# Transparency Act Statement 2026

**West-Norway AS**

Reporting period: 1 January – 31 December 2025

# 1. Introduction

## 1.1 Purpose and scope

The purpose of the Norwegian Transparency Act is to strengthen businesses' respect for fundamental human rights and decent working conditions, and to ensure public access to information about how companies handle actual and potential adverse impacts related to these matters.

The Act applies to larger enterprises domiciled in Norway that offer goods or services in or outside Norway. Larger enterprises are defined as companies that, on the balance sheet date, meet at least two of the following three criteria:

- Sales revenues exceeding NOK 70 million
- Balance sheet total exceeding NOK 35 million
- Average number of employees exceeding 50 full-time equivalents

West-Norway AS (org. no. 917 313 008), Rasmus Rønnebergs gate 21, 6002 Ålesund, is a larger enterprise domiciled in Norway and is therefore covered by the scope of the Transparency Act. In accordance with the Act's requirements, West-Norway AS conducts due diligence assessments based on the OECD Guidelines for Multinational Enterprises.

## 1.2 Reporting period

This statement covers the period 1 January to 31 December 2025 and applies to the activities of West-Norway AS during this period. The statement contains:

- An overall description of the company's organisation, business areas, policies and procedures for handling actual and potential adverse impacts on fundamental human rights and decent working conditions
- Information on material risks and any adverse impacts identified through due diligence assessments
- An overview of measures implemented or planned, including an assessment of the effectiveness of those measures

# 2. Implementation

The due diligence process follows the six phases set out in the Transparency Act, the OECD Due Diligence Guidance and the guidance issued by the Norwegian Consumer Authority on the Transparency Act:

1. Anchor responsibility in policies and management systems
2. Identify and assess actual and potential adverse impacts
3. Implement appropriate measures to cease, prevent or mitigate adverse impacts
4. Monitor implementation and outcomes of measures
5. Communicate with affected stakeholders about how impacts are addressed
6. Provide for, or cooperate on, remediation and compensation where required

The implementation of these phases at West-Norway AS is described in the following sections.

# 3. Anchoring of responsibility

## 3.1 About West-Norway AS – organisation and business areas

West-Norway AS imports and exports fish, fish products and other food products. The company is wholly owned (100%) by Jangaard Export AS and is therefore part of the Aalesund Enterprises group. In 2024, the company had revenues of around NOK 1.1 billion and 9 employees. The head office is in Ålesund, and the company has a branch office and subsidiary in Qingdao, China. The business focuses on the purchasing and sale of seafood and food products in international markets, with substantial activity in Asia.

## 3.2 Policies and governance principles

The commitments of West-Norway AS to respect fundamental human rights and ensure decent working conditions are anchored in the group's governing documents, adopted by the Board of Aalesund Enterprises AS on 29 November 2022. These include:

- Supplier Code of Conduct: Applies to all suppliers, business partners and other third parties. Suppliers commit to comply with the requirements and to communicate them further in their own supply chain.
- Due Diligence Guidelines: Describe the process for identifying, assessing, addressing and communicating about actual and potential adverse impacts on human rights and working conditions.

The policies apply to West-Norway AS and its operations and are available on the company's website.

## 3.3 Responsibility

The Board of West-Norway AS has overall responsibility for the company's work on the Transparency Act and due diligence. The CEO is responsible for operational implementation. Due diligence assessments are conducted at least annually and are updated in response to material changes in the company's risk profile.

## 3.4 Whistleblowing and reporting channels

West-Norway AS has established whistleblowing procedures to ensure that potential breaches of fundamental human rights and decent working conditions in its own operations or value chain can be detected and addressed appropriately. Employees and suppliers are encouraged to report concerns. Reports may be made to the immediate manager, the CEO or the Board. The company ensures that reports are handled confidentially and without risk of retaliation.

## 4. Due diligence

West-Norway AS conducts due diligence to identify and address actual and potential risks of adverse impacts on fundamental human rights and decent working conditions. The assessments cover both the company's own operations and its business relationships, including the supply chain.

### 4.1 Mapping and risk classification

During 2025, West-Norway AS continued the mapping of its supply chain and business relationships. More than 60 suppliers and business relationships have been identified. The majority are Norwegian operators, combined with a significant share of Chinese suppliers and business relationships connected to the company's purchasing and sales activities in Asia.

Based on information about industry, geography and supplier-specific risk factors, suppliers are classified using a traffic-light assessment:

- Red: Significant risk factors based on known information about conditions in the country, the industry or at the supplier.
- Amber: Moderate risk based on known information, or significant to moderate risk where information is lacking.
- Green: Low or negligible risk based on known information about conditions in the country, the industry or at the supplier.

When assessing potential adverse impacts, particular attention has been given to potential negative impacts on individuals from groups at increased risk of vulnerability or marginalisation, and to how risks may differ between women and men.

### 4.2 Due diligence of own operations

The Norwegian operations of West-Norway AS are conducted within Norwegian law and are assessed as low risk for breaches of fundamental human rights.

China operations: The activities at the branch office and subsidiary in Qingdao entail elevated risk. China is generally assessed as a market with elevated risk to human rights and decent working conditions, based on international reports from sources including the ILO, the Norwegian Ministry of Foreign Affairs and civil society organisations. The company ensures that local employees have written employment contracts and wages and working conditions in accordance with Chinese law, and monitors developments closely.

Equality and diversity: The company recognises the risk of discrimination and harassment in an international working environment and works actively to foster an inclusive working environment at all locations.

## 4.3 Due diligence of the supply chain

The 2025 due diligence assessment of the supply chain is based on country and sector risk, supplemented by known information about each individual supplier. Suppliers are classified according to the traffic-light assessment described in section 4.1.

West-Norway AS has a higher overall risk profile than the other group companies. This is primarily linked to Chinese business relationships and logistics chains, as well as a small number of suppliers in the USA and other international markets. The majority of other suppliers are Norwegian.

Identified risk areas at the sector and geographic level:

Seafood and food suppliers – China: Risk relating to working conditions, working hours and pay levels in the Chinese food production sector. Followed up through ethical guidelines, questionnaires, documentation requirements and close dialogue.

Transport and logistics – China and international: Container transport, port and terminal services, and overland transport in China and certain other regions involve risks relating to working conditions for seafarers and terminal personnel, as well as limited transparency at the sub-supplier level.

Seafood suppliers – North America and other markets: A limited number of business relationships in the USA and other international markets. Followed up through supplier requirements and dialogue.

Own operations in China: The company's branch office and subsidiary in Qingdao operate in a market assessed as having elevated risk. The company ensures that local employees have written employment contracts and wages and working conditions in line with Chinese law, and monitors developments closely.

Norwegian suppliers within raw materials, transport, IT and other operational services: Assessed as low risk owing to Norwegian legislation and established frameworks.

## 4.4 Findings

Of more than 60 assessed suppliers and business relationships, the majority are classified as low risk (green). A number of suppliers are classified as moderate risk (amber), and a group as high risk (red). The moderate and high classifications are mainly linked to Chinese business relationships within seafood, food products and logistics, as well as a few other international suppliers.

The 2025 review has not identified actual adverse impacts on fundamental human rights or decent working conditions, neither in the operations of West-Norway AS nor in the supply chain. Potential risks identified are addressed through preventive measures.

## 5. Measures to cease, prevent or mitigate adverse impacts

### 5.1 Internal measures

West-Norway AS works continuously to ensure decent working conditions for all employees. This includes written employment contracts, fair pay in accordance with applicable collective agreements and legislation, necessary training, and full freedom of association. The company has a zero-tolerance policy towards discrimination and harassment.

The company's policies and procedures are reviewed regularly and updated as needed to ensure compliance with applicable regulations and international standards.

### 5.2 External measures – the supply chain

West-Norway AS sets requirements for its suppliers through contracts and the Supplier Code of Conduct. Suppliers are expected to integrate the principles of the guidelines into their own management systems and to communicate the requirements further in their own supply chains.

Measures implemented or planned in respect of the supply chain include:

- Cease activities that cause or contribute to adverse impacts, based on the assessment of the company's own involvement.
- Prepare and implement plans to prevent or mitigate actual or potential adverse impacts directly connected to the company's operations.
- Pursue continuous improvement through dialogue with suppliers, with the aim of improving conditions before any termination of the business relationship is considered.
- Consider changes to the company's own policies to prevent similar situations in the future.
- Monitor implementation and outcomes of measures put in place.

Where serious potential or actual impacts are identified, West-Norway AS will consider engaging external expertise.

## 6. Information requests and whistleblowing mechanisms

### 6.1 Information requests

West-Norway AS responds to all enquiries related to the Transparency Act, including the company's handling of actual and potential adverse impacts on fundamental human rights and decent working conditions. Enquiries are answered within a reasonable time and no later than three weeks after receipt.

Any enquiries regarding the Transparency Act or this statement may be directed to:

West-Norway AS, katrine@bacalanor.com

## 7. Continued follow-up

West-Norway AS will continue its work on due diligence and related measures in line with the company's established procedures. Due diligence assessments are conducted at least annually, in addition to ongoing assessments triggered by material changes in the risk profile or business activities. The statement is updated and published annually by 30 June and made readily available on the company's website.

## 8. Summary

West-Norway AS has anchored its work on the Transparency Act in senior management and in the company's governing documents. As part of the 2025 due diligence assessment, the company has carried out a mapping of its supply chain and business relationships.

No actual adverse impacts on fundamental human rights or decent working conditions were identified in the reporting year 2025.

Potential risks have been identified, which West-Norway AS continues to address through ongoing improvements to business practices, supplier follow-up and strengthening of policies and procedures.

## Signature

This statement has been approved by the Board of West-Norway AS.

The Board consists of Chair Anders Ervik and Board member Gunnar Haagensen.

Ålesund, ___ June 2026

On behalf of West-Norway AS

Chair of the Board: ______________________________ CEO: ______________________________