



Alda Seafood Holding B.V.

Sustainability Report 2022

Alda Seafood Holding B.V.

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A letter from the Chairman

Alda Seafood Holding B.V. (“Alda”) now publishes a sustainability report for the first time. The primary purpose of this report is to provide an accurate overview of our operations and what our companies are doing regarding environmental, social, and governance matters (ESG). The report contains information for the reporting period 1 January to 31 December 2021.

During the preparation of this report, the European Union was set to adopt the Corporate Sustainability Reporting Directive (CSRD) in October 2022, amending the previous Non-Financial Reporting Directive. This directive will require companies within its scope to disclose information on how they operate and manage social and environmental challenges. This helps investors, civil society organisations, consumers, policymakers, and other stakeholders evaluate these companies’ non-financial performance and encourages them to develop a responsible approach to business. Even though this legislation has not come into force, we have decided to publish this information from now on in the form of a sustainability report.



A sustainability report enables companies to be more transparent about their risks and opportunities. It is a communication tool that informs observers about the company's actions. We have sought to do this with our report, which was produced with reference to the Global Reporting Initiative (GRI) standards. The standards allow organisations to publicly declare the impacts of their activities in a structured way that is transparent to stakeholders and other parties. Alda's executive management was directly involved in making the report, and Alda's Supervisory Board reviewed it. The report was not reviewed by an independent, external party. You will see our sustainability priorities, listed below, emphasised in this report:

- Ethical and compliant business
- Employee safety and well-being
- Environmentally responsible operations
- Community engagement

In the report, we have included available and relevant information about the operations of companies in the group for the period 1 January 2021 to 31 December 2021. The report covers subsidiaries and joint ventures where we own 50% of the shares or more. All data and facts are published to the best of our knowledge. However, in some instances, data is not readily available. In cases where we have not been able to publish as detailed information as envisaged, we intend to do better next year. We consider this first report part of our learning process regarding ESG reporting and aim to publish more information in the future.

As the GRI standards require, the report includes a GRI content index that outlines under what chapters or sections individual disclosures can be accessed. All inquiries regarding the sustainability report can be sent via email to sustainability@aldaholding.com

A holding company with a primary focus on Europe

Alda is a holding company in the global fisheries industry, primarily focusing on Europe, where most of our investments are. As a holding company, Alda does not engage with or sell products directly to consumers. Our operations are mainly known to our business partners, customers, government entities, and other stakeholders. Even though we are a holding company, we understand we can influence the companies in our group and the societies they operate in by adhering to specific policies, principles, and values.

Our commitment to sustainable development

We consider sustainable development an essential part of our operations and are committed to supporting the UN's Sustainable Development Goals. On page 24, we outline the most relevant goals for our operations.

Our commitment to sustainable development is enshrined in our policies and procedures which were implemented as part of our compliance system. Many of these policies and procedures directly support the Sustainable Development Goals because they aim to prevent adverse impacts on the economy, environment, and people.

Our mission and the shared philosophy of our companies

As our environmental policy outlines, our goal is to work in harmony with the environment. This means that we expect our companies to engage in responsible fishing and promote sustainable fishing practices.

Companies in our group operate under the same philosophy; to produce the highest quality fish products for the most demanding customers globally. To achieve this goal, their policy is to regularly renew their vessels and utilise the best technology available in all aspects of their operations. This allows the companies to produce higher quality products and promotes the increased well-being and comfort of the vessel crews.

The appointment of a Supervisory Board

Alda Seafood Holding B.V. is a fully established Dutch company with head offices in Oegstgeest. Recently, we set up a Supervisory Board for the company for the first time. The role of the Supervisory Board is to supervise the policy pursued by the directors and the general course of affairs in the company and its business. The supervisory board also advises the directors.

All of the above is a testament to our ambition to grow, both in the Netherlands and the global seafood industry. It also shows our emphasis on transparency and disclosure about our operations.

I hope our business partners, customers, governmental representatives, other stakeholders, and interested parties can access all relevant information about our companies and ESG-related endeavours in this report.

Respectfully,



Baldvin Thorsteinsson
Chairman of the Supervisory Board
Alda Seafood Holding B.V.



About Alda Seafood Holding B.V.

Alda Seafood Holding B.V. (“Alda”), run from its head offices in Oegstgeest, Netherlands, controls a group of entities in the fisheries industry globally with a primary focus on Europe. The company was established in the Netherlands in 2019, but its roots date back to 1983 in Iceland.

Alda is a vertically integrated holding company in the seafood industry that operates a fleet of fishing vessels, processing facilities, and sales offices in Europe and North America. As a holding company, Alda does not engage directly with consumers. Companies in the group produce high-quality seafood products for the global market, while most of the products are sold in Europe and Asia.

Companies within the group mainly fish and sell cod, haddock, blue whiting, mackerel, jack mackerel, saithe, redfish, Greenland halibut, and shrimp. Alda’s companies do not catch any species that are endangered and do not trade products that are banned in any known markets.

Every wild seafood chain begins with the fisher and ends with an end buyer who subsequently sells to a consumer. End buyers include retail outlets from locally owned fish markets to national supermarkets, restaurants, and food service establishments, such as hotels, hospitals, and schools. Alda does not control any retail outlets where seafood products are sold to consumers.

As a vertically integrated seafood group, Alda controls a large part of its supply chain. The most significant amount of all fish caught by vessels operated by companies in the group is frozen at sea. If the seafood products are not produced and frozen at sea, they are delivered fresh to production facilities.



Most of the marketing communications of the companies in our group are directed towards wholesale buyers acquiring large volumes of our products. During the reporting period, 1 January to 31 December 2021, the companies in our group did not identify any non-compliance with regulations or voluntary codes concerning marketing communications.

Organisational chart

According to its articles of association, Alda is a private limited liability company with a board of directors managing the company's business under the supervision of a Supervisory Board. Our organisational chart is outlined below.



Within the applicable boundaries of Dutch law, the general meeting of the shareholders of Alda Seafood Holding B.V. is the company's highest governing body. The Supervisory Board convenes as often as needed, normally six times annually.

The role of the Supervisory Board is to supervise the policy pursued by the directors and the general course of affairs in the company and its business. The Supervisory Board also advises the directors as often as needed.

The Supervisory Board members were appointed on 1 February 2023.

When members were nominated for the Supervisory Board, several factors were taken into consideration:

1. Views of stakeholders

The views of stakeholders, including the shareholders, were important in the nomination process. The shareholders of Alda wanted the Supervisory Board members to have the relevant knowledge and understanding of our business. Naturally, the names of individuals who have worked for the organisation or affiliated companies, or are connected to the shareholders, were proposed during the nomination process.

2. Diversity

Alda's shareholders wanted the Supervisory Board to include individuals of both sexes and with different backgrounds to support diversity. The composition of the Supervisory Board should reflect diversity in thinking, background, skills, experiences, expertise, and a range of appropriate tenures given the company's current and anticipated circumstances. Therefore, diversity directly supports the operations of the company.

3. Independence

The shareholders and management of Alda believe the Supervisory Board must include an individual, preferably a Dutch citizen with an extensive corporate background, who has no affiliation with the shareholders, the organisation itself, or its employees. The board's independence is essential because the members must exercise independent judgment free from any external influence or conflicts of interest. This is to ensure the board's sufficient autonomy concerning the board's supervisory role towards the directors and other management. For this reason, several Dutch individuals with extensive corporate backgrounds were considered for the Supervisory Board of Alda Seafood Holding B.V. In the end, Mr Jan Louis Burggraaf was nominated and then appointed to the Supervisory Board by the General Meeting of shareholders. Mr Burggraaf is a seasoned veteran Dutch company lawyer specialising in mergers and acquisitions. Over the past years, Mr Burggraaf has advised multiple companies, banks, and government institutions on leading transactions. His abilities, knowledge, and experience will benefit Alda.

4. Competencies relevant to the impacts of the organisation

During the nomination process, it became clear that the Supervisory Board members would need to understand Alda's structure and the operations of different subsidiaries within the group. The Supervisory Board members would also need to know how the operations of companies within the group affect the economy, environment, and people. The shareholders believe that the newly appointed Supervisory Board members fulfil these requirements.

On 1 February 2023, the following individuals were appointed to the Supervisory Board of the company:



**Ms. Helga Steinunn
Gudmundsdottir**



Baldvin Thorsteinsson
Chairman of the Supervisory Board



Haraldur Gretarsson



Jan Louis Burggraaf

The responsibility for managing the organisation's impacts on the economy, environment, and people is vested in the company's directors. The Head of Legal and Business Affairs at Deutsche Fischfang Union GmbH & Co. K.G., one of Alda's subsidiaries, has been appointed as the group's sustainability officer. Alongside the sustainability officer, Alda's directors are responsible for all sustainability-related matters and for communicating Alda's policy to the management of the subsidiaries. Alda's directors report directly to the Supervisory Board on the group's efforts and actions on sustainability.

Director

Mr Steingrímur H. Petursson, the managing director of Alda, is responsible for the company's day-to-day management and determining long-term and short-term policy and strategy. The managing director is also responsible for monitoring the general course of events of the business, monitoring the liquidity position, overseeing risk management, and pursuing a financial policy.

Our shareholders

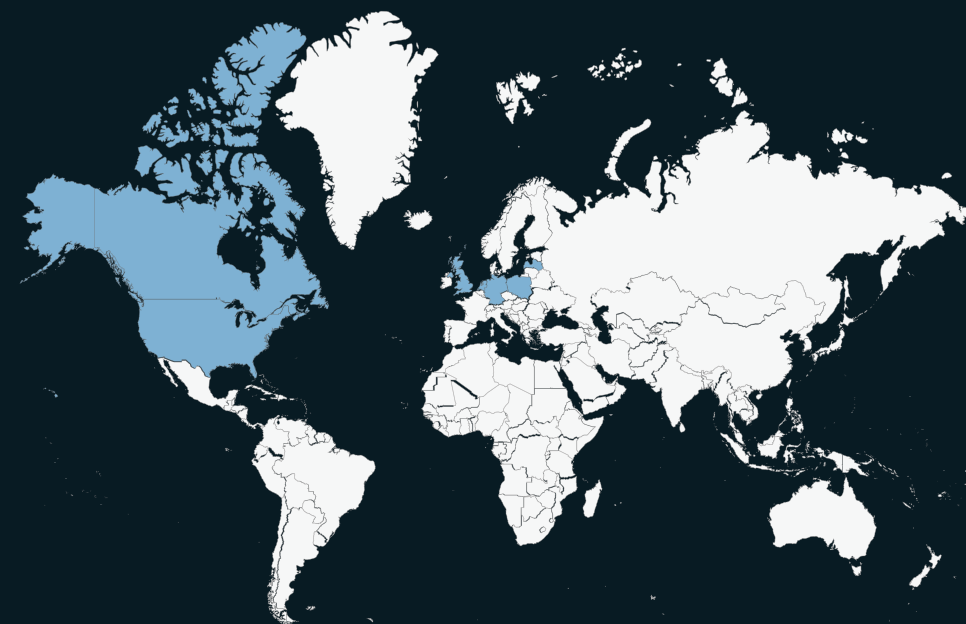
Mr Baldvin Thorsteinsson, Chairman of Alda's Supervisory Board, owns 75% of the shares in Alda Seafood Holding B.V. Other shareholders are Mr Thorsteinn Már Baldvinsson and Ms Helga Steinunn Gudmundsdóttir. Prior to 2022, 100% of the shares in Alda were owned by Samherji Holding ehf.

Since 2019, when Alda Seafood Holding B.V. was established, the group's headquarters have been operating from the Netherlands.



Our investments

Location / Company	Ownership stake
Germany	
CR Group (CR Cuxhavener Reederei GmbH) Fully owned subsidiaries: DFFU Verwaltung GmbH Elke M GmbH Deutsche Fischfang-Union GmbH (DFFU)	100%
Icefresh GmbH (Germany) Icefresh GmbH, founded in 2004, is a fresh-fish processing company near Frankfurt. Its processing plant produces fresh and frozen fillets and portions. The plant has two separate processing areas, one for salmon and the other for groundfish species.	85%
France	
Compagnie des Pêches Saint-Malo (through ownership in UK Fisheries) Compagnie des Pêches Saint-Malo (CPSM) operates a fleet of trawlers producing surimi blocks, shrimps and whitefish fillets. The company also operates a surimi factory (crabstick plant) in Saint-Malo, producing chilled and frozen products.	22,25%
UK	
Onward Fishing in Aberdeen Onward has fishing rights for groundfish in Scottish and Norwegian waters, by Svalbard, and in the Nordic Seas	100%



UK Fisheries in Bradford	50%
Fully owned subsidiaries:	
Euronor (France). Operates fresh fish trawlers in the North Sea.	
Pesquera Ancora (Spain). Operates the freezer trawler Lodairo.	
Absolutely Genuine (Portugal). Operates the freezer trawler Santa Princesa.	
Seagold in Hull (UK)	82,5%
Seagold is a sales and marketing company initially established to sell frozen-at-sea fillets. Today, the company is one of the UK's leading fish importers and sells seafood products to several countries.	
Denmark	
Hesselholt Fisk Eksport (through ownership in Euronor)	50%
Hesselholt Fisk Eksport in Hanstholm was* one of Denmark's biggest fish exporters. The company ran a production facility for fish fillets in Hanstholm.	
Poland	
Atlantex	50%
Atlantex is based in Warsaw and operates the factory trawler Annelies Ilena, the largest fishing vessel in the world.	
Arctic Navigations	50%
Arctic Navigations is based in Gdynia and operates the pelagic vessel, Alina, mainly catching blue whiting, mackerel and herring. Arctic Navigations specialises in frozen fish products that are produced on board the Alina vessel.	
The Netherlands	
Dutch Pelagic B.V. (Netherlands)	50%
The company is a distributor of pelagic products.	
Latvia	
Latvian Fishing Company	50%
The company operates the freezer trawler Dorado II through its subsidiary, Batterfisa SIA.	

Lithuania	
Marlinas	25%
Marlinas, located in Klaipeda in Lithuania, operates two shrimp trawlers.	
Canada	
Newfound Resources Ltd. (Canada)	49%
NRL, operated from St. Johns, Newfoundland, specialises in shrimp.	
USA	
Aquanor Marketing Inc. (U.S.)	50%
Aquanor Marketing is a Boston-based premier importer, distributor, and marketer of the finest fresh seafood.	
Norway	
Nergård AS	39,9%
Nergård is an integrated fishery group whose activities include catching, processing and sales. The company operates four trawlers.	

In 2022, Alda invested in the polish cold storage company PAOP and currently controls an 86,53% stake. No information about PAOP is included in the report because the investment was made outside the reporting period timeframe.

This Sustainability Report covers data for all our controlled subsidiaries and joint ventures where Alda holds at least 50% of the shares, except Aquanor Marketing Inc. in Boston. This means that information about Nergård AS, where Alda holds a 39,9% stake, and Marlinas in Lithuania, where Alda controls 25% of the shares through a subsidiary, is not included in the report.

*On 31 December 2022, Hesselholt Fisk Eksport A/S ceased operations. The company's controlled termination resulted from several contributing factors; challenging markets after the pandemic, the war in Ukraine and an abnormally steep increase in energy costs in 2022.

The scale of the organization

Alda Seafood Holding B.V. is a holding company with investments in several different countries, as listed in this report. In total, the companies in the group covered by the report, employed 848 employees in fifteen separate operations in 2021. If only wholly-owned subsidiaries are included, the total number of employees is 444.

When the total number of employees of companies included in the report is broken down, 76% of the employees are male, and 24% are female. This information is outlined under a specific chapter on employees on page 26.

During the year 2021, the group sold products for EUR 327 million. This is an increase from the year before, when sales amounted to EUR 309 million. The group's total assets stood at EUR 589 million at year-end 2021, and equity amounted to EUR 389 million. The group's equity ratio was 66% at year-end. These numbers are according to the consolidated financial statements of Alda Seafood Holding B.V. for 2021.



Total sales in 2021:

EUR 327 million

Total assets at year end 2021:

EUR 589 million

Equity ratio:

66%

Entities included in the consolidated financial statements

On the opposing page is a list of companies included in the consolidated financial statements of Alda Seafood Holding B.V. The list was taken directly from the consolidated financial statements of Samherji Holding ehf. for the year 2021. Samherji Holding was Alda's parent company until 2022.

The list is displayed precisely the same way as in the consolidated financial statements of Samherji Holding. The ownership stake is for year-end 2021.

“Even though we are a holding company, we understand we can influence the companies in our group and the societies they operate in by adhering to specific policies, principles, and values.”

Ownership in subsidiaries:

CR Cuxhavener Reederei GmbH (Germany)	100%
Arctic Navigations z.o.o, Póllandi (Poland)	61%
DFFU Verwaltung GmbH (Germany)	100%
DFFU GmbH & Co. K.G. (Germany)	100%
Elke M GmbH (Germany)	100%
Icefresh GmbH (Germany)	85%
Nergård Invest Samherji AS (Norway)	100%
Onward Fishing Company Ltd. (UK)	100%
Onward Investment Ltd. (UK)	100%
Onward F.C. Ltd. (Canada)	100%
Fame Fisheries Ltd. (Canada)	100%
Seagold Ltd (UK)	82,5%
Ice Fresh Seafood Ltd. (UK)	100%
Ice Fresh Seafood SARL (France)	100%
Collins Seafood Yorkshire Ltd. (UK)	100%
Collins Seafood Ireland Ltd.	100%
Collins Seafood NE Ltd. (UK)	100%

Ownership í Joint Ventures:

Atlantex, Sp. Z O.O. (Poland)	50%
Aquanor Marketing Inc. (U.S.)	50%
MLK JV LLC (U.S.)	50%
Dutch Pelagic B.V. (Netherlands)	50%
UK Fisheries Ltd. (UK)	50%

Ownership in affiliates:

Nergård AS (Norway)	39,9%
Groupe Compagnie St-Malo	25%
Eskøy (Norway)	39,9%
GOOSS logistics (Germany)	50%

Alda and the UN Sustainable Development Goals

Alda Seafood Holding B.V. supports the United Nations Sustainable Development Goals that provide a framework for government agencies, civil society, the private sector, and citizens to work on creating a more sustainable future. The following goals are most relevant for the business of our group:



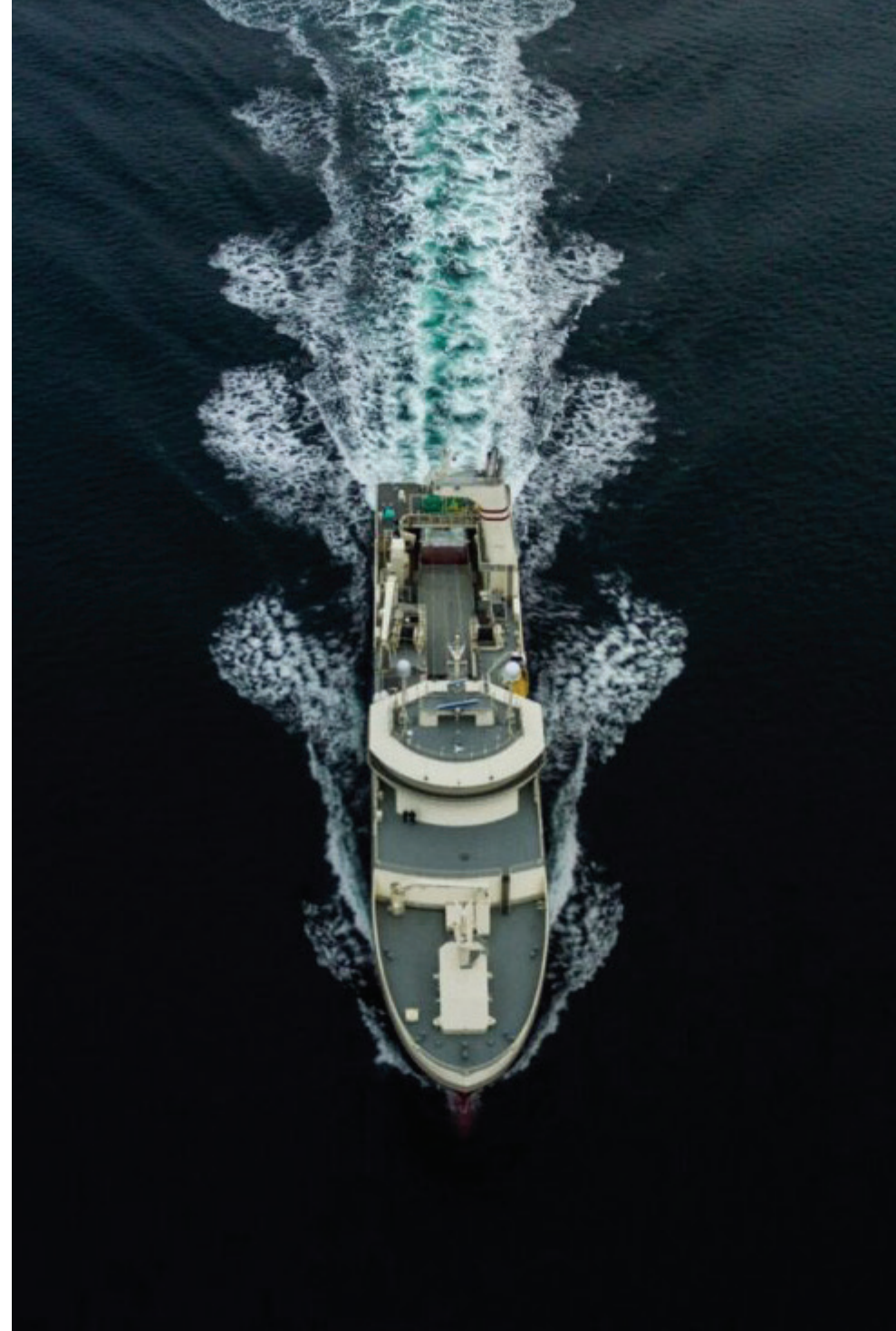
Goal 3 – Good health and well-being

Our policies regarding the health and well-being of our employees directly support Sustainable Development Goal 3, which is to “ensure healthy lives and promote well-being for all at all ages.” Alda believes providing a safe and healthy working environment for its employees is essential. Our commitment to this goal can be seen in our “Human Rights Policy,” “Personnel Policy,” and our “Policy and Contingency Plan against Bullying, Sexual and Gender-based Harassment and Violence,” discussed on pages 50-53.



Goal 5 – Gender equality

To promote equality in the workplace, Alda has implemented “Alda’s Equal Plan,” which outlines Alda’s principles, rules, and guidelines on equality. This plan directly supports UN Sustainable Development Goal 5, which is to “achieve gender equality and empower all women and girls.” Alda’s Equal Plan is explained and discussed on page 52 of this report.





Goal 9 – Industry, innovation, and infrastructure

Alda’s companies have invested substantially in their fleets in the last few years. The companies all follow the same philosophy: renew their vessels regularly and use the most advanced technology onboard. Investing in new vessels directly supports Sustainable Development Goal 9, which is to “build resilient infrastructure, promote inclusive and sustainable industrialisation, and foster innovation.”



Goal 12 – Responsible consumption and production

Alda’s companies produce high-quality seafood products for the most demanding customers globally. In Alda’s Environmental Policy, discussed on pages 38-39, we outline our environmental pillars. One is total utilisation, supporting Sustainable Development Goal 12, which is to “ensure sustainable consumption and production patterns.” Alda emphasises the utilisation of all by-products to get the most out of the raw material that is processed at any given time. As a result, the operations of the companies in the group are constantly being reformed to increase the utilisation of fish products and save energy.



Goal 13 – Climate action

Alda’s companies are constantly looking for ways to reduce fossil fuel emissions. Alda emphasises that when ordering new vessels, the companies focus on energy efficiency and reducing the environmental impact in all design aspects. In addition, we try to identify opportunities to reduce fossil fuel usage and use other realistic energy sources whenever possible. This approach directly supports Sustainable Development Goal 13, which is to “take urgent action to combat climate change and its impacts.”



Goal 14 – Life below water

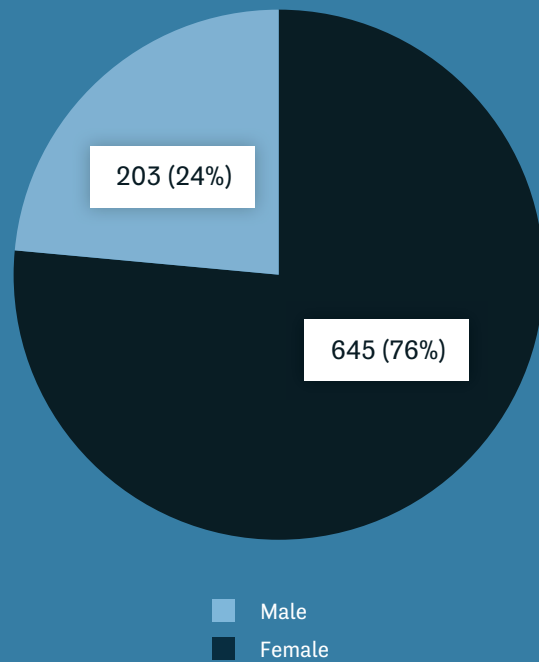
Sustainable Development Goal 14 is to “conserve and sustainably use the oceans, seas and marine resources for sustainable development.” Alda’s objective is to work in harmony with the environment, promote environmentally friendly operations at all stages of production, sustainable utilisation of fish stocks, and good management of the ocean’s resources.

Our employees

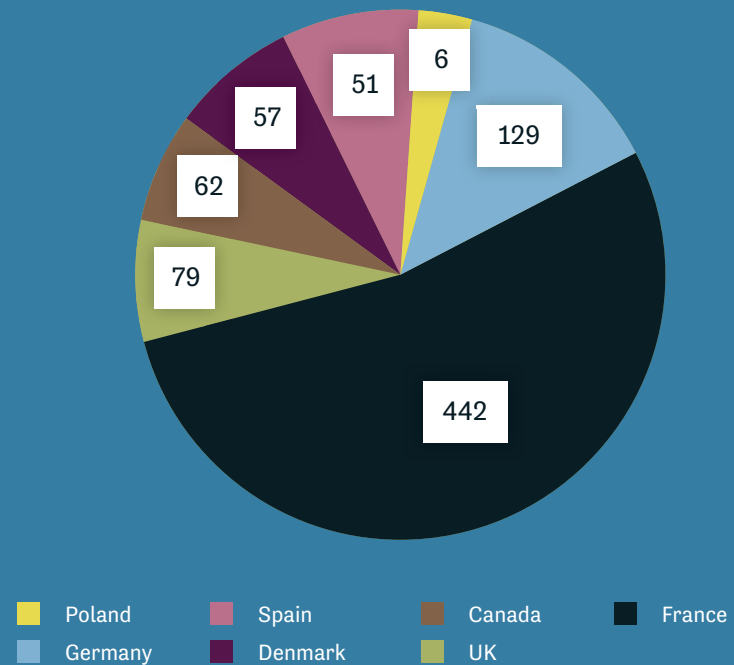


“Respect for employees and human rights is fundamental to our operations, and compliance with applicable laws and regulations is vital.”

Total number of employees

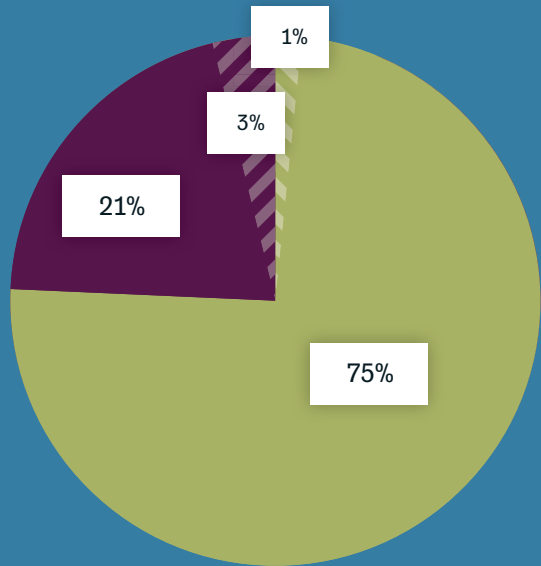


Where our employees are located



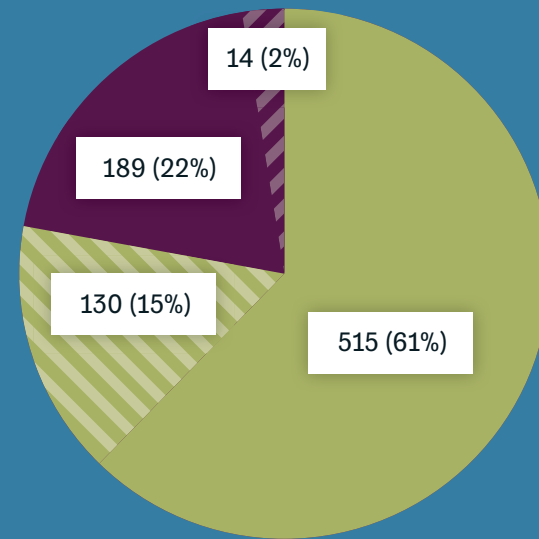
Please note that numbers in the charts displayed on these pages do not include the employees of Aquanor Marketing Inc., where Alda holds a 50% stake, Nergård AS, where Alda owns a 39,9% stake, and Marlinas in Lithuania, where Alda controls 25% of the shares through a subsidiary.

Total number of employees by employment type



- Male part time workers
- Male full time workers
- Female part time workers
- Female full time workers

Total number of employees by employment contract



- Male temporary workers
- Male permanent workers
- Female temporary workers
- Female permanent workers

Poland

A significant part of Arctic Navigation's activities in Poland is performed by workers who are not employees. The crews on vessels are employed as contractors, except seafarers from Poland. Most seafarers are employed only during vessel trips, so there are seasonal variations in the number of contractors. On average, in 2021, there were 43 seafarers employed on the Alina vessel operated by Arctic Navigations. The same goes for Atlantex in Poland, which operates the Annalies Ilena trawler. All the crewmembers are contractors who are engaged temporarily during vessel trips. On average, 63 seafarers were employed on the Annalies Ilena during trips in 2021.

France

At CPSM, the number of temporary workers varies from March to July because of seasonal shifts. Information on workers was gathered from an internal payroll system.

Canada

None of our activities in Canada are performed by workers who are not employees, and there are no seasonal variations in numbers reported. Data for Fame Fisheries was obtained from payroll records filed with the Government of Canada.

UK

The crews on vessels operated by subsidiaries of UK Fisheries are self-employed share fishermen. During the year ended 31 December 2021, 67 such individuals were contracted for trips. There is no seasonal variation in the numbers; however, the crew of the Kirkella vessel changes between trips. Approximately 30 individuals are onboard for each trip. The data for UK Fisheries was collected from the crewing records and fisherman payroll system.

Five workers in Seagold's factory are provided by a temp agency and are, therefore, not employees, but all other workers are employees. There are no seasonal variations in the reported numbers for Seagold. Information was compiled using payroll reports for December 2021 and the final week payroll report for December 2021 for staff on a weekly salary.

Germany

Icrefresh Gmbh hired 25 additional production workers via third-party temporary employment agencies at the end of 2021. The higher workload around holidays, like Easter and Christmas, requires additional workers, and those workers are usually hired via third-party agencies. The data for Icefresh Gmbh was compiled using the internal H.R. management and information system.

Our vessels

Companies owned by Alda operate an extensive fleet of fishing vessels. The companies share the same philosophy regarding investment and the maintenance of ships; they are renewed as regularly as possible and utilise the best available technology.

New vessels are, in many instances, more environmentally friendly because they contribute to a more energy-efficient industry. Furthermore, better accommodation onboard new ships can contribute to the increased well-being and comfort of crews. Therefore, we encourage the companies within our group to adhere to this principle.

Companies owned by Alda regularly enter into investment contracts for the design and construction of new vessels. The most recent is an agreement Deutsche

Fischfang Union GmbH (DFFU) signed with Vard in Norway for the design and construction of a new one stern high-tech trawler. The contract is valued in excess of EUR 50 million.

The new trawler will be equipped with the latest technology, equipment, and solutions for onboard production. All the catch will be processed onboard, packed, and stored in freezers or refrigerators to secure the highest possible quality of the fish. The trawler will be equipped with innovative catch handling solutions, a live fish tank to keep the fish healthy until processing, an advanced fish processing factory, high cargo capacity for refrigerated and frozen fish, and ensilage tanks to ensure full utilisation of the biomass from each catch.

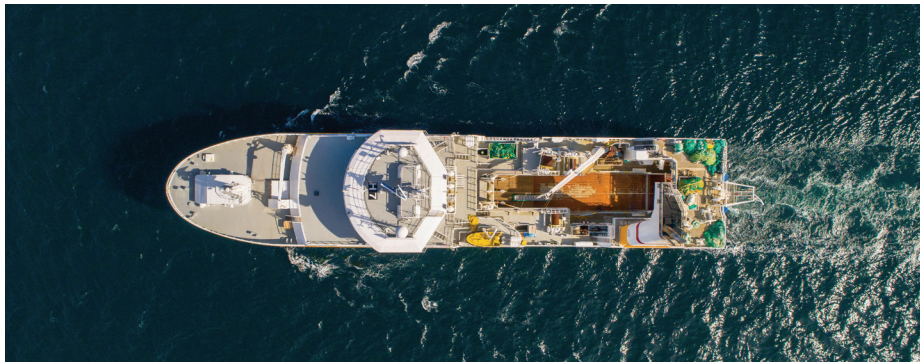
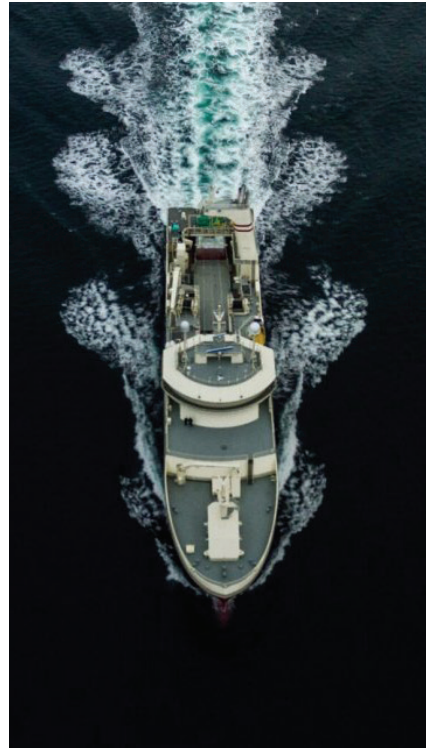


Information about the different vessels operated by companies in our group:

Name of vessel	Country	Company	Type	Species	Year
Newfoundland Victor	Canada	Fame Fisheries Ltd.	Trawler	Shrimp	2016
Lodairo	Spain	Pesquera Ancora SL (UK Fisheries)	Freezer trawler	Cod, haddock, saithe, redfish Barents Sea	2015
Kirkella	UK	Kirkella Ltd. (UK Fisheries)	Freezer trawler	Cod, haddock, saithe, redfish Barents Sea	2018
Farnella	UK	Jacinta Ltd. (UK Fisheries)	Trawler	Saithe in North Sea	2000
Berlin NC	Germany	DFFU	Freezer trawler	Cod, haddock, saithe, redfish Barents Sea	2017
Baldvin (previously Polonus)	Germany	DFFU	Freezer trawler	Cod, haddock, saithe, redfish Barents Sea	1992
Cuxhaven	Germany	DFFU	Freezer trawler	Cod, haddock, saithe, redfish Barents Sea	2017
Annelies Ilena	Poland	Atlantex	Pelagic vessel	Pacific mackerel, Blue whiting, mackerel, herring	2000
Alina	Poland	Arctic Navigations	Pelagic vessel	Blue whiting, mackerel, herring	1983
Dorado II	Poland	Batterfisa SIA	Freezer trawler	Shrimp in Barents Sea	1989

Santa Princesa	Portugal	Absolutely Genuine - Unipesoal	Freezer trawler	Cod, haddock, saithe, redfish Barents Sea	1987
Emeraude	France	Navire Emeraude (UK Fisheries)	Freezer trawler	Cod, haddock, saithe, redfish Barents Sea, saith in North Sea	2018
Joseph Roty II	France	CPSM	Freezer trawler	Blue whiting	1973
Otter Bank	France	Euronor (UK Fisheries)	Fresh fish trawler	Saithe in North Sea	2000
Fisher Bank	France	Euronor (UK Fisheries)	Fresh fish trawler	Saithe in North Sea	1999
Andre Leduc	France	Euronor (UK Fisheries)	Fresh fish trawler	Saithe in North Sea	2003
Cap Saint Georges	France	Euronor (UK Fisheries)	Fresh fish trawler	Saithe in North Sea	2003
Bressay Bank	France	Euronor (UK Fisheries)	Fresh fish trawler	Saithe in North Sea	2001

*Vessel delivered outside of reporting period.



Membership of associations

The companies in the group are members of several different organisations.



The European North Atlantic Fisheries Association (ENAFA)

Arctic Navigations
Deutsche Fischfang-Union GmbH & Co. K.G



The Long Distance Fleet Advisory Council (LDAC)

Arctic Navigations
Atlantex
Deutsche Fischfang-Union GmbH & Co. K.G



The North Sea Advisory Council (NSAC)

Arctic Navigations
Atlantex



The Pelagic Advisory Council

Arctic Navigations
Atlantex



The European Association of Fish Producers Organizations

Arctic Navigations
Atlantex



Europêche

Arctic Navigations
Atlantex
Euronor



European Fisheries Alliance

Arctic Navigations
Atlantex
Euronor



Polish Association of Fish Processors

Arctic Navigations
Atlantex



The Pelagic Freezer-trawler Association (PFTA)

Atlantex



French Association of Processed Food Products Companies

Groupe Compagnie des Pêches Saint Malo



Deutscher Fischerei Verband e.V.

Deutsche Fischfang-Union GmbH & Co. K.G.

Deutsche Hochseefischerei-Verband e.V.
Deutsche Fischfang-Union GmbH & Co. K.G



European Bottom Fisheries Alliance
Deutsche Fischfang-Union GmbH & Co. K.G. (DFFU)
Euronor
Batterfisa SIA (Latvian Fishing Company)



Union des Armateurs à la Pêche de France
Euronor

This organisation represents the interests of fishing vessel owners who mainly operate on the high seas and in long-distance fishing. The organisation assists vessel owners regarding social, tax and legal issues, fishing regulations, and international fishing agreements.



Association nationale des Organisations de Producteurs (ANOP)
Euronor



Comité National des Pêches et des Elevages Marins (CNPMEM)
Euronor

Canadian Association of Prawn Producers
NRL

Northern Shrimp Research Foundation
NRL



Danish Seafood Association
Hesselholt

The Danish Seafood Association is an association for Danish companies active in the production and trade of seafood.



Dansk Industri
Hesselholt

Dansk Industri represents all industries in negotiating collective bargaining agreements for employees in Denmark.



The National Federation of Fishermen's Organisations
UK Fisheries

United Kingdom Association of Fish Producers Organisations
UK Fisheries

Environmental policy

It is the social responsibility of companies in the fisheries sector to reduce their adverse impact on the environment and strive for the continued fishing and production of high-quality fish products. Alda's goal is to work in harmony with the environment, promote environmentally friendly operations at all stages of production, sustainable utilisation of fish stocks, and good management of the ocean's resources.

Alda's policy is to maximise the utilisation of all raw materials. Alda also strives to increase energy consumption efficiency and, at the same time, increase the use of environmentally friendly energy. Compliance with laws and regulations relating to the environment is an essential factor and to achieve its environmental goals, Alda has various projects in progress at any given time.

Alda's environmental policy consists of four pillars.



Sustainability

Alda emphasises sustainable operations. As a result, Alda's operations are healthy and robust, in harmony with society and the environment. Alda firmly holds the principle that resources must be treated with respect and utilised cautiously to ensure sustainable fisheries and promote the continued utilisation of fish stocks for future generations. Alda emphasises responsible fishing and has implemented rules and procedures for this purpose.

Environmentally friendly energy resources

Many of the companies within Alda's group have operations that have a high energy demand in fishing and processing. Investment in the development of equipment and devices for fishing and processing is fundamental in reducing energy consumption and carbon footprint with more environmentally friendly energy sources and better energy efficiency.

Total utilisation

Great emphasis is placed on utilising all by-products to get the most value from the raw material processed at any given time. As a result, Alda's operations are constantly being reformed to increase the utilisation of fish products and energy.

Recycling

When considering the operation's impact on the environment, waste management is essential. Alda places great importance on reducing waste, increasing waste sorting, and the responsible disposal of waste. Increased recycling is a big part of reducing the negative impact on the environment.

Energy usage within the group in 2021

As previously mentioned, Alda's subsidiaries have invested heavily in their fleets in the last few years. The companies renew their vessels regularly and use the most advanced technology available onboard. The new vessels are, in many instances, more energy efficient than older ships. Even though today's vessels use significantly less fuel than the ships of previous generations, the best available ships still rely heavily on fossil fuel in their operations.

These pages outline energy usage for the reporting period for the companies covered by the report.

Company	Fuel from non-renewable sources	Type
Absolutely Genuine Unipessoal	0	
Arctic Navigations	1,820	m ³ MGO/DMA
Atlantex	12,724	m ³ MGO/DMA
Groupe Compagnie des Pêches Saint Malo	6,109	m ³ MGO/DMA
Deutsche Fischfang-Union GmbH & Co. KG	10,017	m ³ MGO/DMA
Comptoir des Pêches d'Europe du Nord (Euronor)	8,255	m ³ MGO
Fame Fisheries	4,494	m ³ MGO/DMA
Hesselholt Fisk Eksport A/S	0	m ³
Icefresh GmbH	0	m ³
Pesquera Ancora SLU	2,776	m ³ MGO/DMA
Seagold Ltd.	0	m ³
UK Fisheries Ltd.	10,533	m ³ MGO/DMA
Dutch Pelagic B.V.	0	0 0
Latvian Fishing Company (Batterfisa SIA)	2,237	m ³ MGO

*6.000 L of Domestic Fioul

** This is all electricity and heating/cooling consumption

Fuel from non-renewable sources in Megajoules	Fuel from renewables	Electricity	Heating	Cooling	Steam	Electricity sold	Heating sold	Cooling sold	Steam sold
	0	0	0	0	0	0	0	0	0
67,704,000	0	28.430 kWh	0	0	0	0	0	0	0
473,332,800	0	N/A	0	0	0	0	0	0	0
227,254,800	0	5.154.693 kWh	0	0	6.623.504 kWh	0	0	0	0
372,632,400	0	367.591 kWh	0	0	0	0	0	0	0
302,133,000	0	85.000 kWh	64.200 kWh*	0	0	0	0	0	0
167,176,800	0	N/A	0	0	0	0	0	0	0
	0	856.000 kWh	593.880 kWh	0	0	0	0	0	0
	0	1.633.641 kWh	657.354 kWh	0	0	0	0	0	0
103,267,200	0	7.161 kWh	0	0	0	0	0	0	0
	0	1.986.060 kWh**	N/A	N/A	0	0	0	0	0
391,827,600	0	7.078 kWh	18.786 kWh	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0
81,874,200	0	0	0	0	0	0	0	0	0

Food Safety

Companies in our group produce fish products for the most demanding customers worldwide. Therefore, food safety and quality control are our highest priority. Our companies take every possible measure to ensure the safety and quality of the products sold. This is done with constant in-house monitoring systems and scientific quality tests. During the reporting period, none of our companies had incidents of non-compliance with regulations concerning the health and safety of products. As a result, none of our companies were issued a warning or fined because food safety issues were lacking.

The companies in our group have several certifications regarding food safety. One of them is the International Featured Standard (IFS).



The International Featured Standard (IFS) is a Global Food Safety Initiative (GFSI) benchmarked standard for manufacturers, wholesalers, distributors, agents and brokers. The standard serves verification and certification of systems to ensure the safeguarding of food safety and is based on the well-known quality management standard DIN EN ISO 9001:2008. In addition, the IFS includes HACCP (Hazard Analysis and Critical Control Point) and principles of good processing practice, including cleaning, disinfection, pest control, machine care and maintenance, and course of instruction.

All our frozen-at-sea factories use a HACCP quality system and are audited and inspected by Food and Veterinary Authorities in each country, in many instances without prior notice.

Food safety and traceability are intertwined with accurate labelling. The traceability of seafood products would not exist without precise labelling. In cooperation with our clients, we can provide full traceability of our products from catch to consumer. Detailed information is recorded on our vessels, such as fishing gear, fishing area, catch volume, bycatch, etc. By reading the label of the finished goods, we can provide full traceability to the origin. All of our onshore production facilities are IFS-certified.

During the reporting period, none of our companies identified incidents of non-compliance with regulations or voluntary codes concerning product information and labelling that were not corrected during the production process or in quality control.



Climate adaption and resilience

Companies in the group face risks due to climate change that have the potential to generate substantive changes in operations and revenue. Because the companies in the group use marine resources to create value, if there are changes to the marine environment due to climate change, which will lead to a change in scientific advice for sustainable fishing, this will reduce the companies' potential for value creation in their core business.

The possible impacts of climate change on fisheries are categorised as physical and biological changes. Physical changes include water surface temperature rise, sea level rise, increasing water salinity and ocean acidification. Biological changes involve changes in fish stock and changes in primary production. The timeframe for possible impacts is unknown. The potential impacts could occur in the distant future or be averted altogether.

Because of the nature of these challenges, companies within the group, and their management, closely follow the latest scientific advice regarding these issues. If biological changes in fish stock do materialise, for example, because of physical changes in the oceans that are a direct result of climate change, this will almost certainly change the Total Allowable Catch (TAC) advice for different species resulting in reduced revenue for the companies in the group.

Since physical changes in the oceans due to global warming are global challenges, there is a limit to what individual companies can do to mitigate risks due to climate change. The companies in the group are constantly measuring risks associated with external factors that can impact operations, and climate change is one of them. The companies have emphasised investing in more fuel-efficient vessels, which in the long term should contribute to lower carbon emissions.

All fishing in the North Atlantic is based on advice from ICES and other organisations that provide science-based advice. ICES provides scientific advice on the marine ecosystem to governments and international regulatory bodies that manage the North Atlantic Ocean and adjacent seas. Alda trusts the scientific advice provided by ICES and expects the relevant governmental bodies to make decisions on TAC based on the best advice available.

Many companies in the group have set up internal control and monitoring systems that measure profitability, equity ratio, and liquidity. Risk management is part of the planning, control, and reporting process for the companies in the group. At Deutsche Fischfang-Union GmbH & Co. K.G. (DFFU), one of our subsidiaries, an in-house risk management system ensures that the company's management recognises significant risks at an early stage and can initiate countermeasures. This involves calculating the financial implications or costs of reduced TAC regardless of cause, be it due to environmental factors, like physical or biological changes in the oceans or other reasons.

The groundfish companies in the group, like DFFU, depend on sufficient fish stocks in the fishing areas assigned to them. To counter the risk of low-yield or fruitless fishing trips, the development of biomass is under constant observation. The fishing operations of these companies, and in particular, compliance with the allocated quotas, are under the ongoing control of the responsible authorities via a dedicated reporting system. Through ongoing modernisation measures and adjustments to the vessels' fishing gear, the companies adapt to the different conditions in the fishing areas.

Compliance

Alda is committed to acting professionally and with fairness and integrity in all our business dealings and relationships. Alda strives to conduct its business honestly and ethically, based on the duty to respect human rights, protect health and safety, work in harmony with the environment, and promote the sustainable utilisation of fish stocks and good management of natural resources.

Alda has implemented a compliance system to mitigate operational risk and prevent its employees and the employees of subsidiaries from violating laws and regulations. The compliance program consists of written policies and procedures that our employees, representatives, and business partners are asked to adhere to.

Alda's managing director and Alda's Compliance Officer are responsible for ensuring these policies and procedures are effectively implemented. Furthermore, they are also responsible for ensuring that the policies and procedures reflect Alda's legal and ethical obligations.

Alda's Compliance Officer monitors compliance with the policies and procedures. The Compliance Officer is also responsible for responding to inquiries about the policies and procedures and ensuring that those subject to them receive adequate education and training. Managers at Alda's companies are responsible for ensuring that the relevant employees understand and comply with the applicable policies and procedures.

Alda's Code of Conduct

Alda's ability to create value depends on promoting and maintaining high ethical standards to create a trust-based relationship with our employees, owners, customers, business partners, communities, and other stakeholders.

Alda adopted a Code of Conduct to describe the ethical commitments and requirements related to the business of Alda. It sets our expectations for ourselves and our people concerning personal conduct and business practice and applies to all subsidiaries in which Alda holds a controlling stake. The Code applies to the Supervisory Board of Alda, its directors, management, and employees, including temporary personnel, as well as others who represent or act on behalf of Alda.

The Code includes our most essential ethical values and constitutes the primary governing document of our compliance system. The Code has specific sections on health, safety, employee security, personal data protection, social responsibility, and the environment and a chapter for non-compliance and reporting concerns.

The Code will be promptly and consistently enforced. If suspicion of non-compliance occurs, Alda may conduct an investigation to clarify the facts, both to handle the incident adequately and to prevent similar non-compliance from occurring in the future.

Alda's Business Partner Code of Conduct

Alda's business partners are expected to adhere to the same or similar standards as Alda. To clarify Alda's position, the company has implemented a Business Partner Code of Conduct ("Business Partner Code") to outline the minimum standard of conduct we expect our Business Partners to adhere to. In addition to this Business Partner Code, Alda expects all Business Partners to comply with applicable national and international laws and standards.

Business Partners representing, or acting on behalf of, Alda Holding (representatives) are expected to abide by Alda's Code of Conduct.

Alda's Sanctions and Trade Controls Procedures

Alda trades with, and relies on, various types of business partners located all around the world (including but not limited to manufacturers, agents, suppliers, traders, consultants, joint venture parties, customers, contractors, shippers, and other intermediaries (Business Partners)). National governments and intergovernmental organisations can impose various sanctions targeting business dealings with specific countries, sectors, entities, or individuals. Further, various laws and regulations apply to the import and export of certain goods or technology to/from a country or territory. Alda is committed to comply with all applicable laws and regulations that govern our international trade and operations, including relevant international sanctions and restrictive measures ("Sanctions") and import and export control regulations ("Trade Controls").

Alda has adopted a Sanctions and Trade Controls Procedure to provide guidance on the main principles relevant to Alda's business operations and to set out the responsibilities and processes for assessing potential Trade Controls or Sanctions risks related to any transaction, activity, or Business Partner relationship.

The procedure states that Alda strives to comply with EU, UK, and US Sanctions and Trade Controls, as well as any locally applicable sanctions and trade controls. It further states that Alda will assess whether government authorisation is required before engaging in activities involving restricted items, sanctioned parties, or countries and strive to obtain and comply with all required authorisations. The procedure states that Alda aims to avoid all transactions with companies or individuals that are blacklisted or under embargo, and not engage in any business comprising deliveries that are restricted or sanctioned.

Procedures for the Prevention of Corruption, Bribery, and Money Laundering

Alda Seafood Holding B.V. has zero tolerance for corruption, bribery, and money laundering. We are determined to operate professionally and fairly, emphasising our integrity in business and relationships.

To underline our commitment to fighting corruption, we have implemented “Procedures for the prevention of Corruption, Bribery and Money Laundering.” The procedures set out requirements and responsibilities relating to measures to address corruption, bribery, and money laundering, within Alda. The Procedures are anchored in Alda’s Code of Conduct and reflect the most relevant corruption and bribery risks in Alda’s operations.

The procedures outline that we want our operations to be conducted honestly and ethically in accordance with applicable laws and regulations. Alda expects the same from everyone providing services or representing Alda. All communication between Alda employees and customers, vendors, and business partners should be professional and in accordance with the highest ethical standards.

The procedures apply to employees, board members, contractors, temporary employees, trainees, agents and others representing Alda.

Employment practices

Alda has applied a personnel policy, “Alda’s Personnel Policy,” which applies to Alda and its subsidiaries. The policy is a guideline that the managing director of Alda and the managing directors of Alda’s subsidiaries are expected to know and adhere to wherever possible.

The policy outlines Alda’s goals concerning employees. Alda strives to hire qualified employees and offer them a safe and positive working environment. Great emphasis is placed on welcoming new employees and providing them with appropriate introduction and training before their work commences, as well as promoting and encouraging continuous training and re-education among employees.

The policy includes chapters on the support and welfare of newcomers, safety manuals, work performed by youth workers, continuous training and education, and end of employment.

Occupational health and safety

Alda believes that providing a safe and healthy working environment for its employees is essential. Therefore, we aim to do everything to prevent accidents and occupational illnesses in compliance with all applicable standards. We also expect our business partners to adhere to the same principles.

At a minimum, we require our business partners to ensure that their premises and operations follow prescribed safety requirements. We also expect that all employees have an opportunity to raise and react to any concerns that may represent a potential threat or a risk to health and safety.

The companies in our group have implemented occupational health and safety management systems for their workers according to applicable local laws and regulations. In addition, our companies are expected to monitor occupational health and safety developments and update equipment and work facilities according to the latest applicable standard.

All of our workers are required to complete occupational health and safety training relevant to their duties. This involves generic training and training on specific work-related hazards, hazardous activities or situations. The training needs are assessed on an individual basis. Training is always provided in a language understood by the relevant employees. The effectiveness of the provided training is monitored, and the relevant managers are responsible for training their subordinates.

We emphasise that the training is provided free of charge and during working hours. If training is provided outside of paid working hours, we emphasise that the workers travel costs and living expenses related to the training are covered by the employer.

**“Alda values and respects
the diversity, culture,
customs, and values of our
employees and the people
in the communities in which
we operate.”**

Human Rights

Respect for employees and human rights and compliance with applicable laws and regulations is important. Accordingly, we respect international conventions on the protection of human rights where we operate.

Alda has adopted a specific policy, “Alda’s Human Rights Policy,” where we outline our principles, rules, and guidelines regarding human rights. At the heart of Alda’s human rights policy is equality which aims for all to be equal before the law and enjoy human rights regardless of gender, sexual orientation, religion, beliefs, ethnic origin, race, descent, colour or economic status.

The policy is a guideline for management and consists of six pillars. The managing directors are expected to ensure that the operations of the relevant subsidiary align with the values described in the guideline.

Prohibition of forced labour and slavery

Alda rejects all forms of forced labour, including debt slavery, slave labour, child slavery, and all manifestations of human trafficking. No one should be forced into work or slavery.

In addition to what is outlined in our Human Rights Policy, we recognise the widespread concern regarding forced labour and child labour and have integrated this as a zero-tolerance issue in our business operations. That means it is also a zero-tolerance issue in our supply chain. As a result, none of our operations and suppliers are considered to have a significant risk for incidents of child labour or forced labour. By applying the above-mentioned zero-tolerance policy, we believe the group contributes to the abolition of child labour and forced labour.



Respect for diversity

A second pillar of the policy is respect for diversity. Alda values and respects the diversity, culture, customs, and values of our employees and the people in the communities in which we operate. Everyone has the right to be treated with respect and for each individual's contribution to be valued independently of, e.g., race, ethnicity, origin, disability, age, gender, or sexual orientation.

A safe and healthy workplace

Alda endeavours to provide its employees with a safe and healthy workplace and emphasises that the environment and safety in the work environment meet modern requirements and are in accordance with current laws and regulations. Alda strives to offer a safe and secure workplace that is inclusive and free from harassment, bullying, and violence.

Integration of work and private life

Alda strives to create conditions for its employees to reconcile work and private life demands as much as possible.

Working hours and wages

Alda emphasises the importance of equality in the workplace, policymaking, and all decision-making. Alda respects current laws and agreements on wages, working hours, overtime, maximum working and rest hours and other statutory rights.

Freedom of association

Alda supports employees' individual and social rights to establish or join an organisation or exercise the right to remain outside an organisation to the extent legally allowed.

Non-discrimination and equal opportunity

To promote equality in the workplace, Alda has implemented “Alda’s Equal Plan,” which outlines Alda’s principles, rules, and guidelines on equality. The plan is a guideline that Alda and all its subsidiaries strive to adhere to.

Alda strives to maintain equality between employees and assess them on merit. Alda believes this will promote loyalty, a good work ethic and a positive attitude for both the employees and Alda.

An equality plan aims to ensure gender equality and that everyone has an equal opportunity to use their talents and energy at work, regardless of gender. Managers and employees must understand the importance of equality in day-to-day operations, policymaking, and all decision-making. Alda’s Equal Plan applies to Alda’s group of companies and aims to make the companies a desirable workplace where equality and non-discrimination prevail.

Where applicable, Alda undertakes to comply with the relevant legal requirements and other requirements regarding the principle that women and men shall be paid equal pay for the same or equivalent work. When determining wages, care must be taken not to discriminate based on gender.

Actions against harassment and violence

To promote a healthy workplace and prevent harassment Alda has adopted a specific policy outlining its principles, rules, and guidelines. This is Alda’s “Policy and Contingency Plan against Bullying, Sexual and Gender-based Harassment and Violence.”

As outlined in the document, Alda emphasises a positive work environment based on trust, confidentiality, equality, and openness between all employees. It states that employees should cultivate courtesy and decorum and show each other respect as well as a positive attitude. It further states that everyone in the workplace needs to do their part to prevent negative behaviour and promote good communication, job satisfaction, and a safe environment. Employees are asked to report any harmful and inappropriate communication in the workplace so the relevant issues can be addressed.

The Policy and Contingency Plan states that bullying, sexual harassment, gender-based harassment, and violence are prohibited. The Policy and Contingency Plan outlines a specific formal procedure if employees experience or are aware of such conduct.

The objective of the Policy and Contingency Plan is to prevent harassment in the workplace and to ensure that remedies are available if a party has been the victim of such behaviour.

Procedure for Reporting Concerns

Alda encourages all its employees to report their concerns if they become aware of, or suspect, misconduct related to its business operations that should be prevented or corrected.

For this purpose Alda has implemented a specific system for reporting these concerns, which includes an electronic whistleblower channel. The system offers the possibility to alert Alda to actual or suspected misconduct in confidence. This is an important tool for reducing risk and maintaining trust in our operations, enabling us to detect and act on possible misconduct at an early stage. Reporting through the whistleblower channel can be done openly or anonymously.

Our Communities

Alda strives to avoid negative impacts on local communities and Alda's subsidiaries are strongly encouraged to support the communities where they operate. This can be done through direct financial sponsorship, training, community programs, or by providing resources such as land or real estate. Our goal is that such support both serves a practical purpose and produces results. Therefore, we aim only to support projects that deliver measurable results.

Alda is currently developing a policy for supporting local communities, which will apply to all companies in our group. This will be outlined in our Sustainability Report for 2023 for the reporting period 1 January 2022, to 31 December 2022. Our aim is to consider the differentiated nature of local communities and take specific action to identify and engage vulnerable groups.

The proportion of spending on local suppliers

Alda emphasises supporting the communities around our operations. This means using local service providers and suppliers wherever possible. While preparing this report we gathered information from all subsidiaries about the proportion of spending on local suppliers.

Poland

Our subsidiary Atlantex, headquartered in Warsaw, Poland, defines three locations as local. Poland, where the company is registered and the two countries where the vessel Annelies Ilena operates, the Netherlands and Chile. The vessel's main port is IJmuiden in the Netherlands, and the ship discharges in Iquique and San Vicente, Chile. During 2021 Atlantex spent 1% of its procurement budget in Chile, 68% in the Netherlands and 2% in Poland. This means a total of 71% of the budget was spent in areas this subsidiary defines as local.

Arctic Navigations in Poland defines three countries as local. Poland, where the company is registered, the Netherlands and Germany. The vessel Polonus has its main port in Cuxhaven, Germany. The city IJmuiden, Netherlands, is the main port of the vessel Alina. During 2021 Arctic Navigations spent 24% of its procurement budget on suppliers in Germany, 20% in the Netherlands and 9% in Poland. This means 53% of the budget was spent in locations this subsidiary defines as local.

Latvia

Batterfisa SIA (Latvian Fishing Company) spent 100% of its procurement budget on local suppliers during the reporting period. This company defines countries in the EU as "local".

Denmark

During 2021, Hesselholt in Denmark spent 100% of its procurement budget on local suppliers.

France

Groupe Compagnie des Pêches Saint-Malo spent 73% of its procurement budget in 2021 in France and 27% outside France. Around 34% was spent locally in the Bretagne region.

In 2021, Euronor spent 48% of its EUR 10 million maintenance budget in France, where 19% of the total budget was in the Boulogne area where the company is located. Euronor only uses non-local service providers and suppliers when there is no offer locally. For example, the recent conversion of technology onboard the trawlers Fisher Bank and Otter Bank was completed in Iceland because of the technical knowledge and ability of the service provider. For the main office, the company works with suppliers around the Boulogne area. For the fishing vessels, the company mainly works with suppliers around the harbours where the vessels are operating from. These harbours are currently Klaksvik in the Faroe Islands and Hanstholm in Denmark.

Germany

DFFU, located in Cuxhaven, spent 54,6% of their procurement budget in 2021 on local suppliers. The company defines local as suppliers in the Elbe-Weser region (North Lower Saxonie), including Bremen and Hamburg.

A total of 60% of what Icefresh GmbH, based in Frankfurt, spent on services in 2021 was spent on Germany-based suppliers. A total of 80% of machinery was bought in Germany and 2% of raw materials.

Canada

For their operations within St. John's, Bay Roberts, and the surrounding area, our subsidiaries in Canada, Fame Fisheries and NRL, spent 88% of their procurement budget on local suppliers. This means suppliers within the province of Newfoundland and Labrador.

UK Fisheries

In 2021 50% of UK Fisheries expenditure was spent on local services. The company defines local as UK based. For Seagold, the percentage was 11,8% of total costs, but Seagold defines local as a supplier based within the same county.

Infrastructure investments

Poland

In October 2021, Arctic Navigations invested EUR 14.875.000 in a new vessel. The ship will positively impact the community and local economies because it allows Arctic Navigations to create new employment opportunities and deliver the highest quality fish products.

France

Since 2018, our subsidiary in France, Groupe Compagnie des Pêches Saint-Malo, has invested EUR 3,5 million in new equipment and industrial fixtures. The company built a surimi factory in 1991, which employs 170 people. Groupe Compagnie des Pêches Saint-Malo has mainly worked with Bretagne's local suppliers to update the factory.

Groupe Compagnie des Pêches Saint Malo is currently transforming its headquarters in Saint-Malo. The transformation of the buildings will cost EUR 1.5 million. The architect who designed the new office is based in Saint-Malo, and the project manager is 60 km from Saint-Malo. The company is currently operating two vessels from Saint-Malo. The Emeraude vessel is managed through a joint venture with another Alda subsidiary, Euronor. The ship was built in Norway and launched in 2018. The two partners' total investment in the vessel amounts to EUR 43 million.

In October 2021, Euronor invested in two fresh fish trawlers to replace two older freezer trawlers. The total investment amounted to EUR 14 million with renovations and new equipment. The upgrades, changes, and instalments of new equipment were done by Slippurinn in Akureyri, Iceland. The modifications

included the instalment of modern and automated factory decks. This enables the crew to land the catch closer to the fishing grounds and transport the fish to the nearest market. The vessel is, therefore, capable of saving energy by reducing oil consumption and increasing the days of production during each trip.

UK

UK Fisheries invested in a new vessel, the Kirkella, in 2018. This was a commercial investment. The ship was a new build, and the investment amounted to GBP 37.34 million. The vessel lands and discharges its catch in Hull. The stock is transported using local hauliers to cold stores located in Grimsby. In 2021 97% of the Kirkella sales were made to UK companies which, ultimately, supplied the fish to fish and chip stores in the UK.



GRI content index

Alda Seafood Holding B.V. has reported the information cited in this GRI content index for the period from 1 January 2021 to 31 December 2021 with reference to the GRI Standards.

GRI 102: General Disclosures

Disclosure	Disclosure title	Reported	Section in report	Reported on page	Additional reference
102-1	Name of the organization	Yes		3	
102-2	Activities, brands, products and services	Yes	About Alda Seafood	10	
102-3	Location of headquarters	Yes		3	
102-4	Location of operations	Yes	Our investments	17	
102-5	Ownership and legal form	Yes		15	
102-6	Markets served	Yes	About Alda Seafood		
102-7	Scale of the organization	Yes	The scale of the organization	20	
102-8	Information on employees and other workers	Yes	Our employees	26-29	
102-9	Supply chain	Yes	About Alda Seafood	10	
102-10	Significant changes to the organization and its supply chain	Yes	The scale of the organization	20	
102-11	Precautionary Principle or approach	No	Environmental policy		
102-12	External initiatives	No			
102-13	Membership of associations	Yes	Membership of associations	36	

102-14	Statement from senior decision-maker	Yes	A letter from the Chairman	6
102-15	Key impacts, risks and opportunities	No		
102-16	Values, principles, standards and norms of behavior	Yes	Compliance, Alda's Code of Conduct	45
102-17	Mechanisms for advice and concerns about ethics	Yes	Compliance, Alda's Code of Conduct	45
102-18	Governance structure	Yes	Organisational chart	11
102-19	Delegating authority	Yes	Organisational chart	11
102-21	Consulting stakeholders on economic, environmental, and social topics	No		
102-22	Composition of the highest governance body and its committees	Yes	Organisational chart	11
102-23	Chair of the highest governance body	Yes	A letter from the Chairman, Organisational chart	6, 11
102-24	Nominating and selecting the highest governance body	Yes	Organisational chart	6
102-25	Conflicts of interest	No		
102-26	Role of highest governance body in setting purpose, values, and strategy	Yes	Organisational chart	11
102-27	Collective knowledge of highest governance body	No		
102-28	Evaluating the highest governance body's performance	No		
102-29	Identifying and managing economic, environmental, and social impacts	Yes	Organisational chart	11
102-30				
102-31	Effectiveness of risk management processes	No		
102-32	Review of economic, environmental, and social topics	No		
102-33	Highest governance body's role in sustainability reporting	Yes	A letter from the Chairman	6
102-34	Communicating critical concerns	No		
102-35	Nature and total number of critical concerns	No		
102-36	Remuneration policies	No		
102-37	Process for determining remuneration	No		

102-38	Annual total compensation ratio	No			
102-39	Percentage increase in annual total compensation ratio	No			
102-40	List of stakeholder groups	No			
102-41	Collective bargaining agreements	No			
102-42	Identifying and selecting stakeholders	No			
102-43	Approach to stakeholder engagement	No			
102-44	Key topics and concerns raised	No			
102-45	Entities included in the consolidated financial statements	Yes	Entities included in the consolidated financial statements	22	
102-46	Defining report content and topic Boundaries	Yes	A letter from the Chairman	6	
102-47	List of material topics	Yes	A letter from the Chairman	6	
102-48	Restatements of information	Yes	A letter from the Chairman	6	
102-49	Changes in reporting	Yes	A letter from the Chairman	6	
102-50	Reporting period	Yes	A letter from the Chairman		January 1st 2021 - December 31st 2021
102-51	Date of most recent report	Yes	A letter from the Chairman	6	Never before published
102-52	Reporting cycle	Yes	A letter from the Chairman	6	Annual
102-53	Contact point for questions regarding the report	Yes			Alda's Sustainability Officer Email: sustainability@aldaholding.com Mailing address: Leidsestraatweg 2 2341 GR Oegstgeest Netherlands
102-54	Claims of reporting in accordance with the GRI Standards	Yes	A letter from the Chairman	6	
102-55	GRI content index	Yes	GRI content index	58	
102-56	External assurance	Yes	A letter from the Chairman	6	The sustainability report was reviewed by Alda's s Spervisory Board but not by an external party.

GRI 103: Management approach

103-1	Explanation of the material topic and its Boundary	No		
103-2	The management approach and its components	No		
103-3	Evaluation of the management approach	No		

GRI 201: Economic Performance

201-1	Direct economic value generated and distributed	Yes	The scale of the organisation	20-21
201-2	Financial implications and other risks and opportunities due to climate change	Yes	Climate adaption and resilience	44
201-3	Defined benefit plan obligations and other retirement plans	No		
201-4	Financial assistance received from government	No		

GRI 202: Market Presence

202-2	Proportion of senior management hired from the local community	No		
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GRI 203: Indirect Economic Impacts

203-1	Infrastructure investments and services supported	Yes	Infrastructure investments	56
203-2	Significant indirect economic impacts	No		

GRI 204: Procurement Practices

204-1	Proportion of spending on local suppliers	Yes	The proportion of spending on local suppliers	54
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GRI 205: Anti-corruption

205-1	Operations assessed for risks related to corruption	No		
205-2	Communication and training about anti-corruption policies and procedures	Yes	Compliance	47
205-3	Confirmed incidents of corruption and actions taken	No		

GRI 206: Anti-competitive Behavior

206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	No		
207-1	Approach to tax	No		
207-2	Tax governance, control, and risk management	No		
207-3	Stakeholder engagement and management of concerns related to tax	No		
207-4	Country-by-country reporting	No		

GRI 301: Materials

301-1	Materials used by weight or volume	No
301-2	Recycled input materials used	No
301-3	Reclaimed products and their packaging material	No

GRI 302: Energy

302-1	Energy consumption within the organisation	Yes	Energy usage within the group in 2021	40
302-2	Energy consumption outside of the organisation	No		
302-3	Energy intensity	No		
302-4	Reduction of energy consumption	No		
302-5	Reduction in energy requirements of products and services	No		

GRI 303: Water and Effluents

303-1	Interactions with water as a shared resource	No
303-2	Management of water discharge-related impacts	No
303-3	Water withdrawal	No
303-4	Water discharge	No
303-5	Water consumption	No

GRI 304: Biodiversity

304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	No
304-2	Significant impacts of activities, products and services on biodiversity	No
304-3	Habitats protected or restored	No
304-4	IUCN Red List species and national conservation list species with habitats in areas affected by operations	No
303-5	Water consumption	No

GRI 305: Emissions

305-1	Direct (Scope 1) GHG emissions	No
305-2	Energy indirect (Scope 2) GHG emissions	No
305-3	Other indirect (Scope 3) GHG emissions	No
305-4	GHG emissions intensity	No
305-5	Reduction of GHG emissions	No
305-6	Emissions of ozone-depleting substances (ODS)	No
305-7	Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	No

GRI 306: Effluents and Waste

306-1	Water discharge by quality and destination	No
306-2	Waste by type and disposal method	No
306-3	Significant spills	No
306-4	Transport of hazardous waste	No
306-5	Water bodies affected by water discharges and/or runoff	No

GRI 308: Supplier Environmental Assessment

308-1	New suppliers that were screened using environmental criteria	No
308-2	Negative environmental impacts in the supply chain and actions taken	No

GRI 401: Employment

401-1	New employee hires and employee turnover	No
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	No
401-3	Parental leave	No

GRI 403: Occupational Health and Safety

403-1	Occupational health and safety management system	Yes	Occupational health and safety	48
403-2	Hazard identification, risk assessment, and incident investigation	No		
403-3	Occupational health services	No		
403-4	Worker participation, consultation, and communication on occupational health and safety	No		
403-5	Worker training on occupational health and safety	Yes	Occupational health and safety	48
403-6	Promotion of worker health	No		
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	No		
403-8	Workers covered by an occupational health and safety management system	No		
403-9	Work-related injuries	No		
403-10	Work-related ill health	No		

GRI 404: Training and Education

404-1	Average hours of training per year	No		
404-2	Programs for upgrading employee skills and transition assistance programs	No		
404-3	Percentage of employees receiving regular performance and career development reviews	No		

GRI 405: Diversity and Equal Opportunity

405-1	Diversity of governance bodies and employees	No
405-2	Ratio of basic salary and remuneration of women to men	No

GRI 406: Non-discrimination

406-1	Incidents of discrimination and corrective actions taken	No
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GRI 407: Freedom of Association and Collective Bargaining

407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	No
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GRI 408: Child Labor

408-1	Operations and suppliers at significant risk for incidents of child labor	Yes	Human Rights	50
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GRI 409: Forced or Compulsory Labor

409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labour	Yes	Human Rights	50
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GR 410: Security Practices

410-1	Security personnel trained in human rights policies or procedures	No
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GRI 411: Rights of Indigenous Peoples

411-1	Incidents of violations involving rights of indigenous peoples	No
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GRI 413: Local Communities

413-1	Operations with local community engagement, impact assessments, and development programs	Yes	Our Communities	53
413-2	Operations with significant actual and potential negative impacts on local communities	No		

GRI 414: Supplier Social Assessment

414-1	New suppliers that were screened using social criteria	No
414-2	Negative social impacts in the supply chain and actions taken	No

GRI 415: Public Policy

415-1	Political contributions	No
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GRI 416: Customer Health and Safety

416-1	Assessment of the health and safety impacts of product and service categories	Yes	Food Safety	42
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	Yes	Food Safety	42

GRI 417: Marketing and Labeling

417-1	Requirements for product and service information and labelling	No		
417-2	Incidents of non-compliance concerning product and service information and labelling	Yes	Food Safety	42
417-3	Incidents of non-compliance concerning marketing communications	Yes	About Alda Seafood Holding B.V.	11

GRI 418: Customer Privacy

418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	No		
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**For more information about this report,
feel free to contact us at sustainability@aldaholding.com**

