



# SUSTAINABILITY REPORT

2023



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# Introduction

Napier AS is a world-leading provider of profitable and sustainable transport of farmed fish. The company offers numerous benefits to our customers in the form of increased fish welfare, biosecurity, profitability, and sustainability.

Napier AS prioritizes fundamental human rights, decent working conditions and environmental impact, both within the company and in relation to subcontractors and service providers. Our assessment is conducted in accordance with OECD guidelines, which also incorporate the business sector's contribution to sustainable development (environment and society).

We acknowledge that sustainable management of human resources and the environment not only benefits future generations, the environment, and employees, but also the company, including:

- Reduction of costs
- Preserving work environment
- A positive reputation
- Potential for increased product quality

Napier AS is committed to continuous improvement, with data being regularly and systematically monitored, analysed, and processed. The data we collect, along with the outcomes of management reviews, are incorporated into our annual ESG (Environmental, Social, and Governance) analysis. This analysis serves as a tool for annually assessing the company's strengths and weaknesses, as well as evaluating potential improvement measures. The insights gained from this analysis, combined with management reviews, shape the company's strategic goals. The results of the ESG analysis and relevant KPIs are detailed in this report.

## CEO

2023 has been an exciting year for Napier, with new owners, vessel construction and our operations. And I would like to thank all our employees and partners for the excellent work which has been done to ensure a successful year for our customers, our employees and Napier.

The year has been marked by a growth for Napier in most aspects, and we have taken several new steps as a company towards refining our operations and offering new and fruitful synergies with our customers.

Our first value is “safety” (trygghet), and I am very glad that we had no serious injuries in 2023 and that we are taking care of each other in Napier. However, we see areas for improvement, and we are working to make each year the safest yet. In 2023 we also made concrete measures together with our most risk affected suppliers to improve reporting and transparency and to make sure the safety of all involved are of the highest priority.

Another important value for us is the pursuit of innovation and progress. And even though the innate environmental aspect of our concept is strong, we are evolving this by looking at existing and promising technology alongside our partners. In 2023 we made efforts to be able to service customers using Hydrogen as fuel – up to 100% of operation / zero emission. We are also evaluating the possibilities for low- and / or zero-emission technology in all projects which we are involved.

## VALUES

### SAFETY AND WELL-BEING

### PROFESSIONAL INTEREST AND ENTHUSIASM

### RESTLESS PURSUIT OF IMPROVEMENTS

During the year we also made significant steps to strengthen our ESG and DEI routines and procedures to adequately reflect our ambition and operational level. With this we also set targets and plans to make sure we meet these in the following years. Napier AS also aims to commit to **Science Based Target Initiative** (SBTi) in 2025 – a statement of our clear intent regarding GHG reductions.

Our two new builds are in Sefine Shipyards Turkey. These vessels represent the next evolvement in processing vessels and will push the concept both regarding technology and capacity.

Thanks for a good year, and we look forward to an exciting 2024 and beyond.

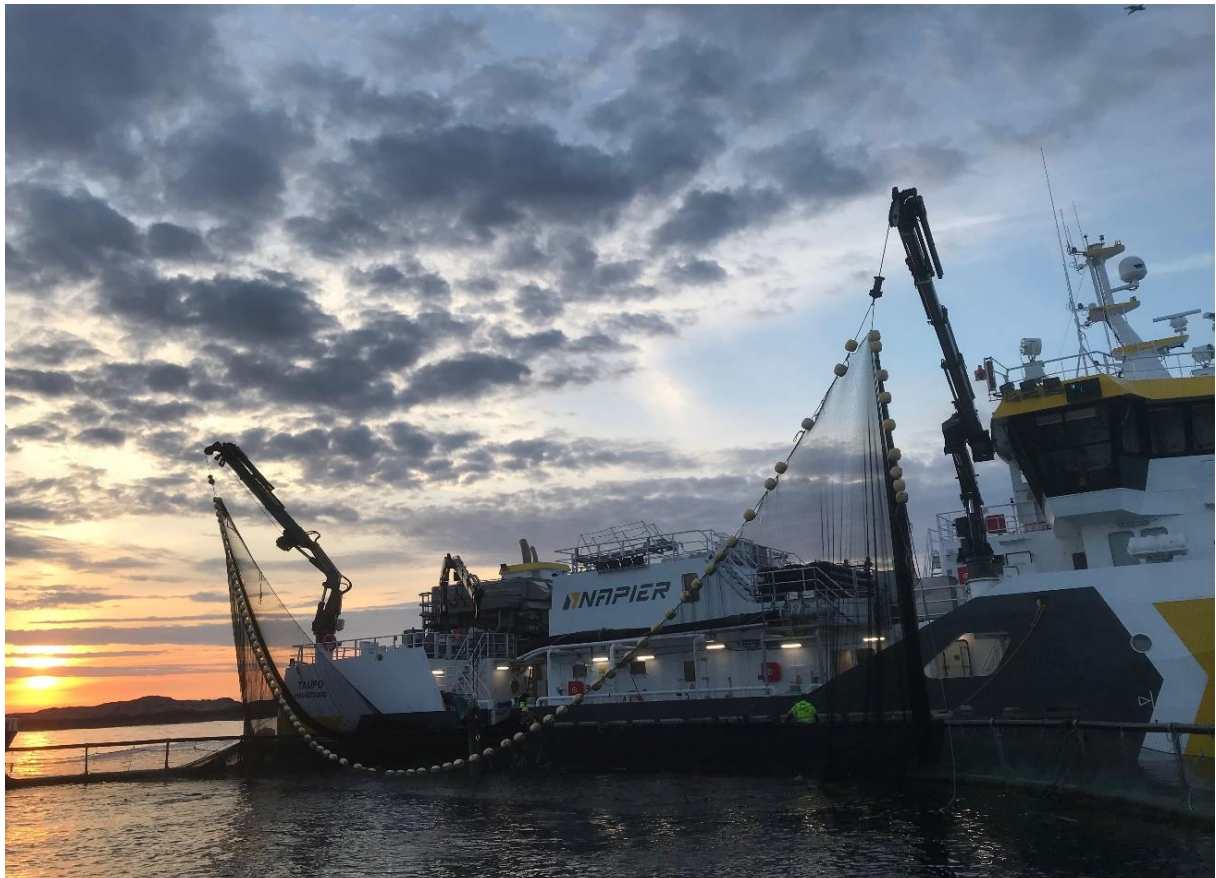


Kjell Taddel



# About Napier AS

**Napier AS has 72 employees and operates four, soon to be six, processing vessels along the Norwegian coast. These vessels harvest fish directly at the fish farm site and transport them to onshore facilities for further processing. The company's headquarters are located at Langevåg, Bømlo. Our vessels operate along the entire Norwegian coast, from Agder in the south to Bodø in the north.**



Napier AS was established in 1995 with the well boat Tauranga. In 2001, we sold this vessel and acquired the "New" Tauranga. In 2008, we entered a comprehensive research and development collaboration with Mowi and Nofima, concluding in the conversion of Tauranga into Europe's first stun-and-bleed vessel. In 2019 and 2020, the sister ships Taumar, Taupiri, and Taupo were completed, and we are currently working on finalizing two additional ships, Tauroa and Tautiki.

Napier AS serves fish farmers who need sustainable and profitable transport of farmed fish with high welfare standards, from the fish farm to the slaughterhouse.

Through knowledge and experience, we have developed groundbreaking solutions and built a fleet based on this expertise.

# Summary of the year 2023

## Production

Napier AS transported in total 95 009 317 kg fish in 2023. This is distributed over 21,5 million fish. Every day on average it was produced 260 tonnes of fish- approximately 1,5 million dinners.

## Areas of Focus for the year 2023

	AREA OF FOCUS
GOVERNANCE	Napier AS aimed to strengthen its ability to withstand and adapt to climate-related hazards and natural disasters by conducting thorough risk assessments.
	Implementing an electronic control system, so that the company will be better equipped to collect and process data for assessing its status concerning ESG
	Napier AS will work towards reducing consumption and promoting smarter spending.
SOCIAL	Napier AS will establish an energy/environment group
	The administration will work towards facilitating waste sorting, enabling the company to contribute to the preservation of value in materials and energy.
ENVIRONMENT	To ensure participation and increased communication across vessels and offices, quarterly HACCP meetings will be arranged going forward.
	To enhance the standard of Napier AS's quality management system, the company will work towards certification according to ISO 22000 by January 2024.
	Efforts to complete a new management system enables greater capabilities for data processing, by 2023.
	There will be an increased focus on contributing to the local communities where the vessels are stationed
	Napier AS will audit its procedures for contract engagement/collaboration with suppliers, implementing stricter controls regarding sustainable production and treatment of employees.

**CONCLUSIONS FOR THE YEAR 2023:** All of the company's initiatives related to focus areas were implemented in 2023, except for the establishment of an energy and environment group. After thorough evaluation of the company's size and resources, it was decided to forego the creation of an energy group. Instead, an ESG manager has been appointed. This decision is considered the most efficient and sensible given the current situation and gives the company further capacity within ESG relevant matters going into the future. Our vessels also continued their good performance within our certification suite related to fish handling, management, documentation and food safety, with complete coverage according to schedule.

# ESG- KPI

## ENVIRONMENTAL

Goal	KPI
Reducing CO2 Scope 1 and 2 emissions per nautical mile traveled	25% by 2028
Reducing CO2 Scope 3 emissions per nautical mile travelled.	Baseline and goal will be set in 2024
Reducing customer CO2 emissions by replacing technology.	Reduction of 8000 tons of CO <sub>2</sub> by 2027

## SOCIAL

Goal	Short- term
Employee satisfaction	Baseline and goal will be set in 2024
A portion of newly hired employees from the base year are women.	10% by 2025

## GOVERNANCE

Goal	Short- term
The overall score of the GRESB assessment	90 by 2025

At the end of 2023 we established our KPIs and strategy for the years to come. In our future sustainability reports, we will address our KPIs and evaluate how the company is performing in relation to our set goals. This is not possible for this year's report, as the KPIs are newly established, and the company is working on finding a baseline for the various KPIs. As well as implementing measures to be able to monitor efficiently. We also aim to make sure our targets align with the SBTi commitment and will adjust these accordingly. The measures the company is taking and the focal points for improvement and achieving our goals will be described under each main topic in this report.

# GOVERNANCE

ESG related matter is overseen by the board, with the CEO being accountable for its implementation and follow-up. Napier AS incorporates ESG matters into the agenda of each board meeting and is obligated to provide the board with updates on our objectives. In addition, we are participating to annual GRESB reporting, so that our ESG performance gets validated and scored independently.

In 2024, the company appointed an ESG- manager, responsible for monitoring our ESG- matters, as well as preparing carbon footprint reports and annual sustainability reports. Throughout 2024, our focus will be on ensuring this individual acquires the necessary expertise to fulfil their responsibilities effectively.

Napier AS has established procedures and policies for issues related to ESG. Following is a list of policies that are established in our organization:

- Safety and environmental protection
- Alcohol and Substance Abuse
- Governance
- Environmental
- Social
- Supplier Code of conduct
- Employees Code of conduct

## Sustainability report

A situational analysis of ESG and the sustainability report was integrated into our governance system in 2023 as part of a strategy to address ESG challenges. The CEO holds the overall responsibility for ensuring that a sustainability report is conducted, approved by the board of directors, and published annually.

The sustainability report is based on the results of the management team's annual assessment of the company's performance (the ESG analysis), the management review, and the annual report.





### **Commitment to KPIs and UN Sustainable Development Goals**

Moving forward, the company will actively work on KPIs and initiatives aligned with the UN's Sustainable Development Goals. To better evaluate the company's status against the established KPIs and to ensure effective data collection and processing, it was decided in 2023 to transition to a new electronic management system.

By thinking globally and acting locally, we aim to contribute to the achievement of the UN's Sustainable Development Goals.

### **Sustainability Improvements**

Napier AS has a well-established system for continuous improvement. Reporting, annual internal audits, external audits, management reviews, ESG analysis, and due sustainability report are all tools designed to identify areas for improvement within our company.

### **Climate change**

Climate change can pose risks not only to the environment and ecosystems but also to businesses. Napier AS is part of a value chain that relies on the ocean as a resource and is therefore vulnerable to climate changes that may affect this resource. Napier AS has conducted a thorough assessment of potential future risks that could negatively impact the business, ensuring that the company takes appropriate actions if these risks materialize. The risks are reviewed annually to keep the company ahead of any changes.

### **Ethics, corruption, and financial misconduct**

Napier AS has established guidelines to ensure compliance with ethical standards, anti-corruption measures,

and prevention of financial misconduct, and have no reported cases in 2023. The company operates in accordance with Norwegian legislation and has developed a "Code of Conduct for supplier" and "Ethical guidelines for employees". These policies contain rules, principles, and expectations that the company holds for itself, its employees, and suppliers. "Employees Code of conduct" are a part of the company's training program.

The company has conducted risk assessments of our suppliers regarding pertinent issues to ensure that we do not support unethical activities. Additionally, we have established channels to enable the public to provide feedback and pose questions to the company regarding our work and our partners.

### **Economics**

Napier AS prioritizes financial health and maintains a socially responsible tax and dividend policy. The company has well-developed budgets and works towards predictability in earnings and expenses. With a long history in the development and implementation of innovative solutions, the innovative mindset is integrated to the company and influences our efforts to enhance both our current and future vessels.

### **Diversity**

Out of the total number of employees in the organization, 8% are women. Men are generally overrepresented in the maritime sector, and there are fewer female applicants for vacant positions. The company encourages women to apply, both when we are looking for apprentices and permanent employees. Currently, there are two women in leadership positions. The group's

personnel policy is considered gender-neutral in all areas, and no feedback has been received indicating that anyone perceives the organization's personnel management as gender-discriminatory. The proportion of female employees in non-seafaring positions today is approximately 40%. No differentiation is made between employees, or in the hiring process, based on ethnicity, national origin, descent, skin colour, language, religion, belief or any other characteristic. Strict requirements for medical certificates and physical fitness are imposed on seafarers, but the group has no policy limiting employment opportunities beyond the legally required criteria.

### Transparency

Napier AS has a policy of transparency regarding our operations. The annual sustainability report is posted on the company's website before June 30th each year. In accordance with the Freedom of Information Act, the company has opened for public inquiries regarding the company's measures concerning actual/potential inherent risks on Napier.no.

## AREA OF FOCUS: GOVERNANCE



The ESG manager will undergo training in carbon accounting and sustainability reporting in 2024.

The company will continue to encourage women to apply as we expand our fleet with two new vessels.

# ENVIRONMENT

Napier AS is subject to strict requirements related to biosecurity and fish handling and has well-established guidelines in place to address these issues, aimed at preventing disease spread and fish escapees.

Each operation is treated as sanitary slaughter, completely without discharge to sea, and the vessels are hermetically sealed during the process. In this way, one ensures safe biological handling at every stage, minimizing the risk of spreading pathogens.

Shipping large volumes of fish are energy intensive and the group recognizes that the primary environmental impact is the emissions from the vessels' machinery:

**Total Scope 1:** 6,74 tCO<sub>2</sub>e

**Total Scope 2 Location:** 0,61 tCO<sub>2</sub>e

**Total Scope 2 Market:** 32,34 tCO<sub>2</sub>e

**Total Scope 3:** 6 521,19 tCO<sub>2</sub>e

Within **Scope 3** 5 545,15 tCO<sub>2</sub>e of the total are from fuel consumption.

However, as processing vessels bleed and cool down the fish, they can transport significantly more fish than a

well-boat of equivalent size. Well-boats transport live fish in water and therefore require considerably larger vessels to transport the same number of fish. Hence, processing vessels have considerably lower GHG impact than the alternatives.

Napier AS's vessels also cool down the fish before arrival, which may lead to reduced need for ice in packaging, and the fish defrost the ice slower. This results in the use of lower amounts of ice in the boxing of the fish for transport from the slaughterhouse and to the next processing step. Further decreasing the amount of weight transported per kilo food, and as such reduces emissions.

## **Sustainable use of raw materials**

By providing hermetically sealed transport, where the risk of infection is reduced, this can lead to absence of disease. Absence of disease creates welfare for new stocking at a site, which in turn reduces mortality and provides more fish for consumption.

Slaughtering at the cage increases fish welfare, as the fish undergo fewer stressful pumping operations and avoid live transport to the slaughterhouse. This is important from an ethical



standpoint, but it is also documented that unstressed and gently treated fish result in higher product quality. The concept of Napier AS also eliminates fish mortality during loading, transport, and stay in waiting pens, which in turn results in increased fish for consumption and a reduction in emissions per produced kilogram.

To enhance our commitment to sustainable use of resources, Napier AS will prioritize systematic monitoring of food waste going forward. During our production process, there are instances where fish that could otherwise be used for consumption ends up on the factory floor and is thus classified as waste. This fish is not reintroduced into production. Moving forward, the company will focus intensively on reducing food waste and will set specific objectives to achieve this reduction.

Napier AS also recognizes that blood itself has the potential to be a valuable resource in the future. Therefore, on our new vessels, we have planned to install systems that allow for the separation of blood from water. Should technology emerge that can utilize blood as a resource, these systems will already be in place on our new vessels, ready to take advantage of such advancements.

### **Sustainable use of water**

During production, a significant amount of water is required for various purposes, including improving flow, rinsing fish, and storage. UV-treated seawater is used for storing fish during transport. However, a considerable amount of freshwater is still used for the crew on board and for cleaning and rinsing in the factory. To better monitor our consumption and increase awareness of our usage, we have

installed water meters on board. These measurements will help us to map the current usage, making it easier to detect overconsumption and identify potential leaks or system faults.

### **Limiting Emissions of air pollutants**

Fuel consumption is our largest source of tCO<sub>2</sub>e emissions. The company therefore puts significant focus on raising awareness about fuel consumption. Additionally, we add urea to reduce NO<sub>x</sub> emissions. In 2023, the company reduced NO<sub>x</sub> emissions by 21 626 kg.

Napier AS has developed a realistic and clear strategy for decarbonization. Our strategy will significantly reduce our carbon emissions without compromising on quality, efficiency, or crew safety.

This approach is structured as a three-phase plan, with our modern fleet serving as its cornerstone. These ships are designed and prepared for zero emissions. The decarbonization process will be implemented through a gradual introduction of new energy solutions in line with technological advancements over the coming years.

The company's second largest emission factor belongs to scope 3, purchased goods and services, with the amount of 852,05 tCO<sub>2</sub>e. Napier AS aims to reduce our supplier-list in 2024, and try to create, as well as possible, a standard list for all vessels. We will also focus on summing up purchases and making larger orders, instead of several small orders. With this initiative, we aim to mitigate emissions within scope 3.

### **Limiting Emissions of Environmental Pollutants**



Napier AS has implemented updated risk-reducing management measures, as well as contingency plans and procedures for mitigating consequences and preventing emissions.

The company has zero emission to the environment from production, all our production waste/water is delivered to the slaughterhouse. However, the factory filter and disinfect our wastewater and emits it to the environment. A new regulation which was implemented in December 2023 imposes stricter limits on emission components. By facilitating the separation of some of the blood from the water delivered to the slaughterhouse, Napier AS hopes to contribute to reducing emission components in the water released after filtration and purification.

In 2023 the company had two cases of limited emission of hydraulic oil. The brakeage of hoses was the cause of this emission. To reduce the consequences of chemical discharge into the environment, Napier AS has entered a collaboration with a key supplier in 2024, with the goal of replacing all chemicals on board with food-grade approved chemistry H1. The initiative aims to increase food safety while also reducing the environmental impact of chemical discharge. Additionally, on new builds, we have opted for food-grade approved oil for our hydraulic systems.

### **Energy conservation**

Energy conservation is beneficial for both the environment and the company. The business has taken several measures to reduce energy consumption.

For instance, cold water and suitable chemicals are used for factory cleaning without compromising the quality of the wash. By using cold water, no energy is expended on water heating. Additionally, heat pumps have been installed in the office and on two of the boats in the fleet, contributing to reduced heating energy requirements.

The company offers transportation that is more environmentally friendly than the alternatives. This is because transporting slaughtered fish allows for 75% fish capacity in the tanks, whereas traditional well-boats can only accommodate 15%. The increased number of fish per cargo volume enables us to use fewer vessels to transport the same volume of fish, resulting in significantly lower fuel consumption. Despite lower fuel consumption per kilogram, the business still emphasizes awareness of fuel consumption in the fleet.

Fuel is used for both transportation and to run the process. To reduce fuel consumption Napier AS has facilitated the use of shore power to operate the unloading process on the new vessels. This will increase the use of electricity but will decrease the use of non-renewable energy in the form of fuel.

Indirect emissions from purchased electricity have a result of 32,34 tCO<sub>2</sub>e in 2023. This is our fifth Largest emission factor in 2023. To reduce emissions in this area, Napier AS will transition to purchasing greener energy in 2024.

### **Waste and noise pollution**

The focus on smarter financial management, achieved by granting the fleet greater ownership over their own budgets, gives not only economic

advantages but also contributes to waste reduction. All waste produced is monitored, ensuring constant oversight of waste intake. Moreover, the company has a well-established waste management plan to ensure proper handling of waste. The emission from waste-handling in 2023 was calculated to 51,17 tCO<sub>2</sub>e. In 2023, Napier AS initiated waste sorting at the offices to promote recycling.

There was no feedback from the public on noise pollution in 2023. Napier AS have also risk assessed the areas we travel through and have concluded that we are only passing by areas for short periods of time and will not significantly affect wildlife. However, we have on new vessels facilitated the use of shore power during unloading. This will reduce noise, as there will be no need for engines to generate power.

### **Environmental improvement**

The entire concept Napier AS stands for is to deliver more environmentally friendly shipments, and the company is constantly working on improvements that can benefit the environment. With methods that allow for the transportation of larger quantities of fish with fewer emissions, as well as our decarbonization plan, the company already has a significant focus on areas for improvement. The company continues to work on both small and large projects that can provide environmental benefits for both us and

our customers. In 2024, Napier AS took the initiative to collaborate with customers regarding data sharing and discussing future solutions that can provide environmental benefits. Furthermore, in 2024, the company participated in an external project called "Nature Positive," which will be described in the section below.

In last year's report, we discussed the possibility of establishing an environmental and energy group, which would work on environmental issues and monitor the company's status. After thorough evaluation of the company's size and resources, it was decided to forego the creation of an energy group. Instead, an ESG manager has been appointed. This decision is considered the most efficient and sensible given the current situation. The measure will be reassessed if the company expands in size.

Although the company is moving away from the development of an energy and environment group, we still have various development groups where issues are addressed, and innovative solutions are discussed.

Napier AS aims to commit to Science Based Target Initiative in 2025.

## Nature Positive

In 2024 Napier conducted, with external experts, an evaluation of our nature impact, with the goal of reducing the impact that our operations have for our surroundings in the future.

Nature loss is an increasing important factor in the overall sustainability space, with a focus on five central aspects outlined below.

1. Land and sea use
2. Resource use and overexploitation
3. Pollution
4. Invasive species
5. Climate change

The overall ambition of the nature positive project is to help Napier, and businesses, to halt and reverse nature loss, and to restore nature instead of damaging it. See figure 1 below for an illustration of the desired effect of targeted nature positive work.

We will use the knowledge collected during the Nature positive study and create plans for minimizing impact and act on opportunities to improve our surrounding environment and the fauna and flora living in it. These includes, but is not limited to, water-use and discarding, chemicals used and more broadly the conservation of local ecosystems critical to our up- and downstream activities.

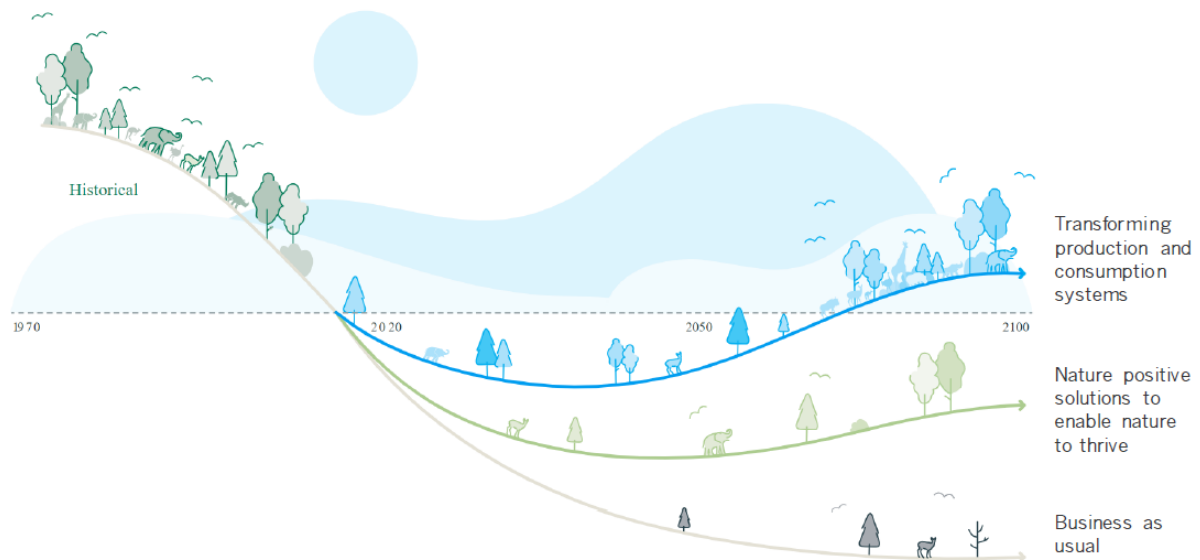


Figure 1. Definition of nature positive, and an illustration of the potential effects of such work.

### Environmental Technology

In our new series of third-generation processing vessels, preparations are made for future zero-emission operations in accordance with our decarbonization plan. As part of the preparation the company seeks engines that are convertible to zero-emission solution and facilitate the implementation of fuel cells and hydrogen.

The new vessels will also utilise surplus heat for heating, thereby mitigating the demand for additional energy consumption for heating purposes.

In addition, the company is working parallel with several technological solutions that will be beneficial for the environment.

Napier AS is constantly working on presenting environmental solutions to the customers and do our utmost to influence customers to make environmentally friendly choices when buying our services.

## AREA OF FOCUS: ENVIRONMENT

Napier AS will implement procedure and objectives regarding food-loss.

Napier AS will target replacement of all chemicals on board with food-grade approved chemistry H1.

Napier AS aims to reduce our supplier-list in 2024, and try to create, as well as possible, a standard list for all vessels.

Napier AS will transition to purchasing energy produced by green options.

12 ANSVARLIG  
FORBRUK OG  
PRODUKSJON



7 REN ENERGI  
TIL ALLE





# SOCIAL

## Human rights and opportunities

Norway is a member of the United Nations. Fundamental human rights and decent working conditions are enshrined and regulated by Norwegian law, which our business is also obligated to follow. Napier AS has agreements with the Coastal Shipowners' Association, the Norwegian Officers' Union, the Norwegian Engineers' Union, and the Norwegian Seafarers' Union, ensuring that employees can negotiate for better working conditions.

Napier AS considers its employees to be the company's most important resource. Creating an inclusive and diverse work environment, where employees feel seen and heard, is viewed as an advantage for the company. By investing in employee well-being, the company aims to provide a good workplace that facilitates performance and continuity.

Napier AS ensures participation and improvement by having well-established routines for reporting and measuring the work environment.

## Health-, safety- and environmental work

The safety of employees is a top priority at Napier AS. The company strives to ensure safe working conditions where employees feel secure at work.

To recognize inherent threats and implement appropriate measures to reduce or eliminate risks, it is crucial to have a management system that facilitates this. Napier AS entered into an agreement with the software tool Unisea in 2023. The software is tailored to Health, Safety, and Environment (HSE), quality, and vessel operations management, and with this, Napier AS intends to further develop its existing management system.

We believe that proactive work is essential to prevent the consequences of risks from realizing. Proactive efforts require effective reporting routines, measurements, risk assessments, and, importantly, organized handling of



reported data. Napier AS has established systems to ensure that reported data is utilized in the company's improvement processes, and the new system will facilitate a higher level of data processing.

All accidents, near misses, and/or observations must be reported and addressed. Reporting safety observations is considered a high priority by the company, as it is seen as central to proactive efforts. In 2023, 87% of reported incidents were categorized as proactive reports. This represents an increase from 2022. This indicates that a portion of what is reported constitutes proactive reporting, but the company aims to increase this percentage even further. There was no absentee injury in 2022, but two injuries that needed medical attention. This is an increase since 2023, where there were no incidents that needed medical attention.

Napier AS has well-established procedures for whistleblowing and has enabled the option for anonymous reporting. The company emphasizes transparency and is committed to ensuring that employees feel secure in reporting issues. Employees are encouraged to raise any concerns. There were no reported incidents in 2023. The company has made a strategic investment in a work environment monitoring program. This initiative is designed to enhance our ability to closely monitor the work environment, establish targeted goals for continuous improvement, and proactively address potential conflicts before they escalate into significant issues.

Napier AS has an agreement with an external firm to conduct internal audits.

The purpose is to assess the effectiveness of the safety management system in meeting specified objectives, and to ensure that changes to the company's SMS system resulting from internal audits comply with the ISM Code. Corrective and preventive actions shall be implemented as required by the ISM Code. By involving an independent third party, Napier AS aims to enhance the quality of compliance checks. The ISM audit is conducted based on requirements from:

- IMO Resolution A. 741 (18) as amended by MSC. 104 (73)
- International Safety Management (ISM) Code
- SOLAS, 74 Chapter IX Management for the safe operation of ships
- Management Code for the Safe Operation of Ships and for Pollution Prevention.
- Mandatory rules and regulations, ensuring that relevant codes, guidelines recommended by the IMO, administration, classification societies, and other relevant organizations have been considered.
- The company's management documents.

### **Safe products and services**

Napier AS acknowledges the resources required to produce the fish processed by its vessels, as well as the potential consequences for consumers in the food industry. The company continuously strives to contribute to the creation of safe products for consumers. The principles of the Codex Alimentarius form the basis for risk assessments related to food safety, ensuring that Hazard Analysis and Critical Control Points (HACCP) are well

integrated into the company's quality system.

Napier AS became FSSC (Food Safety System Certification) 22000 certified in 2024. The FSSC 22000 standard consists of ISO 22000 standard, ISO/TS 22002-1:2009 standard and FSSC 22000 own additional requirements. The standards ensure our customers that when they choose Napier as their supplier their product will be handled by a well-established management system for food safety. The standard has enhanced our company's food safety improvement system and has provided us with greater focus on the control and documentation of equipment placed in the factory. Napier AS has also optimized technical solutions both in existing buildings and new constructions to further secure our delivery of customer products. An example worth mentioning is the implementation of Smart Fleet, which allows monitoring of critical data and enhances traceability of the services the company provides.

### **Personal data**

Napier AS is governed by the Personal Data Act and GDPR (General Data Protection Regulation). Ensuring privacy is crucial for building trust between the company and its employees. This is ensured through disclosure, restriction, and strict control of all material containing personal data. Napier AS acknowledges that the handling of personal data is not up to date, regarding the possibility of electronic solutions that are available. In 2024 Napier AS aims to explore technological possibilities that can simplify the process of handling personal data. Potential investment will be considered on 2025 budget.

The business provides training and procedures for information security and has an enhanced program from its IT provider to further secure our information channels. Alongside regular training for all employees, this is central to reducing the risk of malicious attacks.

### **Contribution to local communities**

Napier AS is committed to contributing to the development of local communities. The company annually supports cultural events and local sports teams in Bømlo. Napier AS also has connections to the fishing port in Bømlo and actively participates in local economic development. Support for local communities extends beyond Bømlo, and Napier AS is committed to positively considering requests for support from local environments in the areas where its vessels operate.

### **Partners and suppliers**

Napier AS strongly condemns any violation of fundamental human rights and is committed to ensuring that the business does not support companies operating under unacceptable working conditions. The company dealt with a total of 534 suppliers in 2023. A risk assessment has been conducted on regular suppliers with whom the company has contracts and where the purchase amount exceeds NOK 100.000 per year. The purpose of this risk assessment is to identify suppliers that may pose a threat in terms of violating fundamental human rights and decent working conditions.

In the future, the company will revise its procedures for contracting and collaborating with suppliers, implementing stricter controls focused on sustainable production and treatment of employees. The results of

the risk assessment, which will be conducted prior to entering contracts, will determine the actions Napier AS will take. This is aimed at reducing the risk of collaboration with suppliers involved in the violations.

#### Risk assessment

Total number of suppliers (purchases exceeding NOK 100.000 annually)	Unlikely risk	Low risk	Medium risk	High risk
86	82	3	1	0

Through mapping and evaluation, it emerged that the company has collaborated with 86 suppliers (purchases exceeding NOK 100.000 annually), of which 83 is assessed as unlikely risk.

Companies that are subject to the same regulations as Napier AS (Norway), and have published a sustainability report, making the risk of violations unlikely are listed as green. Companies that have not published a sustainability assessment, and smaller companies (in which we have fixed agreement) with numerous subcontractors, are considered low risk (yellow).

Contracts/partnerships with companies from foreign countries are evaluated based on whether they are members of the United Nation or not, as well as we consider the UN evaluation of the country and media coverage. The outcome of this evaluation will decide if the companies are considered as low, medium, or high risk.

#### Measures

Napier AS will ensure that major Norwegian suppliers, with whom we collaborate, publish reports according to regulations. Furthermore, we will require smaller Norwegian suppliers (in which we have fixed agreement), who have many subcontractors, to sign our "Supplier Code of Conduct". Foreign suppliers assessed as low risk based on the country's policies, economy, and stability will also be required to sign our "Supplier Code of Conduct", with consideration given to the need for second-party audits.

Regarding our supplier assessed as medium risk, the company in question has signed Napier AS's "Code of Conduct". Napier AS will also have a presence at the supplier's work site throughout the collaboration period. The company sends monthly safety statistics, and Napier AS's representative reports on several implemented measures aimed at improving the working environment for the supplier's employees. Napier AS does not have any suppliers classified as high risk.

## AREA OF FOCUS: SOCIAL

Napier AS will in 2024 consider investing in a new HR-system.

Napier AS will in 2024 activity use Winningtemp to monitor the work environment and establish targeted goals for continuous improvement.

The company will enhance the focus on supplier sustainability prior to entering into agreements. Food safety shall also be evaluated during this process.

Napier AS aims to reduce of the number of suppliers in 2024







## ON THE MOVE FOR OUR CUSTOMERS

15 years of experience in bleeding and transportation from the pen edge has given us unique expertise in biology, process technology, routines, procedures, training, testing, and quality assurance. We use this expertise not only in the development and improvement of our own vessels and services. We also offer it as a valuable resource for our customers' efforts to develop their facilities and operating methods.

At Napier, we are constantly moving forward for our customers, so that fish farmers can continue to expect sustainable and profitable transport with high fish welfare from the innovative salmon transporter.