



ÅRSREGNSKAPET FOR REGNSKAPSÅRET 2023 - GENERELL INFORMASJON

Enheten

Organisasjonsnummer: 923 269 711
Organisasjonsform: Aksjeselskap
Foretaksnavn: DELPEN SEAFOOD AS
Forretningsadresse: Charlotte Andersens vei 6
0374 OSLO

Regnskapsår

Årsregnskapets periode: 01.01.2023 - 31.12.2023

Konsern

Morselskap i konsern: Nei

Regnskapsregler

Regler for små foretak benyttet: Nei
Benyttet ved utarbeidelsen av årsregnskapet til selskapet: Regnskapslovens alminnelige regler

Årsregnskapet fastsatt av kompetent organ

Bekreftet av representant for selskapet: Øystein Egner
Dato for fastsettelse av årsregnskapet: 12.04.2024

Grunnlag for avgivelse

År 2023: Årsregnskapet er elektronisk innlevert
År 2022: Tall er hentet fra elektronisk innlevert årsregnskap fra 2023

Det er ikke krav til at årsregnskapet m.v. som sendes til Regnskapsregisteret er undertegnet. Kontrollen på at dette er utført ligger hos revisor/enhetens øverste organ. Sikkerheten ivaretas ved at innsender har rolle/rettighet for innsending av årsregnskapet via Altinn, og ved at det bekreftes at årsregnskapet er fastsatt av kompetent organ.

Brønnøysundregistrene, 10.07.2025



Resultatregnskap

Beløp i: USD	Note	2023	2022
RESULTATREGNSKAP			
Inntekter			
Salgsinntekt	7	27 287 000	27 271 000
Annen driftsinntekt	7	407 000	878 000
Sum inntekter		27 694 000	28 149 000
Kostnader			
Varekostnad		22 714 000	22 417 000
Annen driftskostnad	8	1 103 000	690 000
Sum kostnader		23 817 000	23 107 000
Driftsresultat		3 877 000	5 042 000
Finansinntekter og finanskostnader			
Annen finansinntekt	9	1 193 000	906 000
Sum finansinntekter		1 193 000	906 000
Annen finanskostnad	9	64 000	39 000
Sum finanskostnader		64 000	39 000
Netto finans		1 129 000	867 000
Ordinært resultat før skattekostnad		5 006 000	5 909 000
Skattekostnad på ordinært resultat	6	1 181 000	1 457 000
Ordinært resultat etter skattekostnad		3 825 000	4 452 000
Årsresultat		3 825 000	4 452 000
Overføringer og disponeringer			
Konsernbidrag		3 287 000	
Overføringer til/fra annen egenkapital		538 000	4 452 000
Sum overføringer og disponeringer		3 825 000	4 452 000



Balanse

Beløp i: USD	Note	2023	2022
BALANSE - EIENDELER			
Anleggsmidler			
Immaterielle eiendeler			
Finansielle anleggsmidler			
Andre fordringer	1	28 124 000	13 714 000
Sum finansielle anleggsmidler		28 124 000	13 714 000
Sum anleggsmidler		28 124 000	13 714 000
Omløpsmidler			
Varer			
Fordringer			
Kundefordringer	2	90 000	1 357 000
Andre fordringer		1 061 000	4 255 000
Sum fordringer		1 151 000	5 612 000
Bankinnskudd, kontanter og lignende			
Bankinnskudd, kontanter og lignende	4	9 000	20 000
Sum bankinnskudd, kontanter og lignende		9 000	20 000
Sum omløpsmidler		1 160 000	5 632 000
SUM EIENDELER		29 284 000	19 346 000
BALANSE - EGENKAPITAL OG GJELD			
Egenkapital			
Innskutt egenkapital			
Selskapskapital	5	4 000	4 000
Annen innskutt egenkapital	5	11 645 000	11 214 000
Sum innskutt egenkapital		11 649 000	11 218 000
Sum egenkapital		11 649 000	11 218 000



Balanse

Beløp i: USD	Note	2023	2022
Gjeld			
Langsiktig gjeld			
Utsatt skatt	6	188 000	214 000
Sum avsetninger for forpliktelser		188 000	214 000
Annen langsiktig gjeld			
Sum langsiktig gjeld		188 000	214 000
Kortsiktig gjeld			
Leverandørgjeld		8 312 000	519 000
Betalbar skatt	6	280 000	1 252 000
Kortsiktig konserngjeld	3	6 420 000	68 000
Annen kortsiktig gjeld		2 435 000	6 075 000
Sum kortsiktig gjeld		17 447 000	7 914 000
Sum gjeld		17 635 000	8 128 000
SUM EGENKAPITAL OG GJELD		29 284 000	19 346 000
POSTER UTENOM BALANSEN			
Garantistillelser		12 000 000	12 000 000



Brønnøysundregistrene

ÅRSREGNSKAP FOR REGNSKAPSÅRET 2023 - GENERELL INFORMASJON

Journalnummer: 2024 360495

Enheten

Organisasjonsnummer: 923 269 711
Organisasjonsform: Aksjeselskap
Foretaksnavn: DELPEN SEAFOOD AS
Forretningsadresse: Trosterudveien 10D
0778 OSLO

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Brønnøysundregistrene, 04.05.2024



Organisasjonsnr: 923 269 711
DELPEN SEAFOOD AS

RESULTATREGNSKAP

Beløp i: USD	Note	2023	2022
RESULTATREGNSKAP			
Inntekter			
Salgsinntekt	7	27 287 000	27 271 000
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Organisasjonsnr: 923 269 711
DELPEN SEAFOOD AS

BALANSE

Beløp i: USD Note 2023 2022

BALANSE - EIENDELER

Anleggsmidler

Immaterielle eiendeler

Finansielle anleggsmidler

Andre fordringer	1	28 124 000	13 714 000
Sum finansielle anleggsmidler		28 124 000	13 714 000
Sum anleggsmidler		28 124 000	13 714 000

Omløpsmidler

Varer

Fordringer

Kundefordringer	2	90 000	1 357 000
Andre fordringer		1 061 000	4 255 000
Sum fordringer		1 151 000	5 612 000

Bankinnskudd, kontanter og lignende

Bankinnskudd, kontanter og lignende	4	9 000	20 000
Sum bankinnskudd, kontanter og lignende		9 000	20 000

Sum omløpsmidler 1 160 000 5 632 000

SUM EIENDELER 29 284 000 19 346 000

BALANSE - EGENKAPITAL OG GJELD

Egenkapital

Innskutt egenkapital

Selskapskapital	5	4 000	4 000
Annen innskutt egenkapital	5	11 645 000	11 214 000
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Gjeld

Langsiktig gjeld

Utsatt skatt	6	188 000	214 000
Sum avsetninger for forpliktelser		188 000	214 000
Annen langsiktig gjeld			



Sum langsiktig gjeld		188 000	214 000
Kortsiktig gjeld			
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Betalbar skatt	6	280 000	1 252 000
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SUM EGENKAPITAL OG GJELD		29 284 000	19 346 000
POSTER UTENOM BALANSEN			
Garantistillelser		12 000 000	12 000 000



Organisasjonsnr: 923 269 711
DELPEN SEAFOOD AS

NOTEOPPLYSNINGER - SELSKAP - alle poster oppgitt i hele tall

Note
8

Antall årsverk i regnskapsåret
0.00

Sum Beløp

Balanseført verdi 31.12. Varige driftsmidler Immaterielle eiend.

Konsernregnskap

Morselskapet sitt navn

Forretningskontor for morselskapet

Begrunnelse for at datterselskap er utelatt fra konsolideringen

Samlet beløp - tilknyttet selskap Årets Fjorårets

Annen langsiktig gjeld

Samlet beløp - foretak i samme konsern Årets Fjorårets
6420000.00 68000.00

Samlet beløp - foretak i samme konsern Årets Fjorårets

Samlet beløp - felles kontrollert virksomhet Årets Fjorårets

Pantstillelse Beløp

Beholdning av egne aksjer Antall Pålydende Andel av aksjek.



DELPEN SEAFOOD

ANNUAL REPORT 2023

Delpen Seafood AS

Org.nr. 923 269 711



ANNUAL REPORT 2023 | Delpen Seafood AS



BOARD OF DIRECTORS' REPORT

Board of directors' Report

All numbers in USD 1.000, numbers in (brackets) are 2022 figures.

Delpen Seafood AS was founded in 2019 as a trading company with the purpose of sale and marketing of seafood products. The business revolves around sales and marketing of high-end seafood products from sustainable and well-managed fisheries.

Delpen Seafood AS is based in Oslo, Norway and is 100% owned by Storkinn AS.

GOING CONCERN ASSUMPTION

Liquidity is satisfactory and by the end of year, the company had 9 (20) in cash and bank deposits and 1.151 (5.612) in short term receivables.

As per 31 December 2023 total assets for Delpen Seafood AS was 29.284 (19.346), equity of 11.649 (11.218), resulting in an equity ratio of 39,8% (58,0%).

Pursuant to section 3-3a of the Norwegian Accounting Act, the Board of directors hereby confirms that the above supports the basis for the going concern assumption and that the annual accounts for 2023 have been prepared based on the Going Concern assumption for Delpen Seafood AS.

STATEMENT OF THE ANNUAL REPORT

The Board of directors consider the annual report to give a satisfactory description of the company's position at year-end.

Sales revenue for 2023 came out at 27.287 (27.271). Other operating income came out at 407 (878).

Cost of goods sold ended at 22.714 (22.417), Operation expenses ended at 1.103 (690), resulting in an operating profit of 3.877 (5.042).

Net financial items were 1.129 (867).

Profit before tax came out at 5.006 (5.909). Tax cost at 1.181 (1.457), Net profit of the year 3.825 (4.452)

The Board of directors proposes the following distribution of the profit for the year:

Net Group Contribution:	3.287	(0)
Other Equity:	538	(4.452)

Cash Flow from operations is 7.569 (9.687), while cash flow from financing is -7.581 (-13.019). Deviation between net profit and net change in cash mainly due to a long term loan given a supplier.

Pursuant to section 3-4 of the Norwegian Companies Act, the board has assessed the equity and liquidity as adequate based on the following:

The company has an equity ratio of 39,8% (58,0%), which is sufficient based on an assessment of the investment needs for the group performed in 2023.

The current liquid assets in the company is sufficient to cover the group's liquidity needs during 2024.



ANNUAL REPORT 2023 | Delpen Seafood AS



BOARD OF DIRECTORS' REPORT

The company have D&O insurance.

No material events have occurred after the year end 2023 balance sheet date.

WORKING ENVIRONMENT

Currently Delpen Seafood AS has no employees; external service providers provide administrative support.

Of the shareholder-elected board members, there are no women. However, both the Board and management are aware of the social responsibility to promote gender equality in business and the Board.

ENVIRONMENT

Delpen Seafood AS emphasizes to ensure and develop the competence and consciousness of health, environment and safety.

The Company's business activities have a limited polluting effect on the environment and seeks to use as energy and environment-friendly solutions as possible.

MARKET AND FINANCIAL RISK

Delpen Seafood AS is exposed to market risk, credit risk, interest rate risk and foreign exchange risk in the normal course of business.

Market risk will primarily be related to general development in the market for the products produced onboard the vessels, including changes in supply, demand and pricing.

Delpen Seafood AS will operate internationally and be exposed to foreign exchange risk arising from various currency exposures, primarily with respect to the USD, EUR and NOK. Foreign exchange risk arises from future commercial transactions.

Changes in exchange rates effecting operating expenses, other receivables, and liabilities nominated in other currencies than the entities functional currency will have a direct effect on the company income statement as per year-end. Wherever possible the company target to balance out the exposure through natural hedging activities. As per 31 December 2023, the Company has not entered into any derivative contracts with financial institutions.



ANNUAL REPORT 2023 | Delpen Seafood AS



BOARD OF DIRECTORS' REPORT

OUTLOOK

Priority for the Board of Directors has been to support ongoing improvement processes and support the Company realizing its full potential.

During 2023, Delpen Seafood AS shows positive development. In the opinion of the board of Delpen Seafood AS, the current financial position is satisfactory and the outlook for the business is positive.

However, forward-looking statements reflect current view about future events, which by nature are subject to significant risks and uncertainties.

Board of directors Delpen Seafood AS

Oslo, 12. April 2024

Ola Snøve
Chairman of the Board



ANNUAL REPORT 2023 | Delpen Seafood AS



INCOME STATEMENT (AMOUNT IN USD 1000)

	Note	2023	2022
Sales revenue	7	27,287	27,271
Other operating income	7	407	878
Total revenue		27,694	28,149
Cost of goods sold		22,714	22,417
Other operating expenses	8	1,103	690
Total operating expenses		23,817	23,107
Operating profit		3,877	5,042
Other financial income	9	1,193	906
Other financial expense	9	64	39
Profit before tax		5,006	5,909
Income tax expense	6	1,181	1,457
Net profit for the year		3,825	4,452
Appropriation of profit			
Dividend		0	0
Net Group Contribution		3,287	0
Other Equity:		538	4,452



ANNUAL REPORT 2023 | Delpen Seafood AS



BALANCE SHEET - ASSETS (AMOUNT IN USD 1000)

ASSETS	Note	2023	2022
Long term Loans	1	28,124	13,714
Total financial fixed assets		28,124	13,714
TOTAL FIXED ASSETS		28,124	13,714
Inventories			
Trade receivables	2	90	1,357
Other receivables		1,061	4,255
Total receivables		1,151	5,612
Cash and bank deposits	4	9	20
TOTAL CURRENT ASSETS		1,160	5,632
TOTAL ASSETS		29,284	19,346



ANNUAL REPORT 2023 | Delpen Seafood AS



BALANCE SHEET - EQUITY AND LIABILITIES (AMOUNT IN USD 1000)

EQUITY AND LIABILITIES	Note	2023	2022
Share capital	5	4	4
Total paid-in equity		4	4
Other equity	5	11,645	11,214
Total retained earnings		11,645	11,214
TOTAL EQUITY	5	11,649	11,218
Deferred tax	6	188	214
Total provisions		188	214
Trade creditors		8,312	519
Tax payable	6	280	1,252
Other short-term liabilities		2,435	6,075
Other short-term liabilities to group companies	3	6,420	68
Total short term liabilities		17,447	7,915
TOTAL LIABILITIES		17,635	8,128
TOTAL EQUITY AND LIABILITIES		29,284	19,346

Oslo 12. April 2024

Ola Snøve
Chairman of the Board



ANNUAL REPORT 2023 | Delpen Seafood AS



Cash flow statement

	2023	2022
Cash flow from operations		
Profit before income taxes	5,006	5,909
Taxes paid in the period	-1,252	-1,828
Change in trade debtors	4,461	6,852
Change in trade creditors	7,793	-8,085
Change in other provisions	-8,439	6,840
Net cash flow from operations	7,569	9,687
Cash flow from financing		
Payment of Interest	584	4
Proceeds from short term loans, Internal	6,352	69
Long term loans	-14,410	-12,304
Payment of dividend	-107	-
Net cash flow from financing	-7,581	-13,019
Exchange gains / (losses) on cash and cash equivalents		
Net change in cash and cash equivalents	-11	-3,331
Cash and cash equivalents beginning of period	20	3,351
Cash and cash equivalents at the end of the period	9	20



ANNUAL REPORT 2023 | Delpen Seafood AS

ACCOUNTING PRINCIPLES

ACCOUNTING PRINCIPLES, BASIS FOR PREPARATION AND ESTIMATES

The annual financial statements have been prepared in accordance with the Norwegian Accounting Act and generally accepted accounting practice for enterprises in Norway.

Accounting principles

The accounting principles presented below have been applied consistently for all periods and companies presented in the financial statements. In the case of significant changes, comparative figures have been reclassified in accordance with this year's presentation.

Sale of goods

Operating revenues for the sale of goods are included when the company has transferred the significant risks and benefits of ownership to the buyer, the income amount can be reliably measured, it is probably that the financial benefits connected with the transaction will fall to the company and the expenses that have accrued or will accrue in connection with the transaction can be reliably measured. Sales commissions on sales invoiced directly from group companies are recognized in the same period as the sale are recognized in the group company. Revenues considered agent commissions are posted net.

Classification and valuation of balance sheet items

Current assets and liabilities relate to items that fall due for payment within one year of the time they are acquired or incurred, and items connected to the circulation of goods. Other items are classified as non-current assets/liabilities. Current assets are valued at the lower of cost and fair value. Current liabilities are recognized in the balance sheet at their nominal amount at the time they are incurred. Non-current assets are recorded at cost, but written down to fair value when any impairment is not considered to be of a temporary nature. Non-current liabilities are recognized in the balance sheet at their nominal amount at the time they are incurred.

Receivables

Trade and other receivables are recognized at nominal value in the balance sheet less provisions for expected bad debts. Bad debt provisions are based on an individual assessment of each receivable. A non-specific provision is also recognized to cover expected bad debts on other trade receivables.

Foreign currency

Monetary items denoted in foreign currency are valued at the rate in force at the end of the financial year.

Current investments

Current investments are valued at the lower of cost and fair value at the balance sheet date.

Taxes

The tax expense in the income statement comprises both taxes payable for the period and changes in deferred tax liabilities/assets. The tax rate for 2023 is 22%. Deferred tax is calculated as 22% of the basis of temporary differences that exist at the end of the financial year between the accounting and tax written down values, and tax loss carried forward. Tax-reducing and tax-increasing temporary differences that reverse or could reverse in the same period are set off. Net deferred tax assets are recognized in the balance sheet to the extent that it is probable that these can be utilized.

To the extent that group contributions are not recognized in the income statement, the tax effect of the group contributions is recognized directly against the investment in the balance sheet



ANNUAL REPORT 2023 | Delpen Seafood AS



ACCOUNTING PRINCIPLES

Statement of cash flow

The cash flow statement has been prepared in accordance with the indirect method. Cash and cash equivalents include cash, bank deposits and other current liquid investments.

Use of estimates

The preparation of the annual financial statements in accordance with generally accepted accounting practice requires management to make estimates and assumptions that affect the reported amounts in the income statement, the valuation of assets and liabilities and information on contingent assets and liabilities at the balance sheet date. Probable and quantifiable contingent losses are expensed on an ongoing basis.

USD as functional currency

All transactions in other currencies than USD are calculated to USD based on the daily actual date's exchange rates.



NOTES (AMOUNT IN USD 1000)

Note 1 Financial fixed assets

Financial fixed asset	2023	2022
Long term loan	28,124	13,714
Total financial fixed assets	28,124	13,714

The loan are open ended and matures as agreed between Borrower and Lender

Note 2 Debtors and liabilities

Trade debtors	2023	2022
Trade debtors at nominal value	90	1,357
Trade debtors in the balance sheet	90	1,357

Note 3 Balance with group companies

Other short-term liabilities to group companies	2023	2022
Group Contribution (Hoven Trading AS AS)	0	0
Other short term liabilities (Storkinn AS)	4,463	68
Other short term liabilities (Hoven Trading AS)	1,957	0
Other short-term liabilities to group companies	6,420	68

Note 4 Restricted bank deposits

The company have no restricted bank deposits

Note 5 Shareholders' equity

Equity changes in the year	Share capital	Share premium	Not reg. capital increase	Other equity	Total
Equity 01.01.	4	-	-	11,214	11,218
Profit for the year	-	-	-	3,825	3,825
Capital increase	-	-	-	-	-
Dividend	-	-	-	-107	-107
Net Group Contribution, exclusive tax	-	-	-	-3,287	-3,287
Equity 31.12.	4	-	-	11,645	11,649

The company is wholly owned subsidiary of Storkinn AS. The companys headquarters is located in Trosterudveien 10D, Oslo, Norway

The share capital of NOK 30 000 consist of 30 000 shares with nominal value of NOK 1 each.
Average Exchange rate used in USD figures = 8,48.



NOTES (AMOUNT IN USD 1000)

Note 6 Taxes

Calculation of deferred tax/deferred tax benefit

	2023	2022
Temporary differences		
Provisions	-118	931
Net temporary differences	-118	931
Tax losses carried forward	0	0
Basis for deferred tax	-118	931
Opening balance deferred tax liability in balance sheet	214	9
Deferred tax 22%	-26	205
Deferred tax benefit not shown in the balance sheet	0	0
Deferred tax in the balance sheet	188	214

Basis for income tax expense, changes in deferred tax and tax payable

Result before taxes	5,006	5,909
Permanent differences due to currency (NOK)	362	708
Permanent differences	-	4
Basis for the tax expense for the year	5,368	6,621
Change in temporary differences	118	-931
Tax losses carried forward utilized	-	-
Basis for payable taxes in the income statement	5,486	5,690
+/- Group contributions received/given	-4,214	-
Taxable income (basis for payable taxes in the balance sheet)	1,272	5,690

Components of the income tax expense

Payable tax on this year's result	1,101	1,300
Adjustment in respect of priors	106	-48
Total payable tax	1,207	1,252
Change in deferred tax	-26	205
Change in deferred tax due to change in tax rate	-	-
Tax expense	1,181	1,457

Reconciliation of the tax expense

Result before taxes	5,006	5,909
Calculated tax 22%	1,101	1,300
Tax expense	1,181	1,457
Difference	80	157

The difference consist of:

22% of permanent differences	80	157
Change in deferred tax due to change in tax rate	-	-
Effect of DTA not recognized	-	-
Sum explained differences	80	157

Payable taxes in the balance sheet

Payable tax in the tax charge	1,207	1,252
Tax effect of group contribution	-927	-
Payable tax in the balance sheet	280	1,252



NOTES (AMOUNT IN USD 1000)

Note 7 Operating income

	2023	2022
Sales income	27,287	27,271
Other operating income	407	878
Total	27,694	28,149

Geographical distribution of sales income

	2023	2022
Europe	-	1,044
North America	23,232	21,566
South America	-	-
Asia	4,055	4,560
Africa	-	101
Total	27,287	27,271

Note 8 Payroll expenses, number of employees, remunerations, loans to employees, etc.

The company currently has no employees. Administrative resources have been hired in as consultants. It is not paid any directors' fees. As there are no employee, Delpen Seafood AS is not obligated to follow the Act on mandatory occupational pensionscheme.

No loans/sureties have been granted to the general manager, Board chairman or other related parties than specified in note 2

Expensed audit fee

	2023	2022
Statutory audit (incl. technical assistance with financial statements)	11	7
Other assurance services	-	-
Tax advisory fee (incl. Technical assistance with tax return)	-	-
Other assistance	-	-
Total audit fees	11	7

VAT is not included in the audit fee.



NOTES (AMOUNT IN USD 1000)

Note 9 Specification of financial income and expenses

Financial income	2023	2022
Net Agio Profit	77	379
Other interest income	1,116	527
Total financial income	1,193	906

Financial expenses	2023	2022
Interest expences group companies	48	-
Other interest expences	2	8
Net Agio Profit	14	31
Total financial expenses	64	39

Note 10 Related-party transactions

Remuneration to executives is disclosed in note 7, and balance with group companies is disclosed in note 2.

Company	Relationship
Storbrea AS	Parent Company Storkinn AS
Storkinn AS	Parent Company
Hoven Trading AS	Sister company

Related-party transactions:	Company	2023	2022
Group Contribution	Storkinn AS	3,287	0

Note 11 Guarantees

Delpen Seafood AS have given a guarantee to DNB Bank ASA connected to a rebuilding project. The guarantee is limited to the amount of the Bank guarantee issued in regard to the rebuilding of USD 12 million.



BDO AS
Munkedamsveien 45
Postboks 1704 Vika
0121 Oslo

Independent Auditor's Report

To the General meeting of Delpen Seafood AS

Opinion

We have audited the financial statements of Delpen Seafood AS.

The financial statements comprise:

- The balance sheet as at 31 December 2023
- The income statement for 2023
- Statement of cash flows for the year that ended 31 December 2023
- Notes to the financial statements, including a summary of significant accounting policies

In our opinion:

- The financial statements comply with applicable statutory requirements, and
- The financial statements give a true and fair view of the financial position of the Company as at 31 December 2023, and its financial performance and its cash flows for the year then ended in accordance with the Norwegian Accounting Act and accounting standards and practices generally accepted in Norway.

Basis for Opinion

We conducted our audit in accordance with International Standards on Auditing (ISAs). Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the Financial Statements section of our report. We are independent of the Company as required by relevant laws and regulations in Norway and the International Ethics Standards Board for Accountants' International Code of Ethics for Professional Accountants (including International Independence Standards) (IESBA Code), and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Other information

The Board of Directors and the Managing Director (management) are responsible for the other information. The other information comprises the Board of Directors' report. Our opinion on the financial statements does not cover the other information.

In connection with our audit of the financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report in this regard.



Opinion on the Board of Directors' report

Based on our knowledge obtained in the audit, in our opinion the Board of Directors' report

- is consistent with the financial statements and
- contains the information required by applicable statutory requirements.

Responsibilities of the Board of Directors and the Managing Director for the Financial Statements

Management is responsible for the preparation of financial statements that give a true and fair view in accordance with the Norwegian Accounting Act and accounting standards and practices generally accepted in Norway, and for such internal control as management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is responsible for assessing the Company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting insofar as it is not likely that the enterprise will cease operations.

Auditor's Responsibilities for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

For further description of Auditor's Responsibilities for the Audit of the Financial Statements reference is made to:

<https://revisorforeningen.no/revisjonsberetninger>

BDO AS

Kjetil Ardem
State Authorised Public Accountant
(This document is signed electronically)

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Ardem, Kjetil André

Partner

På vegne av: BDO AS

Serienummer: no_bankid:9578-5999-4-1283472

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Skatteetaten

Vår dato
27.03.2020

Din/Deres dato
07.02.2020

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DSHT HOLDING AS
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0280 OSLO

Att. Øystein Egner

Tillatelse til å utarbeide årsregnskap og årsberetning på engelsk

Vi viser til deres brev av 7. februar 2020 der det søkes om dispensasjon fra kravet til å utarbeide årsregnskap og årsberetning på norsk for følgende selskaper:

DSHT Holding AS	org.nr. 923 269 770
Delpen Seafood AS	org.nr. 923 269 711
Hoven Trading AS	org.nr. 923 269 789

Skattekontoret gir på bakgrunn av en konkret helhetsvurdering de overnevnte selskaper dispensasjon fra kravet til å utarbeide årsregnskap og årsberetning på norsk, jf. regnskapsloven § 3-4 tredje ledd. Dispensasjonen gjelder så lenge opplysningene som danner grunnlaget for vedtaket ikke endres vesentlig.

Kopi av dette brevet må sendes til Regnskapsregisteret i Brønnøysund sammen med årsregnskapet. Den regnskapspliktige må selv dokumentere ved dette brev at tillatelse er gitt.

Bakgrunn

Delpen Seafood AS og Hoven Trading AS er heleide datterselskaper av DSHT Holding AS. DSHT Holding AS er eid av en norsk aksjonær. Konsernet driver virksomhet innen kjøp og salg av fisk. Fisken kjøpes hovedsakelig fra Argentina og selges hovedsakelig videre til kunder i de amerikanske og asiatiske markedene. Konsernets arbeidsspråk er engelsk.

Skattekontorets vurdering

Etter regnskapsloven § 3-4 tredje ledd skal "årsregnskapet og årsberetningen [...] være på norsk. Departementet kan ved [...] enkeltvedtak bestemme at årsregnskapet og/eller årsberetningen kan være på et annet språk."

I Ot. prp. nr. 42 (1997-1998) Om lov om årsregnskap mv., er det uttalt følgende om regnskapslovens formål, jf. pkt. 1.1:

"Regjeringen har som siktemål at regnskapsloven skal bidra til informative regnskaper for ulike grupper av regnskapsbrukere. Regnskapsbrukerne er dels investorer og kreditorer som tilfører kapital til foretakene, og dels andre grupper som har interesse av å vite hvordan foretaket drives,



f.eks. de ansatte og lokalsamfunnet. Informasjonen til kapitalmarkedet skal gi grunnlag for riktig prising av finansielle objekter. Riktig prisdannelse på aksjer er en forutsetning for at ressursbruken i samfunnsøkonomien skal bli best mulig. Gode regnskaper vil også gjøre det vanskeligere for markedsdeltakere å ta ut spekulasjonsgevinster med basis i skjevt fordelt informasjon.”

Det fremgår således at et av hovedformålene med regnskapsloven er å bidra til “informative regnskaper for ulike grupper av regnskapsbrukere”. Regnskapsbrukere vil omfatte, jf. uttalelsen i proposisjonen, blant andre investorer, kreditorer, ansatte og lokalsamfunnet.

Det er etter skattekontorets vurdering derfor avgjørende ved vurdering av om dispensasjon fra kravet til å utarbeide årsregnskap og/eller årsberetning på norsk kan gis, at det ikke foreligger mulige brukere av regnskapsinformasjon som blir vesentlig berørt negativt ved en eventuell dispensasjon.

Det er særlig hensynet til brukerne av regnskapsinformasjon som skal vurderes ved en dispensasjons-søknad. I denne vurderingen har skattekontoret lagt særlig vekt på at selskapene kun har én eier. Videre er det vektlagt at selskapene driver virksomhet i en internasjonal bransje der alle sentrale aktører behersker og benytter engelsk.

Vennligst oppgi vår referanse ved henvendelse i saken.

Med hilsen

Lars Waalorp
seniorrådgiver
Brukerdialog, brukerkontakt
Skatteetaten

Dokumentet er elektronisk godkjent og har derfor ikke håndskrevne signaturer.