

BAADER Norge AS
Vasstrandvegen 71 / 6011 Ålesund
Postboks 8019 Spjelkavlk / 6022 Ålesund
officeNO@baader.com
www.baader.com

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BAADER Norge's statement according to the Norwegian Transparency Act

5 (a) A general description of the enterprise's structure, area of operations, guidelines and procedures for handling actual and potential adverse impacts on fundamental human rights and decent working conditions

Introduction

BAADER Norge AS (hereinafter BAADER Norge) is part of the BAADER Group (hereinafter BAADER), an international manufacturer of high-quality food processing machinery and solutions. The operational group holding, BAADER Global SE, is located in Lübeck, Germany.

BAADER Norge was established as a Norwegian sales office in 2002, with its headquarters in Ålesund and a branch office in Tromsø. BAADER Norge has two subsidiaries: Trio Food Processing Machinery AS, Norway (hereinafter TRIO), was acquired in 2012, while SEAC AB, Sweden (hereinafter SEAC), joined BAADER in 2021.

BAADER Norge handles the sale of fish processing machines and spare parts in the Norwegian market and supports machine installations and servicing. BAADER entities in other countries produce the machines and serve as suppliers to BAADER Norge.

SEAC produces fish processing machinery for pelagic and whitefish of small sizes. Machines are designed for automatic feeding, nobbing, heading, gutting, and tailing filets as well as belly-cleaning of pelagic fish. TRIO produces fish processing solutions for the deep skinning and skinning of soft fish fillets, as well as pin boning technology for salmon and trout.

Governance of human rights and decent working conditions

The Managing Director of BAADER Norge has the overall responsibility for the Norwegian Transparency Act (in the following also referred to as 'the Act') and oversees the implementation. Purchasing Managers in the subsidiaries TRIO and SEAC are responsible for the operational implementation. Relevant personnel have been trained on topics related to the Act through human rights risk assessment workshops.

The Norwegian Transparency Act has been addressed during board meetings and a supply chain due diligence project was initiated in the beginning of 2023 to review and strengthen the work of BAADER Norge.

BAADER Norge conducted a gap-analysis to assess their work in relation to the requirements of the Act. Based on the outcome of the gap-analysis, they have been strengthening their work with human rights due diligence, which will continue throughout 2023 and beyond.

As of the beginning of July 2023, BAADER Norge is in the process of rolling out the BAADER Global Code of Conduct. At BAADER every employee is committed to ensure that human rights are respected throughout the group and their supply chain, and that everyone complies with all internationally recognized standards for human rights, including the Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and other ILO conventions on labour standards in the areas of working hours, wages and benefits, and health and safety. Furthermore, BAADER expects their suppliers and other business partners to comply with applicable human rights laws during their business.

The BAADER Whistleblower System is being rolled out globally and its implementation in BAADER Norge is planned to start at the beginning of July 2023. BAADER's Whistleblower System is an essential element of the group-wide compliance management system and is managed by the Corporate Compliance Department located at BAADER Global SE. The system is open to all BAADER employees, as well as employees of BAADER business partners, suppliers, subcontractors, customers, sales agents, and distributors. Every report is treated confidentially and processed in secure systems. Whistleblowers can choose to remain anonymous.

5 (b) Information regarding actual adverse impacts and significant risks of adverse impacts that the enterprise has identified through its due diligence

Conducting due diligence

BAADER Norge has set out a commitment to conduct human rights due diligence in line with the OECD guidelines and international standards. In 2023, as part of the supply chain due diligence project, BAADER Norge has started the work of establishing processes to conduct human rights risk assessments.

As a first step, BAADER Norge conducted a high-level risk assessment of their operations, supply chain and subsidiaries to map out potential human rights and labour risks. By categorizing the vendors according to the types of products and services they provide to them, BAADER Norge and its subsidiaries were able to assess potential risks and prioritize groups of vendors for further risk assessments. Based on this prioritization, BAADER Norge and its subsidiaries conducted in-depth risk assessments of sub-categories and vendors to identify areas and vendors with salient human rights and labour risks.

The risk assessments were conducted using a risk tool in which risks are assessed based on the geographical location of suppliers, inherent risks in supplier categories and BAADER's company-specific inputs on risks. The risk information on various supplier categories information is based on credible sources such as the UN, ILO and Norwegian Agency for Public and Financial Management.

Additionally, internal risk workshops were conducted in collaboration with BAADER Global SE to include company-specific knowledge on risks in own operations and supply chain. As part of the BAADER Group, the key suppliers of BAADER Norge are BAADER firms in other countries. Relevant participants from these BAADER entities participated in workshops to help assess exposure to human rights risks and potential adverse impacts in the supply chain of BAADER products and services. BAADER Global SE is working to set up global structures for compliance and human rights due diligence across the various legal entities, which will serve as a foundation for human rights risk management of BAADER products worldwide.

Identified risks of adverse impacts

For own operations, BAADER Norge, TRIO and SEAC concluded that there is low risk of serious human rights and labour violations. However, through an internal workshop assessment BAADER Norge and subsidiaries did note that working environment, access to grievance mechanism, minority rights and discrimination and recruitment, as well as management of workers are areas that could potentially pose risks, and their own operation is continually monitored.

In the supply chain of BAADER Norge and subsidiaries the following purchasing categories were identified to have potential risks related to human rights and labour standards:

- Machinery components, materials and operational equipment
- Transport and logistics
- Facility management

BAADER Norge has assessed the vendors in these three categories and prioritized high-risk vendors for risk mitigation and follow-up. TRIO and SEAC have prioritized to assess and follow-up suppliers of machinery components, materials and operational equipment, as this is where the risk is considered highest in their respective supply chains.

BAADER Norge has not uncovered any actual negative consequences in its operations or supply chain.

In the human rights risk assessments of BAADER Norge, identified human rights risks were prioritized based on saliency. Salient human rights issues are those risks that have the highest severity, meaning potential to do severe harm, and likelihood of the harm occurring. Severity of human rights impacts can be determined by their scale, scope and irremediable character. Scale refers to the gravity of impact on the affected stakeholder, while scope indicates how many people are impacted. Irremediability considers the possibility of restoring someone's rights meaning that individuals who experience adverse impact are restored back to their situation before the impact, or equivalent¹.

5(c) Information on measures that the enterprise has taken or plans to implement to stop actual negative consequences or limit material risks of negative consequences, and the result or expected results of these measures

Measures and results

At group level, BAADER is in the process of further developing a Compliance Management System throughout global operations. A Corporate Compliance Department was established in 2022, headed by a Compliance Officer. An annual compliance program, approved by the Executive Board of BAADER Global SE, is implemented to achieve the defined compliance objectives and consider the identified compliance risks.

Supply chain due diligence is a key element of the Compliance Program for 2023/24, whereby the implementation of human rights due diligence in BAADER Norge shall be referred to for the group-wide work. As an extension to BAADER's commitment to respect human rights throughout the group and their supply chain and to meet legal requirements on the topic, BAADER Global SE is working towards developing global policies and guidelines on human rights due diligence to support implementation in subsidiaries. This will include a global Supplier Code of Conduct, global policies and procedures on how to conduct human rights due diligence

¹ [User Guide - UNDP \(hrdd-assessment.org\)](https://hrdd-assessment.org/)

and identify, mitigate and monitor risks related to human rights and decent working conditions in operations and the supply chain.

BAADER Norge and subsidiaries TRIO and SEAC are currently taking on measures to help address severe human rights risks in their own operations and supply chain. They are in the process of establishing a local Policy on Human Rights Due Diligence that sets forth the commitment to assess, cease, prevent and mitigate potential and actual adverse impacts on human rights and decent working conditions. Furthermore, BAADER Norge and subsidiaries are setting up clear requirements on human rights due diligence for their suppliers as part of purchasing orders and contracts with suppliers. As part of the human rights risk assessments that have been conducted, BAADER Norge has established a dialogue with relevant entities in the BAADER system that serve as vendors to them, helping set a foundation for inter-group collaboration on human rights due diligence in BAADER's global supply chains.

During 2023 BAADER Norge, TRIO and SEAC will continue to strengthen their efforts on human rights through internal capacity building, establishing procedures on implementation of due diligence, increased traceability in the supply chain and close dialogue with suppliers.

At global level, BAADER Group SE plan is working with the following ongoing and planned activities as part of the Compliance Program for 2023/24:

- Strengthening the compliance organization by appointing and training Local Compliance Officers in all the group companies
- Rolling out the BAADER Code of Conduct to all employees of the BAADER Group
- Implementing the group wide BAADER Whistle blower System
- Providing training on relevant compliance topics and setting up the BAADER Learning Management System
- Conducting a compliance risk analysis, including human rights aspects, which will serve as a basis for the Compliance Program for 2024/25

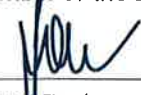
BAADER Norge, TRIO And SEAC, along with BAADER Group SE are expecting to establish a sound approach for group-wide human rights due diligence, whereby the various BAADER entities are in full capacity to identify, assess and reduce risk or remedy any negative consequences of the businesses.



Petra Baader
Chairwoman of the board



Torsten Krausen
Member of the board



Robert Focke
Member of the board



Vidar Breiteig
General Manager