

Account of due diligence regarding the Transparency Act (“Lov om Åpenhet”) for the period 1 January – 31 December 2025

Background

The [Transparency Act](#) is a Norwegian law which “*shall promote enterprises' respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services and ensure the general public access to information regarding how enterprises address adverse impacts on fundamental human rights and decent working conditions*”.

The law has been in force since 1 July 2022.

TripleNine Group is a Danish company with head office in Esbjerg, Denmark, with subsidiaries and business activities in Denmark, Norway, and Chile. Triplenine Group is covered by the scope of the law, and in order to comply with the law, the company has based its due diligence assessments on the [OECD Guidelines for Multinational Enterprises](#).

General description of the company's organization and operation

The Group produces fishmeal and fish oil and has operations in Norway, Denmark, and Chile. The companies of the Group source raw material in local markets and sell products in the global market. Machines and equipment are mainly purchased from European machine manufacturers.

The Transparency Act is incorporated in the governance throughout the Group and the legal requirements are embedded in policies, guidelines, and routines. Both TripleNine and the ultimate owner, the Norwegian company Koppernæs, are requiring that the suppliers comply with our ethical guidelines, which are based on the UN principles for business and human rights.

After the annual due diligence assessment has been carried out, the assessment is reported to the Board of Triplenine Group at the June meeting. The company publishes an account of due diligence, easily accessible on the enterprise's website, <https://www.999.dk/>, no later than 30 June of each year. Any inquiries regarding the process can be addressed to 999@999.dk

Information regarding actual adverse impacts and significant risks of adverse impacts which the company has identified through the due diligence

The performed due diligence has not identified any significant violation of human rights or decent working conditions but has identified one significant risk, namely the risk of subcontractors breaking the working environment law in the countries where the business operates. This generally applies to equipment suppliers and suppliers of raw materials and other substances for production.

Information regarding measures the company has implemented or plans to implement to cease the actual adverse impacts or mitigate significant risks of adverse impact – and the result or expected results of the measures

Regular supervisions are carried out, to the extent possible, that subcontractors comply with statutory working environment laws and have the required safety installations. Only serious suppliers who operate under orderly conditions are chosen.

All companies of the TripleNine Group must comply with the Group’s Code of Conduct, called “Sustainable Business Principles”, covering TripleNine Group’s principles related to environmental, social, and governance matters. In addition, a whistleblower system is in place and a management instruction covering key elements of managerial responsibility and accountability has been implemented.

The Group companies are all members of industry organizations at national, European, and international level that actively work for the sustainable development of the industry. Every year, third-party auditors from the organization [MarinTrust](#) performs audits at all production units and associated supply chains, based on strict rules around suppliers. MarinTrust integrates robust ESG principles through its certification by strengthening environmental, social, and governance criteria — especially in its Factory Standard Version 3, which enhances worker welfare, health & safety, and supply-chain transparency.

The TripleNine Group continuously strive to comply with international standards and are committed to respect and support human rights wherever people work and live. TripleNine is working actively to be a good employer and create attractive and safe working conditions for everyone. Lastly, the Group is encouraging employees to organize in trade unions and to take an active part in securing a mutually beneficial working environment.

Esbjerg, 18 June 2026,

Casper Andersen

Group CEO of TripleNine Group

Kenneth Lande Klokk

Chairman of the Board

Hans Peter Koppernæs

Board member

Torben Svejgaard

Board member

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Niels Casper Andersen

Group CEO

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Torben Svejgård

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