

Report under the Norwegian Transparency Act for EWOS AS and EWOS Innovation AS

For Fiscal Year 2025 (1 June 2024 – 31 May, 2025)

The Norwegian Transparency Act (Åpenhetsloven) requires larger enterprises to publish a report on due diligence assessments carried out on human rights and decent working conditions, in line with the OECD Guidelines for Multinational Enterprises. This is the report for Fiscal Year 2025 for EWOS AS and EWOS Innovation AS.

Cargill Incorporated is the sole owner of EWOS AS, EWOS Innovation AS and related companies. The company structure in Norway consists of these registered companies:

- Cargill Norway Holding AS (org.nr. 914 992 990), which owns 100% of:
- Cargill Norway AS (org.nr. 914 993 024), which owns 100% of:
- Cargill AS (org.nr. 914 993 024), which owns 100% of:
- EWOS AS (org nr. 979 184 832), which owns 100% of:
- EWOS Innovation AS (org.nr. 911 501 252)

Cargill AS, EWOS AS, and EWOS Innovation AS exceed two of the thresholds for reporting under the Norwegian Transparency Act. Cargill Norway AS and Cargill Norway Holding AS have no employees and provide no services or goods. Cargill AS has no other counterparts than EWOS AS resulting in aligned risk and due diligence assessments.

EWOS AS employs 453 people, including seasonal workers, and produces aquaculture feed in the form of extruded pellets at three feed mills along the Norwegian coast. Raw materials sourced for this production are natural products from fisheries and agriculture from a wide variety of countries on all continents in the form of protein, fat, and carbohydrates in addition to nutrients such as vitamins and minerals. Its main customers are salmon and trout producers in Norway.

EWOS Innovation AS employs 49 people and is a dedicated research and development company for Cargill's aqua businesses focusing on fish feed, method development and sustainability. EWOS Innovation AS primarily performs analysis on feed produced and sold by EWOS AS.

The companies adhere to the fiscal year of their U.S. parent, from June 1 to May 31, and all financial and compliance reporting is submitted in English, including this report.

2. Governance and Policy Framework

The boards of both EWOS AS and EWOS Innovation AS adopted full compliance with the Norwegian Transparency Act in 2022. The report is published on a dedicated section of the website where also the public is informed of how to submit inquiries related to the Act.

Sustainability and Risk Management and Sourcing teams manage the risk assessments of suppliers and raw material producers, ensure all raw material suppliers comply with our Sourcing Policy, oversees the execution of the risk assessments, and coordinates this work with larger Cargill-wide due diligence work and third-party consultants. Risk assessments in own operations include HR, representatives of Manufacturing and Supply Chain, and Admin resources.

Cargill Incorporated's policies and commitments regarding human rights and working conditions also apply for both EWOS AS and EWOS Innovation AS as fully owned subsidiaries. This report refers to Cargill when referring to Cargill-wide policies.

2.1. Commitment on Human Rights

Human rights are fundamental at Cargill and our actions are driven by our values and our culture of putting people first, championing action and embracing our responsibility to protect people and planet. We are committed to respecting the human rights of all Cargill employees and all those whose lives and livelihoods we touch. Cargill complies with local laws and respects internationally recognized human rights throughout our own operations, supply chains and the communities where we do business. We take guidance from international standards and declarations, including the United Nations Guiding Principles on Business and Human Rights (UNGPs), the International Bill of Human Rights and the International Labour Organization Fundamental Principles and Rights at Work. As a signatory company of the United Nations Global Compact, we also are committed to promoting human rights.

Our Human Rights Policy outlines our commitment to human rights within our operations and supply chains, and it applies to Cargill Incorporated and its subsidiaries. We also expect our suppliers and business partners to uphold these principles and urge them to adopt similar policies within their own businesses.

2.2 Cargill's Corporate Human Rights Due Diligence Policy

Cargill's Corporate Human Rights Due Diligence Policy brings clarity to our due diligence process for identifying risks and working to ensure our products are compliant. Our work in this area is supported by a multidisciplinary team to implement this process across our businesses. We are committed to regularly evaluating and strengthening our process to identify, prevent, mitigate, and remediate adverse human rights.

The Cargill corporate DD policy states that when adverse human rights or environmental impacts are identified following an assessment, we implement time-bound action plans to prevent, mitigate, and/or remediate those risks. Then, following the implementation of an action plan, we measure the results to track specific human rights and environmental impacts.

2.3 CANH Sourcing policy

Cargill's commitments on human rights are specified in both Cargill's supplier Code of Conduct and Code of Conduct. Both are based on the seven Guiding Principles of Cargill which outlines the company's ethical and compliance standards for conducting business throughout the world and serves as a guide for employees in conducting their daily work. EWOS AS has specified further expectations from suppliers and has developed a separate Supplier Code of Conduct, which, through several revisions and a renaming, has become the Cargill Animal Nutrition and Health (CANH) Sourcing Policy. This sourcing policy aligns with key international frameworks such as the UN Guiding Principles on Business and Human Rights, the International Bill of Human Rights, ILO Core Conventions, and the UN Global Compact.

The CANH Sourcing Policy has been rolled out to existing suppliers since January 2021 and has been a requirement in new supplier approvals since then. All suppliers of raw materials to EWOS have signed or acknowledged the Sourcing Policy.

2.4. ASC Feed Standard

Over the past few years, EWOS AS has further developed its due diligence practices with the aim of achieving certification under the Aquaculture Stewardship Council (ASC) Feed Standard. This standard is grounded in internationally recognized principles for sustainability and corporate

responsibility and is aligned with the OECD Guidelines for Multinational Enterprises, with an emphasis also on social responsibility throughout the value chain. In spring 2025, EWOS AS was successfully audited by independent third-party auditors and achieved certification under ASC Feed Standard v1.0.

2.5. Grievance channel

Cargill's Ethics Open Line is available 24/7 for employees and third parties worldwide, allowing concerns to be raised anonymously and securely. This channel is managed by a third-party to secure confidentiality and protection from retaliation. No grievances affecting EWOS AS or EWOS Innovation AS were reported in FY2025.

A local grievance mechanism is also established at our Norwegian feed mills as part of the ASC Feed Standard requirements. No relevant grievances were received through these channels in FY2025.

3. Due Diligence Assessments

Our due diligence process follows OECD's framework and is conducted through two complementary systems, Cargill's Corporate Human Rights Due Diligence and the ASC Feed Standard certification process. Both approaches apply risk-based assessments targeting countries, sectors, and suppliers with elevated human rights risks.

EWOS AS sources more than 90 % of its raw materials from a range of countries, including regions with medium to high risk in terms of human rights and labor standards according to most country rankings used for this purpose. The highest potential for adverse impacts on decent working conditions and fundamental human rights lies within the upstream parts of our supply chain, and as such this is the primary focus of our due diligence work.

However, we also do risk assessments on secondary procurement and own operations, in line with expectations in the ASC Feed standard.

3.1 ASC Due Diligence

Whereas the Transparency Act sets out broad, principle-based requirements for due diligence on human rights and decent working conditions, the ASC Feed Standard provides a concrete, operational framework based on the same foundations, fully aligned with international due diligence frameworks such as the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

Following the framework specified in ASC Feed Standard's "Annex 3: Due diligence", EWOS AS has mapped all our suppliers of ingredients that account for more than 1% of the total feed volume, and we have conducted social risk assessments as well as legal and environmental risk assessments. Based on this we have classified our suppliers and raw material producers according to the ASC risk model consisting of three tiers: low, medium, high.

The ASC DD then specifies 4 pathways in which a supplier or raw material producer can achieve low-risk classification:

1. ASC Country Score Card
2. Sub-national/sectoral assessment
3. Ingredient manufacturer assessment
4. ASC approved certifications (e.g., SEDEX, MarinTrust, ProTerra)

EWOS AS has also conducted review of its own operations as part of the process to achieve ASC Feed Standard certification. This includes assessments of labor rights, working conditions, grievance

mechanisms, legal compliance, health and safety, non-discrimination, fair wages, and the right to organize.

4. Identified Risks and Measures

Cargill's salient human rights issues are at the core of our human rights strategy and were determined – in alignment with the UNGPs – through human rights assessments, internal and external consultations, and engagement in multistakeholder collaborative forums and were validated by external advisors.

We prioritize our actions in the areas with greatest risk to people in our operations and supply chains and seek to identify and address negative impacts where they occur and remediate those we have caused or to which we have contributed. We also seek to focus on areas where we can have the greatest positive impact, using our influence to affect change.

Cargill's salient human rights issues are:

- Health and safety
- Worker Voice
- Fair wages and working hours
- Forced labor
- Child labor
- Land rights

Advancing equity and women's empowerment is central to addressing the root causes of our salient human rights issues and we will use this as a cross-cutting lens as we implement our work. We strive to ensure fair treatment and access to opportunity, while contributing to broad societal change by empowering women and promoting equity for all. This is not intended to be an exhaustive list of all human rights issues that exist across our businesses, and we will continue to address and update this list, as needed. Cargill will assess its human rights issues by implementing periodic risk-based human rights assessments.

Sourcing from several different countries in various parts of the world, these issues are also valid for EWOS AS, and EWOS Innovation AS. Furthermore, Cargill's salient human rights issues closely align with the social risk factors defined in the ASC Feed Standard.

EWOS AS has used 85 raw material suppliers/manufacturers over the last two years. When the materials are sourced through traders, distributors, brokers and agents, also the manufacturers of the raw materials sourced through these are included in our risk assessments. In total, 264 ASC due diligence assessments were completed in FY2025. The majority of these were found to be low risk using one or more of the four ASC due diligence pathways:

- 146 using the ASC Country Score Card, (ASC Pathway 1)
- 65 through ASC approved certifications, (ASC Pathway 2)
- 18 via sub-national/sectoral assessments (ASC Pathway 3)
- 26 through ingredient manufacturer assessments (ASC Pathway 4)

In the end, 3 producers remained, from which customer requirements required a temporarily pause in purchases until certifications are in place.

Our due diligence on raw material producers and suppliers as well as own operations has been audited by external ASC approved auditors and certification was achieved in the beginning of calendar year 2025.

Even though all suppliers and raw material producers have passed the ASC DD process, there are still areas of potential concern in the supply chain that warrant further follow up, though the status from previous reports is mainly unchanged for these areas:

4.1 Marine raw materials

EWOS AS has made the commitment only to source marine raw materials from forage fish from certified fisheries or from fisheries in an improvement program with the aim to become certified under MSC or Marine Trust. Key social issues in sourcing marine raw materials for fish feed include risks of forced and child labor, and unsafe working conditions at sea. EWOS AS is now, through the work of Cargill, following up suppliers in high-risk countries also on social issues by engaging with local leaders of the Fisheries Improvement Programs and with other involved parties - including other companies sourcing the same raw materials - to safeguard human rights and proper working conditions. How much underway reporting can be done on these efforts is dependent on alignment amongst partners involved and is still to be determined.

4.2 Guar meal in India

Guar meal is harvested by smallholder and large-scale farmers in India who employ manual laborers, traded through brokers, and delivered to mills for processing. Key social issues here include risks of child labor, unsafe working conditions, wages not being fair, and limited worker rights, especially in rural areas with weak labor law enforcement. After an initial human rights assessment, we are now following up with a human rights assessment performed by a 3rd party agency in the most relevant geographical area. We have invited other companies to participate in this effort that also sources guar meal from this region who are also members of this 3rd party agency.

As these collaborations are still in their early stages, the extent and format of future reporting will depend on the progress and alignment achieved among the partners involved.

It is our view that true change is best achieved through broad, industry wide initiative such as ASC standards, we also believe that broad engagement by multiple actors across sectors is vital to driving lasting change in supply chains, rather than separate efforts by individual companies.

4.3. Indirect procurement in EWOS AS

EWOS AS have 585 companies within indirect procurement providing other goods and services not part of primary production, which have been ranked according to the ASC country scorecard. Of these, three are listed as originating outside Europe, two from the US and one in Thailand, which are the only ones not achieving low status by country scorecard.

The Thai supplier is part of an international corporation with a subsidiary in Norway which also reports on the Norwegian Transparency Act. The international corporation has a human right policy, Anti-Fraud and Anti-Corruption Policy and Code of Ethics in place together with a Whistleblowing and Anonymous Reporting Policy, outlining their commitment to the basic principles for protecting human rights and maintaining decent working conditions. Their Norwegian subsidiary also reports on the Norwegian Transparency Act, and we see no reason for further follow-up.

4.4. EWOS Innovation AS vendor list

EWOS Innovation AS' vendor list has 356 entries including services (201) goods (122), and raw materials (33). As for EWOS AS, the risks are highest amongst the raw material suppliers, with the same salient issues. Most of the 33 raw material suppliers are in Europe, except three located in Vietnam, Thailand and Oman. These raw materials are in quantities less than 500 kilos obtained for

specific projects. Given the very limited quantities and that repeat purchases are unlikely, these will not be prioritized, in line with our risk-based approach.

5. Remediation and Follow-Up

EWOS AS works diligently to have close working relationships with our suppliers with frequent contact with many of them. We have been auditing suppliers for years and have applied the ASC principles to risk assessment in the supply chain for years, resulting in the removal of several potentially problematic producers in earlier years, and the pausing of 3 additional producers this fiscal year.

Our broader due diligence is looking at some of the areas with the highest potential risk. This work is in the early stages of being established, and as such it will take time before progress or results can be reported.

Under the requirements of Cargill's own human rights due diligence process and those of the Act, we will continue to monitor suppliers who operate in countries that are deemed at medium or high risk based on the ASC country risk. We will continue to review their risks and mitigations as part of future risk assessments and will conduct additional due diligence on those suppliers as appropriate.

6. Communication and Accessibility

The Norwegian Transparency Act requires companies to disclose their due diligence assessments through an annual statement outlining organizational structure, policies, identified risks, and measures taken to prevent or mitigate adverse impacts on human rights and working conditions. These results are included in this report and published on our webpages as the Transparency Act requires.

Furthermore, the ASC Feed Standard mandates public disclosure of ingredient sourcing, country-level risk classifications, due diligence pathways, and mitigation actions, using standardized templates and procedures. These results are published on the ASC webpage, as are the results from the external audits.

By aligning our reporting with the ASC framework, we ensure both compliance with the Norwegian Transparency Act and transparent communication of our risk management efforts to the public.

Signature page follows

Signature page for EWOS AS and EWOS INNOVATION AS – Norwegian Transparency Act –
report 2025

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