More information about the Group's endeavours to promote equality and combat discrimination may be found in the [Group's Equality Report 2023](#).

Each individual employee is responsible for complying with Lerøy's Code of Conduct. The Group communicates

constantly with its employees and encourages openness and engagement.

The Group has established an internal mechanism whereby employees may anonymously report suspected wrongdoing and censurable conditions. A group-wide committee has been established to deal with incoming reports. The committee coordinates the administrative steps involved and the implementation of necessary measures.

Companies in the Lerøy Group submit quarterly reports to head office in the form of a "compliance certificate". Compliance reports contain information on several areas relevant for the protection of human rights and decent working conditions. These include occupational health and safety, codes of conduct and whistleblowing reports.

Every year, the Board of Directors reviews the codes of conduct and policy documents. An annual calendar is ensuring the performance of different activities throughout the year.

The Group has established a [Supplier Portal](#) on its global website. Via this portal, new and existing suppliers can find information about the Group's expectations with respect to supplier behaviour. The Group has drawn up a Supplier Code of Conduct and a self-assessment form that may be accessed via the online Supplier Portal. These documents explain what the Group expects of its suppliers and are intended to ensure that suppliers develop in a sustainable direction. In these documents, particular emphasis is placed on highlighting the Group's respect for human

rights and decent working conditions, as well as the steps it takes to combat corruption and money laundering.

Information about Norway's Transparency Act may be obtained by contacting the Group via the Contact form on Lerøy's website [leroyseafood.com](http://leroyseafood.com).

External parties may submit reports of suspected wrongdoing or censurable conditions via Lerøy's website or this [link](#). Such reports may be made anonymously if so desired.

## 2.5 Communication with stakeholders

Lerøy communicates continuously with its various stakeholders by means of quarterly reports and other notices, in accordance with the Oslo Stock Exchange's guidelines. See [Annual Report for 2023](#), page 211, for a list of stakeholder groups. Lerøy is also actively involved in various special interest organisations, such as the Norwegian Seafood Federation.

## 3. Due diligence assessments and relevant measures

### 3.1 Description of the due diligence process

The Group has performed a risk assessment of the actual or potential adverse impact of its business activities and operations on fundamental human rights and decent working conditions.

Pursuant to the Norwegian Transparency Act, the following overarching goals have been set in relation to the due diligence process:

- Ensure the business or operation does not have a potential or actual adverse impact on fundamental human rights or decent working conditions.
- Provide information to the public annually in the form of a report.
- Provide information upon request.

### 3.2 Identification of risk

A wide-ranging survey has been undertaken to identify those areas of the business, both geographical and operational, including the supply chain, where the risk of Lerøy having an adverse impact on human rights and decent working conditions is highest.

The risk identification process has rested on the OECD's guidelines, which focus on industrial risk, geographic risk, product/service risk and company risk. In 2023, Lerøy focused in particular on suppliers operating in countries ranked as constituting the highest risk in the ITUC Global Rights Index and Transparency International's Corruptions

Perception Index. Because Lerøy has business activities in Spain and Turkey, it focuses especially on suppliers in these countries.

The Group has performed due diligence assessments on both its own operations and its suppliers. As part of its efforts to comply with the Norwegian Transparency Act, it has focused particularly on human rights and decent working conditions.

Lerøy has centralised functions and shared management systems, and standardises across companies within the same business segment. For this reason, due diligence assessments have been performed on a segment-wide basis, with all the companies within the respective segments being assessed. The chief executive of reportable subsidiaries has performed due diligence assessments in their own business units. If a risk factor or finding relates specifically to one company within a segment, this will be disclosed.

Priorities are set on the basis of the risk survey. Prioritisation is based primarily on the risk's degree of seriousness and probability of materialising. A more detailed assessment of prioritised risk areas is then made.

As previously mentioned, Lerøy has established a Supplier Portal on its corporate website. Here, suppliers will find information about what the Group requires of them.

Lerøy has established a procurement policy and various procedures for how the Group's procurement activities are to be conducted. These documents apply to all our companies irrespective of business segment. The policy document has been approved by the Group's Board of

Directors and the boards and managements of all the subsidiaries.

As part of the onboarding process, new suppliers and customers are screened against sanctions lists and negative press reports. Negative press reports are publicly available reports containing negative, unfavourable or harmful information, including accusations of poor working conditions or human rights abuses. Going forward, existing suppliers and customers will be continuously monitored against sanctions lists and negative press reports.

Physical audits are performed on larger suppliers. In the past year, Lerøy has partnered with its largest feed supplier, which facilitates even closer cooperation with respect to subcontractors. Audits are performed on the Group's suppliers by third-party entities, as well as Lerøy's own companies. Audits of this kind focus strongly on human rights and decent working conditions.

Because Lerøy has over 9 000 suppliers from more than 30 countries, there will always be risks associated with its supply chain. Due to the large number of suppliers, Lerøy takes a risk-based approach.

This means that suppliers are assessed on the basis of various risk criteria. These include:

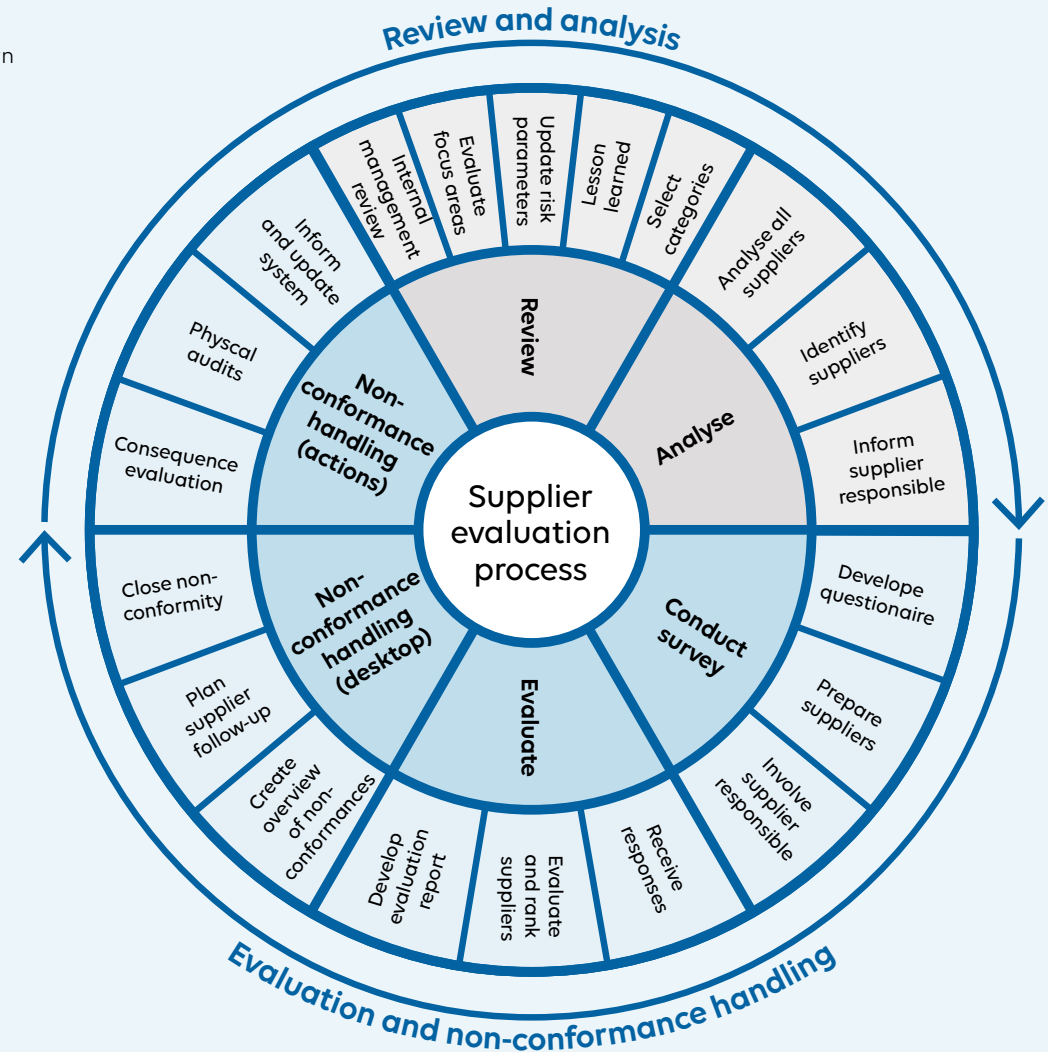
- **Supplier category**
  - Aquaculture services
  - Fish feed
  - Construction services\*
  - Shipping and shipbuilding\*
  - ICT
  - Transport services\*
  - Cleaning services\*
  - Food products
  - Rights to land and resources
  - Temporary staffing agencies\*
  - Equipment
  - Other
- **Revenue**
- **Country of origin**
- **History**

A survey of selected suppliers was also carried out. This survey focused on:

- **Governance**
  - Codes of conduct
  - Policy documents
  - Compliance
  - Quality management systems
  - Anti-corruption procedures
  - Anti-competitive behaviour

- **Supply chain**
  - Requirements and guidelines for own supply chain
- **Human rights**
  - Fair pay
  - Working hours provisions
  - Equality and discrimination
  - Modern slavery and forced labour
  - Child labour
  - Trade union rights
  - Whistleblowing procedures
- **Occupational health, safety and environment (HSE)**
  - Working environment
  - Safety
  - Sickness absence
  - Risk assessments

The results from this risk-based approach and our inquiries are further evaluated and any necessary measures implemented.



The figure shows the process for supplier follow-up and evaluation

\* Particular focus recommended by the Norwegian Labour Inspection Authority

### 3.3 Summary of due diligence assessments and associated measures

Below is a summary of the most important risks identified during the risk assessment and the risk-reducing measures that are planned or have been implemented to halt, prevent or reduce any harmful impacts.

When assessing potential measures, account is taken of Lerøy's specific involvement in the actual or potential harms that have been identified in order to select the most appropriate course of action. This means assessing whether: a) Lerøy caused (or would have caused) the negative impact, or b) Lerøy contributed (or would have contributed) to the negative impact, or c) the negative impact is (or would have been) directly related to its production processes, products or services through a business relationship.

Other risks that have been identified will be followed up in the same way to assess current checks and consider recommended measures. An individual is allocated responsibility for the risks, and a deadline for completion is set for the implementation of any planned risk-reducing measures and addressing any residual risk.

**The due diligence assessment performed on behalf of the Group did not uncover any actual negative consequences or material risk of negative consequences.**

The Group's three focus areas in 2023 will continue into the coming year. In addition, we will focus on customers' corporate governance.

- Occupational health, safety and environment (HSE) in own business operations

- Discrimination and harassment in own business operations
- Supplier corporate governance
- Customer corporate governance

#### 3.3.1 Occupational health, safety and environment (HSE) in own business operations

Lerøy maintains a strong focus on HSE in all parts of its business operations and strives constantly and in many ways to reduce HSE-related risks.

In order to reduce a higher number of injuries than desired, we are working continuously to reduce our H1 value/LTIFR. If steps are not taken, there will be a heightened risk of new injuries occurring. (LTIFR = Number of lost-time injuries in the reporting period \* 1 000 000 / Total hours worked in the reporting period).

Lerøy considers its workforce to be its most important resource and aims to provide employees with the best possible working conditions. At Lerøy, we have a strong focus on preventing accidents and unwanted incidents, and on following up closely if and when an accident occurs. We are a learning organisation, which means we learn from our mistakes and seek to apply what we have learnt in pursuit of continuous improvement.

##### 3.3.1.1 Measures and their expected impact

A number of measures were implemented in various parts of the Group in the reporting period, and we are seeing changes in individual attitudes and the overall culture which, in turn, are impacting the injury rate. As previously stated, HSE is extremely important for the Group, and we will maintain our increased focus on this area in 2024 as well.

**Some of the measures that have been implemented:**

- Management's focus has been intensified.
- A new resource is now leading the HSE endeavor across companies and segments.
- The allocation of responsibility and authority has been clarified.
- Conferences attended by staff from multiple companies and segments have been held.
- Procedures and reporting have been improved.

**In 2024, the Group will continue building on the measures implemented in 2023, while focusing on:**

- Reporting of unwanted incidents and nonconformities
- Safe work analyses and safety talk
- Various competence-enhancing measures
- Digitalisation projects
- Continuous improvement
- Additional KPIs related to HSE

The Group expects that these measures, in conjunction with day-to-day management, will reduce the number of injuries incurred going forward, and thereby also its LTIFR.

#### 3.3.2 Discrimination and harassment in own business operations

There must be genuine equality at Lerøy, and all employees must be afforded equal opportunities regardless of gender. Lerøy's Norwegian companies employ 6 013 people in permanent and temporary positions. Of these, 671 are third-party contract workers. At the close of 2023, women made up 39 per cent of the Group's entire workforce, while 61 per cent were men. Although the percentage of men and women working at Lerøy remained stable for a long time, we have seen an increase in the percentage of women in



all segments in recent years. The Group's target is to have a 40 per cent share of women in leadership positions by 2030. In 2023, women filled 26 per cent of management positions with personnel responsibility in the Group's Norwegian companies.

We strive to create a safe, inclusive and developing working environment at Lerøy, in keeping with the Group's core values. At Lerøy, diversity and inclusion mean that each employee is treated equally, irrespective of gender, age, skin colour, origin, ethnicity, language, sexual orientation or religion.

### 3.3.2.1 Measures and their expected impact

Efforts are constantly being made with respect to fundamental human rights and decent working conditions in all parts of our business operations. These include management training through leadership programmes, management handbooks and seminars, as well as increased professional support from HR with respect to the identification and management of unwanted incidents. With respect to the workforce in general, the Group's continuous improvement measures include a focus on communication and information about Lerøy's codes of conduct and core values, as well as regular training in its policies and procedures. The Group offers an eLearning course on its codes of conduct, equality and diversity, as well as its whistleblowing procedure.

The promotion of equality and diversity is established in Lerøy's overarching strategy. Increasing the percentage of women in leadership positions is one of the KPIs that Group Management has in its strategic scorecard. Efforts are underway to boost diversity in all job grades. For more information about Lerøy's efforts to combat discrimination and harassment, see our [Equality Report 2023](#).

Norwegian fisheries organisations have signed an agreement to prevent and put a stop to all forms of harassment in the fishing industry. As a result of the harassment that has been found to exist in the sector, Lerøy's Wild Catch segment is focusing especially on measures to combat this in its own operations, in partnership with the industry as a whole.

Each year, Lerøy conducts a survey of all employees within the Group, in connection with the Great Place To Work scheme. The employee survey asks specific questions relating to discrimination, bullying and harassment in order to illuminate employees' experiences in the workplace. The survey provides Lerøy with important insights for its further endeavours relating to the working environment and management.

The Group expects that the steps it has taken will contribute to a safe, inclusive and developing working environment, in line with its core values.

### 3.3.3 Corporate governance in the supply chain

The due diligence assessment conducted in 2022 revealed that we had some suppliers which had not performed a complete risk-based investigation into their own supply chains. Some suppliers also lacked policy documents and had codes of conduct that were not up to date. We found the same in our 2023 due diligence assessment. We will therefore continue to focus on our suppliers' corporate governance practices in 2024.

#### 3.3.3.1 Measures and their expected impact

New requirements set out in the Norwegian Transparency Act and the EU's Corporate Sustainability Reporting Directive (CSRD) resulted in a more intense dialogue with

and follow-up of companies in the Group's entire supply chain in 2023.

New procedures applicable across departments and business segments have been established. Nevertheless, we will continue to draw up and implement new procedures in 2024.

We expect that closer cooperation between suppliers and our quality assurance and procurement functions will have the desired effect over time. Internal training and frequent communication with the individual supplier is expected to gradually result in the new procedures being implemented both internally and externally.

The importance of corporate governance in the supply chain is underscored by the fact that it has been designated a material topic in Lerøy's materiality analysis. Going forward, Lerøy will also focus on its suppliers' corporate governance practices in areas other than human rights and decent working conditions. With effect from 2024, Lerøy will be subject to the EU's CSRD. The Group will therefore report on this area in the Board of Directors' Report section of its annual report.

### 3.4 General measures to halt, prevent or limit harmful impacts

To reduce identified risks, Lerøy has implemented the following general measures:

- Annual revision of its Code of Conduct
- Annual revision of its Human Rights policy
- Annual revision of its Supplier Code of Conduct
- Whistleblowing channel for employees
- Whistleblowing channel for third parties
- Continuous learning and development for managers and employees

The Group's digital whistleblowing channel provides employees with the opportunity to report suspected wrongdoing or censurable conditions anonymously. Reported cases are registered, investigated and dealt with in accordance with Lerøy's whistleblowing policy and internal procedures. Account shall be taken of the fact that all reported cases are different. Depending on the nature, scope and seriousness of the case, the matter is investigated by local management, the business segment's COO, the CEO or, in special cases, the Board of Directors. The measures implemented will depend on the nature and seriousness of the nonconformity.

The Group's Whistleblowing Committee submits quarterly reports on whistleblowing cases to Group Management and the Board of Directors. The Group has also established a whistleblowing channel for third parties, which is accessible on Lerøy's website. All cases are registered, investigated and dealt with in accordance with Lerøy's internal procedures. In the same way as for internal whistleblowing cases, the way cases reported by third parties are handled will depend on their nature, scope and seriousness. The matter may therefore be investigated by local management, the business segment's COO, the CEO or, in special cases, the Board of Directors. Such cases are reported quarterly to Group Management and the Board of Directors. None of the cases reported in 2023 were related to decent working conditions or human rights.

In the past year, the Group has implemented several new procedures for the follow-up of its suppliers. One such measure is the expansion of its procurement organisation. We believe that, going forward, this will play an important role in preventing and limiting harmful impacts in the supply chain.

## 4. Requests for information

In 2023, Lerøy received three requests for information pursuant to the Norwegian Transparency Act about how the Group deals with actual and potential negative consequences for fundamental human rights and decent working conditions. All these were addressed in compliance with the Transparency Act's provisions.

## 5. Further follow-up by the Lerøy Group

Lerøy will follow-up on the outcome of the due diligence assessment and the measures described above in accordance with its own procedures and guidelines, as well as through short-term and long-term initiatives. This includes communication with stakeholders about how any negative consequences are handled, as well as the remedying of or provision of compensation for such harms either alone or in partnership with others.

A due diligence assessment must be performed at least annually and also in connection with material changes in the risk picture or material changes in the Group's risk assessments. Lerøy has guidelines for the performance of due diligence assessments in segments and in all group companies. These are intended to ensure that due diligence assessments are performed uniformly throughout the Group.

Lerøy will respond to requests for information from the Group and its subsidiaries in the manner described [here](#).

Lerøy Seafood Group ASA will produce an annual Transparency Report on behalf of the Group. The Transparency Report is signed by the Board of Directors and the CEO. The same applies to subsidiaries with a statutory duty to report.

Bergen, June 13 2024

The Board in Lerøy Seafood Group ASA

**Arne Møgster**  
Chairman



**Are Dragesund**  
Board member



**Karoline Møgster**  
Board member



**Silje Elin Butt**  
Board member



**Didrik Munch**  
Board member



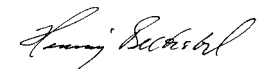
**Bjarne Kristiansen**  
Board member



**Britt Kathrine Drivenes**  
Board member



**Henning Beltestad**  
CEO Lerøy Seafood Group ASA



**Linda K. Pedersen**  
Board member



**Tor Ivar Ingebrigtsen**  
Board member



## Lerøy Seafood Group ASA subsidiaries with a statutory duty to report under the Transparency Act

**Lerøy Aurora AS**

Kurt-Einar Karlsen (General manager)  
Bjarne Reinert (Chairman)  
Sjur Svenningsson Malm  
Tor-Ivar Ingebrigtsen

**Lerøy Midt AS**

Harald Larssen (General manager)  
Bjarne Reinert (Chairman)  
Sjur Svenningsson Malm  
Finn Wilhelm Sinkaberg  
Helene Bergsli  
Bjørn Saga Østensen

**Lerøy Midt Sjø AS**

Harald Larssen (General manager)  
Bjarne Reinert (Chairman)  
Sjur Svenningsson Malm

**Lerøy Vest AS**

Morten Egenæs Fjæreide (General manager)  
Bjarne Reinert (Chairman)  
Sjur Svenningsson Malm  
John Andre Njåstad

**Lerøy Vest Sjø AS**

Morten Egenæs Fjæreide (General manager)  
Bjarne Reinert (Chairman)  
Sjur Svenningsson Malm

**Sjøtroll Havbruk AS**

Morten Egenæs Fjæreide (General manager)  
Helge Singelstad (Chairman)  
Sjur Svenningsson Malm  
Frode Møgster  
Nils Arve Eidsheim  
Bjarne Reinert  
Karoline Møgster  
Nina Møgster

**Lerøy Sjøtroll Kjærelva AS**

Morten Egenæs Fjæreide (General manager)  
Bjarne Reinert (Chairman)  
Sjur Svenningsson Malm

**Lerøy Austevoll AS**

Ivar Helge Melingen (General manager)  
Ivar Wulff (Chairman)  
Henning Beltestad  
Kim Fjellheim

**Norsk Oppdrettservice AS**

Karl Tron Skarpenes (General manager)  
Bjarne Reinert (Chairman)  
Andreas Lindhom  
Harald Larssen  
Morten Egenæs Fjæreide  
Torgny Vetarhus

**Lerøy Havfisk AS**

Eldar Kåre Farstad (General manager)  
Helge Singelstad (Chairman)  
Arne Møgster  
Henning Kolbjørn Beltestad  
Britt Kathrine Drivenes  
Sjur Svenningsson Malm  
André Steffensen

**Nordland Havfiske AS**

Ronny Vågsholm (General manager)  
Eldar Kåre Farstad (Chairman)  
Tone Utseth Myklebust  
Lars Ole Sørensen  
Pål Krüger

**Hammerfest Industrifiske AS**

Ronny Vågsholm (General manager)  
Eldar Kåre Farstad (Chairman)  
Elisabeth Rønning  
Kurt Alfred Methi  
Evelyn Lundanes Rørvik

**Finnmark Havfiske AS**

Ronny Vågsholm (General manager)  
Eldar Kåre Farstad (Chairman)  
Tone Utseth Myklebust  
Sigurd Kvammen Råfaelsen  
Evelyn Lundanes Rørvik  
Andreas Bye Paulsen

**Lerøy Norway Seafoods AS**

Børge Soleng (General manager)  
Helge Singelstad (Chairman)  
Arne Møgster  
Bjarne Egil Kristiansen  
Nina Katrine Hanssen  
Henning Kolbjørn Beltestad  
Sjur Svenningsson Malm  
Britt Kathrine Drivenes  
Mikael Johansen

**Lerøy Seafood AS**

Ivar Wulff (General manager)  
Henning Kolbjørn Beltestad (Chairman)  
Sjur Svenningsson Malm  
Kjersti Selvik  
Linda Larsen  
Fredrik Kristensen

**Sjømathuset AS**

Nikolai Thorstensen (General manager)  
Ivar Wulff (Chairman)  
Vidar Egil Olsen  
Eirik Fosse  
Lene Fammestad  
Kristine H. Hartviksen

**Lerøy Fossen AS**

Endre Kristensen (General manager)  
Ivar Wulff (Chairman)  
Knut Hallvard Lerøy  
Kjersti Selvik  
Tove Camilla Ruud Olsen  
Toralf Tufta

**Lerøy Norge AS**

Tom Nordby (General manager)  
Ivar Wulff (Chairman)

**Lerøy Bulandet AS**

Per Arild Tysse (General manager)  
Knut Hallvard Lerøy (Chairman)  
Ivar Wulff  
Owen Jarvis Westergård  
Ruth Landøy  
Ragna Sofie Hillersøy

*(Signed electronically)*

