



# EQUALITY, NON-DISCRIMINATION AND GENDER PAY **REPORT**

LERØY SEAFOOD GROUP ASA AND SUBSIDIARIES

*Approved by the Group's Board of  
Directors of Lerøy Seafood Group ASA  
2023/04/28*



**WE CARE**

# Introduction

Lerøy is committed to genuine equality, and all employees are entitled to the same opportunities regardless of gender. Lerøy Seafood Group ASA employs 5,972 permanent and temporary employees of whom 853 are contract workers. At the end of 2022 the workforce comprised 39% women and 61% men across the Group. The gender ratio has been stable over several years, but in recent years we have seen a positive trend in the number of female workers.

Lerøy is working to ensure a safe, inclusive and developing working environment built on the Group's values. Diversity and inclusion at Lerøy means that every employee is treated equally regardless of gender, age, skin colour, ethnicity, language, sexual orientation, religion or personal philosophy. Lerøy has made it its priority to create a workplace without discrimination on the basis 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 its strategic priorities. The Group also continues to offer equal employment opportunities and rights to all employees, male or female. Lerøy is an international employer and has employees from a number of different countries. Many of our companies have multinational workforces.

This equality report comes in two parts and covers the Norwegian companies in the Group.

- Part 1: The state of gender equality at Lerøy
- Part 2: Our work to promote equality and work against discrimination





The people are Lerøy's most important resource, and diversity makes us better. Creating a fair, equitable, inclusive and engaging working environment built on co-operation, skills, learning and continuing development is essential to us.

Our annual employee survey and leadership programmes show that we are moving in the right direction, although we are conscious that there is still room for improvement to ensure an equitable working environment in all parts of the Group. Training, clear goals and an awareness of equality and diversity therefore remain important in our strategic priorities"

– Siren Grønhaug, CHRO Lerøy Seafood Group ASA



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- 01 The state of gender equality at Lerøy**
- 02 Our work to promote equality and work against discrimination**



# Part 1

## The state of gender equality at Lerøy

The Norwegian companies in the Group employ 3,593 permanent and temporary employees of whom 138 are contract workers. At the end of 2022 the workforce comprised 29% women and 71% men across the Norwegian companies.

Lerøy's work on equality and diversity is embedded in its overarching strategy, and increasing the proportion of women in the workforce and in management positions is a strategic KPI scorecard. The Group has set itself a target of 40% women in leading roles by 2030. In 2022 there were 25% women in manager roles with personnel responsibilities at the Norwegian companies in the Group.

### Gender balance at the Group's Norwegian companies

Company	Employees Numbers		Temporary employees Numbers		Actual part-time Numbers		Involuntary part-time Numbers		Parental leave Average no. of weeks	
	Women	Men	Women	Men	Women	Men	Women	Men	Women	Men
Lerøy Aurora AS	109	354	18	54	7	27	0	0	23,8	13
Lerøy Bulandet AS	27	16	0	0	8	0	0	0	28	0
Lerøy Fossen AS	53	39	0	1	3	4	3	0	0	2
Lerøy Havfisk AS	29	379	0	0	0	1	0	0	0	0
Lerøy Midt AS	202	537	14	35	23	62	0	0	17,1	12,6
Lerøy Nord AS	1	7	0	0	0	0	0	0	0	17
Lerøy Norge AS	13	89	3	8	6	14	0	0	32	7
Lerøy Norway Seafoods AS	238	379	39	111	0	0	0	0	17	11
Lerøy Seafood AS	99	84	1	3	15	10	0	0	28	11
Lerøy Seafood Group ASA	45	81	5	4	1	1	0	0	15	11
Lerøy Sjømatgruppen AS	1	2	0	0	0	1	0	0	0	0
Lerøy Sjøtroll Kjærelva AS	7	22	2	4	2	4	0	0	0	12,95
Lerøy Vest AS	58	206	19	32	24	32	0	0	0	8,39
Norsk Oppdrettsservice AS	14	39	5	10	9	13	0	0	0	2
Sirevaag AS	4	5	1	0	1	1	0	0	0	0
Sjømathuset AS	62	95	8	19	6	17	1	2	0	10
Sjøtroll Havbruk AS	70	227	16	35	13	29	0	0	13,33	7,61
<b>TOTAL NORWEGIAN COMPANIES</b>	<b>1032</b>	<b>2561</b>	<b>131</b>	<b>316</b>	<b>118</b>	<b>216</b>	<b>4</b>	<b>2</b>		

### Parental leave

As an equitable employer, Lerøy aims to give women and men the same opportunity to take parental leave. We encourage our male employees to take parental leave just like their female colleagues. The table above shows the average number of weeks of parental leave by gender in 2022 at the Group's Norwegian companies.

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

9.3% of employees at Lerøy's Norwegian companies work part-time. Of those, 35.3% are women and 64.7% are men. Some of these part-time positions reflect the reduced need for full-time roles, or they have been created in response to the employee's needs and wishes. Many of the part-time roles at Lerøy are auxiliary roles staffed by students. This allows the students to gain practical work experience alongside their studies.

Total number of part-time employees and involuntary part-time at the Norwegian companies	Women	Men
Number of part-time employees	118	216
Number of involuntary part-time employees	4	2

The companies have identified involuntary part-time work by speaking to employees. Every part-time employee is welcome to speak to their line manager or HR if they wish to work more hours. 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.

Lerøy has inadequate procedures for identifying involuntary part-time work at a general level; this is only done locally. However, the problem of involuntary part-time seems to be very limited.

### Temporary employment

12.4% of employees at the Norwegian companies are working in temporary roles. Most temporary roles are seasonal and fluctuate with demand, e.g. during the skrei season. Lerøy also draws on a pool of on-call workers to meet its ever changing need for resources throughout the year and to cover for employees who are on leave or working on projects.

Total temporary employees at the Norwegian companies	Women	Men
Number of employees by gender	131	316



# Pay analysis of Norwegian companies in Lerøy Seafood Group

The pay analysis covers Norwegian companies in Lerøy Seafood Group ASA with more than 50 employees.

As part of its work on anti-discrimination and equality, Lerøy has defined five job grades. The job titles have been assigned to the different job grades on the basis of same work or work of equal value in accordance with Section 34 of the Equality and Anti-Discrimination Act.

- Example of same work: two operating technicians in the same department/company or different departments/companies
- Example of work of equal value: manager of a supporting function and production manager
- Examples of other considerations: former managers who have moved to less senior roles but retained their pay are still considered managers

The tables show female earnings as a percentage of male earnings. To protect the privacy of the employees, the number of job grades in the summary has been set at five grades for companies with more than 100 employees and three grades for companies with fewer than 100 employees. The salaries of the Group executive management are not included in the summary.

## Description of job grades and pay

The job grades are based on existing job categories at Lerøy and on an assessment of which job categories exist at the different levels. Many 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 health and safety officers are involved in pay negotiations.

## Job grade

- Grade 0 = Group executive management
- Grade 1 = company management
- Grade 2 = heads of staff / department managers
- Grade 3 = other managers with personnel responsibilities, technical specialist
- Grade 4 = administrators / functionaries
- Grade 5 = production workers, apprentices, trainees

## Key findings from the pay analysis

- Many Lerøy companies offer pay according to a collective bargaining agreement. This means equal pay for women and men.
- There are significant differences 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 several different job types. Although some roles have been grouped in the same grade, pay levels are not directly comparable since we have not taken into account factors such as specialism, years of service, premiums for trade certificates / qualifications, shift arrangements, level of responsibility etc. Had the pay analysis been divided into specialisms under the Group's collective agreements and individually negotiated pay agreements rather than by subsidiary, the data on pay by gender and job grade would have been more comparable.



## Lerøy Seafood Group ASA

Pay differences and gender distribution by job grade 2022									
Women's earnings are given as a percentage of men's earnings									
	Number of women	Number of men	Cash benefits					Benefits in kind	Comments on discrepancies
			Total cash benefits	Agreed pay / fixed pay	Irregular supplements	Bonuses	Overtime pay	Total taxable benefits in kind	
Grade 0	1	4	>5	-	-	-	-	-	Inadequate number of employees to report on this grade
Grade 1	0	8	>5	-	-	-	-	-	Inadequate number of employees 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 is more or less equal. 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 number of employees to report on this grade

## Lerøy Aurora AS

Pay differences and gender distribution by job grade 2022									
Women's earnings are given as a percentage of men's earnings									
	Number of women	Number of men	Cash benefits					Benefits in kind	Comments on discrepancies
			Total cash benefits	Agreed pay / fixed pay	Irregular supplements	Bonuses	Overtime pay	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%	Extensive range of job descriptions and areas of responsibility
Grade 4	25	113	88%	94%	73%	97%	43%	67%	Pay according to collective agreement, but men have more years of service and work more overtime. This grade includes various job categories where there have traditionally been few women
Grade 5	62	148	91%	98%	56%	83%	61%	71%	Pay according to collective agreement, but men have more years of service, and they work more overtime

## Lerøy Midt AS

Pay differences and gender distribution by job grade 2022									
Women's earnings are given as a percentage of men's earnings									
	Number of women	Number of men	Cash benefits					Benefits in kind	Comments on discrepancies
			Total cash benefits	Agreed pay / fixed pay	Irregular supplements	Bonuses	Overtime pay	Total taxable benefits in kind	
Grade 1	2	7	>5	-	-	-	-	-	Inadequate number of employees 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 according to collective agreement, but there are more men with many years of service in the industry. More men are also second in command, which generates additional benefits. Technical personnel are included, and there currently no female employees
Grade 5	65	147	81%	85%	47%	91%	63%	134%	Pay according to collective agreement, but there are more men with many years of service in the industry

## Lerøy Sjøtroll AS

Pay differences and gender distribution by job grade 2022									
Women's earnings are given as a percentage of men's earnings									
	Number of women	Number of men	Cash benefits					Benefits in kind	Comments on discrepancies
			Total cash benefits	Agreed pay / fixed pay	Irregular supplements	Bonuses	Overtime pay	Total taxable benefits in kind	
Grade 1	5	4	>5	-	-	-	-	-	Inadequate number of employees to report on this grade
Grade 2	5	33	44%	45%	0%	34%	0%	13%	Majority of men. Considerable variations in pay between different roles for this grade
Grade 3	16	36	78%	108%	8%	63%	7%	70%	Women have a lower proportion of variable pay. More overtime amongst men
Grade 4	37	248	94%	94%	62%	101%	48%	92%	Most employees with this grade are paid according to collective agreement. The Group also includes team leaders, who receive a pay premium for their team responsibilities. The majority of team leaders are men. Women generally work less overtime than men
Grade 5	30	34	67%	68%	102%	49%	60%	50%	Pay according to collective agreement. Differences due to years of service and overtime.

## Lerøy Norway Seafoods AS

Pay differences and gender distribution by job grade 2022									
Women's earnings are given as a percentage of men's earnings									
	Number of women	Number of men	Cash benefits					Benefits in kind	Comments on discrepancies
			Total cash benefits	Agreed pay / fixed pay	Irregular supplements	Bonuses	Overtime pay	Total taxable benefits in kind	
Grade 1	6	10	69%	69%	-	77%	0%	1%	Differences in job categories and areas of responsibility create a discrepancy
Grade 2	11	19	57%	86%	59%	381%	48%	65%	A one-off bonus has been paid, generating a significant discrepancy different job categories and area of responsibilities
Grade 3	9	18	96%	102%	27%	-	47%	89%	Differences in job categories create a discrepancy, and men also work more overtime
Grade 4	7	27	71%	79%	77%	-	4%	22%	Differences in job categories create a discrepancy, and men also work more overtime
Grade 5	182	223	84%	94%	77%	-	48%	0%	Pay according to collective agreement. The discrepancy is due to differences in years of service and premiums for trade certificates

## Lerøy Seafood AS

Pay differences and gender distribution by job grade 2022									
Women's earnings are given as a percentage of men's earnings									
	Number of women	Number of men	Cash benefits					Benefits in kind	Comments on discrepancies
			Total cash benefits	Agreed pay / fixed pay	Irregular supplements	Bonuses	Overtime pay	Total taxable benefits in kind	
Grade 1	0	0	-	-	-	-	-	-	
Grade 2	2	3	>5	-	-	-	-	-	Inadequate number of employees to report on this grade
Grade 3	37	36	72%	90%	-	69%	55%	-	Years of service not taken into account
Grade 4	47	35	112%	106%	-	90%	139%	-	Years of service not taken into account
Grade 5	9	10	101%	130%	-	-	69%	-	Years of service not taken into account

## Lerøy Fossen AS

Pay differences and gender distribution by job grade 2022									
Women's earnings are given as a percentage of men's earnings									
	Number of women	Number of men	Cash benefits					Benefits in kind	Comments on discrepancies
			Total cash benefits	Agreed pay / fixed pay	Irregular supplements	Bonuses	Overtime pay	Total taxable benefits in kind	
Grade 1	1	1	>5	-	-	-	-	-	Inadequate number of employees to report on this grade
Grade 2	4	2	>5	-	-	-	-	-	Inadequate number of employees to report on this grade
Grade 3	0	2	>5	-	-	-	-	-	Inadequate number of employees 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%	-	Pay according to collective agreement. Differences in years of service. Men work more overtime than women

## Sjømathuset AS

Pay differences and gender distribution by job grade 2022									
Women's earnings are given as a percentage of men's earnings									
	Number of women	Number of men	Cash benefits					Benefits in kind	Comments on discrepancies
			Total cash benefits	Agreed pay / fixed pay	Irregular supplements	Bonuses	Overtime pay	Total taxable benefits in kind	
Grades 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%	-	Pay according to collective agreement. Shift work, years of service and overtime will affect total pay

## Lerøy Norge AS

Pay differences and gender distribution by job grade 2022									
Women's earnings are given as a percentage of men's earnings									
	Number of women	Number of men	Cash benefits					Benefits in kind	Comments on discrepancies
			Total cash benefits	Agreed pay / fixed pay	Irregular supplements	Bonuses	Overtime pay	Total taxable benefits in kind	
<b>Grades 1-3</b>	1	11	>5	-	-	-	-	-	Inadequate gender balance to report on this grade
<b>Grade 4</b>	6	28	104%	167%	-	-	108%	84%	Impacted by long-term sickness absence amongst men and temporarily more overtime amongst women
<b>Grade 5</b>	7	40	57%	78%	111%	-	5%	60%	Overnight allowance and overtime affect gender balance, and men have a few more years of service

## Norsk Oppdrettsservice AS

Pay differences and gender distribution by job grade 2022									
Women's earnings are given as a percentage of men's earnings									
	Number of women	Number of men	Cash benefits					Benefits in kind	Comments on discrepancies
			Total cash benefits	Agreed pay / fixed pay	Irregular supplements	Bonuses	Overtime pay	Total taxable benefits in kind	
<b>Grades 1-3</b>	2	5	>5	-	-	-	-	-	Inadequate number of employees to report on this grade
<b>Grade 4</b>	2	0	>5	-	-	-	-	-	Inadequate number of employees to report on this grade
<b>Grade 5</b>	7	23	73%	46%	-	-	27%	-	Men hold roles with more responsibilities, and they work more overtime. Female apprentices / part-time employees make this discrepancy seem significant

# Main findings from the pay analysis for fishing vessels

Separate job grades have been defined for fishing vessels in order to be able to compare the different roles on board the vessels. All employees on vessels are subject to collective agreements between the vessels and the Norwegian Seafarers' Union, the Norwegian Union of Marine Engineers and the Norwegian Maritime Officers' Association. Pay is the same for women and men. Few women work on fishing vessels. For that reason, it is not possible to disclose pay details for the different grades.

## Job grade – employees on fishing vessels

- 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 = fisherman
- Grade 6 = catering assistant
- Grade 7 = employees training for trade certificate or other qualification (apprentices, cadets)

	Pay differences and gender distribution by job grade 2022 Women's earnings are given as a percentage of men's earnings						
	Finnmark Havfiske AS				Hammerfest Industrifiske AS		
	Number of women	Number of men	Total cash benefits		Number of women	Number of men	Total cash benefits
<b>Grade 1</b>	0	6	-	<b>Grade 1</b>	0	4	-
<b>Grade 2</b>	0	18	-	<b>Grade 2</b>	0	12	-
<b>Grade 3</b>	0	18	-	<b>Grade 3</b>	1	11	-
<b>Grade 4</b>	0	16	-	<b>Grade 4</b>	0	8	-
<b>Grade 5</b>	0	42	-	<b>Grade 5</b>	0	24	-
<b>Grade 6</b>	6	0	-	<b>Grade 6</b>	0	0	-
<b>Grade 7</b>	0	18	-	<b>Grade 7</b>	0	2	-

	<b>Pay differences and gender distribution by job grade 2022</b> Women's earnings are given as a percentage of men's earnings						
	<b>Lerøy Havfisk AS (administration)</b>				<b>Nordland Havfiske AS</b>		
	Number of women	Number of men	Total cash benefits		Number of women	Number of men	Total cash benefits
<b>Grades 1-3</b>	2	6	-	<b>Grade 1</b>	0	10	-
<b>Grade 4</b>	3	7	-	<b>Grade 2</b>	0	30	-
<b>Grade 5</b>	4	0	-	<b>Grade 3</b>	1	29	-
				<b>Grade 4</b>	0	23	-
				<b>Grade 5</b>	2	66	-
				<b>Grade 6</b>	8	0	-
				<b>Grade 7</b>	1	29	-

# Part 2

## Lerøy's equality and non-discrimination approach

In its work on equality and non-discrimination, Lerøy has focused on the following employment areas: recruitment, compensation and benefits, 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 its various strategies, tools and guidelines. Detailed descriptions can be found in the sustainability library at [leroyseafood.com](http://leroyseafood.com) and internal documents such as the code of conduct, management manual, working regulations and employee manual.

### 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 whistle-blowing poster, procedures and whistle-blowing channels have been communicated and made available to all employees across the Group
- Equality and non-discrimination are also an integral part of 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, as we believe that diversity has a positive impact in 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 2022 the proportion of female workers stood at 39%. The figure for the Group's Norwegian companies was 28.7%.

Equality and diversity are an important part of the Lerøy culture and a key priority for the Group. As part of a digital transformation, the Group has acquired a new payroll and HR system for all its Norwegian companies which will provide increased data quality and opportunities for more detailed analysis. This will give us better insights and help reinforce

our work on equality and diversity. The Group has also decided on a new HR operating model with associated structuring at its Norwegian companies. This will add further expertise in key areas, through both dedicated roles and professional networks. Culture, equality and diversity are an integral element in these key areas. Lerøy has begun standardising HR processes and will continue to do so in 2023 as we are seeing the value of standardising practices across the companies wherever possible.

### Code of conduct

Lerøy's code of conduct is a set of shared principles and rules applicable to all employees and contract workers at Lerøy Seafood Group and its subsidiaries. The guidelines on behaviours reflect the values the Group stands for and give employees guidance on day-to-day behaviours and issues to consider. The code of conduct is designed to give employees an understanding of what is right and what is wrong and information about which channels to use in the event of potential breaches of the 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 must familiarise themselves with the Group's code of conduct. Each company provides training in the code of conduct, and an obligatory e-learning programme has been developed for all employees of the Group's Norwegian subsidiaries. The principles from the Group's code of conduct have been incorporated into the Group's leadership standard and management manual.



### Whistle-blowing

Lerøy's main priority is to create an organisational culture with a good and constructive environment in which people can speak freely. The whistle-blowing rules are designed to enable both employees and external parties to speak up and be critical without risking any kind of punishment or negative reaction. Internal procedures have been drawn up for how external and internal whistle-blowers should be treated. These can be found in the Group's internal control system.

### Employee survey

Lerøy conducts an annual survey of all employees across the Group in collaboration with Great Place to Work. The employee survey asks specific questions about equality and discrimination in order to identify the employees' workplace experiences. The survey is completely anonymous, voluntary and available in 18 languages to enable as many people as possible to respond in a language they know well. A total of 86% of the Group's employees responded to the survey at the start of January 2023\*.

The employee survey can be filtered to view the overall Group results by demographics, including gender, age and job grade, in order to determine whether different employees experience things differently. The survey asks specific questions about bullying and harassment and about discrimination on the basis of age, gender, sexual orientation and cultural or ethnic affiliation. There are also open questions where employees can comment in their own words. The employee survey has found that men are slightly happier at work than women, although there is a positive trend for all the survey statements, regardless of gender. The employee survey is a good tool for identifying the status quo in the workplace, hearing the employees' experiences and giving Lerøy important insights for making further improvements. Involving employees in addressing the results at company and department level has had a positive effect and is something Lerøy will continue to do.

### Attractive employer

Lerøy is working to make the seafood industry a more attractive place to work. Amongst the initiatives launched in the past few years a review of wordings and pictures used in job adverts to ensure that they are more suitable for all candidates, a review of the use of pictures in marketing materials to highlight diversity in the workplace, and increased participation at education fairs and company presentations for students to demonstrate the career opportunities that exist in the seafood industry. Lerøy also publishes employee interviews at [leroyseafood.com](http://leroyseafood.com), and since 2020 we have had a particular focus on publishing stories that show women in typically male-dominated roles. We will continue to follow up on these activities to show that there are exciting career opportunities and room for everyone in the seafood industry.

The Group wishes to continue to improve diversity and will be working to develop and improve the measures already taken while also focusing on training during recruitment processes to eliminate prejudice and unconscious bias and discrimination. One important measure will be an increased focus on internal mobility and on highlighting in-house career opportunities for all our employees.



\* The employee survey is issued during the first two weeks of January and measures the employees' experiences over the past 12 months

### Leadership development

Leadership is an important part of the Lerøy culture and vital to attaining the Group's goals for equality and diversity. Lerøy focuses on value-based and future-oriented leadership based on the Group's values and business strategy. Our leaders shall represent the company's values, lead by example and serve as good ambassadors for Lerøy. Being a leader in Lerøy is a vote of confidence that carries significant responsibility. The Group has implemented a management manual, leadership standard and leadership development programmes to ensure that our leaders are confident in their role. In 2022 a total of 90 managers from the Norwegian companies and 33 managers from the international companies completed Lerøy's leadership development programme. During 2023 a total of 108 managers will participate in the programme. Our ambition is for all managers at Lerøy to complete the leadership development programme.

### Pay and working conditions

Many Lerøy employees are paid according to a collective agreement, with equal pay regardless of gender. On average, men have more years of service than women at the Norwegian companies. This is a natural consequence of the seafood industry traditionally having been a male-dominated industry. The introduction of a new, joint payroll system for the Norwegian companies in 2023 can help make it easier to make comparisons across the different companies. In 2022 we started the process of identifying job grades in the fish farming segment and will do the same in the other segments in order to get a better basis for comparison across the Norwegian companies. This standardisation process, combined with the transition to uniform job titles, will be important in order to complete 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.

When producing this equality report we found that there are more men in management roles and higher job grades. Lerøy aims to increase the proportion of women in management positions to 40% by 2030.

Gender distribution by job grade at the Norwegian companies	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	1,216	470 (39%)	746 (61%)

Gender distribution by job grade on board fishing vessels	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 aims to be an inclusive employer for all its employees. Most of its employees in Norway do not work in administrative roles in an office but are involved in physical work such as industry, fishing vessels or fish farming. Working hours for this group often involve both shifts and permanent hours, which can make it more difficult to strike a balance between work and family life than we would have liked. For employees in administrative roles, 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 contains several questions about this topic, which has given us valuable insights that we can continue to work on. One measure is to develop Lerøy's life phase policy and raise awareness amongst managers and employees of the different needs of employees during different life stages: from graduate to retirement.

#### **Diversity business of the year**

Equality at Lerøy is about more than just gender. We want to ensure diversity and inclusion by finding a good balance between genders but also when it comes to age, ethnicity and cultural background. We know that diversity benefits the enterprise.

In 2021 Lerøy Norway Seafoods' factory in Melbu was named diversity business of the year at the annual conference of the Directorate of Integration and Diversity. The factory employs around 120 people, of whom 70% are of an immigrant background.

Most team leaders at the factory come from countries other than Norway, and the management aims to give all employees the same opportunities, including the opportunity to obtain trade certificates. The factory organises Norwegian language courses. It also ensures additional tuition with a dedicated teacher to allow employees to become fluent enough in the language to be able to obtain trade certificates in seafood production – something which benefits both employer and employee. Another initiative is the increased use of process visualisation, which makes training easier for those with a mother tongue other than Norwegian. Activities similar to those organised by Lerøy Norway Seafoods in Melbu are also taking place elsewhere within the Group. Language plays an important role in inclusion in the workplace and in society, and as an employer, we see great value in helping our employees learn the local language.

#### **Internal and external events to celebrate equality and diversity**

One 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 uses the Group intranet, social media and [leroyseafood.com](http://leroyseafood.com) actively to distribute this information. Some of the activities that attracted particular attention in 2022 were:

- Winner of the diversity business of the year 2021
- Pride
- International Women's Day
- The Pink Ribbon Race
- The «Women at Sea» equality conference
- TV-aksjonen annual fundraising event
- Articles with stories about Lerøy employees
- UN sustainable development goals

On connection with the «Women at Sea» conference, Lerøy held an in-house workshop to identify potential barriers and create opportunities for improving equality at Lerøy. Employees and employee representatives from the entire Lerøy value chain participated in the workshop. A number of important perspectives and proposals were heard along with reflections inspired by the conference. Many of the proposals from the workshop were taken on board when preparing the equality report and converted into measures to strengthen equality and diversity at Lerøy.

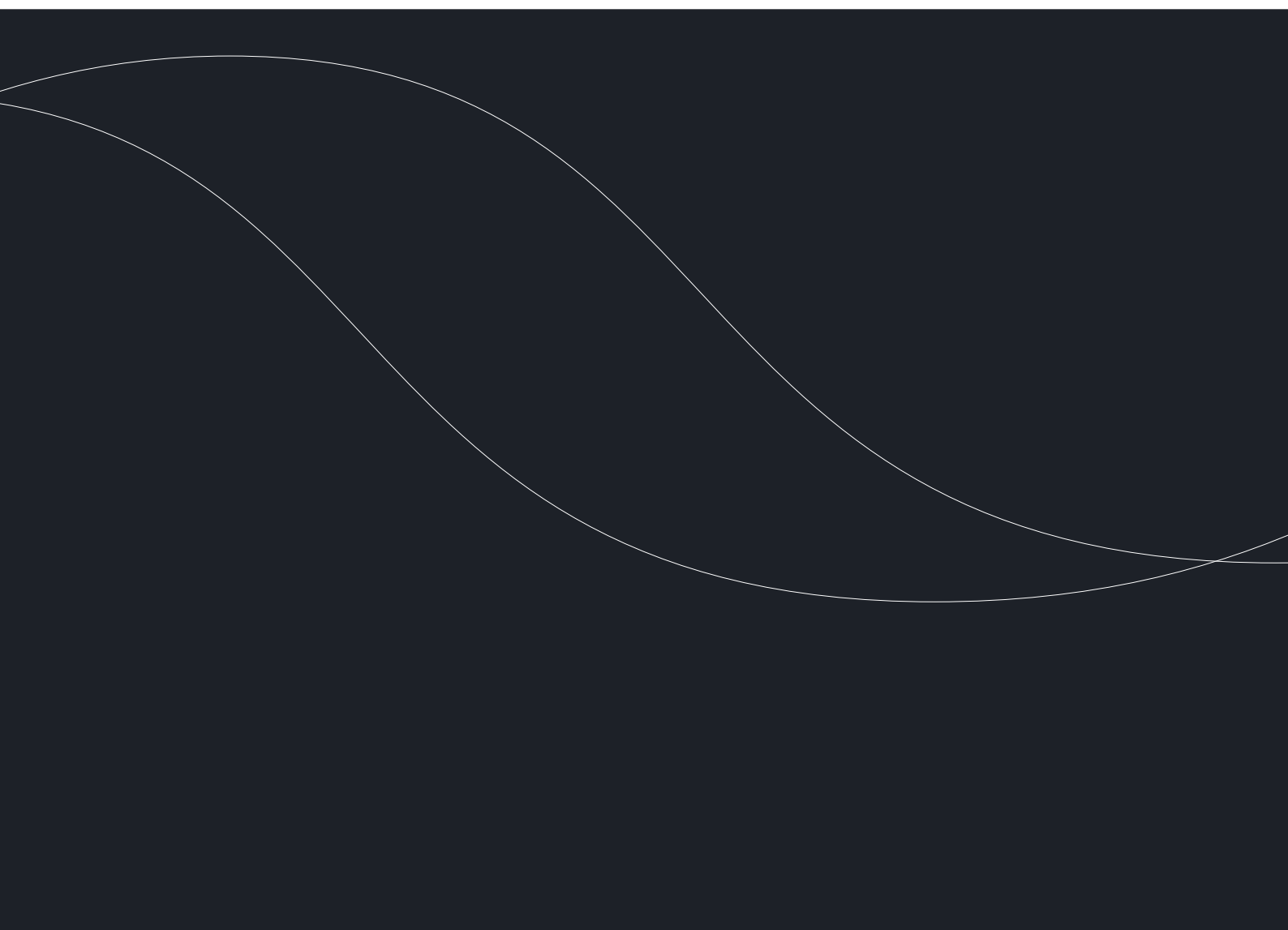
#### **Action plan to promote equality and eliminate discrimination**

A great deal of good work has been done in 2022 on equality at the companies in Lerøy Seafood Group. Although constructive processes and measures have been undertaken locally at the companies, the Group as a whole still has some way to go to realise its ambitions and goals for equality and diversity. One important aspect of this work in 2023 will be to standardise processes and introduce measures for all the companies in the Group based on best practice. So far, the work has largely been driven by HR, but we are looking to be more agile and involve the organisation and take a more cross-disciplinary approach.

## Measures and action plan

HR factor	Reason for measure	Description of measure	Aim of measuree	Responsibility	Status	Outcomes
<b>Recruitment</b>	Greater diversity in all job grades  Objective evaluation of candidates	Focus diversity on our career portal  Wording and criteria in job adverts  Standardise processes  Training in interview techniques and unconscious bias	Increase proportion of female applicants  Increase proportion of female job interviewees  Increase proportion of minority job interviewees	HR and managers	Ongoing  Planned activities on roadmap	Greater proportion of women
<b>Promotion and development opportunities</b>	Highlight internal development opportunities for all employees	Standardise processes  Skills overview  Development plans  Internal mobility  Lerøy mentoring programme  Increased implementation of Lerøy Way	Greater degree of internal mobility  Greater proportion of female applicants for management roles	HR and managers  Lerøy Way Office	Ongoing  Planned activities on roadmap	Increased GPTW score Greater proportion of women in management roles
<b>Pay and working conditions</b>	Pay based on job grade and job category	Standardise processes  Shared HR and payroll system in Norway  Standardisation of job grades and categories  Pay analysis in Norway	Equal pay regardless of gender	HR and managers	Ongoing  Planned activities on roadmap	Increased GPTW score
<b>Adaptation, opportunity to combine work and family life</b>	Lower than desired GPTW score on work-life balance	Standardise processes  Uniform life phase policy  Adapted workwear for women and pregnant employees  Flexible hours for roles where it is possible  Option to work from home for roles where it is possible	Inclusion and adaptation as needed  Ensure that we have workwear tailored for women and pregnant employees	HR and managers	Ongoing  Planned activities on roadmap	Increased GPTW score
<b>Harassment, sexual harassment and gender-based violence</b>	Wording and criteria in job adverts	Group e-learning on: - code of conduct - equality and diversity - whistle-blowing  Standardise processes  Management development  Communication	Obligatory training  Use of internal whistle-blowing channel	HR and managers	Ongoing  Planned activities on roadmap	Following up on whistle-blowing
<b>Working environment</b>	Different employee experiences across the Group	Employee survey  Standardise processes  Equality and diversity are a fixed item on the working environment committee's agenda  Information in Norwegian and English on the intranet	Reduced sickness absence  Increased satisfaction	HR and managers	Ongoing  Planned activities on roadmap	Increased GPTW score  Reduced sickness absence  Reduced turnover





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