



SUSTAINABILITY REPORT

2024



Table of Contents

Table of Contents 2

Foreword..... 3

Introduction 4

CEO 5

About Napier 6

Summary of the year 2024 7

ESG- KPI..... 9

Contribution to UN Sustainable Development Goals 12

GOVERNANCE 14

ENVIRONMENTAL 17

SOCIAL 22

Focus areas and actions for 2025..... 28

ON THE MOVE FOR OUR CUSTOMERS 29

Foreword

Sustainability is becoming increasingly important due to growing global challenges such as climate change, resource scarcity, and social inequality. Companies are expected to take greater responsibility for their environmental and social impact, driven by stricter regulations, investor expectations, and changing consumer preferences. At Napier, we recognize the significance of integrating sustainability into our operations and long-term strategy. To enhance transparency and demonstrate our commitment to responsible business practices, we publish annual sustainability reports. This marks the second year we are releasing a comprehensive sustainability report, reflecting our ongoing efforts to create long-term value for both society and our stakeholders.

The UN Sustainable Development Goals (SDGs) set a global agenda for a sustainable future, with responsible business practices playing a key role. Companies contribute by acting with integrity, respecting human rights, protecting the environment, and promoting economic justice.

Following the OECD Guidelines and UN Guiding Principles, businesses must assess, prevent, and mitigate negative impacts, engage with stakeholders, and transparently report on their efforts.

We are committed to these principles to help build a more sustainable future.



This report summarizes Napier's due diligence efforts to ensure fundamental human rights and decent working conditions in Napier's supply chain. The report covers the non-financial reporting for Napier AS, including the statement in accordance with the Transparency Act and the duty to act and report on equality and discrimination.

Contact person for the report:

COO: Kåre Cederström

E-mail address: kaare@napier.no

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 will henceforth be evaluated 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

2024 has been a transformative year for Napier AS, marked by significant advancements in our operations, sustainability initiatives, and overall growth. I would like to extend my heartfelt gratitude to all our employees and partners for their dedication and hard work, which have been instrumental in our success.

This year, we have continued to prioritize safety, our core value, and I am pleased to report that we have maintained a strong safety record with no serious injuries. Our commitment to safety extends beyond our employees to our suppliers, with whom we have collaborated to enhance reporting and transparency, ensuring the highest safety standards for all involved.

Innovation and progress remain central to our mission. The newly built processing vessels at Sefine Shipyards in Turkey mark a significant leap forward in technological advancements and capacity. Additionally, we are excited to introduce a groundbreaking fish welfare KPI, tied directly to our sustainability-linked financing.

Our ESG and DEI (diversity, equity and inclusion) routines and procedures have been further strengthened to reflect our ambitions

VALUES

SAFETY AND WELL-BEING

PROFESSIONAL INTEREST
AND ENTHUSIASM

RESTLESS PURSUIT OF
IMPROVEMENTS

and operational level. We have set clear targets and plans to ensure we meet these goals in the coming years. Additionally, we have enhanced our internal audit capacity and food safety certification through FSSC 22000, reinforcing our commitment to quality and safety.

As we look ahead to 2025 and beyond, we remain focused on continuous improvement, sustainability, and innovation. Thank you for a successful year, and we look forward to achieving even greater milestones together.



Kjell Taddal

About Napier

Napier AS has 83 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 the sister ships Taupiri, and Taupo were completed, quickly followed by Taumar in 2020. In May 2025 we received the first of two large new builds, Tauroa, which represents a next step for the concept, in regard to capacity, efficiency, fish welfare and biosecurity.

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 2024

Production

Napier AS transported a total of 112 258 191 kg fish in 2024, which is an increase of 17 million kg from 2023 and a new record. This is distributed over ~24,1 million fish.

Area of focus for the year 2024

GOVERNANCE

In 2024 Napier AS aimed to train our ESG manager in carbon accounting and sustainability reporting. During 2024 we established an ESG-group consisting of three employees, where one of the members has completed external training. This group works collaboratively on reporting and monitoring the company's ESG data, goals, and initiatives.

ENVIRONMENTAL

Reducing food waste, especially food that is still suitable for consumption, is one of our key priorities. Promoting this focus to customers is a central part of the concept Napier strives to deliver. More fish reaching the plate as a result of removing stages in the process as transportation, repeated crowding and pumping operations, and holding in waiting pens. It was therefore a natural step for the company to begin, in 2024, working on monitoring, establishing routines, and setting targets for internal food waste. In 2024, the company implemented a food waste contingency plan and established goals and limits for acceptable food waste. A new routine for registering food waste allows the company to measure its performance in this area.

In food production, strict requirements apply to the types of chemicals that can be used in food processing areas and along the production line. To reduce the risk of potential misuse, as well as to decrease the amount of hazardous waste and the use of hazardous chemicals, Napier aimed in 2024 to replace all chemicals with food-grade approved alternatives. This is still an ongoing process. The decision has been made, but the vessels are still in the process of phasing out existing chemical inventories.

In 2024, Napier expressed an ambition to transition to sourcing electricity exclusively from renewable energy. However, during discussions with the electricity provider, the company was informed that such an agreement could not be facilitated unless multiple customers requested the same arrangement.

Considering both environmental and social focus areas, the company aimed in 2024 to reduce the number of suppliers. We had a goal to create a standardized suppliers list for all vessels. This goal aimed to reduce both the transportation emissions and the social risk of purchasing products from unknown suppliers. In 2024, extensive work was carried out to map all our suppliers, and the company established one primary supplier for each of these categories: maintenance chemicals, cleaning chemicals, clothing and protective equipment, and workwear. This has reduced the number of suppliers in 2024, and we expect to see further results in 2025.

SOCIAL

As a result of the company’s growth, the need for a more structured approach to managing employee data has increased. Napier AS acknowledges this need and decided that, in 2024, the company would evaluate the potential investment in an electronic HR system. The systems that were evaluated in 2024 did not meet the company’s requirements. The company will wait to see whether the existing electronic management system releases an HR module that fulfils these requirements. Combining everything into one system would simplify operations.

Napier AS aimed to actively use Winningtemp to monitor the work environment and establish targeted goals for continuous improvement in 2024. Winningtemp has become a key part of the company’s workplace environment monitoring.

The company wanted in 2024 to enhance the focus on supplier sustainability prior to entering into agreements, and that food safety also would be evaluated during this process. In 2024, the purchasing process was updated to better incorporate ESG and food safety considerations. The company already had an established routine for risk assessment of new suppliers prior to agreements or purchases, but this process has now been further organized. Checklists have also been developed for third-party audits of shipyards, which include interviews with key personnel within the company. These assessments are designed in accordance with OECD guidelines.

In the previous year’s report, we acknowledged the overrepresentation of men in the maritime sector and emphasized our recommendation for women to apply for positions within our organization. We aimed to highlight our commitment to addressing this gender imbalance and identified it as a key focus area for 2024.

	2023	2024
Percentage of women in the company overall	9%	14%
Percentage of women in the fleet	1,5%	8%

Napier AS experienced an increase in female employees in 2024 both within the fleet and the company overall.

ESG- KPI

To ensure targeted progress within sustainability, we have defined a set of Key Performance Indicators (KPIs) that measure our performance across environmental, social, and governance (ESG) areas. These indicators provide a clear overview of our current position and help identify opportunities for improvement as we work toward our long-term sustainability goals.

The KPIs are tailored to our company’s size, industry, and impact. We report on these indicators to our board of directors monthly, and they serve as a foundation for both internal management and external transparency.

By tracking the development of our KPIs over time, we strengthen our ability to make responsible decisions, reduce risk, and create sustainable value for the company and society at large.

GOVERNANCE

Goal	Short- term goal	Long-term goals	2023
The overall score of the GRESB assessment	90 by 2025	95 by 2027	89

Status: GRESB is an independent global benchmark that evaluates the ESG performance of real estate and infrastructure assets. It is widely used by investors to assess sustainability efforts and to compare companies and funds within the sector.

In 2024, Napier reported its 2023 figures and procedures to GRESB. This was the company’s first year receiving a GRESB score, achieving 89 out of 100. A score of 89 is considered very strong, indicating that the company has well-developed and well-documented ESG structures, processes, and performance. The result is close to the company’s target of a score of 90 by 2025, however, the benchmark continues to shift due to the performance of other reporting companies and increasing expectations from GRESB. Maintaining or improving the current score requires continuous advancement. In 2024, targeted efforts were made to address areas identified for improvement, and the company hopes to see the results of these efforts in autumn 2025.

ENVIRONMENTAL

Goal	Baseline	Short-term goal	Long-term goals	2024
Reducing CO2 Scope 1 and 2 emissions per nautical mile traveled	2021	25% by 2029	50% by 2034	Not able to calculate without 2021 data
Reducing CO2 Scope 3 emissions per nautical mile travelled.	2021	Baseline and goals will be set by 2025		
Reducing customer CO2 emissions by replacing technology.	2023	Reduction of 8000 tons of CO ₂ by 2028	Reduction of 10 000 tons of CO ₂ by 2031	0 tons
Minimize errors during fish stunning prior to inspection		3% by 2026	2% by 2028	1,57%

Status: KPI set on Scope 1, 2 and 3 emissions could not be calculated in 2024 report due to missing baseline calculations. The calculations have been delayed, as a result of research on suitable baseline and data collections. In 2025, Napier identified 2021 as the most likely baseline and aim to do the calculations by end of 2025.

The KPI “Reducing customer CO2 emissions by replacing technology” is in 2024 0 tons. This target aims to encourage customers to choose Napier’s transport services over conventional alternatives, which have higher emissions per kg fish. With no new vessels or customers in 2024, the result was 0 tons. In 2025 we expect to see a higher impact on this KPI, with the arrival of our new build Tauroa.

Regarding the KPI on minimizing errors during fish stunning prior to inspection, the result in 2024 was at average 1,57%. This is within the short-term and long-term goal. Napier acknowledge that this can rapidly turn and will continue the work on improvements on this area.

SOCIAL

Goal	Baseline	Short- term goals	Long-term goals	2024
Employee satisfaction	2024	8 eNPS by 2026	10 eNPS by 2028	5,5 eNPS
A portion of newly hired employees from the base year are women.	2023	10% by 2026	18% by 2028	26%

Status: The company implemented a monitoring system in the autumn of 2024, and the result from the 2024 measurement was an eNPS of 5.5. This score is in the lower, yet still positive range. A +5.5 eNPS indicates that there are more satisfied than dissatisfied employees, but the margin is small. It suggests that there is room for improvement, especially if many employees are passive or have low levels of satisfaction. In 2025, the company has set targets for employee satisfaction and aims to improve these results going forward. Napier will, in 2025, work to utilize the opportunities provided by the program to further identify the causes of dissatisfaction and clarify any misunderstandings that may influence employees' perception of the company.

In 2024 there were 23 newly hired employees in total, six of the newly hired employees were women. This represent 26% of newly hired employees, which is within both the short-term and long-term goals. The calculation is based on the average from all the years from baseline, so the company must continue its work on encouraging women to apply for positions at Napier.

Contribution to UN Sustainable Development Goals

The performance KPI set by the company within ESG are linked to contributions to several of the UN Sustainable Development Goals:

Goal 6 – Clean Water and Sanitation



GRESB assessments cover water consumption, wastewater management, and water-related risks. By addressing these areas, the company helps ensure more responsible water use and protection of aquatic environments.

Goal 7 – Affordable and Clean Energy



By improving energy efficiency and shifting to renewable energy, the company supports the transition to clean energy. Napier's work on hydrogen-powered vessels aligns directly with this goal.

Goal 8 – Decent Work and Economic Growth



The company supports this goal through employee satisfaction and gender-balanced hiring. These efforts foster a fair, inclusive, and productive work environment. Strong GRESB performance reflects responsible social governance, contributing to decent work and sustainable economic growth.

Goal 9 – Industry, Innovation and Infrastructure



Through innovative technologies like hydrogen-powered vessels and shore power infrastructure, the company promotes sustainable industrial development.

Goal 11 – Sustainable Cities and Communities



The company contributes to this goal by reducing vessel emissions and noise in port areas, supporting cleaner, healthier coastal cities. GRESB evaluates how infrastructure enhances safety, inclusivity, and urban sustainability.

Goal 12 – Responsible Consumption and Production



The company contributes to this goal by reducing Scope 3 CO₂ emissions and minimizing errors during fish stunning.

These efforts support efficient resource use, reduce waste in food handling, and promote responsible practices across the value chain. GRESB reporting supports transparent disclosure of sustainability performance and practices.

Goal 13 – Climate Action



The company contributes to this goal by reducing Scope 1, 2, and 3 emissions, enhancing energy efficiency, and transitioning to renewable energy. GRESB highlights climate adaptation and emissions reduction, reinforcing action against climate change.

Goal 14 – Life Below Water



The goal of minimizing errors during fish stunning and bleeding reflects a commitment to sustainable and ethical use of marine resources.

Goal 16 – Peace, Justice and Strong Institutions



The company contributes to this goal through improved employee satisfaction, gender-balanced hiring, and strong GRESB performance. These efforts support inclusion, fairness, and transparency—core elements of ethical leadership and well-functioning institutions.

GOVERNANCE

In the ESG context, "governance" refers to the systems, processes, and principles by which a company is directed, managed, and held accountable. It is about ensuring the business is run ethically, transparently, and responsibly. Strong governance provides the foundation for effective environmental (E) and social (S) initiatives. Without sound governance, ESG commitments risk being superficial or inconsistently implemented.

ESG related matters are 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 top responsible and established a ESG group, where one member completed external training. The group is responsible for monitoring our ESG- matters, as well as preparing carbon footprint reports and annual sustainability reports.

Napier AS has established procedures and policies for issues related to ESG. The following are examples of policies that are established in our organization:

- Safety and environmental protection
- Alcohol and substance abuse
- Governance
- Environmental
- Social
- Counterparty Code of Conduct
- Ethical guidelines for employees

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 result of the management review and the annual assessment of company's performance (the ESG analysis).

Commitment to KPIs and UN's Sustainable Development Goals

The company's KPIs are intended to serve as a motivator for contributing to nine of the UN Sustainable Development Goals. By thinking globally and acting locally, we aim to contribute to the achievement of the UN's Sustainable Development Goals.

Napier will actively pursue initiatives that support the achievement of these goals and will monitor progress on a regular basis. To better evaluate the company's status against the established KPIs and ensuring effective data collection and processing, the company will in 2025 take the electronic management system to next level. With technology that allows us to collect data from different platforms and manage them in one single system, we will have a greater access to trending and monitoring. This new technology will also reduce the risk of human error in the process of data collection.

Sustainability Improvements

Napier AS has a well-established system for continuous improvement. Reporting, annual internal audits, external audits, management reviews, ESG analysis, and sustainability report are all tools

designed to identify areas for improvement within our company. In 2025 Napier will work on and implement a yearly customer survey, and monthly meetings with our regular customers. The purpose of the annual customer survey and increased communication with clients is to ensure that customers regularly can share feedback that may contribute to the company's continued development and advancement.

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 2024.

The company operates in accordance with Norwegian legislation and has developed a "Counterparty Code of Conduct" and "Ethical guidelines for employees". These policies contain rules, principles, and expectations that the company holds for itself, its employees, and suppliers. "Ethical guidelines for employees" are a part of the company's training program.

The company has conducted risk assessments of our suppliers 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 ensures financial sustainability in alignment with its governing policies, enabling the company to maintain decent working conditions and support long-term value creation. Robust budgeting processes

and regular financial oversight promote predictability in income and expenditure. With a long-standing track record in developing and implementing innovative solutions, an innovation-driven mindset is deeply embedded across the organization. This mindset continues to shape our work on enhancing both current and future vessels, ensuring that financial constraints do not limit progress toward more efficient and environmentally beneficial solutions.

Diversity

In 2024, women make up 14% of the company's total workforce and 8% of the vessel crew. This represents an increase in female representation both within the fleet and across the organization compared to 2023. Men are generally overrepresented in the maritime sector, and there are fewer female applicants for vacant positions. The company will continue encouraging women to apply, both when we are looking for apprentices and permanent employees.

Currently, there are three 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 50%. 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.

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, in collaboration with an external company and its owners, has conducted thorough assessments and risk evaluations of the company's resilience and opportunities in relation to climate change. The company has also participated in the 'Nature Positive' project. A more detailed review of these can be found in the 'Environmental' section further down in the report. These risk assessments are reviewed annually.

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 Transparency Act, the company has opened for public inquiries regarding the company's measures concerning actual/potential inherent risks on [Napier.no](https://www.napier.no).

The topic of due diligence assessments and the Transparency Act will be described in more detail in the 'Social' section further down in the report.

ENVIRONMENTAL

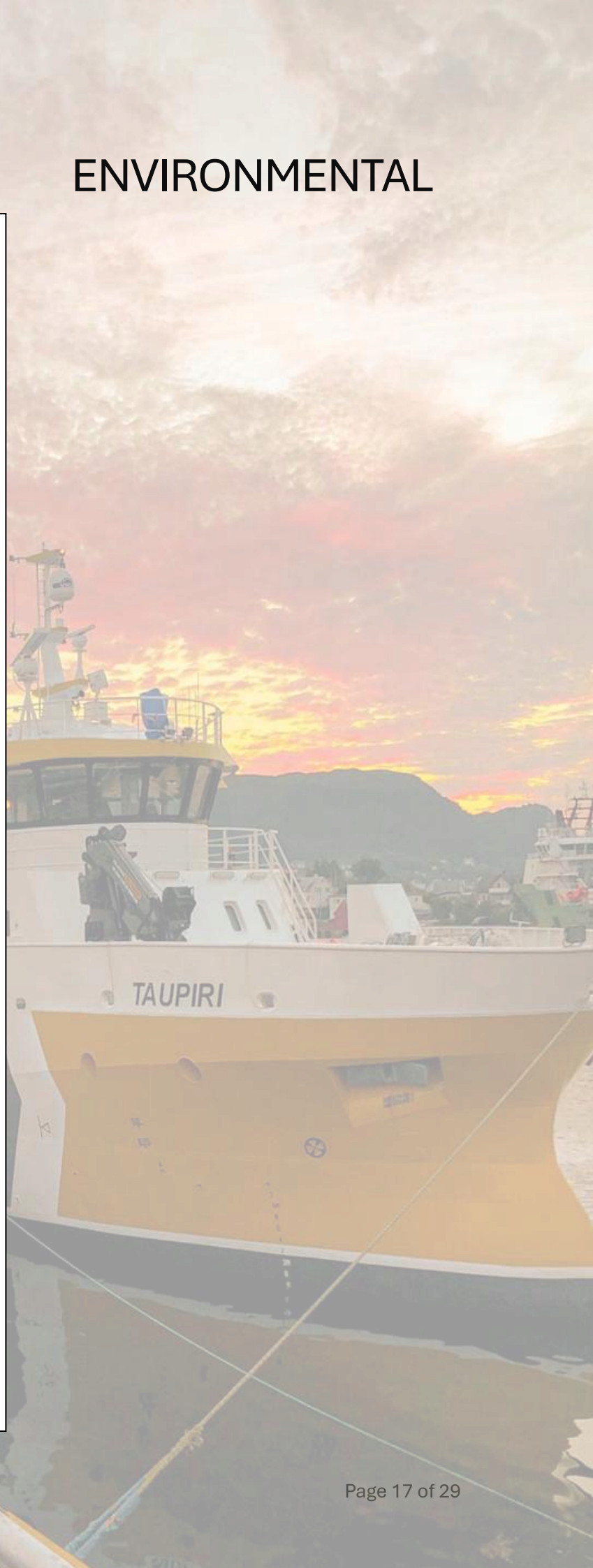
The Environmental pillar of ESG focuses on how a company impacts the planet and how it manages environmental risks and opportunities. It is critical because stakeholders—including investors, regulators, and customers—expect businesses to act responsibly toward the environment.

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. 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 kilogram of food, and as such reduces emissions.



Nature Positive

In 2024 Napier conducted, with external experts, an evaluation of our nature impact with the goal to identify the impact that our operations have on our surroundings and how to reduce the impact.

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

- Land and sea use
- Resource use and overexploitation
- Pollution
- Invasive species
- Climate change

The overall ambition of the nature positive project is to support actions that contribute to the recovery and resilience of nature, fostering a positive impact on ecosystems rather than causing harm. We will in 2025 use the knowledge collected during the Nature positive study and created plans and actions for minimizing impact and act on opportunities to improve our surrounding environment and the fauna and flora living in it.

Climate risk assessment

In 2024 Evora Global, a sustainability consultancy and software provider, delivered a detailed climate risk assessment for Napier. The assessment meets GRESB standard Guidelines, and the purpose of the report is to identify the vulnerability of the company in relation to physical and transition risks. The assessment showed that Napier's risks are primarily related to its vessels, assessed in terms of physical and transition risks.

From the observations in the report, two main interventions were identified: use of renewable energy systems and crew

training. These address risks related to fuel supply volatility and inefficient use of advanced technologies.

Follow-up actions include collecting vessel performance data and climate risk training, with recommended implementation within 12 months and ongoing thereafter. Napier already started working towards this in 2024 and will continue this work in 2025.

Sustainable use of raw materials

With zero discharge of blood water and good cleaning routines, the risk of disease in fish is reduced. Reducing the risk of disease improves fish welfare and can lead to lower mortality, resulting in 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 for any stay in waiting pens, which in turn results in increased fish for consumption and a reduction in emissions per produced kilogram.

Food waste

To strengthen our commitment to the sustainable use of resources, Napier implemented a systematic approach to monitoring food waste in 2024. 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.

A dedicated procedure was established to address potential risks, defining an upper threshold for acceptable food waste, and outline both preventive and corrective actions aimed at reducing or eliminating food waste. As part of this initiative, a KPI for food waste was introduced, set at $\leq 0.0375\%$. The KPI is established with the aim of identifying deviations from normal levels, enabling the detection and follow-up of potential areas for improvement. No reported cases exceeded this KPI during the reporting year.

Exploiting potential resources

Napier AS also recognizes that blood itself has the potential to be a valuable resource in the future. In 2025, Napier will explore the possibilities of utilizing blood as a resource and gain practical experience with front line technology to separate blood from water. Should supply lines emerge that can utilize blood as a resource, these systems will already be in place and be ready to take advantage of this resource.

GHG scope 1, 2 and 3 emissions

Total	Napier (tCO ₂ e) 2024
Scope 1	10,37
Scope 2-Location	1,31
Scope 2-Market	43,81
Scope 3	8715,73
Total Scope 1, 2 and 3 (market based)	8769,90

Fuel Consumption

Scope 3 downstream emissions, section “Fuel”, is our largest source of tCO₂e emissions with 5861,75 tCO₂e. The company therefore puts significant focus on raising awareness about fuel consumption. In 2024, the company reduced NO_x emissions by 20902 kg by adding urea.

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. The decarbonization process will be implemented through a gradual introduction of new energy solutions in line with technological advancements over the coming years.

As mentioned, Napier has a decarbonization plan in place but is currently working on gaining support and commitment from our customers for the strategy. To achieve the KPI on emission reduction, the company relies on engaging clients. However, the current process vessel solution is already a more environmentally friendly alternative to traditional fish transport, and as such represents a major step in a green direction for customers replacing conventional technology with our concept.

Transitioning to greener energy solutions, such as hydrogen-powered vessels, remains challenging due to the limited incentive schemes available to support companies through the green shift. To successfully offer green technology, it must be economically sustainable for the customer, and we must engage with governmental bodies to promote and address this need. In 2024, Napier was granted NOK 123 million for the construction of hydrogen vessels, and through this initiative, we hope to bring our customers along on our journey toward a greener future. However, there is a short deadline on

this incentive that do not match the workload on such projects.

Although fuel consumption is primarily related to vessel operations, the company is also seeking to reduce it in other areas. It has been decided that in 2025, the company will add one electric car to its growing demand for vehicles.

Purchased goods and services

The company's second and third largest emission factors belongs to scope 3, "purchased goods and services" and "capital goods", with the amount of 1432,82 tCO₂e and 1282,89 tCO₂e.

In 2024, extensive work was carried out to map all our suppliers. The company has established one primary suppliers for each of these categories: maintenance chemicals, cleaning chemicals, clothing and protective equipment, and workwear. This has reduced the number of suppliers in 2024, and we expect to see results from this in 2025.

Through our mandatory Counterparty Code of Conduct we are setting clear expectations to our suppliers to promote emission reductions. Suppliers are encouraged to adopt sustainable practices that minimize environmental impact and support ecosystem health - such as reducing waste, improving energy efficiency, and implementing recycling initiatives. In addition, they are expected to assess the climate impact of their operations and take concrete steps to reduce greenhouse gas emissions from their activities, products, and services.

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.

Reduction of waste-water emissions

The company has zero emission to the environment from production, all our production waste/water is delivered to the slaughterhouse for filtration and disinfection. By facilitating the separation 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 2025, Napier will work towards a collaboration with the customer for the delivery of blood as waste, to reduce emission components to the external environment.

In 2024, the company recorded one incident involving the discharge of blood water into the sea.

The cause of the discharge was valves that were incompatible with the cleaning chemicals used in the system. As a corrective measure, double safety mechanisms were installed, and all valves were replaced with ones made from compatible materials. Authorities were notified in accordance with established procedures.

Reduction of chemical emissions

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. Although the

decision has been made, the vessels are still phasing out their existing chemical inventories. Additionally, on new builds, we have opted for food-grade approved oil for our hydraulic systems. Before we decide on implementing this on existing fleet, we will in 2025 work on assessing the risk that H1 hydraulic oil poses to food safety, considering the potential amount of chemical, concentration limits, and dilution.

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 up-to 75% fish capacity in the tanks, whereas traditional well-boats can only accommodate max 15%. The increased number of fish per cargo volume enables us to use smaller 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 decrease the net emissions drastically. Indirect emissions from purchased electricity have a result of 43,81 tCO₂e in 2024. This is our fifth largest emission factor in 2024. In last year's report Napier expressed an ambition to transition to sourcing electricity exclusively from renewable energy. However, during discussions with the electricity provider, the company was informed that such an agreement could not be facilitated unless multiple customers requested the same arrangement.

Waste and noise pollution

The focus on smarter financial management gives economic advantages and 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 2024 was calculated to 16,78 tCO₂e, which is a reduction from 51,17 tCO₂e in 2023.

The process that generates the most noise within the company has been identified as the offloading operation. The risk of disturbing the local population and wildlife is considered low due to the geographical location, the timing of the operation and no feedback from local environment. Nevertheless, this has been considered in the design of the new vessel, where the use of shore power during offloading is planned. 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.

SOCIAL

The Social pillar of ESG focuses on how a company affects people – both within the organization and in the broader society. This includes how we treat employees, promotes diversity and inclusion, ensures safe working conditions, and engages with communities. A strong social focus helps build trust, attract talent, and maintain a social license to operate.

Napier AS has made substantial progress in strengthening its social responsibility in 2024. The company has prioritized employee safety, diversity, and inclusion, while also implementing structured systems to ensure transparency, ethical supply chains, and compliance with the Norwegian Transparency Act.

A key initiative included the roll-out of a fully digital HSE management system to better monitor risks and working conditions, alongside increased reporting of incidents and observations. Employee well-being remains a focal point, supported by a new monitoring system and targeted actions to improve job satisfaction. Napier has also enhanced its internal audit capacity and food safety certification through FSSC 22000.

Risk assessments of suppliers and stricter procurement policies further reinforce its human rights commitment across the value chain. These efforts reflect Napier's ambition to be a responsible employer and business partner, fostering a safe, inclusive, and compliant work environment.



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. We acknowledge that working at sea is a high-risk profession, and the company strives to ensure safe working conditions where employees feel secure.

Management system

To identify inherent threats and implement appropriate measures to mitigate or eliminate risks, it is essential to have a management system that supports this process. Since 2023, Napier AS has been using the software

tool Unisea – a software suite dedicated to Health, Safety, and Environment (HSE), quality, and vessel operations management.

Taking proactive measures is key to preventing risks from materializing. Proactive efforts require effective reporting routines, measurements, risk assessments, and, importantly, organized handling of reported data.

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 2024, 69% of reported incidents were categorized as proactive reports. The proportion of preventive reports has decreased since 2023, but this is due to the crew becoming better at reporting deviations, which has provided a more realistic picture of operations. Despite the decrease in proportion, preventive reports still make up a larger share, and the company will continue working to increase this proportion.

There was no absentee injury in 2024, but nine small injuries that needed medical attention on-site. This is an increase since 2023, when there were two incidents that needed medical attention. Napier aims to reverse this negative trend and will place increased focus on this area in 2025.

Whistleblowing

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 2024.

Employee Satisfaction

In 2024 the company 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. The company implemented the monitoring system in the autumn of 2024, and the result from the 2024 measurement was an eNPS of 5.5. This score is in the lower, yet still positive range. A +5.5 eNPS indicates that there are more satisfied than dissatisfied employees, but the margin is small. It suggests that there is room for improvement, especially if many employees are passive or have low levels of satisfaction. In 2025, the company has set targets for employee satisfaction and aims to improve these results going forward. Napier will, in 2025, work to utilize the opportunities provided by the program to further identify the causes of dissatisfaction and clarify any misunderstandings that may influence employees' perception of the company.

Internal audits

In 2024, Napier made the strategic decision to discontinue its collaboration with an external party for the execution of internal audits. This decision was based on the company's assessment that internal audits are more effectively conducted by in-house personnel who possess a deeper understanding of the system, including its potential weaknesses and associated risks. Accordingly, two auditors were appointed. One of them already met the

required qualifications and training, while the other completed the necessary certification in 2024. The company is now well positioned to carry out internal audits in a competent and structured manner.

The purpose of the internal audit 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. 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.

Work force

Attracting and retaining a skilled workforce is a strategic priority for the company, particularly in a phase of rapid growth. To strengthen its position in the labour market, the company aims to increase its visibility not only locally but also on a national level. With increasing

competition for key personnel, Napier recognizes the importance of investing in employer branding to position itself as an attractive and forward-thinking workplace. Employment on board the company's vessels is not limited by the geographic location of applicants, which opens opportunities to attract talent from across the country. Ensuring access to a competent and sufficiently large applicant pool is essential to support continued development and operational excellence.

Training

To ensure a safe working environment and employee well-being, it is essential that all personnel receive thorough and effective training. Feeling competent and confident in one's role is closely linked to both job satisfaction and overall engagement. In 2025, the company will place increased focus on strengthening its training procedures to ensure that employees are well prepared for the tasks they are expected to perform. This effort is aimed not only at maintaining high safety standards, but also at promoting a sense of mastery and belonging among crew members—key factors in fostering a positive and resilient work culture

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.

FSSC 22000

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.

System for continuous improvement

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.

In the new vessels, the company has also taken food safety and quality to a new level by separating the bleeding process from the cooling tanks. The fish will bleed in dedicated bleeding pipes before being transferred to the tanks. The blood will be separated from water by centrifuge, in the bleeding pipes and cooling tank. By implementing these measures, we expect an improvement in some elements of product quality.

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 and business partners. This is ensured through disclosure, restriction, and strict control of all material containing personal data. In 2024, we began the process of selecting a suitable HR system to simplify and improve the management of personal data. We have not yet finalized the system choice, but the investment in this area is included in the 2025 budget.

Stakeholder engagement program

The company has identified and mapped its stakeholders—those who directly or indirectly influence, or are influenced by, Napier. This includes employees, local communities, authorities, customers, suppliers, and environmental groups. Stakeholders have been assessed as having high, medium, or low influence/impact on/by the company and have been prioritized accordingly in terms of engagement. Based on this assessment, policies and procedures have been developed, along with plans for interaction, monitoring and reporting, as well as a framework for continuous improvement and feedback.

Contribution to local communities

Napier is a major contributor to the local community where its headquarters are located, and in 2025, the company became the main sponsor of the local sports club. Napier's fleet operates from Ryfylke in the south to Bodø in the north, covering a wide geographic area. This broad operational spread presents challenges in contributing to the local communities where the vessels operate. Nevertheless, the company remains open to applications and requests for support from local clubs and associations.

Transparency act

The Norwegian Transparency Act, which came into force on July 1, 2022, aims to promote companies' respect for fundamental human rights and decent working conditions throughout their supply chains. The Act requires larger enterprises to carry out due diligence assessments, publish an annual statement, and respond to public requests for information. It is a key step toward greater transparency, accountability, and sustainable business practices.

Partners and suppliers

Napier 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. In 2023 we conducted a risk assessment 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 was to identify suppliers that may pose a threat in terms of violating fundamental human rights and decent working conditions.

In 2024, Napier updated the Counterparty Code of Conduct to specify aspects as required by the Norwegian Transparency Act. We also updated our procurement procedure to ensure that a risk assessment is conducted for all new suppliers and established a policy outlining how this risk assessment is carried out.

Risk assessment:

Total number of risk-assessed suppliers	Unlikely risk	Low risk	Medium risk	High risk
173	171	0	2	0

In 2024, the company engaged with 464 suppliers, of which 173 underwent a risk assessment. Among these, 171 were classified as posing an 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.

Regarding our suppliers assessed as medium risk:

- One of the companies was not willing to sign our Counterparty Code of Conduct. As a result, we discontinue our business relationship with this supplier.
- The other company in question has signed Napier's "Counterparty code of Conduct". Napier will also have a presence at the supplier's work site throughout the collaboration period. The company sends monthly safety statistics, and Napier's representative reports on several implemented measures aimed at improving the working environment for the supplier's employees.

Napier does not have any suppliers classified as high risk.

Napier aims to continue the work on reducing our number of suppliers to improve control, efficiency, and sustainability. With fewer suppliers, Napier AS can strengthen relationships, ensure better compliance with ethical and legal standards, and simplify procurement processes. It also enables more effective risk management and follow-up on human rights and working conditions.

Due diligence

Upon entering agreements with major suppliers (shipyards), Napier implemented in 2024 a stricter evaluation and control process prior to signing. A meeting with the supplier is required to assess their competence and capacity. In addition, a Napier representative will visit the supplier to gain an impression of their compliance with ESG-related requirements, including adherence to OECD guidelines.

Focus areas and actions for 2025

GOVERNANCE

Napier will in 2025:

- Take the electronic management system to the next level, to ensure effective data collection.
- Work on and implement yearly electronic customer survey, and monthly meetings with our regular customers.
- Continue encouraging women to apply for positions at Napier.

SOCIAL

Napier will in 2025:

- Increase its visibility not only locally but also on a national level.
- Implement quarterly HSE meetings within the operations management team.
- Place increased focus on strengthening its training procedures.
- Work to utilize the opportunities provided by the environmental surveillance program.
- Separate the bleeding process from the cooling tanks on new builds.
- Centrifuge the water from bleeding pipes and cooling tanks on new builds.
- Consider investing in new HR-system.

ENVIRONMENTAL

Napier will in 2025:

- Seek to submit SBTi targets for validation
- Use insights from the Nature Positive study and Climate Risk Assessment to reduce our environmental impact and support local ecosystems.
- Explore the possibilities of utilizing blood as a resource.
- Work towards a collaboration with the customer for the delivery of blood as waste.
- Aim to sign a new vessel to replace conventional technology and work towards ensuring that it will be a zero-emission hydrogen-powered ship.
- Work to promote effective and feasible incentive schemes in collaboration with governmental bodies.
- Replace one corporate vehicle with an electric car.
- Work on assessing the risk that H1 hydraulic oil poses to food safety.
- Facilitate the use of shore power for the unloading process on the new vessels.
- Work towards approval of a new procedure to prevent food waste.





ON THE MOVE FOR OUR CUSTOMERS

17 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.