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TRANSPARENCY BUILDS TRUST



TRANSPARENCY ACT

The Transparency Act in Geia Food AS

At Geia Food, we aim to be the leading food concept provider in the Nordics. And among other things, we aspire to do so by always holding a GFSI approved Agent Broker certification. Throughout our IFS Broker certification, we set strict requirements through supplier approval, purchasing agreements and non-negotiable signing for our Supplier Code of Conduct. We are aware that all trade of goods and services involves various types of risk. The larger the business and the more complex the supply chains, the greater this risk, the greater the responsibility.

We seek to be a responsible social actor and have in addition to already implemented measures such as being a Sedex member since 2019 – [Sustainable Supply Chain Solutions](#) – [Sedex](#), committed to – [Ambitious corporate climate action](#) – [Science Based Targets](#) and set our net-zero target validated as “science-based”.

We have also committed to EcoVadis do define and improve our business sustainability ratings. [The World's Most Trusted Business Sustainability Ratings | EcoVadis](#)

As part of our strategy to integrate sustainability in our daily business we have joined Greenstone+ in pursuit of a sustainable, fair and resilient future.

STATEMENT OF DUE DILIGENCE ASSESSMENTS 2022

This is Geia Food AS handling of the risk of violations of human rights and decent working conditions in our supply chain.

[Read the Report here.](#)

Our work with the Transparency Act

We welcome the Transparency Act and take the obligations seriously. As soon as we became aware of the new law, we started extensive work to prepare the organization to meet the obligations of the law.

Geia Food has more than 375 suppliers from all over the world.

It goes without saying that it is demanding to have an overview of all suppliers at all levels. Although we believe that we have good and robust systems for selecting suppliers, we, like most other large companies, must do even more to prevent violations of human rights and decent working conditions.

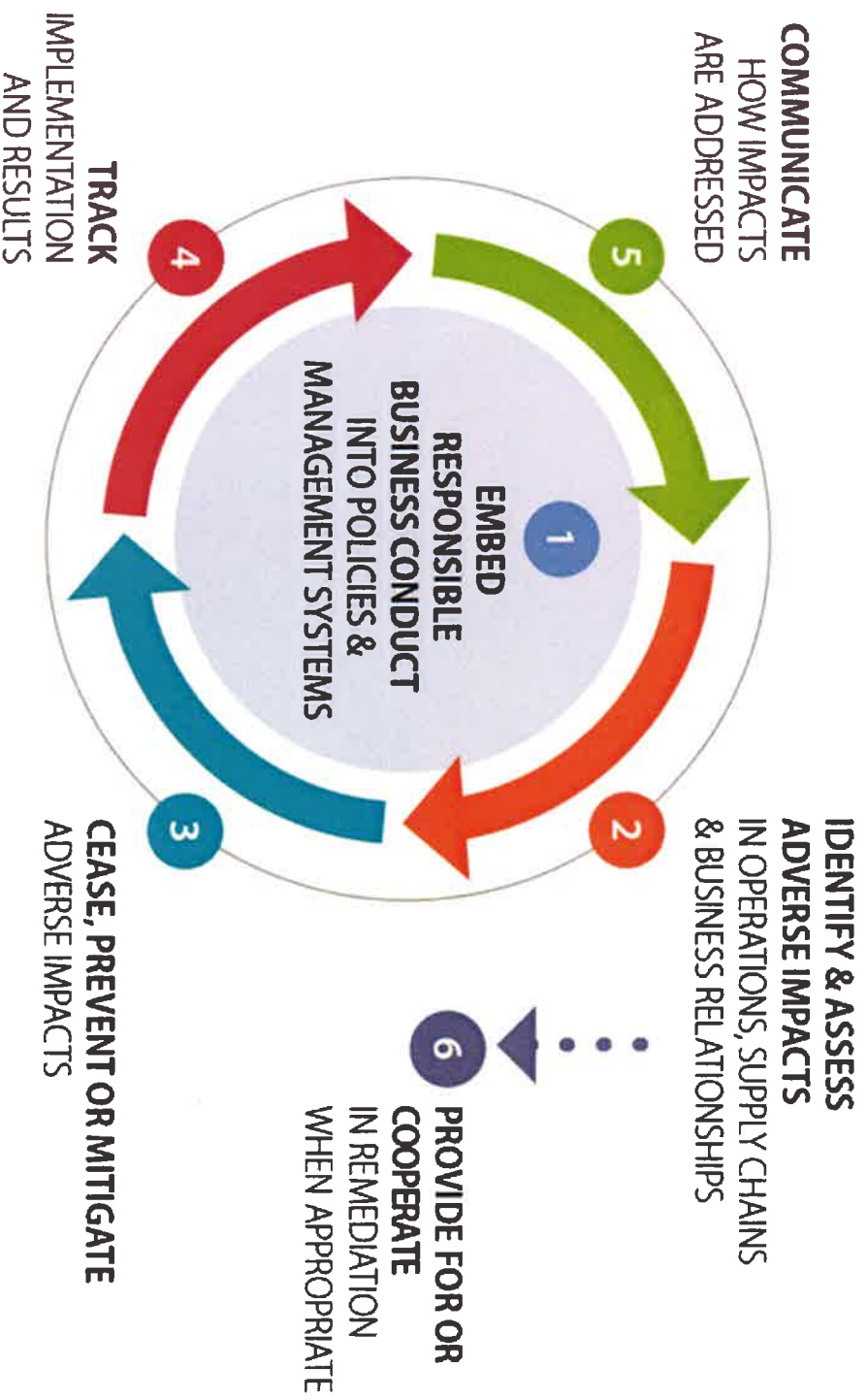
Geia Food has worked with responsible purchasing for several decades, and we have solid experience in selecting suppliers based on criteria such as quality, delivery security, sustainability, labour, and human rights.

Through our MSC and ASC certification we aim to have as much of our seafood assortment certified within these certifications to contribute positively to this category.

The Openness Act motivates us to work even more thoroughly and systematically with information gathering and risk mapping. If we suspect or uncover possible violations of human rights and decent working conditions, we will immediately implement the necessary measures. Sometimes it may be necessary to break the partnership and find a new and

better supplier. The problem with such a solution will often be that the supplier simply finds other customers so that the bad practice continues. Therefore, it can often be better to cooperate and make demands on suppliers so that those who work have their rights strengthened.

To make this possible, Geia Food strives to implement the OECD guide lines in all parts of our value chain.



About the OECD – OECD

ABOUT THE TRANSPARENCY ACT

The Transparency Act is the short name for the Act relating to enterprises' transparency and work on fundamental human rights and decent working conditions (Transparency Act) – Lovdata and came into force on 1st of July 2022.

The purpose of the Act is to “promote businesses’ respect for basic human rights and decent working conditions in connection with the production of goods and the provision of services, and to ensure the public has access to information about how businesses deal with negative consequences for basic human rights and decent working conditions.”

The law is based on the [OECD Guidelines for Multinational Enterprises on Responsible Business Conduct \(oecd-ilibrary.org\)](https://www.oecd-ilibrary.org/). The OECD’s guidelines for multinational enterprises are recommendations from the OECD countries to promote responsible business in all sectors. The guidelines set expectations for businesses in areas such as human rights, employee rights, the environment, tax, anti-corruption, competition law, consumer interests and transparency. The guidelines expect businesses to carry out due diligence assessments (risk assessments), and further that measures be taken to preserve the environment, respect human rights, safeguard employee rights and avoid corruption/smearing.

Geia Food AS is among the 9,000 Norwegian businesses covered by the Transparency Act. As can be seen from the model above, one of the first and most important things is to anchor the work right at the top of the business. Thereafter, the work with due diligence assessments must follow a clear structure and sequence:

Due diligence assessments are about investigating and managing risks of negatively affecting human rights and working conditions. These assessments include both our own operations, as well as supply chains and business partners.

The obligation to provide information came into force on 1st of July 2022. This means that anyone can demand information about how Geia Food and other businesses handle actual

and potential negative consequences. Requests for such information must be sent in writing.

From 2024 Geia Food will include the public reporting of the measures and actions taken in 2023 in the Sustainability Report – Geia – The leading food concept provider in the Nordics (geiafood.com)



Jon Van Nuthyell