PRIMA BLUE
Norwegian Transparency Act Statement 2026

Organization and Operational Area of the Business

This statement covers the following companies within Prima Blue: Prima Protein and Prima Seafood.

Prima Protein produces high-quality marine proteins and marine oils from fresh pelagic fish and trimmings from seafood processing. The products are supplied to leading fish feed manufacturers, both nationally and internationally. Trimmings and by-products from Prima Seafood and other relevant suppliers are a valuable raw material source. 100% of the fish is utilized.

Prima Seafood processes and handles pelagic wild-caught fish and delivers seafood and fish products to customers worldwide.

Quality concepts and sustainability are the cornerstones of Prima Blue. The raw material used is exclusively from responsibly managed fisheries, approved by officially recognized authorities. The high quality is maintained from the fisherman through production to the customer. We strive for the highest standards in all areas – health, safety, environment, customer requirements, social responsibility, ethical principles, and employee rights. Respect and humility underpin all our actions and decisions.

Prima Blue's production facilities are located in Egersund, with an ideal location and good proximity to the fishing grounds in the North Sea.

Guidelines and Procedures for Managing Risks Related to Human Rights and Decent Working Conditions

Our commitment to respecting human rights and standards for decent work is implemented in line with the UNGP and OECD's guidelines for due diligence for responsible business conduct (Figure 1), as pointed out by the Transparency Act.

The six steps in this continuous work involve:

1. Embed responsible business conduct into policies and management systems.
2. Identify and assess adverse impacts/damage from our own operations, supply chain, and business relationships.
3. Cease, prevent, or mitigate adverse impacts
4. Track implementation and results.
5. Communicate how impacts are addressed
6. Provide for or cooperate in, remediation when appropriate.

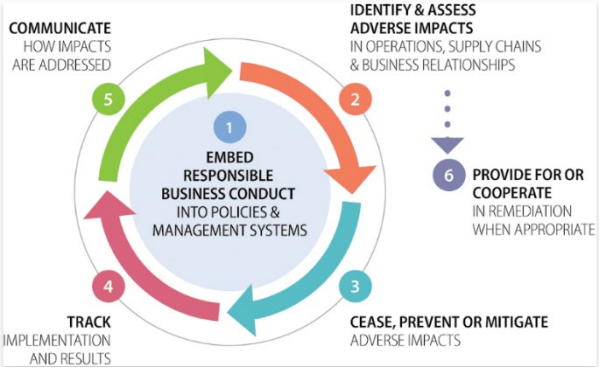


Figure 1. The Six Steps for Due Diligence Assessments*

**Source: OECD; Norway's OECD Contact Point for Responsible Business Conduct OECD's model for due diligence*

At Prima Blue, we are committed to ensuring that the products we produce, and sell are as sustainable as possible, considering both environmental and social footprints. We are committed to meeting the company's responsibility to respect human rights, which means treating people with dignity and decency and considering their welfare in the context of our production and all business activities. This applies to both our own employees and our partners.

We comply with relevant national and international laws, regulations, and standards in our daily operations. As part of this commitment, we work to operationalize our responsibility to respect human rights in line with the UN Guiding Principles on Business and Human Rights (UNGP) and the OECD Guidelines for Responsible Business Conduct.

We at Prima Blue are both women and men, from many different nations and regions, speaking different languages and coming from various backgrounds, bringing important skills with us. We are production workers, warehouse workers, technicians, managers, and salespeople. We are also mothers, fathers, and grandparents, but first and foremost, whole people who should be respected for who we are.

As a company, we are committed to ensuring that this diversity we have is unique and contributes to creating value. We see the great value of having diversity in gender, nationality, and background, not least to create a good and safe work culture that has room for everyone.

We have developed a policy for fundamental human rights and decent working conditions that explains our commitment and how we work to implement this in practice. The policy sets the overall direction for the work to ensure that human dignity is maintained in all activities associated with Prima Blue, both in our own operations and in the supply chain. Our daily work in these areas is governed by our ethical guidelines for employees and our employee handbook. Compliance with the policy is reviewed annually.

Reporting censurable conditions

Procedures and routines for reporting censurable conditions are part of the company's management system, which is available to all employees. Employees are encouraged to speak up about censurable conditions and behavior. The reporting procedures describe how to report unwanted conditions and behavior, who should receive such reports and how the company should deal with them.

Due Diligence process

Our work related to activity and reporting obligations follows the legally mandated 4-step work method:

1. Monitoring implementation and results
2. Analyze causes
3. Implement measures
4. Evaluate the results of measures

In accordance with the Transparency Act, we conduct due diligence assessments regularly to identify, prioritize, and manage negative impacts on people in our value chain, whether they arise directly in our own operations or indirectly through our business partners or suppliers.

Follow-up in the Value Chain

We have developed our own ethical guidelines for our suppliers, in line with the policy and the requirements of the Transparency Act. The guidelines are the foundation for our work to prevent and manage violations of fundamental human rights and decent working conditions in our supply chain and with our business partners. They also cover other aspects to ensure a more sustainable supply chain, including feed and food safety, environment, climate, and anti-corruption

Gender Balance

Equality is about a fair distribution of power, influence, and resources. Studies show that political, economic, and social equality between genders contributes to positive development at all levels.

A good gender balance is of great importance for a good work culture and a good working environment. We therefore focus on this when recruiting both administrative staff and production employees.

Prima Blue, particularly Prima Seafood, has a significant proportion of production workers. Parts of the work in production are physically demanding. Despite this, the proportion of women is relatively high. The total proportion of women is 33.7%. In administration and management, the proportion of women is 46%, and in production, it is 31.3%. The distribution may vary somewhat due to seasonal fluctuations.

Work Environment and Working Conditions

We are committed to ensuring a competitive salary and good working conditions for all employees. We have a clear gender-neutral salary policy and equal conditions for women and men.
Salaries are reviewed and adjusted annually based on internal guidelines, considering industry standards and broader societal trends.

A safe and good workplace is maintained by the HSE (Health, Safety, and Environment) manager in collaboration with the safety representative.

The proportion of foreign labor in the fishing industry is high both in Norway and Europe. Hired foreign workers can be more vulnerable to exploitation through poorer working conditions and the maintenance of basic standards for decent working conditions. Focus on this issue is therefore important both for our own business and in dialogue with our business partners. We comply with employment legislation. Working conditions should be equal, regardless of age, gender, orientation, and ethnicity. Foreign temporary workers should have the same working conditions and salary terms as Norwegian hired personnel and permanent employees. Together with the rest of the industry, we will work to prevent social dumping in the fishing industry in Norway and ensure equal salary terms and working conditions for workers hired on a temporary basis.

We only work with reputable staffing agencies. Our partners must be committed to responsible and ethical recruitment and hiring practices in accordance with relevant legislation and international standards. They must be able to document that they ensure standardized salary and working conditions for the hired workers.

Regular employee surveys are conducted with a focus on well-being, recognition, and development opportunities, where employees are involved in any measures and further follow-up.

Contact

For questions about this statement and our approach to fundamental human rights and working conditions, please contact us at post@primaprotein.no.