



STATEMENT PURSUANT TO THE TRANSPARENCY ACT 2026

NoriDane Group

12.06.2026

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NoriDane Group Statement Pursuant to the Norwegian Transparency Act for 2025

1.1. Introduction

NoriDane Group publishes an annual account of its due diligence assessments in accordance with the Norwegian Transparency Act.

The Act aims to promote respect for fundamental human rights and decent working conditions within companies.

This report outlines the due diligence assessments NoriDane Group has carried out and the measures taken to reduce the risk of negative impacts related to human rights and working conditions.

The following companies are part of NoriDane Group:

- NoriDane Foods A/S – VAT No: DK20721537
- NoriDane Consult A/S – VAT No: DK40813233
- Madeco International A/S – VAT No: DK27043593
- NoriDane Foods Norge AS – VAT No: NO992318899

These entities are collectively referred to as "NoriDane Group" throughout this report.

During the reporting period, NoriDane continued its risk-based due diligence approach and engaged directly with selected suppliers through the Transparency Act 2026 assessment process. This work forms part of the company's ongoing efforts to identify, prevent and mitigate potential adverse impacts on human rights and decent working conditions throughout its supply chain.

1.2. Contact Information

Inquiries regarding this report can be directed to: compliance@noridane.com

1.3. Duty to Report

NoriDane Group is headquartered at Amaliegade 9B, 1256 Copenhagen K, Denmark. As it meets the threshold criteria of the Transparency Act, it is subject to the reporting obligations therein.

2. ABOUT NORIDANE GROUP

2.1. Organization and Business Scope

NoriDane Group is a subsidiary of Nortura AS. We operate as B2B trading companies in the food industry, primarily focusing on meat trading. As intermediaries, we connect importers, distributors, and slaughterhouses globally while offering expertise in product knowledge, market analysis, and logistics.

Our procurement sources include: Spain, Poland, Brazil, the Netherlands, Turkey, USA, Germany, Belgium, Norway, Denmark, France, Canada, UK, Italy, Ireland, Uruguay, Sweden, Argentina, India, Hungary, Mexico, Portugal, Mauritania, Paraguay, Ukraine, Oman, Botswana, Iceland, Vietnam, Finland, Austria, China, Morocco, Chile, Romania, and Malaysia. We do not own production facilities. Our 2026 workforce includes 65 employees working from offices in Denmark, Spain and Norway.

NoriDane Consult provides agricultural consulting in the meat industry, focusing mainly on pork slaughterhouses, with additional services in beef and deboning processes. In 2026, it had four employees.

As part of its due diligence efforts, NoriDane Group maintains regular contact with suppliers and business partners and performs risk-based assessments of selected suppliers based on geography, product category, supplier profile and business volume.

2.2. Internal Guidelines

NoriDane Group has implemented internal procedures to anchor efforts regarding human rights and decent working conditions. These are approved by the Board and communicated to employees via internal channels. Annual training is provided, and the Transparency Act is a key topic during August staff days and regular team meetings.

The guidelines detail the due diligence and mitigation processes, including a whistleblower mechanism accessible via our website. This supports the identification and follow-up of any negative impacts.

2.3. Goals and Progress

2.3.1. Ongoing Objectives

We continually assess risks related to our operations and business partners and implement actions to reach compliance goals.

2.3.2. Future Objectives

- Continue applying a risk-based supplier due diligence process.
- Continue direct engagement with suppliers identified as high-risk through the Transparency Act assessment process.
- Increase supplier participation rates in future Transparency Act assessments.
- Continue collecting and reviewing supplier documentation, certifications and policies relating to human rights, labour standards and business ethics.
- Utilize the Microsoft Dynamics 365 platform to improve supplier data quality, transparency and risk monitoring capabilities.
- Strengthen ongoing supplier dialogue to improve visibility throughout the supply chain.

3. DUE DILIGENCE ASSESSMENT

3.1. Focus Areas

NoriDane Group uses the Ignite Procurement platform for risk analysis of suppliers and partners. This tool helps us:

1. Map all tier-1 suppliers using ERP data.
2. Enrich data via ENIN, including financials and company structure.
3. Classify suppliers based on geography, industry, product, and past risks.
4. Send surveys and collect documentation.
5. Analyze risks and determine actions.
6. Engage stakeholders in corrective actions.

The dashboard provides:

- Total number of suppliers and those who responded to surveys
- Supplier disclosure of their own Transparency Act compliance
- Risk classification breakdown (very high, high, medium, low)
- Identified violations and remedial actions
-

In 2026, additional focus was placed on supplier engagement and supplier transparency. Selected suppliers were invited to participate in the Transparency Act assessment process and provide supporting information regarding human rights, labour practices, health and safety standards and corporate governance.

3.2. Internal Operations Assessment

Our risk is low since we do not have production, but we monitor:

- Labor conditions and employee well-being
- Freedom of association
- Ethical trading risks via procurement
- Psychosocial risks due to high-paced trading environments

3.3. Supplier Chain and Partners

We evaluate suppliers using:

- Screening tools for compliance risk
- KYC/KYS processes
- Ongoing dialogue and certifications
- Risk-based internal reviews

Across NoriDane Group, 126 suppliers with annual turnover exceeding DKK 5 million were subject to annual due diligence review. Based on the Group's risk-based assessment methodology, selected suppliers were invited to participate in the Transparency Act 2026 assessment process.

A total of 19 suppliers provided completed responses and supporting documentation, resulting in a response rate of approximately 15%. The information received was reviewed and incorporated into NoriDane Group's annual supplier risk assessment process.

As part of the Transparency Act 2026 assessment, NoriDane contacted selected suppliers for further due diligence review. A total of 19 suppliers submitted completed responses together with supporting documentation. The responses were reviewed by Compliance as part of the annual due diligence process.

3.4. Key Findings

Product/Service	Human Rights Violations	Region	Discovery Method
Food suppliers participating in the Transparency Act 2026 assessment	No material human rights violations identified	Global	Transparency Act 2026 supplier assessment questionnaire and supporting documentation review
Supplier transparency and due diligence coverage	Continued improvement required regarding supplier participation and transparency	Global	Transparency Act 2026 supplier assessment process

Based on the Transparency Act 2026 assessment, no material human rights violations or significant breaches of decent working conditions were identified among participating suppliers. Several suppliers provided supporting policies, certifications and documented procedures covering human rights, health and safety, anti-discrimination, labour standards and business ethics.

While the results were generally positive, NoriDane recognizes the importance of increasing supplier participation in future assessments to strengthen transparency and due diligence coverage across the supply chain.

4. MITIGATING MEASURES

Risk 1.

Identified Risk:

Limited supplier participation in Transparency Act assessments.

Actions Implemented:

- Direct follow-up with selected suppliers.
- Increased communication regarding the purpose of the assessment.
- Continued engagement between Compliance and relevant suppliers.

Objective:

Increase supplier participation and improve supply chain transparency.

Status:

Ongoing

Risk 2.**Identified Risk:**

Need for continued visibility into supplier human rights and labour practices.

Actions Implemented:

- Collection and review of supplier policies and certifications.
- Review of supplier responses relating to human rights, labour standards, health and safety and business ethics.
- Ongoing risk-based supplier monitoring.

Objective:

Strengthen due diligence coverage and supplier transparency.

Status:

Ongoing.

Risk 3.**Identified Risk:**

Suppliers previously identified for additional review.

Actions Implemented:

- Follow-up communication conducted with suppliers identified through previous assessments.
- Review of available supplier information and supporting documentation.
- Continued monitoring where relevant.

Objective:

Ensure identified suppliers remain subject to appropriate due diligence and follow-up activities.

Status:

Ongoing. Follow-up efforts have been initiated; however, responses from certain suppliers are still pending and additional information is being requested where necessary.

Several participating suppliers demonstrated established policies and procedures relating to human rights, health and safety, anti-discrimination, labour standards and ethical business conduct. Multiple suppliers also provided third-party certifications supporting their responses.

5. MONITORING ACTIONS AND OUTCOMES

5.1. Overview

We continuously monitor implemented actions and outcomes.

5.2. Follow-Up Procedures

- Compliance oversees execution and effectiveness
- Regular internal/third-party audits
- Supplier feedback integrated
- Adjustments made based on evaluations
- Results from the Transparency Act 2026 assessment are incorporated into future supplier monitoring and risk assessments.

A progress plan aligned with Section 3 guides our recovery efforts.

6. REMEDY AND COMPENSATION

No instances requiring remediation or compensation were identified during the 2025 reporting period.

Based on the due diligence assessments performed and the responses received through the Transparency Act 2026 assessment process, no actual adverse impacts requiring remediation measures were identified.

NoriDane will continue monitoring suppliers and business partners through its ongoing due diligence activities and will implement remediation measures if future assessments identify a need for such actions.

Chairman of the Board Per Stride

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Board Member Hans Thorn Wittussen

Signature: _____

Board Member Rolf Gjermund Fjeldheim

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Board Member Janni Bové Schou

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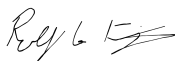
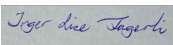
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  Janni Bové Schou Styremedlem cd0d5ad8-c701-4319-8037-61cc027260e32026-06-15 09:12:24Z	  Inger Lise Fagerli Styremedlem d6d4b046-70b7-4eb2-8b86-3569e4a2a4f12026-06-15 11:31:54Z
  Kristin Ianssen Styremedlem 09622e1c-1078-4d1f-b4c4-64a6b8a1897f2026-06-17 08:28:07Z	  Hans Thorn Wittussen Næstformand ad5d23a2-680d-42e4-8a0a-a5cf4bf05acc2026-06-17 12:46:14Z
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