

Insula AS

The Norwegian Transparency Act (Åpenhetsloven)

2023

Introduction

INSULA is a producer and supplier of seafood products for the food retail industry and the foodservice industry in the Nordic region. The company's portfolio includes both fresh, frozen and canned seafood products that Insula develops, manufactures, markets and sells.

Insula was established as a seafood group in 2015, but the companies that today make up the group has a history that dates back to 1905. The idea behind establishing Insula was to gather and build interdisciplinary and strong expertise within processing and sale of seafood. Since its inception, Insula has completed more than 20 acquisitions, which together form today's seafood group Insula.

The group's overall goal is to increase seafood consumption among our consumers, and our ambition is to become the leading supplier of sustainable seafood in the Nordic markets. Another objective is to achieve the best profitability in our industry.

Our vision: Seafood is good for the body and good for the environment. Consumers choose seafood when it tastes good and is easy to prepare. We have a strong commitment to develop healthy, sustainable and convenient seafood products with superior taste. In this way we make society healthier and more sustainable. And this is how we keep a proud seafood tradition alive and constantly evolving.

Our values: Courage, closeness and commitment

The Insula group's main owner is Kverva AS, a privately owned Norwegian investment company.

A better world through love of seafood

Date Amund Fjørtoft, CEO

The original report in Norwegian is signed electronically and can be found on www.insula.no

General information about Insula

Address Head Office: Storeidøya, 8370 Leknes

Number of employees: Approximately 1000 organized in different business areas.

Contact person: Amund Fjørtoft, CEO Insula AS

Contact information: amund.fjørtoft@insula.no

Website where the report is published: www.insulaseafood.com

Organisation:

Insula is organised in five different business areas. Each business area is individually managed by local management groups.

The **FMCG business areas** are **Insula Norway, Marenor AB and Insula Denmark**¹. Their aim is to be the seafood expert in each respective market, helping consumers to choose seafood more frequent through strong partnerships with our customers.

The fourth business area, **Insula Whitefish**, is responsible for securing quality raw material for the group's companies. The proximity to the fishermen and the buyer is key to this role. This provides the necessary preconditions for good quality and regular supply. Insula Whitefish also accounts for large parts of Insula's export outside the Nordic region.

A fifth business area, **Insula Redfish**, was established in 2023 and is a dedicated joint purchasing, processing and distribution facility for salmon, serving both internal and external customers.

See schematic overview in figure 3.

Each company within Insula Norway, Insula Whitefish and Insula Redfish, all located in Norway, compose their own reports according to the Norwegian Transparency act and can be found on the respective webpage (insula.no) and (firstseafood.no). Marenor AB and Denmark are not directly covered by the Transparency act per se, but indirectly covered as subsidiaries of Insula AS.

This report covers Insula's group level functions (Insula AS) as well as subsidiaries outside of Norway; Insula Denmark and Marenor AB in Sweden. For additional information and details please contact Insula Denmark and Insula Sweden directly (insula.dk and marenor.se).

On a group level, Insula has the following functions: General Management, Finance, IT Business development and Sustainability. Some are employed directly by Insula AS and some have their formal employment within other Insula companies. A total of 16 persons were directly employed by Insula AS the 31st of December 2023.

¹ Insula Finland was discontinued in the beginning of 2024

This report is signed by Insula’s CEO and the board and anchored in the management team in Insula AS. It covers the period 1 January to 31 December 2023.

Value chain

As a major seafood processor, the main raw materials are fish and other seafood products, as well as ingredients and packaging materials. We purchase a few products which origin from countries where the risk of breaches on human rights and decent working conditions is high, but most of the purchased products origin from non-risk countries. Insula Whitefish and Insula Redfish are part of the value chain as suppliers of raw materials to other Insula companies.

The downstream value chain for Insula in total – and in this report relevant for Marenor AB and Insula Denmark, are food retail chains, food service customers and other producers, both in the Nordic countries and export markets. The upstream value chain mainly consists of raw material suppliers. Insula has no transport functions of our own but can still be responsible for the transport of the products.



Figure 1. Schematic overview of the value chain

Information

Insula AS is obliged to answer any request for information related to the Transparency act, human Rights and/or working conditions. No such requests have been made to Insula in 2023.

All requests for information can be addressed to post@insula.no

Double materiality assessment

In 2023, Insula decided to conduct a double materiality assessment according to CSRD for the entire group. The assessment was done during the first two quarters of 2024 and involved dialogue with selected stakeholders. The result of the assessment will be further processed and presented during 2024. Two of the identified material topics are *Own workers* and *Workers in the value chain*, which will add additional focus in line with the requirements in the Transparency act.

Due diligence process

Due diligence according to the Transparency act is a continuous process to help enterprises identify risks relating to human rights and labour rights with a view to ending, preventing or mitigating those risks. Due diligence is an essential element of international responsible business conduct and is a key theme of the internationally endorsed OECD Guidelines for Multinational Enterprises (2023) and the United Nations Guiding Principles (UNGPs). Insula's due diligence process follows OECD's six main principles (figure 2).

Each business area manages their own risk assessments/due diligence processes, and it is organised under different functions, such as Quality and Sustainability, Purchasing and/or HR together with the local management team, depending on the topic and if it is an internal or external issue.

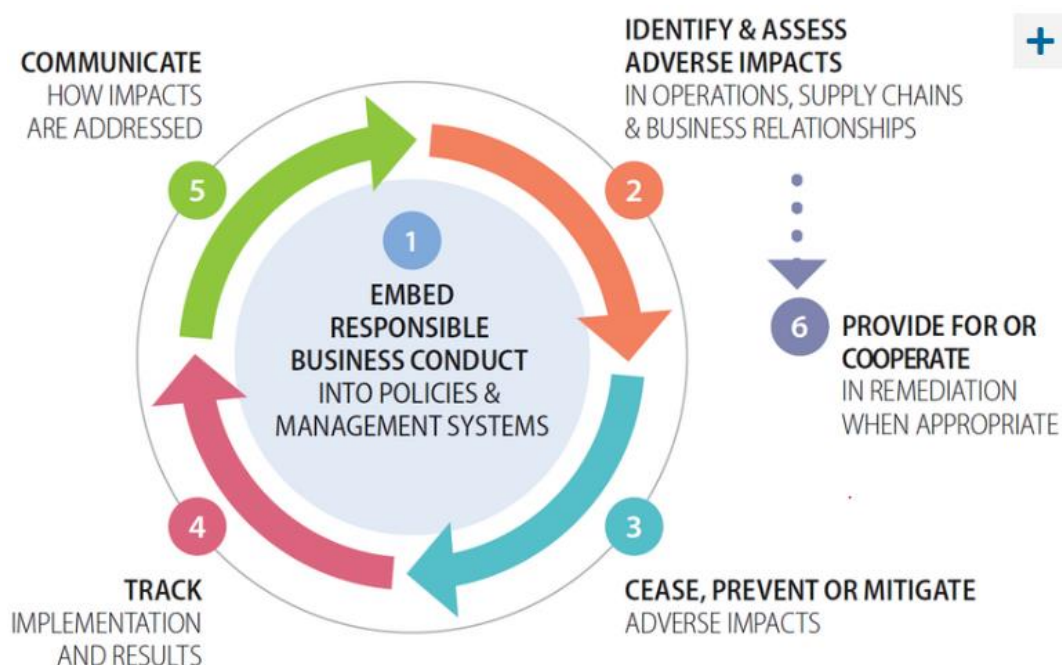


Figure 2. The Due diligence process according to OECD.

Processes regarding human rights and working conditions

We are committed to respect human rights and decent working conditions in our own operations and throughout the supply chain. Our approach to human rights and decent work internally as well as externally, is guided by external and internal policies and procedures.

Scope External

For Insula AS, the main purchases are services and systems related to Finance and IT. All IT hardware and software is purchased through a central agreement. The function responsible for the purchase is also responsible for the risk assessment.

Insula DK and Marenor AB are responsible for selection and evaluation of their own suppliers, including aspects on human rights and decent working conditions. Insula has a **Supplier Code of Conduct** based on international standards such as the Universal Declaration of Human Rights, the International Labour Organization's core conventions, and the UN Global Compact. It outlines the minimum requirements that we expect from our suppliers and is part of the procurement process, and available on our website.

The suppliers' compliance with the Supplier Code of Conduct is primarily monitored through assessments and dialogue. Supplier audits are conducted based on risk.

In countries classified as risk countries according to BSCI, there is an elevated risk for unethical working conditions. Examples of such countries are China, Vietnam and Thailand. Also, suppliers of additives and spices for example. To mitigate this, social certification (Sedex/BSCI or equivalent) is a demand for suppliers in risk countries.

For Insula AS, Insula Denmark and Marenor AB most products are purchased through Nordic suppliers, which generally have been assessed with low risk for violations on human rights and working conditions. However, breaches can occur, and the fisheries sector is known to be at certain risk and therefore a good dialogue with the suppliers and knowledge about the industry is essential.

Insula's Supplier Code of Conduct applies to the entire group. It was last issued, updated and approved by insula's CEO In 2022 and will be revised again during 2024.

Link to the Supplier Coc of Conduct (English): [Insula Supplier Code of Conduct](#)

Findings, external operations:

No actual negative consequences have been found through the due diligence assessments.

One key finding is that for some suppliers the social certifications need to be updated and reconfirmed. Another finding is that not all suppliers have signed Insula's Suppliers CoC (target 100%). One key action is close this gap, and to conduct supplier audits where relevant and continue to work with local partners to secure working conditions at the supplier.

Insula has about 600 users of different IT equipment. IT hardware is known to be at high risk regarding breaches on human rights and decent working conditions. Insula's contracted supplier of IT hardware has identified possible issues related to conflict minerals, cobalt and certain indigenous groups in Congo and China in its own due diligence process. The supplier is TCO-certified, approved by Insula and regularly assessed. Additional assessments within IT and software suppliers will be conducted to assure that social compliance is considered.

Scope Internal

Regarding the wellbeing of Insulas employees, including human rights and decent working conditions, each business area is responsible for its own routines and HR processes. Marenor AB has a dedicated Human Resources department, whereas Insula Denmark has the responsibility organized directly under the CEO. During 2023, the central Human Resources function at Insula AS was phased out.

Insula's ethical guidelines, the **Internal Code of Conduct**, defines the ethical standards and values that we expect from all our employees, managers, board members and business partners. It covers topics such as anti-corruption, anti-discrimination, health and safety, freedom of association, fair wages, and working hours. The ethical guideline is available on our website and intranet. It is communicated to all new employees, and signed by all employees in Insula AS.

Other important internal measures are keeping up a good relationship and dialogue with the local trade unions, as well as performing regular employee assessments and employee surveys, in addition to seeing and meeting the employees in their daily work environment.

All personnel employed by Insula AS has a formal and written employer agreement and are part of a collective agreement. Sick leave and accidents are recorded, handled and reported in the Annual report. The same also applies for Insula Sweden and Insula Denmark.

In 2023, all employees with access to an Insula mail account received training in IT security on a regular basis. Protecting sensitive information, including personal information, is crucial and an important right. The training will continue in 2024. Insula also has a common **IT-policy** with the objective to achieve safe and secure use of Insula's and the companies' IT solutions.

Insula's **Ethical guidelines** apply to the entire group and were last issued, updated and approved by insula's CEO in 2023 and will be revised again during 2024. The guidelines can be read in all local languages within Insula; Swedish, Norwegian, Danish, Finish as well as in English.

Link to Insula's ethical guidelines (English): [Insula Ethical guidelines](#)

Findings, internal operations:

No actual negative consequences have been found through the due diligence assessments.

There was not performed an employee survey in Insula Denmark and Insula at group level in 2023, which implies that there might be risk of breaches regarding the general wellbeing and health of the employees that is unknown. A survey will be conducted during 2024, where deviation, if any, will be recorded and handled.

In Marenor AB additional work on leadership is planned for 2024 to further improve the wellbeing and work-life balance for the employees.

Employers are required by law to review the pay conditions by reference to gender, as part of the Equality and Anti-Discrimination Act. It has been done in both Marenor AB and Insula Denmark in 2023 according to national laws.

Whistleblower protection law

During late 2023, the Whistleblower protection law came in to force for all companies within the Insula group. Some companies and business areas already had the whistleblowing mechanism implemented from earlier. It is now possible for anyone to anonymously report any concerns or misconduct regarding human rights and decent work violations or any other breaches to our internal and external Code of Conduct to an independent third party. For Insula AS in Norway www.mittvarsel.no and in Marenor AB and Insula Denmark haileyhr.com.

No alerts related to the Whistleblower protection law from any part of Insula were received in 2023.

Actions

- Conduct an employer assessment in Insula DK and Insula AS
- Update Insula's internal Ethical guidelines
- Update Insula's supplier Code of Conduct and ensure that all suppliers are committed to it by signing it (target 100%), in particular suppliers whose products have an origin in a risk country according to BSCI
- Conduct supplier audits where relevant, based on risk, and continue to work with local partners to secure working conditions at the supplier.
- Update and produce central policies and actions related to the work and findings in the double materiality assessment according to CSRD
- Conduct additional assessments within IT and software suppliers to assure that social compliance is considered.
- Conduct additional work on leadership to further improve the wellbeing and work-life balance for the employees in Sweden (Marenor AB).
- Continue regular training in IT security for all employers in Insula

The board

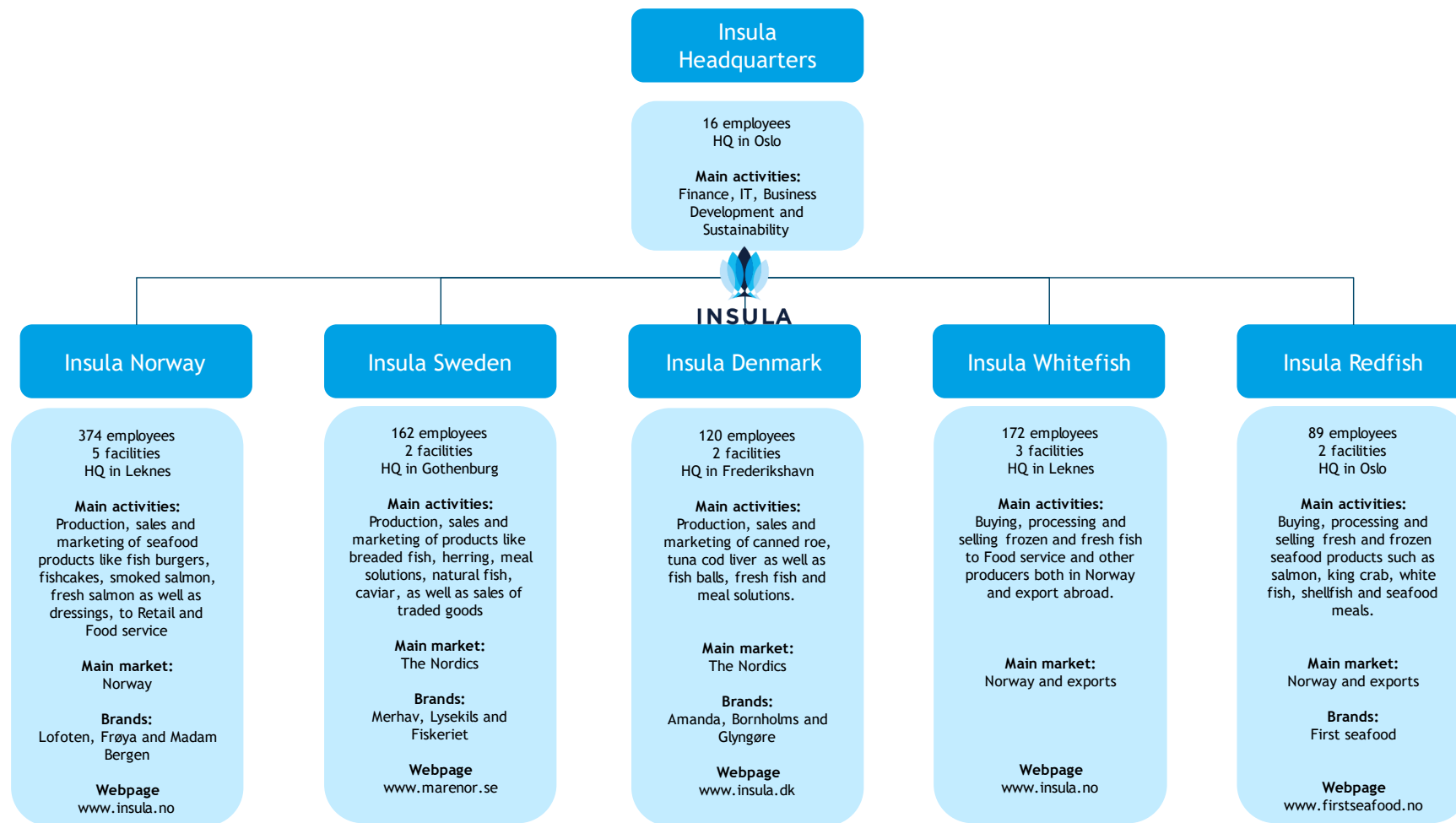
Date and signatures:

Tor Lønnum (styreleder)

Olav Holst-Dyrnes

Kristin Olstad Schea

The original report in Norwegian is signed electronically and can be found on www.insula.no



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Figure 3. Schematic overview of the Insula group.

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Reports from Insula's other subsidiaries can be found here: [https://insula.no/redegjorelser-
apenhetsloven/](https://insula.no/redegjorelser-apenhetsloven/)

Redegjørelser åpenhetsloven

Årlige aktsomhetsvurderinger

I henhold til Åpenhetsloven § 4 gjør vi regelmessige aktsomhetsvurderinger i våre selskap.

[Batsfjordbruket-AS_redegjorelse-apenhetsloven-regnskapsaret-2022](#)

[Fiskcentralen-AS_redegjorelse-apenhetsloven-regnskapsaret-2022](#)

[Froya-Salmon-AS_redegjorelse-apenhetsloven-regnskapsaret-2022](#)

[INP_redegjorelse-apenhetsloven-regnskapsaret-2022](#)

[Insula-AS_redegjorelse-apenhetsloven-regnskapsaret-2022_pdf](#)

[Keco-Logistikk-AS_redegjorelse-apenhetsloven-regnskapsaret-2022](#)

[Lofotprodukt_redegjorelse-apenhetsloven-regnskapsaret-2022](#)

[Maritim-Food-AS_redegjorelse-apenhetsloven-regnskapsaret-2022](#)

[Nordic-Group_redegjorelse-apenhetsloven-regnskapsaret-2022](#)

[Sjofrisk-Norge-AS_redegjorelse-apenhetsloven-regnskapsaret-2022](#)

[Tobo-Fisk-AS_redegjorelse-apenhetsloven-regnskapsaret-2022](#)

Figure 4: Reports on the Transparency act from Insula's subsidiaries in Norway (2022)