

# Equality, non-discrimination and gender pay report

Lerøy Seafood Group ASA  
and subsidiaries



# Introduction

Lerøy is committed to genuine equality, and all employees are entitled to the same opportunities regardless of gender.

Lerøy Seafood Group ASA has 6,013 employees in permanent and temporary positions, and 671 of these are contract workers. At the end of 2023, the entire Group's workforce comprised 39% women and 61% men. The gender ratio has been stable over several years, and in recent years we have seen a positive trend in the number of female workers.

We strive to ensure a safe, inclusive and developing working environment built on the Group's core values. At Lerøy, diversity and inclusion mean that each employee is treated equally, irrespective of gender, origin, ethnicity, skin colour, language, religion or personal philosophy. One of Lerøy's priorities is to provide a workplace free of discrimination on the

grounds of functional ability, and we will make the necessary individual adjustments wherever possible to accommodate employees and job seekers with disabilities.

The Group has always emphasised the importance of individual skills, performance and responsibility in its recruitment policy, and personal development is one of our strategic priorities. Furthermore, the Group always ensures equal employment opportunities and rights for all employees, both women and men. Lerøy has an international working environment and employs people of many different nationalities. Several of our companies have multinational workforces.

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**This Equality Report is divided into two parts and covers the Group's Norwegian entities:**

**Part 1:** The status of gender equality at Lerøy

**Part 2:** Our work to promote equality and combat discrimination

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*The Group's employees are Lerøy's most important resource, and diversity makes us better. Creating a fair, equitable, inclusive and engaging working environment, built on cooperation, competence, learning and continuous development, is essential for us at Lerøy.*

*Through our annual employee surveys and leadership programmes, we see that we are moving in the right direction. We are nevertheless aware that much remains to be done to ensure we have an equitable environment in all parts of the Group's operations. For this reason, training, clear goals and awareness-raising in the area of equality and diversity will remain an important strategic priority going forward.*

– Siren Grønhaug, CHRO Lerøy Seafood Group ASA



## Part 1

The status of gender equality in Lerøy's Norwegian companies

# Gender balance

Lerøy's Norwegian companies have 3,932 employees in permanent and temporary positions, of whom 132 are contract workers.

At the end of 2023, the Norwegian companies' workforce comprised 30% women and 70% men.

The Group's target is to have a 40% share of women in leading roles by 2030. In 2023, women filled 26% of management roles with personnel responsibility in the Group's Norwegian companies.

Gender balance in the Group's Norwegian companies

Company	Employees Numbers		Temporary employees Numbers		Actual part-time Numbers		Involuntary part-time Numbers (2022)		Parental leave Average numbers of weeks	
	Women	Men	Women	Men	Women	Men	Women	Men	Women	Men
Lerøy Aurora AS	112	359	17	47	5	30	0	0	98	58
Lerøy Austevoll AS	71	150	23	58	1	2	0	0	63	42
Lerøy Bulandet AS	28	17	1	0	10	0	0	0	17	17
Lerøy Fossen AS	85	73	12	10	13	10	3	0	0	0
Lerøy Havfisk AS	32	380	0	0	2	1	0	0	0	0
Lerøy Midt AS	231	560	21	44	26	53	0	0	22.8	15.9
Lerøy Nord AS	2	8	1	1	0	0	0	0	0	0
Lerøy Norge AS	12	90	3	8	1	7	0	0	0	35
Lerøy Norway Seafoods AS	227	358	35	73	0	0	0	0	17	14
Lerøy Seafood AS	89	79	1	2	13	12	0	0	20.4	2.3
Lerøy Seafood Group ASA	77	106	7	4	2	4	0	0	24.7	13.5
Lerøy Sjømatgruppen AS	1	2	0	0	0	0	0	0	0	0
Lerøy Sjøtroll Kjærelva AS	7	23	1	2	0	2	0	0	47.6	15.7
Lerøy Vest AS	29	14	3	2	2	0	0	0	28.6	8.9
Norsk Oppdrettservice AS	11	32	1	6	6	8	0	0	0	15
Sirevaag AS	4	6	0	0	1	1	0	0	0	0
Sjømathuset AS	54	78	2	5	0	7	1	2	16.5	6.5
Sjøtroll Havbruk AS	101	424	48	111	49	111	0	0	24.3	12.6
<b>Total Norwegian Companies</b>	<b>1173</b>	<b>2759</b>	<b>176</b>	<b>373</b>	<b>131</b>	<b>248</b>	<b>4</b>	<b>2</b>		

### Parental leave

As an equitable employer, Lerøy aims to give women and men the same opportunities to take parental leave. We encourage our male employees to take parental leave in the same way as our female employees. The table above shows a breakdown by gender of the average number of weeks of parental leave taken in 2023 at our Norwegian companies.

As an initiative to promote equality, Lerøy has introduced two weeks of paid parental leave for fathers/co-mothers at all Norwegian companies. Lerøy has also introduced payment of parental benefits in advance, provides full pay compensation for those earning more than six times the Norwegian National Insurance Scheme's basic unit of calculation (6G), and offers full holiday pay accrual for all those who take parental leave at its Norwegian companies. This embodies one of our core values, **responsible**, and aims to ensure that no one suffers financially if they take parental leave.

### Use of part-time employment and involuntary part-time employment

At Lerøy's Norwegian companies, 9.6% of the workforce works part-time. Of those working part-time, 34.6% are women and 65.4% are men. Some part-time positions reflect a reduced need for full-time work or have been adjusted to accommodate the wishes and needs of the employee concerned. A large proportion of the part-time positions at Lerøy are auxiliary roles and are filled by students. This gives students an opportunity to gain practical work experience alongside their studies.

Breakdown of part-time staff and involuntary part-time staff at Norwegian companies	Women	Men
No. of people working part-time	131	248
No. of people working part-time involuntarily (figures from 2022)	4	2

Through conversations with employees in 2022, the companies discovered that a small proportion of part-time work was involuntary. Every part-time employee who is available for and wishes to work more hours has the opportunity to discuss the situation with their immediate manager or with a representative from HR. As a general rule, all vacancies are also advertised internally in line with internal procedures. We encourage our employees to apply for internal career opportunities.

### Use of temporary employment

Temporary employees account for 14% of the Norwegian companies' workforce. Most temporary positions are seasonal and fluctuate with demand, such as the skrei fishing season. Lerøy also has a pool of on-call workers who are brought in on an as-needed basis to cover fluctuating demand for resources. In addition, some are employed temporary in connection with leave, absence and projects.

Breakdown of temporary employees at Norwegian companies	Women	Men
No. of people by gender	176	373

### Preferential right in case of downsizing in the Group

In connection with reorganisation, restructuring, and downsizing, Lerøy's Norwegian companies has a duty and actively strive to offer another suitable position to our employees. This is in line with employee protection and preferential rights to re-employment, which was further strengthened from 1 January 2024, pursuant to section 14-2 of the Norwegian Working Environment Act.

The extended preferential right correspondingly applies to temporary employees, except for those engaged as temporary replacements.

The preferential right to re-employment and the duty to offer other suitable employment in another Norwegian company within the group are "secondary," meaning that the right will only apply in cases where other suitable work cannot be offered within the employee's own company.

In connection with digital transformation, the group has acquired a new shared HR and payroll system for all companies in Norway. Shared HR and payroll system will provide us with better opportunities for coordination and good procedures in the event of downsizing and calculating length of service within Lerøy's Norwegian companies.

# Gender Pay Analysis (2022)

In 2022, the Group performed a pay analysis that included all Norwegian companies with more than 50 employees. A corresponding analysis will be performed in 2024.

As part of our efforts to combat discrimination and promote equality, Lerøy has defined five job grades. The individual positions have been allocated to the different job grades on the basis of similarities in the positions' work content or value, pursuant to section 34 of the Norwegian Equality and Anti-Discrimination Act.

- Example of equal work: two operating technicians in the same or different departments/companies
- Example of work of equal value: head of a support function and a production manager
- Example of other considerations: former managers who have taken a lower position but retained their previous pay are counted as managers

The tables show women's earnings as a percentage of men's earnings. To protect employee privacy, the number of job grades in the breakdown is set at five for companies with more than 100 employees, and three for companies with fewer than 100 employees. The salaries paid to members of Group Management are not included in the breakdown.

## Description of job grades and pay

The definition of the job grades is based on existing job categories at Lerøy and an assessment of which job categories fit into the different grades. Some of the companies use additional grades, but five grades have been defined to ensure that the data is not identifiable and that it includes at least five persons of each gender. Employee representatives and/or safety representatives are involved in pay negotiations.

### Job grade

**Grade 0** = group management

**Grade 1** = company management

**Grade 2** = heads of staff/department managers

**Grade 3** = other managers with personnel responsibility, technical specialists

**Grade 4** = administrative staff/functionaries

**Grade 5** = production workers, apprentices, trainees

## Main findings from the pay analysis

- A large proportion of the companies in the Group offer pay in accordance with collective bargaining agreements, under which men and women receive equal pay.
- There are significant difference in gender ratios across the companies and across different job grades. This makes it impossible to disclose pay data for grades where there are fewer than five persons of each gender.
- The pay analysis is reported at company level. Lerøy has a complex organisational structure, with many different types of jobs. Although some positions are grouped into the same grade, pay levels are not directly comparable because differences relating to specialisation, years of service, qualifications/certifications, shift work, responsibility etc. are not taken into account. The pay analysis would have given a more correct basis for comparison with respect to the differences in pay per gender and per job grade if it had been divided into trade specialisations within the Group's collective agreements and individually negotiated pay agreements, rather than by subsidiary company.

## Differences in pay and gender breakdown per job grade 2022

Women's earnings are presented as a percentage of men's earnings

### Lerøy Seafood Group ASA

	No. of women	No. of men	Cash benefits					Benefits in kind	Comments on discrepancies
			Total cash benefits	Agreed pay/fixed pay	Irregular supplements	Bonuses	Overtime payments	Total taxable benefits in kind	
Grade 0	1	4	<5	–	–	–	–	–	Inadequate gender balance to report on this grade
Grade 1	0	8	<5	–	–	–	–	–	Inadequate gender balance to report on this grade
Grade 2	4	8	<5	–	–	–	–	–	Inadequate gender balance to report on this grade
Grade 3	23	40	96%	99%	–	77%	81%	–	Fixed pay practically identical. Pay discrepancy is due to overtime and bonuses
Grade 4	16	20	100%	100%	–	127%	56%	–	Fixed pay is equal for this grade. Pay discrepancy is due to overtime and bonuses
Grade 5	1	1	<5	–	–	–	–	–	Inadequate gender balance to report on this grade

### Lerøy Aurora AS

	No. of women	No. of men	Cash benefits					Benefits in kind	Comments on discrepancies
			Total cash benefits	Agreed pay/fixed pay	Irregular supplements	Bonuses	Overtime payments	Total taxable benefits in kind	
Grade 1	6	7	74%	85%	–	54%	–	15%	Different job descriptions and areas of responsibility
Grade 2	3	24	<5	–	–	–	–	–	Inadequate gender balance to report on this grade
Grade 3	10	35	94%	103%	7%	63%	51%	163%	Wide variety of job descriptions and areas of responsibility
Grade 4	25	113	88%	94%	73%	97%	43%	67%	Pay determined in accordance with collective agreements but men have several years of service than women and work more overtime. This level contains a variety of job categories where few women are traditionally employed
Grade 5	62	148	91%	98%	56%	83%	61%	71%	Pay determined in accordance with collective agreements but men have longer years of service than women and work more overtime.



**Lerøy Midt AS**

	No. of women	No. of men	Cash benefits					Benefits in kind	Comments on discrepancies
			Total cash benefits	Agreed pay/ fixed pay	Irregular supplements	Bonuses	Overtime payments	Total taxable benefits in kind	
Grade 1	2	7	<5	–	–	–	–	–	Inadequate gender balance to report on this grade
Grade 2	2	37	<5	–	–	–	–	–	Inadequate gender balance to report on this grade
Grade 3	23	25	102%	102%	165%	113%	1%	136%	Different job descriptions and areas of responsibility
Grade 4	51	221	92%	96%	69%	96%	63%	71%	Pay paid in accordance with collective agreements but men have longer years of service in the industry. More men act as "second-in-command", which generates additional benefits. Technical personnel are included. There are currently no female technical personnel.
Grade 5	65	147	81%	85%	47%	91%	63%	134%	Pay paid in accordance with collective agreements but men have longer years of service in the industry.

**Lerøy Sjøtroll AS**

	No. of women	No. of men	Cash benefits					Benefits in kind	Comments on discrepancies
			Total cash benefits	Agreed pay/ fixed pay	Irregular supplements	Bonuses	Overtime payments	Total taxable benefits in kind	
Grade 1	5	4	<5	–	–	–	–	–	Inadequate gender balance to report on this grade
Grade 2	5	33	44%	45%	0%	34%		13%	Majority of men. Considerable variation in pay between the different positions at this level. Payment of irregular supplements only to men
Grade 3	16	36	78%	108%	8%	63%	7%	70%	Women have a lower percentage of variable pay. More overtime among men
Grade 4	37	248	94%	94%	62%	101%	48%	92%	Most employees at this level are paid in accordance with collective agreements. This group also includes team leaders who receive a supplement for this additional responsibility. The team leaders are mostly men. Women generally work less overtime than men.
Grade 5	30	34	67%	68%	102%	49%	60%	50%	Paid in accordance with collective agreements Differences due to years of service and amount of overtime

**Lerøy Norway Seafoods AS**

	No. of women	No. of men	Cash benefits					Benefits in kind	Comments on discrepancies
			Total cash benefits	Agreed pay/fixed pay	Irregular supplements	Bonuses	Overtime payments	Total taxable benefits in kind	
Grade 1	6	10	69%	69%	–	77%	0%	1%	
Grade 2	11	19	57%	86%	59%	381%	48%	65%	The significant variance is due to payment of a one-off bonus.
Grade 3	9	18	96%	102%	27%	–	47%	89%	The variance is attributable to differences in job categories and that men work more overtime.
Grade 4	7	27	71%	79%	77%	–	4%	22%	The difference is attributable to differences in job categories and that men work more overtime
Grade 5	182	223	84%	94%	77%	–	48%	0%	Paid in accordance with collective agreements. The variance is due to years of service and supplements for trade certification.

**Lerøy Seafood AS**

	No. of women	No. of men	Cash benefits					Benefits in kind	Comments on discrepancies
			Total cash benefits	Agreed pay/fixed pay	Irregular supplements	Bonuses	Overtime payments	Total taxable benefits in kind	
Grade 1	0	0	–	–	–	–	–	–	
Grade 2	2	3	<5	–	–	–	–	–	Inadequate gender balance to report on this grade
Grade 3	37	36	72%	90%	–	69%	55%	–	Years of service is not assessed
Grade 4	47	35	112%	106%	–	90%	139%	–	Years of service is not assessed
Grade 5	9	10	101%	130%	–	–	69%	–	More women than men work overtime

**Lerøy Fossen AS**

	No. of women	No. of men	Cash benefits					Benefits in kind	Comments on discrepancies
			Total cash benefits	Agreed pay/fixed pay	Irregular supplements	Bonuses	Overtime payments	Total taxable benefits in kind	
Grade 1	1	1	<5	–	–	–	–	–	Inadequate gender balance to report on this grade
Grade 2	4	2	<5	–	–	–	–	–	Inadequate gender balance to report on this grade
Grade 3	0	2	<5	–	–	–	–	–	Inadequate gender balance to report on this grade
Grade 4	4	6	<5	–	–	–	–	–	Inadequate gender balance to report on this grade
Grade 5	41	26	98%	99%	99%	–	85%	–	Paid in accordance with collective agreements. Different levels of years of service. Men work more overtime than women.

**Sjømathuset AS**

	No. of women	No. of men	Cash benefits					Benefits in kind	Comments on discrepancies
			Total cash benefits	Agreed pay/fixed pay	Irregular supplements	Bonuses	Overtime payments	Total taxable benefits in kind	
Grade 1–3	6	6	140%	79%	97%	–	246%	–	Women work more overtime than men
Grade 4	12	3	<5	–	–	–	–	–	Inadequate gender balance to report on this grade
Grade 5	43	79	88%	99%	75%	–	92%	–	Paid in accordance with collective agreements. Shift work, years of service and overtime will affect the total amount paid.

**Lerøy Norge AS**

	No. of women	No. of men	Cash benefits					Benefits in kind	Comments on discrepancies
			Total cash benefits	Agreed pay/fixed pay	Irregular supplements	Bonuses	Overtime payments	Total taxable benefits in kind	
Grade 1-3	1	11	<5	-	-	-	-	-	Inadequate gender balance to report on this grade
Grade 4	6	28	104%	167%	-	-	108%	84%	Affected by long-term sickness absence on the part of men and temporarily more overtime on the part of women.
Grade 5	7	40	57%	78%	111%	-	5%	60%	Supplements for night-work and overtime affect the gender balance, as well as slightly longer years of service for men.

**Norsk Oppdrettsservice AS**

	No. of women	No. of men	Cash benefits					Benefits in kind	Comments on discrepancies
			Total cash benefits	Agreed pay/fixed pay	Irregular supplements	Bonuses	Overtime payments	Total taxable benefits in kind	
Grade 1-3	2	5	<5	-	-	-	-	-	Inadequate gender balance to report on this grade
Grade 4	2	0	<5	-	-	-	-	-	Inadequate gender balance to report on this grade
Grade 5	7	23	73%	46%	-	-	27%	-	Men have positions with more responsibility and work most overtime. Female apprentices/part-time employees make the variance seem considerable.

### Main findings from the pay analysis for fishing vessels (2022)

Separate job grades have been defined for fishing vessels to facilitate a comparison between different positions on board the vessels. All crew members are paid in accordance with collective agreements between the vessels and the Norwegian Seafarers Union (Norsk Sjømannsforbund), the Norwegian Union of Marine Engineers (Norsk Maskinistforbund) and the Norwegian Maritime Officers' Association (Sjøoffisersforbundet). Men and women receive the same pay. Few women work aboard fishing vessels. For that reason, it is not possible to disclose pay details for the different grades.

#### Job grades – fishing vessel crew members

Grade 1 = skipper

Grade 2 = chief mate, chief engineer and engineer

Grade 3 = bosun, factory manager and steward

Grade 4 = deckhand, factory foreman and process operator

Grade 5 = fishers

Grade 6 = catering assistant

Grade 7 = employees training for trade certificate or other qualification (apprentices, cadets)

#### Women's earnings are presented as a percentage of men's earnings

	Finnmark Havfiske AS				Hammerfest Industrifiske AS		
	No. of women	No. of men	Total cash Benefits		No. of women	No. of men	Total cash Benefits
Grade 1				Grade 1			
Grade 2				Grade 2			
Grade 3	0	18	–	Grade 3	1	11	–
Grade 4	0	16	–	Grade 4	0	8	–
Grade 5	0	42	–	Grade 5	0	24	–
Grade 6	6	0	–	Grade 6	0	0	–
Grade 7	0	18	–	Grade 7	0	2	–

	Lerøy Havfisk AS (administration)				Nordland Havfiske AS		
	No. of women	No. of men	Total cash Benefits		No. of women	No. of men	Total cash Benefits
Grade 1-3	2	6	–	Grade 1	0	10	–
Grade 4	3	7	–	Grade 2	0	30	–
Grade 5	4	0	–	Grade 3	1	29	–
				Grade 4	0	23	–
				Grade 5	2	66	–
				Grade 6	8	0	–
				Grade 7	1	29	–



## Part 2

Our work to  
promote equality  
and combat  
discrimination

# Promote equality and combat discrimination

In our work on equality and non-discrimination, Lerøy has focused on the following personnel areas: recruitment, pay and working conditions, promotion and development opportunities, workplace adaptation, and work-life balance.

## Principles, procedures and standards for equality and against discrimination

Lerøy's equality work is embedded in the Group's various strategies, tools and guidelines. Detailed descriptions are available in the sustainability library at [leroyseafood.com](http://leroyseafood.com), as well as in internal documents, such as the Group's Code of Conduct, management handbook, personnel handbook and company regulations.

### Examples of principles, procedures and standards

- Part 2, Chapter 3 of Lerøy's Code of Conduct concerns human rights and decent working conditions
- Policy for Diversity and Inclusion
- Policy for Human Rights
- Lerøy's blowing regulations, procedures and reporting channel have been communicated and made available to all employees within the Group.
- Equality and non-discrimination considerations are included in the Group's personnel policy in general.

## How we work to ensure equality and non-discrimination in practice

Lerøy is a big operator in the seafood industry, a sector that has historically been highly male dominated. Lerøy has over several years worked actively to increase the proportion of women in the company, since we find that diversity has a positive impact on the workplace. An analysis of Lerøy's social reporting concludes that there is a clear majority of men among the group's workforce, but there has been a steady increase in the proportion of women in recent years. In 2023, women made up 39% of the Group's entire workforce and 30% in the Norwegian companies.

Equality and diversity are an important part of Lerøy's corporate culture, and are given priority in the Group's activities. As part of a digital transformation, the group has acquired a new shared HR and payroll system for all its Norwegian companies. This will provide better underlying data and opportunities to perform more detailed analyses than have previously been possible. The increased insights will enable us to reinforce our

efforts with respect to equality and diversity going forward. In addition, the Group has chosen a new HR operating model, with associated structuring in the Norwegian companies, which will further increase our competence in prioritised areas of expertise, both through dedicated roles and professional networks. Corporate culture, equality and diversity form one of these prioritised areas of expertise. Lerøy has started to standardise employee-related processes and is working constantly to standardise processes and practices, since we see that maximising the standardisation of practices across the companies is of great value.

## Code of Conduct

Lerøy's Code of Conduct contains a shared set of principles and rules that apply to all employees and contract workers at the Lerøy Seafood Group, and its subsidiaries. The Code of Conduct reflects the values that the Group stands for and provides our employees with guidance on how to behave and what must be taken into account in their day-to-day work. The Code of Conduct is intended to give employees an

understanding of what is right and what is wrong, and provide them with knowledge of the channels to use in the event of potential breach of the company's guidelines.

Part 2, Chapter 3 of the Code of Conduct concerns human rights and decent working conditions. It states that **“all forms of discrimination or harassment at work based on ethnicity, religion, age, language, disability, gender, marital status, sexual orientation, trade union membership or political beliefs are strictly prohibited”**.

All employees are responsible for familiarising themselves with the Group's Code of Conduct. Every Lerøy company provides training in the Code of Conduct's provisions. In addition, a mandatory eLearning course has been developed for all employees in the Group's Norwegian subsidiaries. The principles set out in the Code of Conduct are included in the Group's leadership standard and management handbook.

### Whistle-blowing

Lerøy's overarching goal is to maintain a corporate culture that fosters a good and constructive climate for freedom of expression. The whistleblowing regulations are designed to enable both employees and third parties to speak out and express criticism without risking any form of reprisals or negative reactions. Internal procedures have been drawn up for how reports received from third parties and employees shall be dealt with. These are available in the Group's internal control system.

### Employee survey

Lerøy conducts an annual survey of all employees across the group in partnership with Great Place to Work. The employee survey asks specific questions relating to equality and discrimination in order to identify employees' experiences in the workplace. The survey is completely anonymous, participation is voluntary, and it is available in 17 languages to make sure as many people as possible can respond in a language they are proficient in. The response rate for the employee survey conducted in early January 2024<sup>1</sup> was 82% for the entire Group.

It is possible to filter the survey's overarching Group results in relation to demographics, including gender, age and job grades, in order to determine whether different employee groups experience things differently. The survey includes specific questions on workplace bullying and harassment, as well as discrimination based on age, gender, sexual orientation and cultural or ethnic affiliation. It also includes open questions where employees can submit their own comments. The employee survey has identified that men are slightly more satisfied than women in the workplace, but we see a positive development in the results. The employee survey is an effective means of shedding light on the current situation in the workplace and employee experiences, thereby providing Lerøy with important insights that can be used for making further improvements. Involving the employees in the follow-up of the survey's results at both the company and department level has had a positive impact, and is something Lerøy will continue to do going forward.

### Attractive employer

Lerøy contributes in several ways to making the seafood industry a more attractive place to work. Measures taken in recent years include a review of the language and images used in job adverts to ensure that these are better suited to all candidates, a review of the images used in marketing materials to highlight workplace diversity, and increased participation in educational fairs and company presentations to students and school pupils to highlight the career opportunities available in the seafood industry. In addition, Lerøy publishes articles featuring interviews with employees on the website [leroyseafood.com](http://leroyseafood.com). One area of special focus since 2020 has been to communicate stories showing women in typically male-dominated roles. These are activities we will continue to focus on going forward, in order to highlight the exciting career opportunities that the seafood industry offers and underline that it is open to everyone.

The Group wishes to continue developing diversity at Lerøy, and will be working to develop and improve the measures already implemented, as well as focus on training in relation to recruitment processes to eliminate prejudice and unconscious bias and discrimination. One important initiative going forward will be to increase focus on internal mobility and on highlighting in-house career opportunities for all our employees.

### Leadership development

Leadership is an important aspect of the Lerøy corporate culture, and is vital for the realisation of the

<sup>1</sup> The employee survey is distributed in the first two weeks of January, and measures employee experiences in the previous 12 months.



Group's goals for equality and diversity. Lerøy focuses on value-based and future oriented leadership, based on the Group's values and business strategies. Our managers shall lead by example, point the way and focus on achieving results as a team. Being a manager in Lerøy is a vote of confidence that carries significant responsibility. The Group has drawn up a management handbook, leadership standard and leadership development programmes to ensure that our managers fulfil their roles in a responsible and proficient manner. In 2023, 79 managers from the Norwegian companies and 14 managers from the international companies completed Lerøy's leadership development programme. In 2024, 90 managers will take part in the programme. Our ambition is for all of Lerøy's managers to complete our leadership development programme.

### Pay and working conditions

A large percentage of Lerøy's workforce is paid in accordance with collective agreement, with equal pay irrespective of gender. On average, men have more years of service than women across the Norwegian companies. This is naturally a result of the seafood industry historically being a male-dominated sector. The introduction of a new shared payroll system for the Norwegian companies in 2023 is likely to provide a better basis for comparison across the Group's companies, which could strengthen this effort. In 2022, Lerøy began categorising jobs in the aquaculture segment into job grades, and will perform an equivalent categorisation in the other business segments in order to obtain a better basis for comparison between the Norwegian companies. This standardisation effort, along with a transition

to uniform job titles, will enable us to perform more detailed pay analyses across job categories and disciplines. It will also be possible to conduct analyses at company level and thereby obtain a better basis for comparison at Group level.

In 2022, Lerøy mapped the gender distribution in each job grades in its Norwegian companies and found that there were more men in management positions and in higher job grades. A corresponding survey will be performed in 2024 to see whether the measures that have been initiated have had the desired effect of improving the gender balance. The Group's target is to have a 40% share of women in management positions by 2030.

**Breakdown of gender balance per job grade in the Norwegian companies (2022)**

	Total	Women	Men
Grade 0	5	1 (20%)	4 (80%)
Grade 1	71	25 (35%)	46 (65%)
Grade 2	179	40 (22%)	139 (78%)
Grade 3	319	119 (37%)	200 (63%)
Grade 4	916	211 (23%)	705 (77%)
Grade 5	1216	470 (39%)	746 (61%)

**Breakdown of gender balance per job grade in the fishing fleet (2022)**

	Total	Women	Men
Grade 1	24	1 (4%)	23 (96%)
Grade 2	64	1 (2%)	63 (98%)
Grade 3	60	2 (3%)	58 (97%)
Grade 4	57	3 (5%)	54 (95%)
Grade 5	138	6 (4%)	132 (96%)
Grade 6	14	14 (100%)	0 (0%)
Grade 7	50	1 (2%)	49 (98%)

Lerøy's objective as an employer is to be an inclusive workplace for all our employees. Most of those working in Norway do not have office jobs but engage in physical labour at industrial processing plants, fishing vessels or fish farms. Working hours for this group often involve both shifts and permanent hours, which can make it more difficult to achieve a good work-life balance than we would like. For those working in administrative positions, we aim to enable employees to work from home and make use of flexible hours and core hours where possible, to ensure a better balance between work and family life for those who need it.

The employee survey asks several specific questions about this issue, which gives us valuable insights that we can continue to work on. One of the initiatives will be to develop Lerøy's life-phase policy and increase the awareness amongst managers and employees about the different needs employees may have through their different life phases – from graduate to retiree.



## Lerøy wins award for equality and the working environment

In 2023, Lerøy was named "Maritime Company of the Year" in connection with its efforts to challenge the supply industry to produce workwear suitable for women (including pregnant women). As a result, Ahlsell can now offer workwear tailored to the female body. The reason given by the jury for the award was: "This year's award goes to one of Norway's largest seafood companies, Lerøy Seafood Group. The company receives the award for its efforts and commitment to creating a safe, inclusive and developing working environment. Women will now be able to get workwear they feel comfortable in. This is a victory for equality and the working environment, which others in the industry can emulate."

## Diversity business of the year

Equality at Lerøy is about more than just gender. For us, it is not only important to ensure diversity and inclusion by having a good balance between the genders, but also in relation to age, ethnicity and cultural background. We know that diversity is a strength for the business.

In 2021, Lerøy Norway Seafood's Melbu facility was named "Diversity business of the year" at the annual conference of the Directorate of Integration and Diversity (IMDi). Around 120 people are employed at the factory, 70% of whom have an immigrant background. Most of the team leaders at the factory come from countries other than Norway, and management aims to enable all employees to have equal opportunities, for example to obtain trade certification. The factory arranges Norwegian language courses and provides additional coaching by a dedicated teacher, in order to give as many as possible

the language proficiency needed to become trade certified in seafood production, which is of benefit to both the company and the employee concerned. Another initiative that has been implemented is to increase the use of process visualisation, which makes training easier for those whose first language is not Norwegian. Other parts of the Group are implementing measures similar to those in effect at Lerøy Norway Seafoods' Melbu facility. Language is an important aspect of workplace and social inclusion. As an employer, we see great value in helping our employees learn the local language.

## Internal and external celebrations of equality and diversity-promoting activities

An important aspect of Lerøy's work to ensure equality and diversity is to communicate internally and externally the Group's approach and ambitions for equality and diversity. Lerøy actively uses the Group's intranet, social media channels and website to provide such information. Some of the activities to which particular attention has been paid in recent years include:

- Winner of the "Maritime Company of the Year" in 2023
- Winner of the "Diversity business of the Year" in 2021
- Pride
- International Women's Day
- Pink Ribbon Race
- The equality conference "Women at Sea"
- Annual National Telethon
- Articles featuring Lerøy employees
- UN Sustainable Development Goals

In connection with the "Women at Sea" event, Lerøy held an internal workshop to identify potential barriers and create opportunities to strengthen our efforts

in the area of equality and diversity. Employees and employee representatives from the entire Lerøy value chain took part in the workshop. Many important perspectives emerged and proposals made, in addition to useful reflections inspired by the conference. Several of the suggestions made at the workshop have been included in the work on the equality report and implemented as measures to strengthen Lerøy's overarching efforts with respect to equality and diversity. One of the measures implemented after the workshop was to challenge the supply industry to deliver workwear tailored to the female body. Among other things, this work resulted in Lerøy being named "Maritime Company of the Year" in 2023 for its efforts in the field of inclusion and the working environment.

## Action plan to promote equality and prevent discrimination

At Lerøy, we are constantly working to promote equality and diversity in all the Group's companies. Although good processes and initiatives have been implemented locally at the companies, Lerøy as a Group still has a way to go to fulfil its ambitions and meet its goals in this area. One important aspect of the work going forward will consist of standardising processes and implementing measures at all the Group's companies on the basis of best practice. So far, this effort has largely been driven by HR. Going forward, however, we wish to be more agile and involve the organisation, and take a more cross-disciplinary approach.

List of measures and action plan

Personnel area	Background for the measure	Description of the measure	Goal for the measure	Responsibility	Status	Result
Recruitment	Increased diversity in all job grades Objective assessment of candidates	Increased diversity in the career portal Wording and requirements in job adverts Standardised processes Training in interview techniques and unconscious bias	Increase the percentage of women applicants Increase the percentage of women called for an interview Increase the percentage of minorities called for an interview	HR and managers	Ongoing Planned activities in the roadmap	Increased proportion of women
Promotion and development opportunities	Highlight internal development opportunities for all employees	Standardised processes Competence mapping Development plans Internal mobility Lerøy mentoring programme Increased implementation of Lerøy Way	Increased level of internal mobility Increased percentage of women applying for management positions	HR and managers Lerøy Way Office	Ongoing Planned activities in the roadmap	Increased score on GPTW <sup>2</sup> Increased percentage of women in management positions
Pay and working conditions	Pay based on job grade and job category	Standardised processes Shared HR and pay system in Norway Standardisation of job grades and job categories Pay analysis in Norway	Equal pay irrespective of gender	HR and managers	Ongoing Planned activities in the roadmap	Increased score on GPTW
Facilitation and enable a good work-life balance	Lower than desired score on the GPTW ranking for work-life balance	Standardised processes Uniform life-phase policy Workwear adapted to women (including pregnant women) Flexitime for those positions where this is possible Opportunities to work from home for positions where this is possible	Facilitation to secure inclusion where necessary Ensure that we have workwear adapted to women (including pregnant women)	HR and managers	Ongoing Planned activities in the roadmap	Increased score on GPTW
Bullying, sexual harassment and genderbased violence	Unwanted incidents	Group-wide eLearning courses in: – Code of Conduct – Equality and diversity – Whistleblowing procedure Standardise processes Leadership development Communication	Mandatory training Use of the internal whistleblowing channel	HR and managers	Ongoing Planned activities in the roadmap	Better follow-up of whistleblowing cases
Working environment	Differences in employee experiences in the companies	Employee survey Standardise processes Equality and diversity are a fixed items on the agenda at Working Environment Committee (AMU) meetings Information provided in Norwegian and English on the intranet	Reduction in the sickness absence rate Increased employee satisfaction	HR and managers	Ongoing Planned activities in the roadmap	Increased score on GPTW Reduction in the sickness absence rate Reduced turnover

2 Annually, Lerøy conducts a survey among all employees within the Group, in partnership with Great Place To Work.

