

1. POLICY AMBITION, OBJECTIVE AND SCOPE

Aker QRILL Company is an Antarctic krill-harvesting company dedicated to improving health across species. We develop krill-based ingredients for nutraceutical, aquaculture, and animal feed applications, backed by rigorous science and research into krill's benefits. Sustainability is at the core of our operations, rooted in world-class standards.

We believe that sustainability, transparency, and responsibility, with strong governance, is the only way to operate. It's what ensures our long-term profitability and gives us license to operate. The Sustainability Policy governs environmental, social and governance (ESG) aspects of Aker QRILL Company's own performance and strategic decisions. This policy communicates long-term ambitions and sustainability expectations for Aker QRILL Company. The Sustainability Policy is supplemented by Aker QRILL Company's Code of Conduct, and governing policy framework. It is reviewed by Aker QRILL Company's executive leadership team and approved by the Board of Director.

2. POLICY FRAMEWORKS

The following frameworks are core to this Sustainability Policy and guide how Aker QRILL Company integrates ESG:

- The UN Global Compact, the UN Sustainable Developments Goals and the UN Global Compact SDG implementation framework.
- The OECD Guidelines for Multinational Enterprises.
- The Norwegian Code of Practice for Corporate Governance.
- The Transparency Act
- The EU ETS framework

3. POLICY COMMITMENTS AND REQUIREMENTS

Aker QRILL Company commits to good corporate governance guided by the Norwegian Code of Practice for Corporate Governance and the UN Global Compact SDG implementation framework. Aker QRILL Company's corporate governance principles are established by the board. The purpose is to ensure a productive division of roles and responsibilities amongst Aker QRILL Company's owners, board and executive management, as well as to ensure satisfactory control of the company's activities. Employee representatives are part of the board of directors. The board of directors in Aker QRILL Company's has the overall responsibility for integration of ESG. Aker QRILL

Company shall have zero tolerance for all forms of corruption, money laundering and all other economic crimes Aker QRILL Company is committed to data privacy, cyber security and responsible and safe use of data. Aker QRILL Company shall ensure that all employees have the necessary knowledge of and training in how to comply with Aker QRILL Company Code of Conduct. Aker QRILL Company shall ensure full integration of ESG across strategy, operations and stakeholder engagement.

3.1 GOOD GOVERNANCE

Aker QRILL Company commits to good corporate governance guided by the Norwegian Code of Practice for Corporate Governance and the UN Global Compact SDG implementation framework. Aker QRILL Company's corporate governance principles are established by the board. The purpose is to ensure a productive division of roles and responsibilities amongst Aker QRILL Company's owners, board and executive management, as well as to ensure satisfactory control of the company's activities. The board of directors in Aker QRILL Company's has the overall responsibility for integration of ESG. In addition, ESG performance, risk monitoring, reporting, internal controls, and compliance. As described in Aker QRILL Company's anticorruption policy, Aker QRILL Company shall have zero tolerance for all forms of corruption, money laundering and all other economic crimes. Aker QRILL Company is committed to data privacy, cyber security and responsible and safe use of data. Aker QRILL Company shall ensure that all employees have the necessary knowledge of and training in how to comply with the Aker QRILL Company Code of Conduct. Aker QRILL Company shall ensure full integration of ESG across strategy, operations and stakeholder engagement.

3.2 CARE FOR THE PLANET

Climate change is one of the most significant challenges facing our world today, and joint efforts across all parts of society is necessary to minimize the level of global warming. Aker QRILL Company endorses the ambition set out in the Paris Agreement (2015) to remain within a trajectory well below 2°C warming towards 2050, pursuing efforts to limit the temperature increase to 1.5°C above pre-industrial levels. This implies an ambition of net zero emissions for Aker QRILL Company by 2050, which is ambitious given that large parts of Aker QRILL Company's infrastructure is anchored in hard-to-abate industries.

- To achieve net-zero emissions by 2050, working systematically to reduce all possible sources down to unavoidable emissions, and compensate thereafter by investing in tangible carbon capture projects for offsetting.

- To reduce the climate impact from our value chain Greenhouse Gas Protocol (GHG) reporting of scope 1, 2 and 3), working systematically to reduce emissions in all parts of our operations, and tracking progress against our 2035 carbon intensity ambition of 50% reduction against 2020 levels, per tonne produced.
- To systematically map, understand and proactively position for any climate adaption necessary for our operations and our business model.
- To deliver low-carbon ingredients and contribute positively to the carbon footprint of customer products in a variety of segments across global food and nutrition.
- To systematically implement, progress and publicly disclose our climate related efforts in alignment with the relevant reporting frameworks, like Corporate Sustainability Reporting Directive. Aker QRILL Company shall be transparent about our work and sustainability results.
- To openly share sustainability data, and report on these in the annual report. Aker QRILL Company's emissions shall be reported according to recognized international standards and be assured by an independent third-party.
- To protect, preserve, and restore the environment and biodiversity on land and in the ocean.
- To minimize our ecological footprint.
- To strive to minimize impact on ecosystems, in particular in relation to our operations in or near biodiversity sensitive areas like Antarctica.
- To strive to respect and protect water and ocean resources and to minimize water and ocean impact.
- To respect animal rights and welfare.
- Aker QRILL Company ambition is circularity on all our principal waste streams, sound resource utilization and the realization of the circular economy.

3.3 RESPECT FOR PEOPLE

Aker QRILL Company shall respect human rights, including labor and children's rights and to protect vulnerable individuals and groups of people affected by our business. Aker QRILL Company shall minimum social safeguards. Aker QRILL Company shall strive to identify, prevent and report on salient human rights including prevent child labor, forced labor and modern slavery, and protect vulnerable groups such as migrant workers. Aker QRILL Company recognizes the rights to freedom of expression,

association and organization, trade union rights, privacy, and collective bargaining, and will strive to safeguard these throughout our business. Aker QRILL Company recognizes and strives to obtain free, prior, and informed consent of indigenous communities, and will interact with indigenous communities in a way that respects their history, culture, and custom.

Aker QRILL Company shall perform human rights impact assessment and due diligence to understand and mitigate potential and actual adverse impact and ensure that Aker QRILL Company, through its operations, does not cause or contribute to adverse human rights impacts. Aker QRILL Company shall implement and enforce effective systems to minimize risks of adverse human rights impact in its operations and in its value chain. If Aker QRILL Company causes or contributes to adverse human rights impact Aker QRILL Company shall take necessary steps and strive to remedy the adverse impact.

Aker QRILL Company shall work systematically for health, safety, and well-being, strive for zero harm and continuous improvement throughout the value chain. Aker QRILL Company shall ensure a health-promoting working environment that provides a basis for a healthy and meaningful working situation and prevents harmful effects from physical and psychological influences and a standard of welfare consistent with the level of technological and social development of society.

Aker QRILL Company shall strive to offer non-excessive working hours and safeguarding a work-life balance. Aker QRILL Company shall strive to ensure equality, diversity, and inclusion throughout its business. Aker QRILL Company shall ensure equal opportunities and strive for a balance between the genders, increased diversity and inclusion in all parts and levels of the business.

Aker QRILL Company does not tolerate any form of discrimination on the basis of among others gender expression, sexuality, disabilities, race and religious beliefs.

3.4 PROSPERITY FOR ALL

Aker QRILL Company strive to reduce economic inequality and promote financial inclusion and resilience. Aker QRILL Company will strive for decent living wages, access to technology and equal economic and social benefits throughout our value chain. Aker QRILL Company shall engage in the development of science, technology and innovation and the use of best commercial technology in support of the sustainability agenda. Aker QRILL Company aspires to be a frontrunner in using, sharing, collaborating, and scaling for solving global challenges and shall contribute to the diffusion of knowledge and know-how throughout our operations. Aker QRILL Company shall ensure corporate transparency and responsible tax compliance.

4. REPORTING

Aker QRILL Company shall strive to address material risks and opportunities, changes in legal requirements and global norms and carefully consider the views of key stakeholders in developing the sustainability agenda. The sustainability and climate risk, reporting and performance shall be reviewed by the Board of Directors. The principal channel for Aker QRILL Company's ESG reporting to external stakeholders will be the annual report. In an evolving reporting landscape, Aker QRILL Company will commit to be transparent compliant and in accordance with required reporting standards at any given time. Aker QRILL Company's emissions reporting practices shall be in accordance with recognized international standards and assured by an independent third-party.