

# PROOF OF ASSESSMENT

## GLOBALG.A.P. RISK ASSESSMENT ON SOCIAL PRACTICE (GRASP)

Assessment No.  
255356-2018-GLOBALGAP-NOR-DNV

Date of Assessment  
2023-09-28

Date of Upload  
2023-12-13

Valid until  
2024-12-11

Registration No.: DNV CERT14742017GGNORACCREDIA

GGN Number.: 4059883202717

Issued to

**Nordlaks Holding AS**

Industriveien 14, Postboks 224, 8455 Stokmarknes, Norway

**GLOBALG.A.P.**

OPT 1-Individual Producer

According to GRASP General Regulations V1.3-1-i July 2020

The Annex contains details of the GRASP results (GRASP Check List)

DNV Business Assurance Italy S.r.l. declares that the producer mentioned on this proof has been assessed according to the GLOBALG.A.P. Risk Assessment on Social Practice V1.3-1-i July 2020

Assessment Number	Product handling	Remote assessment
00129-CLTXX-0003	Yes	na

Overall compliance level: Fully compliant

Assessment result in detail:

Control Point 1: Fully compliant

Control Point 2: Fully compliant

Control Point 3: Fully compliant

Control Point 4: Fully compliant

Place and date:

Vimercate (MB), 2023-12-13

For the issuing office:

**DNV - Business Assurance**  
Via Energy Park, 14 - 20871 Vimercate (MB) - Italy



**Sabrina Bianchini**  
Management Representative



**GGN: 4059883202717**

Registration number of producer/  
producer group (from CB): DNV  
CERT14742017GGNORACCREDIA

## **GLOBALG.A.P. RISK ASSESSMENT ON SOCIAL PRACTICE (GRASP)**

### **PROOF OF ASSESSMENT**

According to

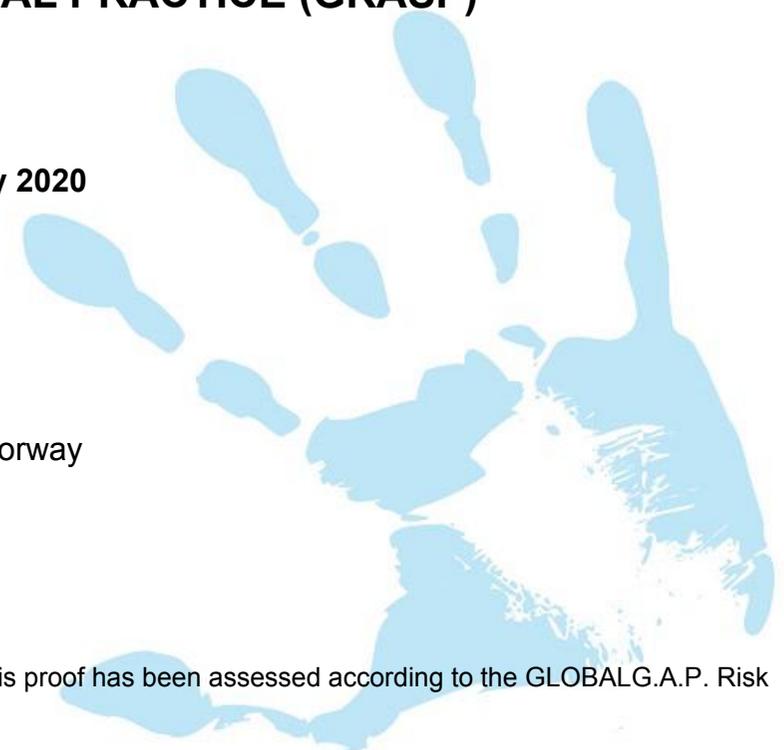
**GRASP General Rules V1.3-1-i July 2020**

**Option 1**

Issued to

Producer Nordlaks Holding AS

Postboks 224, 8455 Stokmarknes, Norway



### **The Annex contains details of the GRASP results.**

The Certification Body DNV Business Assurance Italy Srl declares that the producer group mentioned on this proof has been assessed according to the GLOBALG.A.P. Risk Assessment on Social Practice Version 1.3-1-i July 2020.

# GLOBALG.A.P. RISK ASSESSMENT ON SOCIAL PRACTICE (GRASP) - PROOF OF ASSESSMENT

Product Handling	Remote Assessment	Employee Interview
Yes	N/A	Yes

**Overall assessment result: Fully compliant**

**GGN: 4059883202717**

## Assessment result in detail:

Control Point 1	Fully compliant
Control Point 2	Fully compliant
Control Point 3	Fully compliant
Control Point 4	Fully compliant
Control Point 5	Fully compliant
Control Point 6	Fully compliant
Control Point 7	Fully compliant
Control Point 8	Fully compliant
Control Point 9	Not applicable
Control Point 10	Fully compliant
Control Point 11	Fully compliant

**Date of Assessment: 28-09-2023**

**Date of Upload: 13-12-2023**

**Validity: 12-12-2023 - 11-12-2024 (depending on GLOBALG.A.P. certificate validity)**

**The actual status of this proof is always displayed at: <https://database.globalgap.org>**

# GLOBALG.A.P. RISK ASSESSMENT ON SOCIAL PRACTICE

GRASP Checklist - Version 1.3-1-i

Checklist Producer Group (Option 2)

Valid from: July 2020

Mandatory from: October 2020



1. CERTIFICATE HOLDER REGISTRATION DATA								
Producer Group GGN/GLN:*	4059883202717			Registration N°:				
Company name:*	Nordlaks Holding AS			Address:*	Industriveienveien 14, 8450 STOKMARKNES, NORWAY			
Telephone:*	00 47 76 11 81 00							
Email:				Fax:				
Assessment date:*	28/09/2023			Contact person:*	Odd Johannessen, Quality Manager			
Previous assessment date(s):	18/10/2022							
Does the producer group have any other external audits or certification covering social practices? If yes, which?								
Standard 1: Valid to:	Standard 2: Valid to:			Standard 3: Valid to:	Standard 4: Valid to:			
Has the Certification Body detected any significant breach of legal requirements concerning labor conditions?					<input type="checkbox"/>	YES	<input checked="" type="checkbox"/>	NO
Has the Certification Body reported this finding to the local/national responsible and competent authority?					<input type="checkbox"/>	YES	<input type="checkbox"/>	NO
Comments:								
Company description: Production of Atlantic salmon covering all stages from ova, smolt and ongrowing to harvested and packed product. All production in Nordlaks Holding AS is GlobalG.A.P. certified and several sites is ASC certified. Harvest facility is GlobalG.A.P. certified under the company certificate and is also ASC CoC certified.								
	YEAR							
Total number of producer group members participating in GRASP:								
Total number of producer group members included in the GLOBALG.A.P. IFA Certificate:								
Total number of externally assessed GRASP producer group members:								
* Mandatory field								

List the GLOBALG.A.P. Numbers (GGN) or Global Location Number (GLN) of the externally assessed GRASP producer group members:									
4059883202717									

Are produce handling (PH) facilities included in the GRASP assessment?				<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
Is produce handling sub-contracted?		<input type="checkbox"/> YES		<input checked="" type="checkbox"/> NO	
Does the produce handling facility(ies) have any social standards implemented?		<input type="checkbox"/> YES		<input checked="" type="checkbox"/> NO	
		If yes:		Name of the PH company:	
				Nordlaks Produkter AS (Subsidiary of Nordlaks Holding AS)	
				GGN/GLN of the PH company (if applicable):	
				4059883202717	

Name and location of the assessed PH Facilities:			
PH Facility 1		PH Facility 4	
PH Facility 2		PH Facility 5	
PH Facility 3		PH Facility 6	

Does the company subcontract any other activities?				<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
If yes, which one?		Are the subcontracted activities included in the GRASP assessment?			
<input checked="" type="checkbox"/>	Pest and rodent control	<input type="checkbox"/>	YES	<input checked="" type="checkbox"/>	NO
<input type="checkbox"/>	Crop protection	<input type="checkbox"/>	YES	<input checked="" type="checkbox"/>	NO
<input type="checkbox"/>	Harvest	<input type="checkbox"/>	YES	<input checked="" type="checkbox"/>	NO
<input checked="" type="checkbox"/>	Others (please specify): Diving, net cleaning, wellboat	<input type="checkbox"/>	YES	<input checked="" type="checkbox"/>	NO

## 2. STRUCTURE OF EMPLOYMENT

Month(s) of peak season (if applicable):	NA						% of employees living in accommodation provided by the company (if applicable):	0		
Nationalities of employees	Norwegian and EU citizens									
Total number of employees	Local			Cross-Border Migrants			National Migrants			Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	Permanent	Temporary	Agency	
in agricultural production	291	14	0	0	0	0	0	0	0	305
in product handling facility(ies)	279	31	100	0	0	0	0	0	0	410
Total	570	45	100	0	0	0	0	0	0	715

### 3. PRESENCE DURING THE ASSESSMENT

	SITE MANAGEMENT		PERSON RESPONSIBLE FOR THE IMPLEMENTATION OF GRASP		EMPLOYEES' REPRESENTATIVE	
Names <sup>1</sup> :	T.B (HR consultant), P.E.H (HR manager), O.J (Quality manager)		T.B (HR consultant), P.E.H (HR manager), O.J (Quality manager)		S.B (emp rep), S.O.G (emp rep), P.V (emp rep)	
Present at the opening meeting?	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO
Present at the assessment?	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
Present at the closing meeting?	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO

**OVERALL ASSESSMENT RESULT:** *(Calculated automatically based on the results per sub-controlpoint)*

**Fully compliant**

Assessment results reviewed with company management?	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
Name of certification body:	DNV	Duration of the assessment: 8 hours
Name of assessor:	Kim-Andre Karlsen	
Name of company management:	Eirik Welde	

<sup>1</sup> Only mention the names if the persons have agreed to release there personal data to be uploaded with the checklist to the GLOBALG.A.P. Database.

## GRASP CHECKLIST

N°	CONTROL POINT & COMPLIANCE CRITERIA	VERIFICATION	COMPLIANCE			
			Y	N	N/A	
<b>EMPLOYEES' REPRESENTATIVE(S)</b>						
1	<p>CP: Is there at least one employee or an employees' council to represent the interests of the staff to the management through regular meetings where labor issues are addressed?</p> <p>CC: Documentation demonstrates that an employees' representative(s) or an employees' council representing the interests of the employees to the management is elected or in exceptional cases nominated by all employees and recognized by the management. The election or nomination takes place in the ongoing year or production period and is communicated to all employees. This employees' representative(s) shall be aware of his/her/their role and rights and be able to discuss complaints and suggestions with the management. Meetings between employees' representative(s) and management occur at accurate frequency. The dialogue <u>taking place in such meetings is duly documented</u>. If a producer group member has less than 5 employees, it is allowed to have an employees' representative at the level of the producer group.</p>					
1.1	The election/nomination procedure has been defined and communicated to all employees.	  	1	0	0	
1.2	Documentation shows that the election and the counting of votes were carried out fairly and openly. In case of representative(s) not elected but nominated, there is a document justifying why elections could not take place.	 	1	0	0	
1.3	The results of the election (name of employees' representative(s) or in case of council composition of the council) were communicated to all employees.	 	1	0	0	
1.4	The election/nomination has taken place in the ongoing year or production period. The representation is current (all elected/nominated person(s) according to the list still working for the company).		1	0	0	
1.5	The employees' representative(s) is/are recognized by the management and a job description clearly defines his/her/their role and rights. The employees' representative(s) is/are aware of his/her/their role and rights (in case of an employees' council, all members are interviewed).	 	1	0	0	
1.6	There is documentary evidence of regular meetings at accurate frequency between the employees' representative(s) and the management, where GRASP related issues are addressed.		1	0	0	
<b>COMPLIANCE LEVEL CONTROL POINT 1:</b> <i>(Calculated automatically based on the results per sub-controlpoint)</i>			Fully compliant			
<p>Evidence/Remarks: Nordlaks Holding AS has several employee's representatives both Union Representatives (UR) and Safety Representatives (SR). The election of UR and SR is regulated in procedure "Ansvar &amp; Myndighet" EQS procedures document ID 2631 and ID 2632. The last election of UR and SR was done open and fairly dated 03.03.22 and 19.01.23 and list of all names of UR and SR is present in EQS procedure 2632.</p> <p>Nordlaks Holding AS has several meetingpoints between management and the employee's representatives. They have a common AMU (Working Environmental Committee) which meet 4 times a year. Last AMU meeting PHU dated 19.09.23. Last AMU meeting PMU dated 30.08.23. The management meet the URs and SRs for Nordlaks departments in these AMU meetings to discuss GRASP related issues, The SR and UR are recognized and respected by the management - verified during interviews with employees representatives</p>						
Corrective Actions:						

N°	CONTROL POINT & COMPLIANCE CRITERIA	VERIFICATION	COMPLIANCE		
			Y	N	N/A
<b>COMPLAINT PROCEDURE</b>					
2	CP: Is there a complaint and suggestion procedure available and implemented in the company through which employees can make a complaint or suggestion?  CC: A complaint and suggestion procedure appropriate to the size of the company exists. The employees are regularly informed about its existence, complaints and suggestions can be made without being penalized and are discussed in meetings between the employees' representative(s) and the management. <u>The procedure specifies a timeframe to answer complaints and suggestions and take corrective actions.</u> Complaints, suggestions and their follow-up from the last 24 months are documented.				
2.1	A documented complaint and suggestion procedure is available, appropriate to the size of the company.		1	0	0
2.2	Employees are regularly and actively informed about the complaint and suggestion procedure.	  	1	0	0
2.3	The procedure states clearly that employees will not be penalized for filing complaints or suggestions.	 	1	0	0
2.4	Complaints and suggestions are discussed in meetings between the employees' representative(s) and the management.		1	0	0
2.5	The procedure sets a timeframe to resolve complaints and suggestions (e.g. during the next month).	  	1	0	0
2.6	The complaints, suggestions and their follow-up are documented and available for the last 24 months.		1	0	0
<b>COMPLIANCE LEVEL CONTROL POINT 2:</b> <i>(Calculated automatically based on the results per sub-controlpoint)</i>			<b>Fully compliant</b>		
Evidence/Remarks: Nordlaks Holding AS has several procedures to maintain a sufficient system for complaint and suggestion from the employee's, EQS doc ID 1148 and preventive actions described EQS internal procedure EQS ID 1144 and EQS ID 1145. All procedures are applicable for both PHU and PMU. The procedures are actively informed and made easily available for all employees - verified during interviews with the employees representatives. The procedure states clearly that employees will not be penalized for filing complaints or suggestions Last example of case where the procedure is used: complaint filed 22.03.22 management follow up and handling dated 22.03.22 and 30.03.22, survey and analysis of the problem done in period 22.03.22 - 04.04.22. Report with conclusion dated 06.04.22. No formal complaints in period March 22 - October 23.					
Corrective Actions:					

N°	CONTROL POINT & COMPLIANCE CRITERIA	VERIFICATION	COMPLIANCE		
			Y	N	N/A
<b>SELF-DECLARATION ON GOOD SOCIAL PRACTICES</b>					
3	<p>CP: Has a self-declaration on good social practice regarding human rights been signed by the management and the employees' representative(s) and has this been communicated to the employees?</p> <p>CC: The management and the employees' representative(s) have signed, displayed and put in practice a self-declaration assuring good social practice and human rights of all employees. This declaration contains at least the commitment to the ILO core labor conventions (ILO Conventions: 111 on discrimination, 138 and 182 on minimum age and child labor, 29 and 105 on forced labor, 87 on freedom of association, 98 on the right to organize and collective bargaining, 100 on equal remuneration and 99 on minimum wage) and transparent and non-discriminative hiring procedures and the complaint procedure. The self-declaration states that the employees' representative(s) can file complaints without personal sanctions. The employees have been informed about the self-declaration and it is revised at least every 3 years or whenever necessary.</p>				
3.1	The declaration is complete and contains at least all points referred to ILO core labor conventions.		1	0	0
3.2	The declaration has been signed by the management and by the employees' representative(s).		1	0	0
3.3	The declaration is actively communicated to the employees (e.g. displayed on the production site/in the handling unit/management office or attached to the working contract, information at meetings etc.).	  	1	0	0
3.4	The management, the responsible person for the implementation of GRASP and the employees' representative(s) know the content of the declaration and confirm that it is put into practice.	  	1	0	0
3.5	It is stated that the employees' representative(s) can file complaints without personal sanctions.		1	0	0
3.6	The declaration is checked and revised at least every 3 years or whenever necessary.	 	1	0	0
<b>COMPLIANCE LEVEL CONTROL POINT 3:</b> <i>(Calculated automatically based on the results per sub-controlpoint)</i>			<b>Fully compliant</b>		
<p>Evidence/Remarks: Selfdeclaration working-environment. Evolution system ID 2719. Self declaration ID 2419 in EQS system dt.25.09.23. signed by both management and employees representatives</p> <p>The declaration is complete and contains a refererance to relvant national labour regulations (AML) and the ILO core labour conventions. Signed declaration in EQS, ID 2712, 2713, 2638 og 2633 for Nordlaks Produkter, Nordlaks Havbruk and Nordlaks Smolt.</p> <p>The declaration is actively communicated to the employees - verified during interviews</p>					
Corrective Actions:					

N°	CONTROL POINT & COMPLIANCE CRITERIA	VERIFICATION	COMPLIANCE			
			Y	N	N/A	
<b>ACCESS TO NATIONAL LABOUR REGULATIONS</b>						
4	CP: Do the person responsible for the implementation of GRASP (RGSP) and the employees' representative(s) have knowledge of or access to recent national labor regulations?  CC: The person responsible for implementation of GRASP (RGSP) and the employees' representative(s) have knowledge of or access to national labor regulations, such as gross and minimum wages, working hours, trade union membership, anti-discrimination, child labor, labor contracts, holiday and maternity leave. Both the RGSP and the employees' representative(s) know the essential points of working conditions in agriculture as formulated in the applicable GRASP National Interpretation Guidelines.					
4.1	The RGSP provides the employees' representative(s) with the valid labor regulations (e.g. the GRASP National Interpretation Guidelines).	  	1	0	0	
4.2	RGSP and employees' representative(s) have knowledge about or access to the valid labor regulations on gross and minimum wages and deductions from wages.	  	1	0	0	
4.3	RGSP and employees' representative(s) have knowledge about or access to the valid labor regulations on working hours.	  	1	0	0	
4.4	RGSP and employees' representative(s) have knowledge about or access to the valid labor regulations on freedom of association and right to collective bargaining.	  	1	0	0	
4.5	RGSP and employees' representative(s) have knowledge about or access to the valid labor regulations on anti-discrimination.	  	1	0	0	
4.6	RGSP and employees' representative(s) have knowledge about or access to the valid labor regulations on child labor and minimum age of working.	  	1	0	0	
4.7	RGSP and employees' representative(s) have knowledge about or access to the valid labor regulations on holiday and maternity leave.	  	1	0	0	
<b>COMPLIANCE LEVEL CONTROL POINT 4:</b> <i>(Calculated automatically based on the results per sub-controlpoint)</i>			Fully compliant			
Evidence/Remarks: All labour laws and regulations are linked in several procedures and documents, e.g "Oversikt lover & forskrifter" EQS document ID 1135. The employees has access to computers where links to quality system (EQS), HR system (4humanHRM) and relevant legislations are easy available						
Corrective Actions:						

N°	CONTROL POINT & COMPLIANCE CRITERIA	VERIFICATION	COMPLIANCE		
			Y	N	N/A
<b>WORKING CONTRACTS</b>					
5	<p>CP: Can valid copies of working contracts be shown for the employees? Are the working contracts compliant with applicable legislation and/or collective bargaining agreements and do they indicate at least full names, nationality, a job description, date of birth, date of entry, the regular working time, wage and the period of employment? Have they been signed by both the employee and the employer?</p> <p>CC: For every employee, a contract can be shown to the assessor on request on a sample basis. The contracts correspond with the applicable legislation and/or collective bargaining agreements. Both the employees as well as the employer have signed them. Records contain at least full names, nationality, a job description, date of birth, date of entry, the regular working time, wage and the period of employment (e.g. permanent, period or day laborer etc.) and for non-national employees their legal status and working permit. The contract does not show contradiction to the self-declaration on good social practices. Records of the employees must be accessible for at least 24 months.</p>				
5.1	Random checks show availability of written contracts for all employees signed by both parties.	 	1	0	0
5.2	There is evidence that the employees have the correct contract according to national legislation and/or collective bargaining agreements (as stipulated in the applicable GRASP National Interpretation Guideline).		1	0	0
5.3	The working contracts include at least basic information on the employee's name, date of birth and nationality according to the applicable GRASP National Interpretation Guideline.		1	0	0
5.4	The working contracts or attachments to the contracts include basic information on the contract period (e.g. permanent, period or day laborer etc.), the wage, working hours, breaks, and a basic job description.		1	0	0
5.5	In the contract, there is no contradiction to the self-declaration on good social practice.		1	0	0
5.6	If non-national employees are working for the company, records indicate their legal status for being employed by the company. A respective working permit is available.		1	0	0
5.7	Records of the employees must be accessible for at least 24 months.		1	0	0
<b>COMPLIANCE LEVEL CONTROL POINT 5:</b> <i>(Calculated automatically based on the results per sub-controlpoint)</i>			Fully compliant		
<p>Evidence/Remarks: Seen contract for PMU employees #721, dt.08.09.17 - #707, dt.27.02.19 - #5031, dt.24.08.21 - #838, dt.22.06.23 - #572, dt.07.06.23 - #323, dt.01.02.22- #143, dt.07.08.23- #203, dt.09.11.16 - PMU Farming, signed by both manager and employee.  Seen contract for PHU employees #1564, dt.21.09.23 - #5478, dt.25.08.23 - #1962, dt.01.06.21 - #5445, dt.15.03.23 - #585, dt.06.02.17 - PHU, signed by both manager and employee.  Working contracts include all applicable information and are in accordance with national labour legislation. Basic job descriptions are attached to the contracts. All contracts are stored for several years (&gt; 24 months). Agency employees contracts checked by HR manager to be according to tariff-agreement and national labour legislation. Records in Quinyx and Evolution/4 Human.</p>					
Corrective Actions:					

N°	CONTROL POINT & COMPLIANCE CRITERIA	VERIFICATION	COMPLIANCE		
			Y	N	N/A
<b>PAYSLIPS</b>					
6	CP: Is there documented evidence indicating regular payment of salaries corresponding to the contract clause?  CC: The employer shows adequate documentation of the regular salary transfer (e.g. employee's signature on pay slip, bank transfer). Employees sign or receive copies of pay slips/pay register that make the payment transparent and comprehensible for them. Regular payment of the employees during the last 24 months is documented.				
6.1	Documented evidence that the payment is made in defined intervals (e.g. pay slips or pay registers) is available for the employees (random checks).	 	1	0	0
6.2	Pay slips or pay registers indicate that payments are made in accordance with the working contracts (e.g. employee's signature on pay slips, bank transfer etc.).	 	1	0	0
6.3	The records of payments are kept for at least 24 months.		1	0	0
<b>COMPLIANCE LEVEL CONTROL POINT 6:</b> <i>(Calculated automatically based on the results per sub-controlpoint)</i>				<b>Fully compliant</b>	
Evidence/Remarks Monthly payment in Farming and every 14 days in PHU with bank transfer. Payslips are sent online and are protected with a password. Seen payslips for PMU employees PMU employees #721 - #707 - #5031 - #838 - #572 - #323 - #143 - Department Nordlaks Havbruk and Nordlaks Smolt - PMU Farming. Seen payslips for PHU employees #1564 - #5478 - #1962 - #5445 - #585 - Department Nordlaks Produkter - PHU Processing. payslips verified and in accordance with contract. Interview with employees representatives indicate no problems with payment /payslips. Records in Quinyx and Evolution. Records are kept for more than 24 months.					
Corrective Actions:					

N°	CONTROL POINT & COMPLIANCE CRITERIA	VERIFICATION	COMPLIANCE			
			Y	N	N/A	
<b>WAGES</b>						
7	CP: Do pay slips/pay registers indicate the conformity of payment with at least legal regulations and/or collective bargaining agreements?  CC: Wages and overtime payment documented on the pay slips/pay registers indicate compliance with legal regulations (minimum wages) and/or collective bargaining agreements as specified in the GRASP National Interpretation Guideline. If payment is calculated per unit, employees shall be able to gain <u>at least the legal minimum wage (on average)</u> within regular working hours.					
7.1	Pay slips or pay registers give clear indication on the number of compensated working time or harvested amount including overtime (hours/days).	 	1	0	0	
7.2	Wages and overtime payments as shown in the records are according to the contracts and indicate compliance with national labor regulations (minimum wages), and/or collective bargaining agreements as specified in the GRASP National Interpretation Guideline.			1	0	0
7.3	Independently from the calculation unit, pay slips/pay registers document that employees gain in average at least the legal minimum wage within regular working times (especially check when piece-rate is implemented). If there are deductions from salaries and employees are being paid below minimum wage, the deductions must be justified in writing.		 	1	0	0
<b>COMPLIANCE LEVEL CONTROL POINT 7:</b> <i>(Calculated automatically based on the results per sub-controlpoint)</i>			Fully compliant			
Evidence/Remarks: Regular working hours, overtime, type of overtime (day night, public holidays etc) stated and payment per hour clearly defined. All above minimum wage level and in accordance with tariff agreements. Any deduction of salary clarified in payslip and understood - verified during interview with employees representative. Seen payslips and time records for PMU employees #721 - #707 - #5031 - #838 - #572 - #323 - #143- Nordlaks Havbruk and Nordlaks Smolt - PMU Farming Seen payslips and time records for PHU employees #721 - #707 - #5031 - #838 - #572 - #323 - #143 - Department Nordlaks Produkter - PHU Processing. Payslips shows normal time, overtime and additions on a monthly basis, and are in accordance with contracts / collective bargaining agreements. Records in Quinyx and Evolution.						
Corrective Actions:						

N°	CONTROL POINT & COMPLIANCE CRITERIA	VERIFICATION	COMPLIANCE			
			Y	N	N/A	
<b>NON-EMPLOYMENT OF MINORS</b>						
8	CP: Do records indicate that no minors are employed at the company?  CC: Records indicate compliance with national legislation regarding minimum age of employment. If not covered by national legislation, children below the age of 15 are not employed. If children—as core family members—are working at the company, they are not engaged in work that is dangerous to their health and safety, jeopardizes their development, or prevents them from finishing their compulsory school education.					
8.1	Dates of birth on the records show that no employee is aged below the legal minimum age of employment or, if not specified in the GRASP National Interpretation Guideline, under the age of 15.		1	0	0	
8.2	If children – as core family members – are working at the company, they are not engaged in work that is dangerous to their health and safety (according to the applicable IFA All Farm Base Module), that jeopardizes their development or prevents them from finishing their compulsory school education.	     	0	0	1	
<b>COMPLIANCE LEVEL CONTROL POINT 8:</b> <i>(Calculated automatically based on the results per sub-controlpoint)</i>				Fully compliant		
Evidence/Remarks: Seen list of all employees in HR system Evolution/4 Human for both PHU Processing and PMU Farming with no minors employed. No children employed, no employees living at sites.						
Corrective Actions:						

N°	CONTROL POINT & COMPLIANCE CRITERIA	VERIFICATION	COMPLIANCE		
			Y	N	N/A
<b>ACCESS TO COMPULSORY SCHOOL EDUCATION</b>					
9	CP: Do the children of employees living on the company's production/handling sites have access to compulsory school education?  CC: There is documented evidence that children of employees at compulsory schooling age (according to national legislation) living on the company's production/handling sites have access to compulsory school education, either through provided transport to a public school or through on-site schooling.				
9.1	There is a list of all children in the age of compulsory schooling age living on the company's production/handling sites, with sufficient indications on name, name of parents, date of birth, school attendance, etc. Children of management may be excluded.	 	0	0	1
9.2	There is evidence of transport facilities if children cannot reach school within acceptable walking distance (half an hour walking or according to GRASP National Interpretation Guideline).	    	0	0	1
9.3	There is evidence of an on-site schooling system when access to schools is not available.	    	0	0	1
<b>COMPLIANCE LEVEL CONTROL POINT 9:</b> <i>(Calculated automatically based on the results per sub-controlpoint)</i>			Not applicable		
Evidence/Remarks: No workers are living at the sites. No children of employees or employees living on the company's PMU/PHU					
Corrective Actions:					

N°	CONTROL POINT & COMPLIANCE CRITERIA	VERIFICATION	COMPLIANCE			
			Y	N	N/A	
<b>TIME RECORDING SYSTEM</b>						
10	CP: Is there a time recording system that shows daily working time and overtime on a daily basis for the employees?  CC: There is a time recording system implemented appropriate to the size of the company that makes working hours and overtime transparent for both employees and employer on a daily basis. Working times of the employees during the last 24 months are documented. Records are regularly approved by <u>the employees and accessible for the employees' representative(s)</u> .					
10.1	A time recording system is implemented, appropriate to the size of the company (e.g. time record sheet, check clock, electronic cards, etc.).	  	1	0	0	
10.2	The records indicate the regular working time for employees on a daily basis.		1	0	0	
10.3	The records indicate the overtime hours as defined by contracts per legislation for all employees on a daily basis.		1	0	0	
10.4	The records indicate the breaks/festive days for the employees (on a daily basis).		1	0	0	
10.5	The working records are regularly approved by the employees (e.g. regularly signed record sheet, checking clock).	 	1	0	0	
10.6	Access to these records is provided to the employees' representative(s).	  	1	0	0	
10.7	The records are kept for at least 24 months.		1	0	0	
<b>COMPLIANCE LEVEL CONTROL POINT 10:</b> <i>(Calculated automatically based on the results per sub-controlpoint)</i>			Fully compliant			
<p>Evidence/Remarks: Quinyx system for working time. Mobile APP can be used for registration of hours.  Employees has full access to data for working time and spare time, mobile app to stamp in/out at work and see record of hours.  Time records with normal time, overtime and additions on a daily basis recorded in Quinyx system.  Access to records of working time are granted to workers representatives on request.  Records are kept for more than 24 months.  Seen payslips and time records for PMU employees#721 - #707 - #5031 - #838 - #572 - #323 - #143 - Nordlaks Havbruk and Nordlaks Smolt - PMU Farming  Seen payslips and time records for PHU employees #721 - #707 - #5031 - #838 - #572 - #323 - #143 - Department Nordlaks Produkter - PHU Processing.  Verified during interviews with employees representatives</p>						
Corrective Actions:						

N°	CONTROL POINT & COMPLIANCE CRITERIA	VERIFICATION	COMPLIANCE		
			Y	N	N/A
<b>WORKING HOURS &amp; BREAKS</b>					
11	CP: Do working hours and breaks documented in the time records comply with applicable legislation and/or collective bargaining agreements?  CC: Documented working hours, breaks and rest days are in line with applicable legislation and/or collective bargaining agreements. If not regulated more strictly by legislation, records indicate that regular weekly working hours do not exceed a maximum of 48 hours. During peak season (harvest), weekly working time does not exceed a maximum of 60 hours. Rest breaks/days are also guaranteed during peak season.				
11.1	Information on valid labor regulation and/or collective bargaining agreements regarding working hours and breaks is available (e.g. in the GRASP National Interpretation Guideline).	  	1	0	0
11.2	Working hours including overtime as shown in the records indicate compliance with legal regulations and/or collective bargaining agreements.		1	0	0
11.3	Rest breaks/days as shown in the records indicate compliance with national regulations and/or bargaining agreements.		1	0	0
11.4	If not regulated more strictly by applicable legislation, regular weekly working time does not exceed 48 hours. During peak season (harvest), weekly working time does not exceed 60 hours.	   	1	0	0
11.5	The records indicate that rest breaks/days are also guaranteed during peak season.		1	0	0
<b>COMPLIANCE LEVEL CONTROL POINT 11:</b> <i>(Calculated automatically based on the results per sub-controlpoint)</i>			Fully compliant		
Evidence/Remarks: Quinyx system for working time. The system is also used for making reports to monitor use of overtime. Seen reports for 2022 and up to date 2023 in accordance with national labour legislation. Site managers are responsible for their employees to be compliant in accordance with legislation. Monitored by operation management and HR management. Regular working hours does normally not exceed 48 hours per week and 60 hours per week in peak seson (PHU/PMU). As required in norwegian labor legislation agreement with trade union and employee representative in place Nordlaks særavtale for PMU and PHU "arbeidstid og lønn" framework LO-NHO signed for PMU Havbruk/Smolt 24.05.23/28.06.23 and signed for PHU 25.05.23 by local TU representatives and company management.					
Corrective Actions:					

ONLY APPLICABLE FOR PRODUCER GROUPS

N°	CONTROL POINT & COMPLIANCE CRITERIA	VERIFICATION	COMPLIANCE		
			Y	N	N/A
<b>INTEGRATION INTO QMS</b>					
QMS	<p>CP: Does the assessment of the Quality Management System (QMS) of the producer group show evidence of the correct implementation of GRASP for all participating producer group members?</p> <p>CC: The assessment of the Quality Management System of the producer group demonstrates that GRASP is correctly implemented and internally assessed. Non-compliances are identified and corrective actions are taken to enable compliance of all participating producer group members.</p>				
QMS1	The implementation of GRASP is included in the Quality Management System of the producer group, based on the respective part of the GLOBALG.A.P. General Regulations for Producer Group Certification.	 	X		
QMS2	There is a system in place to regularly inform and train key staff on GRASP related issues.	 	X		
QMS3	All steps taken in the frame of the QMS to implement GRASP among all participating producer group members are documented.	 	X		
QMS4	There is evidence that the producer group fosters compliance of all participating producer group members with the GRASP requirements and assesses the progresses and problems complying with GRASP every year.	 	X		
QMS5	A register is maintained of all GLOBALG.A.P. producers implementing GRASP. It contains for every producer group member the internal assessment date as well as the compliance level reached, all non-compliances detected in internal and external assessments and corrective actions given to non-compliances.	 	X		
QMS6	There is a procedure to implement corrective actions from previous internal assessments.	 	X		
QMS7	The internal producer group inspector is qualified according to the GRASP General Rules.	 	X		
<b>COMPLIANCE LEVEL CONTROL POINT QMS:</b> <i>(Calculated automatically based on the results per sub-controlpoint)</i>		<input checked="" type="checkbox"/> Fully compliant. <input type="checkbox"/> Not compliant.			
Evidence/Remarks: QMS1 Common QMS (in EQS) for all sites. Includes procedures, records, NC system, etc. QMS2 Seen meeting appointments for HR regarding GRASP in EQS. QMS3 Common QMS (in EQS) for all sites. QMS4 Common QMS (in EQS for all sites. QMS5 Seen register with all sites and example of NC recording. GRASP assessment dt.04.09.23 in EQS and sharepoint. QMS6 EQS procedurs; "Prosedyre for avviksbehandling og korrigerende tiltak" "Avviksbehandling" EQS ID 1021 describing how non- compliances complaints and suggestions for improvement are handled. QMS7 Inspectors is qualified.					
Corrective Actions:					

## RECOMMENDATIONS FOR GOOD PRACTICE

N°	CONTROL POINT & COMPLIANCE CRITERIA
<b>ADDITIONAL SOCIAL BENEFITS</b>	
R1	What other forms of social benefit does the company offer to employees, their families and/or the community? Please specify (incentives for good and safe working performance, bonus payment, support of professional development, social benefits, child care, improvement of social surroundings etc.).
Evidence/Remarks: Additional insurance package for all employees which is also includes issues outside job. Pension payment above required minimum standard for all employees. Several social happenings during year, good cantine system, support to training/swimming, support to professional development (fagbrev) (lederutvikling), welfare committee, yearly gatherings with all employees to improve expertise in the relevant aquaculture and food industry subjects.	