



Fish Pool

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## **Statement regarding compliance with the Transparency Act – Fish Pool ASA**



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## 1. Introduction and background

The Norwegian Act on Business Transparency and Work with Fundamental Human Rights and Decent Working Conditions (the "**Transparency Act**") (*Norw.:* Åpenhetsloven) entered into force on 1 July 2022. The main purpose of the Transparency Act is to foster a higher level of transparency regarding the production of goods and the provision of services, especially relating to how businesses respect fundamental human rights and decent working conditions as part of these processes. For more information, see section 2 below.

Fish Pool ASA ("**Fish Pool**") is subject to the Transparency Act cf. section 2 and 3 of the Transparency Act. On this background, Fish Pool is obligated to have in place sufficient routines and mechanisms to assess, map, follow up possible breaches on fundamental human rights and/or decent working conditions down the supply chain.

This statement is an account of these first due diligence assessments performed by Fish Pool.

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## **2. Compliance with the Transparency Act**

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### **2.1 The Transparency Act – purpose and obligations**

The Transparency Act promote respect for fundamental human rights and decent working conditions and support the general desire for more transparency regarding the production of goods and the provision of services in these areas.

Fundamental human rights mean the internationally recognized human rights that follow from the UN Convention on Economic, Social and Cultural Rights, the UN Convention on Civil and Political Rights and the ILO's core conventions on fundamental rights and principles in working life, as specified by section 3 (b) of the Transparency Act.

Decent working conditions mean work that safeguards fundamental human rights, health, the environment, and safety in the workplace, and that provides a living wage with reference to section 3 (c) of the Transparency Act.

The Transparency Act stipulates that enterprises such as Fish Pool shall conduct due diligence assessments, where one look both at its own business, its supply chain, and business partners to assess potential risks of breaches of fundamental human rights or decent working environments. The due diligence assessments shall be carried out regularly and in proportion to the size and nature of the enterprise, the context of its operations and the severity and probability of adverse impacts on fundamental human rights and decent working conditions.

Enterprises shall prepare an annual statement of its due diligence assessments, which shall be published within 30 June each year.

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### **2.2 Statement by the Board of Directors of Fish Pool**

Fish Pool confirms that procedures and internal guidelines have been adopted and that due diligence assessments have been carried out in accordance with the requirements in the Transparency Act.

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### **3. Description of the enterprise – Fish Pool ASA**

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#### **3.1 Organization and operation on Fish Pool**

Fish Pool ASA is established as an international, regulated marketplace for buying and selling of financial salmon contracts. Fish Pool ASA was established in 2005 and is located in Bergen, Norway. Oslo Børs ASA owns 97 % of the shares in Fish Pool ASA.

Fish Pool ASA is licensed by the Norwegian Ministry of Finance to operate as a regulated marketplace for commodity derivatives with fish and seafood as underlying products. We are bound by the rules of our license and under surveillance of The Financial Supervisory Authority of Norway (Finanstilsynet).

Fish Pool is a service provider without manufacturing or processing of physical goods and our suppliers are service providers to our operation. Due to the Euronext “federal model” a considerable part of the services delivered to Fish Pool are centralized through group functions.

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#### **3.2 Guidelines and routines to handle actual and potential negative consequences for fundamental human rights and decent working conditions**

Fish Pool has adopted a policy regarding the Norwegian Transparency Act, applicable for all parts of the organisation. The policy establishes clear and uniform routines to ensure compliance with the Transparency Act.

The policy shall ensure that risks of actual and potential negative consequences on fundamental human rights and decent working conditions Fish Pool has contributed to or caused are mapped, that suitable and necessary measures are taken to limit and prevent the harmful effects of deviations, that structured processes are carried out to follow up measures and analyse the effect of implemented measures, that there are appropriate and good routines for communication with affected parties in the event of deviations, and there are effective processes for recovery where Fish Pool has contributed to or caused actual negative consequences.

In addition, Fish Pool has prepared internal guidelines on operational assessments of negative consequences, implementation of measures and follow-up and restoration in case of breaches.



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#### **4. Internal routines for relevant departments**

Fish Pool has refined its framework for conducting due diligence assessments and supporting measures, both for internal assessments and assessments of third parties, aiming to uncover potential or actual adverse impacts on human and labour rights.

Fish Pool has prepared and implemented a new questionnaire for suppliers. Additionally, a more comprehensive risk assessment tool has been developed and adopted in order to better identify and manage potential risks.

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## 5. The Due Diligence process

Fish Pool has conducted due diligence assessments to follow up and ensure compliance with the requirements for decent working conditions and fundamental human rights. The assessments have been carried out by Euronext group functions, with support from the compliance department.

The assessments have primarily been divided into two main areas:

- i) due diligence assessments focusing on decent working conditions. The assessments have been aimed towards Fish Pool internally and towards suppliers providing services to Fish Pool, and
- ii) due diligence assessments focusing on safeguarding fundamental human rights. The assessment has been aimed towards suppliers providing services to Fish Pool.

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### 5.1 The form and content of the due diligence assessment - employees

The due diligence assessments focusing on the right to decent working conditions have consisted of answering a questionnaire, one for Fish Pool internally and one directed towards suppliers providing services to Fish Pool.

The internal questionnaire includes questions on how Fish Pool follows up and ensures compliance with obligations set down in the Norwegian Working Environment Act, as well as questions about routines and mechanisms to ensure that employees have an employment relationship that does not conflict with fundamental human rights and/or decent working conditions. In addition, internal policies and procedures relevant to the Transparency Act have been mapped.

One important document is the Code of Business Conduct, which explains the responsibilities of all employees at Fish Pool and the Euronext Group within the areas of the Transparency Act. For instance, the Company is committed to treat all employees with honesty, fairness, and respect and provide a safe and healthy working environment. In addition, abusive, harassing, or offensive conduct, whether verbal or physical, is considered unacceptable.

The examples cover derogatory comments based on a person's gender or racial or ethnic characteristics and unwelcome sexual advances. Employees are directed to report such conduct when it occurs. Additionally, the Company is committed to provide all employees and others on Company property with a safe and healthy work environment. Accordingly, all employees shall comply with all health and safety laws and regulations as well as Company policies governing health and safety. All employees have a duty to immediately report accidents, injuries and unsafe equipment, practices or conditions to a manager or other designated person.

Fish Pool has also prepared an external questionnaire directed towards suppliers. The questionnaire consists of questions relating to internal guidelines and routines for equal treatment of employees, working hours, wages and questions on collective agreements and freedom of association.

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## **5.2 The form and content of the due diligence assessment - suppliers**

The due diligence assessments focusing on safeguarding fundamental human rights are directed towards suppliers providing services to Fish Pool and follow a risk-based approach.

A selection of suppliers has been subject to a more detailed risk classification and assessment based on the size and length of the contract, geographical conditions, industry and sector etc. Euronext group functions have been involved in the due diligence assessments. Fish Pool will continue the work in 2024, and aims to have all suppliers' risk classified by 2024/2025.

Part of the due diligence assessment has consisted of mapping how many of Fish Pool' suppliers have signed the Suppliers Code Of Conduct and give information on the main terms within this CoC vis-à-vis the areas of the Transparency Act.

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## **5.3 Findings from the due diligence assessment relating to own employees**

No breaches or increased risks relating to decent working conditions have been uncovered, neither on Fish Pool nor suppliers.

In 2023, certain areas of improvement were uncovered, mainly related to the follow-up of sub-contractors. During 2023 and 2024, remedial measures have been put in place to better secure the follow-up of sub-contractors.

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## **5.4 Findings from the due diligence assessment relating to suppliers**

No breaches or increased risks have been uncovered under the due diligence assessments focusing on fundamental human rights.

Certain suppliers have not signed the Euronext Supplier Code of Conduct, and measures have been taken to obtain their signatures.

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## **6. Implemented measures and initiatives**

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### **6.1 Measures and initiatives relating to employees**

As stated in section 0 above, certain areas of improvement were uncovered in connection with the due diligence assessments in 2023, mainly related to the follow-up of sub-contractors.

Remedial measures were implemented in 2023 and have been followed up in 2024.

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### **6.2 Measures and initiatives relating to suppliers**

Fish Pool has initiated work on risk classifying and assessing suppliers who deliver services to Fish Pool. This work will continue in 2024.

Further, and as stated in section 0, it has been discovered that certain suppliers have not signed the Euronext Suppliers Code of Conduct. Measures have been taken to ensure that all suppliers of Fish Pool have signed the Suppliers Code of Conduct.





Fish Pool

*This statement has been signed by the Board of Directors and the CEO of Fish Pool.*



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Øivind Amundsen  
Chairman of the board

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Camilla Berg Myrstad  
Board member

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Ingrid Kassen  
Board member

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Richard Arnesen  
Board member

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Robin Mainsonneuve  
Board member

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Søren Martens  
Managing director