



# Alda Seafood Holding B.V.

Sustainability Report 2023



**Alda Seafood Holding B.V.**

Leidsestraatweg 2  
2341 GR Oegstgeest  
Netherlands

[info@aldaholding.com](mailto:info@aldaholding.com)

[sustainability@aldaholding.com](mailto:sustainability@aldaholding.com)

[www.aldaholding.com](http://www.aldaholding.com)

# Table of contents

A letter from the Chairman	<b>6</b>	Fuel usage	<b>27</b>
About this report	<b>7</b>	Carbon footprint by scope	<b>28</b>
Our sustainability strategy	<b>9</b>	Waste	<b>30</b>
About the company	<b>12</b>	Plastics	<b>31</b>
Scale of the organisation	<b>12</b>	Other packaging	<b>32</b>
Our organisation	<b>13</b>	Water	<b>33</b>
Alda organisational chart	<b>15</b>	Food safety	<b>34</b>
Environmentally responsible operations	<b>20</b>	About our sustainability governance	<b>35</b>
Sustainable fisheries	<b>20</b>	Sustainable Development Goals	<b>36</b>
Certified catches	<b>22</b>	Our employees	<b>37</b>
Environmental footprint	<b>23</b>	Number of employees by age group and gender	<b>38</b>
Use of electricity	<b>23</b>	Number of paid work hours	<b>39</b>
Gas	<b>26</b>	Absenteeism	<b>40</b>

Work-related injuries	<b>43</b>	Alda's Procedure for Reporting Concerns	<b>48</b>
Compliance and corporate governance	<b>44</b>	Our Compliance Officer	<b>49</b>
Alda's Code of Conduct	<b>45</b>	General summary regarding compliance	<b>49</b>
Alda's Business Partner Code of Conduct	<b>45</b>	Our Communities	<b>50</b>
Alda's Procedures for the Prevention of Corruption,		Procurement from local suppliers	<b>52</b>
Bribery and Money Laundering	<b>46</b>	Donations	<b>52</b>
Alda's Procedures for Sanctions and Trade Controls	<b>46</b>	Memberships of associations	<b>53</b>
Alda's Personnel Policy	<b>46</b>	GRI Content Index	<b>54</b>
Occupational health and safety	<b>47</b>		
Human Rights	<b>48</b>		
Alda's Equal Plan	<b>48</b>		

# A letter from the Chairman

Alda Seafood Holding B.V., a vertically integrated company in the global seafood industry, was established in the Netherlands in 2019. The company now publishes a Sustainability Report for the second time, where we disclose information about the non-financial impacts of the companies in our group. The report, which covers the reporting period from 1 January 2022 to 31 December 2022, was prepared with reference to the Global Reporting Initiative (GRI) standards.

Since Alda Seafood was established, it has been our goal to provide detailed information about our operations in a transparent manner. Part of that policy is the publication of this Sustainability Report. Other projects are a new website for Alda Seafood, launched in the summer of 2023, and an active presence on social media.

While preparing this report, we used, for the first time, a sustainability reporting software which allowed the digital collection of all data. This tool is aligned with the GRI standards, which means the data we ask our companies to report is directly based on requirements from the standards. The tool allows us to track our environmental and social Key Performance Indicators (KPIs). These are environmental KPIs, such as fuel usage, energy consumption, energy intensity and

efficiency, water usage and waste and social KPIs, such as employee diversity. The adoption of this organised process in data collection allows better tracking of our KPIs. It underlines our mission to continually strive to improve and disclose more information about the non-financial impacts of our companies. In this report, we publish detailed information about our carbon footprint for the first time by scopes 1, 2, and 3, which show our direct and indirect emissions.

Our sustainability journey has just recently begun, and this is still a learning process for our companies and their management. I sincerely hope this report is a valuable source of information for our customers, business partners, government officials, and other stakeholders about Alda Seafood and the non-financial impacts of our companies.

Respectfully,



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



# About this report

The first Sustainability Report for Alda Seafood, which covered 2021, was prepared with reference to the Global Reporting Initiative (GRI) standards and published in April 2023. This report, which covers the reporting period from 1 January 2022 to 31 December 2022, was also prepared with reference to the GRI standards. The reporting cycle is annual. The reference table for the GRI standards is accessible at the end of the report.

The primary objective of this report is to provide accurate information about the non-financial impacts of the companies in Alda Seafood's group and to disclose our objectives and progress with regard to environmental, social and governance matters. The process for defining the report content and topics involved weighing and evaluating the impacts of our companies. The first step was understanding the organisation's context, identifying actual and potential impacts, and then assessing the significance of these impacts. When Alda Seafood decided on material topics and the content of this report, the company considered the reasonable expectations and interests of its stakeholders, such as customers, employees, business partners and government officials. As outlined in the next chapter of this report, we have organised our sustainability efforts around four principles: environmentally responsible operations, ethical and compliant business, employee safety and well-being and community engagement.

No information in this report is a restatement of information given in previous reports, except general information about the company and its operations. This includes information under chapters outlining our organisational chart, compliance, and corporate governance. The reason for such restatements is that this information has not changed since the first sustainability report was published.

In recent years, there has been an increasing demand for corporate sustainability information, particularly from the investment community. This heightened demand stems from the evolving risks businesses face and a heightened investor consciousness regarding the financial consequences associated with these risks. The EU adopted the Corporate Sustainability Reporting Directive (CSRD) with the aim of advancing sustainable finance and enhancing transparency and comparability of sustainability information disclosed by companies.

The directive, adopted in November 2022 and came into force at the beginning of 2023, requires companies within its scope to disclose information on how they operate and manage social and environmental challenges. This makes evaluating these companies' non-financial performance easier and encourages them to develop a responsible approach to business. The CSRD mandates the use of European Sustainability Reporting Standards (ESRS), which have not yet been finalised and adopted, but several drafts have been published. Based on the drafts, it is safe to state that companies that are preparing their reports according to, or with reference to, the GRI standards will be well-equipped to meet the requirements of the ESRS.

This report covers all active companies in our group except Nergård in Norway, where Alda Seafood owns 39,9% of the shares. Alda Seafood's executive management was directly involved in making the report, and two members of our Supervisory Board reviewed it. An independent, external party did not review the report.

If you have any questions regarding this report, please contact us at [sustainability@aldaholding.com](mailto:sustainability@aldaholding.com)



Cuxhaven NC 100

# Our sustainability strategy



In 2022, when we were preparing our first-ever Sustainability Report, we started developing our sustainability strategy. The companies in our group are focused on fisheries, processing, and the sales and marketing of seafood products. Some of them are vertically integrated and operate in all the above. Based on the focus of the companies in our group, we have recognised five principles that together form the pillars of our sustainability strategy. Each principle is equally important and guides our decision-making process with regard to our current operations and new investments. These principles are:



## Environmentally responsible operations

We recognise that we can contribute to lower emissions by using the latest technologies onboard our vessels and in our land-based processing facilities. More fuel-efficient vessels mean less waste and less emissions in the long run. Alda emphasises that when ordering new vessels, the companies focus on energy efficiency and reducing the environmental impact in all design aspects.

We limit the negative impacts of our operations on the environment as outlined in our Environmental Policy. The environment and sustainable fisheries are material topics for Alda Seafood because our companies utilise natural resources and own and operate vessels dependent on fossil fuels. Sustainable fisheries are important for external stakeholders because it is the duty of companies in the seafood industry to ensure the continued utilisation of natural resources for future generations.

## Ethical and compliant business

It is important for the shareholders, employees, customers, business partners, and other stakeholders of Alda Seafood that the company and its subsidiaries operate an ethical and compliant business. This emphasis on compliance impacts all aspects of our organisation and is essential to our companies thriving in different countries and regions. Risk mitigation is, therefore, crucial for our group.

Alda has implemented a compliance system to mitigate operational risk and prevent its employees and the employees of subsidiaries from violating laws and regulations. This system consists of written policies and procedures that our employees, representatives, and business partners are asked to adhere to. The compliance program was implemented on a group-level basis in 2023.



## Worker safety and well-being

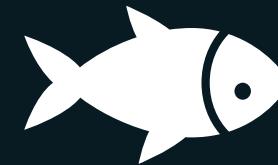
The safety and well-being of our employees are important for us and our external stakeholders because without healthy and happy employees, our ability to produce high-quality products for our customers would be impaired. This means that we want our employees to operate under the best possible conditions. We use the latest available technology, and when new workspaces are designed or new vessels are being built, we consider light and sound and how they will affect our people.

We have adopted policies to ensure the safety and well-being of our workers, which apply to all our companies. We emphasise the continuous training and re-education of our employees. Our Personnel 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.



## Community engagement

We believe that supporting the communities where we operate is not only a responsibility but also an opportunity to build sustainable and meaningful relationships. Therefore, we adopted Alda's Community Policy, which outlines our goals regarding community support. The policy contains provisions on direct financial sponsorship, training and community programs, and other forms of support in the form of land or real estate to contribute to community projects that align with our sustainability goals. The policy also includes a specific chapter on procurement from local suppliers, where we encourage our companies to prioritise their budget for local businesses to support their communities.



## Healthy nutrition

We recognise that by providing high-quality and nutritious seafood products, we are contributing to the supply of essential nutrients such as healthy proteins for the global market. We recognise our reputation is directly tied to the quality of our products, and we strive to continually provide the highest quality seafood products for the most demanding customers worldwide.



Kirkella (UK Fisheries)

# About the company

Alda Seafood Holding B.V. (Alda Seafood, Alda) has its foundations in the European operations of Icelandic seafood company Samherji, which has operated a successful fishery in Iceland and Europe for decades. Alda was founded in Holland in 2019, initially as the headquarters of Samherji in Europe. The Alda company headquarters are located in Oegstgeest in the Netherlands. Since 2022, the company has been managed by its principal owner, the second generation of one of the founders of Samherji.

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 endangered species 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 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.

The companies in our group do not sell any products directly to consumers. Most of the marketing communications of the companies in our group are directed towards wholesale buyers acquiring large volumes of our products.

## The scale of the organisation

Alda Seafood Holding B.V. has investments in several countries. In total, the companies in the group covered by the report employed 867 employees in fourteen separate operations in 2022.

Breaking down the total employee count featured in this report reveals that 78% of the workforce is male, while 22% are female. This information is outlined under a specific chapter on employees on page 38.

During the year 2022, the group sold products for EUR 285.3 million. This is a decrease from the year before, when sales amounted to EUR 327 million. When viewing these figures, asset sales and group restructuring activities that took place in 2022, need to be considered. Amounts in our last Sustainability Report, which covered the year 2021, were taken directly from the financial statements of Samherji Holding ehf., which was the owner of the companies in the group until late 2022.

The total assets of Alda Seafood stood at EUR 173 million at year-end 2022, and equity amounted to EUR 164.3 million. The group's equity ratio was 95% at year-end. These numbers are from the financial statements of Alda Seafood Holding B.V. for 2022.

# Our organisation

Alda Seafood is a vertically integrated seafood group. Ownership in companies ranges from 22,5% to 100%. This report covers all active companies in our group except Nergard in Norway, where Alda Seafood owns 39,9% of the shares.

## Fisheries

**Compagnie des Pêches Saint-Malo (CDPSM)**

Fisheries, vessel management, processing, sales

**Location** Saint-Malo, France**Focus** Long-distance water trawling, Surimi blocks, shrimps, whitefish fillets, Crabstick processing**Fishing grounds** Svalbard, Norwegian EZ north of 62 degrees, East and West Greenland, North Sea, North Atlantic**UK Fisheries**

Fisheries, vessel management

**Location** Hull, UK**Focus** Long-distance water trawling**Fishing grounds** North-Atlantic. Norway, Iceland, Faroes

## Marlinas

**Marlinas**

Fisheries, vessel management

**Location** Klaipėda, Lithuania**Focus** Shrimp**Fishing grounds** Northwest Atlantic Ocean and NEAFC waters**DFFU**

Fisheries, vessel management

**Location** Cuxhaven, Germany**Focus** Long-distance water trawling. Cod, Greenland halibut, redfish**Fishing grounds** Svalbard, East and West Greenland, Norwegian coast north of 62 degrees**Atlantex**

Fisheries, vessel management, sales

**Location** Warsaw, Poland**Focus** Pelagic species such as blue whiting, mackerel, herring, and jack mackerel**Fishing grounds** North-East Atlantic and the South Pacific**Arctic Navigations**

Fisheries, vessel management, sales

**Location** Warsaw, Poland**Focus** Pelagic species**Fishing grounds** North-East Atlantic and the South Pacific

**Batterfisa**

Fisheries, vessel management

**Location** Riga, Latvia

**Focus** High sea fisheries. Shrimp (Pandalus borealis) and cod as a bycatch

**Fishing grounds** Northwest Atlantic Ocean, Svalbard Economic Zone and NEAFC waters

**Newfound Resources Limited**

Fisheries, vessel management, processing, sales

**Location** St. John's, Newfoundland, Canada

**Focus** Shrimp

## Processing and cold store

**Icefresh GmbH**

Processing and sales

**Location** Groß-Gerau, Germany

**Focus** Sourcing and distributing fresh fish

**Północnoatlantycka Organizacja Producentów sp. z o.o. (PAOP)**

Cold storage company

**Location** Warsaw, Poland

**Focus** Storage and handling of frozen seafood

## Sales and marketing

**Seagold**

Processing, sales, and marketing

**Location** Hessle, UK

**Focus** Sales and marketing of frozen-at-sea fillets

**Icefresh GmbH**

Processing and sales

**Location** Groß-Gerau, Germany

**Focus** Sourcing and distributing fresh fish

## Alda 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.

A Supervisory Board was established in the company at the beginning of 2023. 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. Furthermore, the Supervisory Board adopted specific policies and procedures that form part of Alda Seafood's corporate governance structure. The Supervisory Board convenes as often as needed, usually six times annually.

The following members of the Supervisory Board were appointed on 1 February 2023:



**Helga Steinunn  
Gudmundsdóttir**



**Baldvin Thorsteinsson**



**Haraldur Grétarsson**



**Jan Louis Burggraaf**

Further information about the Supervisory Board and the CVs of the Supervisory Board members can be found on our website [www.aldaholding.com](http://www.aldaholding.com)

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

#### **I. 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.

#### **II. 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.

#### **III. Independence**

The shareholders and management of Alda believed the Supervisory Board needed to include an individual, preferably a Dutch citizen with an extensive corporate background, who had 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 sufficient autonomy of the board concerning its supervisory role towards the Managing Director 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.

#### **IV. 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 of Alda believe that the members of the Supervisory Board fulfil these requirements.

#### **Managing Director**

The Managing Director of Alda Seafood Holding B.V. is Steingrímur H. Pétursson. He 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, watching the liquidity position, overseeing risk management, and pursuing a financial policy.

#### **Our shareholders**

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



**Steingrímur H. Pétursson**  
Managing Director of Alda Seafood



Kirkella (UK Fisheries)

# Environmentally responsible operations

## Sustainable fisheries

As an investment company operating in the international seafood industry, we understand we can have a global impact. We are fully aware of our responsibilities regarding natural resource utilisation and that our decisions can impact future generations.

From day one, Alda's companies have emphasised sustainable fisheries and responsible utilisation of resources. As we outlined in our first Sustainability Report, which covered our operations in 2021, we have a clear objective regarding sustainable fisheries, which forms part of our Environmental Policy. The policy outlines that 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 responsible management of the ocean's resources. Furthermore, 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 for Alda Seafood, and to achieve its environmental goals, the company has various projects in progress at any given time. In 2022, no incidents of non-compliance with environmental laws or regulations were identified within Alda's group of companies.

Alda's Environmental Policy consists of four pillars.

Sustainability utilisation of fish stocks 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.

## Alda's Environmental Policy



### Sustainable utilisation of fish stocks

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.



### Energy efficiency

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 of our operations on the environment.



Snow crab pots that got stuck in the trawl of the Lodairo vessel in the Barents Sea. The pots were brought to land, and DFFU in Cuxhaven paid for the recycling.



## Waste disposal is the shared responsibility of the industry

For the past few years, several of our vessels have received snow crab pots in their trawls during fishing trips in the Barents Sea. These are crab pots that have been abandoned by Russian and Norwegian vessels. Our companies have sent these waste items to recycling facilities and paid the disposal fee.

Significant amounts of snow crab pots have been abandoned in the Barents Sea for the past few years. The Norwegian Directorate of Fisheries carries out an annual gear retrieval program, and about 1200 and 2400 abandoned snow crab pots were retrieved in the Barents Sea in 2019 and 2020, respectively.

Bringing large waste items to shore and their safe disposal is an inevitable by-product of fisheries. The responsible disposal of waste from the sea is the shared responsibility of all companies in the industry. Our vessels regularly pick up waste from the sea during fishing trips. We don't see it as a burden but as an opportunity to make the sea and its environment cleaner.

Jose Luis Otero Santos, the captain of the vessel Lodairo, was on duty when snow crab pots got stuck in the vessel's trawl in the Barents Sea recently.

"We have repeatedly received large waste items like these in our fishing gear. Both we, the crew, and the company, are aware of our responsibility at sea and in the fisheries industry in general. When this happens, we sort the waste items and bring them securely to land, where they are disposed of at recycling facilities. It is obviously in our best interests to keep the ocean clean to protect its continued resource utilisation for future generations. Cleaning up the ocean is an important part of our business," says Otero Santos.



Jose Luis  
Otero Santos



Cuxhaven NC (DFFU)

## Certified catches

In our pursuit of sustainability, we are progressively expanding the proportion of certified products. Currently, the only benchmark we use is a certification by the Marine Stewardship Council (MSC). An MSC certification is a way of showing that a fishery meets international best practices for sustainable fishing. In 2022, our companies caught 112.259 tonnes of fish, of which 61.138 tonnes were MSC certified or 54% of the total catches. Most of the certified catches are whitefish such as cod, hake, haddock, and saithe.

The main reason for the percentage of certified catches not being higher is the fact that there are no coastal fishing agreements in the North Atlantic for blue whiting, Atlantic mackerel and Atlanto-Scandian herring. A long-term management

strategy exists for blue whiting, agreed by the European Union, the Faroe Islands, Iceland, and Norway in 2016, but without a fishing agreement, the fishery will not be certified. In 2022, our companies caught 30.793 tonnes of blue whiting or 27% of the total volume of catches of Alda Seafood's group, excluding Nergård. With an MSC certification in place for blue whiting, the level of certification for the group would have been 81%.

Greenland halibut is mainly caught in East and West Greenland. Our Greenland halibut fishery in East Greenland is currently not certified, even though a certification for this fishery is available. Companies in our group have already applied for an MSC certification for the Greenland halibut fishery in East Greenland, and we hope this will be finalised in early 2024.

# Environmental footprint

This report covers our environmental footprint in a specific chapter where information about electricity, fuel usage, plastics usage, etc., is broken down. This Sustainability Report covers all companies in Alda Seafood's group except Nergård AS, where Alda Seafood owns 39.9 % of the shares.

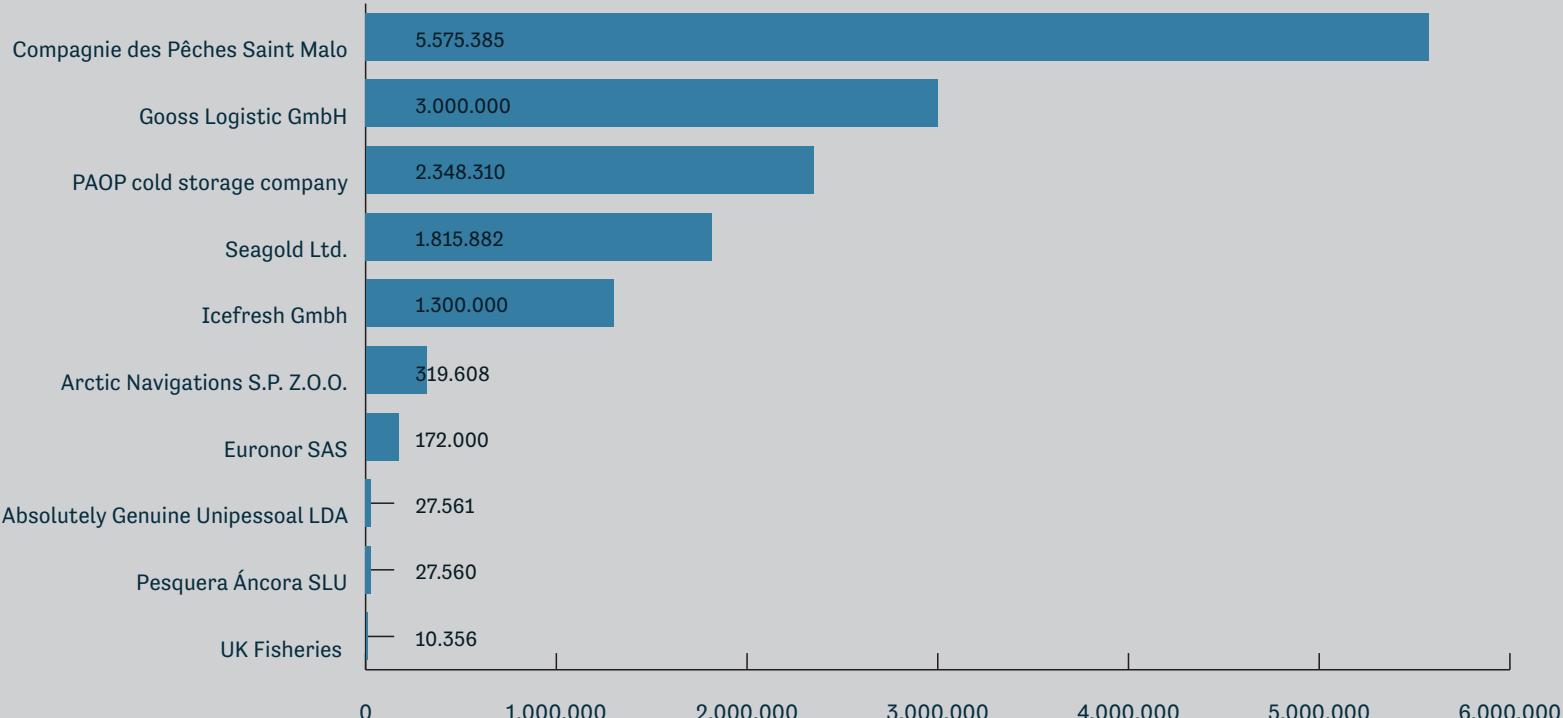


Cuxhaven NC (DFFU)

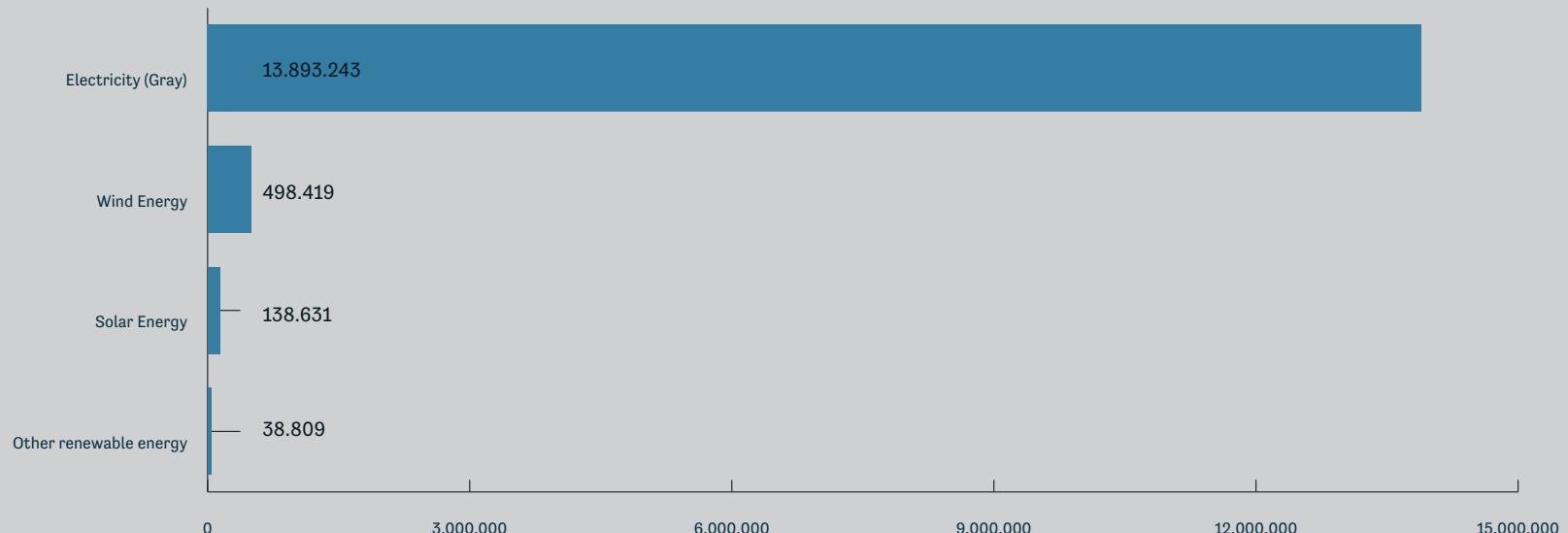
## Use of electricity

As a group, we used 14.596.662 kWh of electricity in 2022, which is broken down in the accompanying table. To put this number in perspective, Dutch households use an average of 2.930 kWh annually. This means our electricity use last year equals the usage of 4.982 Dutch homes. The electricity usage of the companies is broken down in the accompanying table. Our companies operating processing and cold storage facilities use the most significant volume of electricity.

**Electricity usage in kWh by entity in 2022**



### Electricity total usage in kWh by type



### Gas

Only four companies in our group reported gas usage in 2022.

The total usage amounted to 780,005 m<sup>3</sup>.

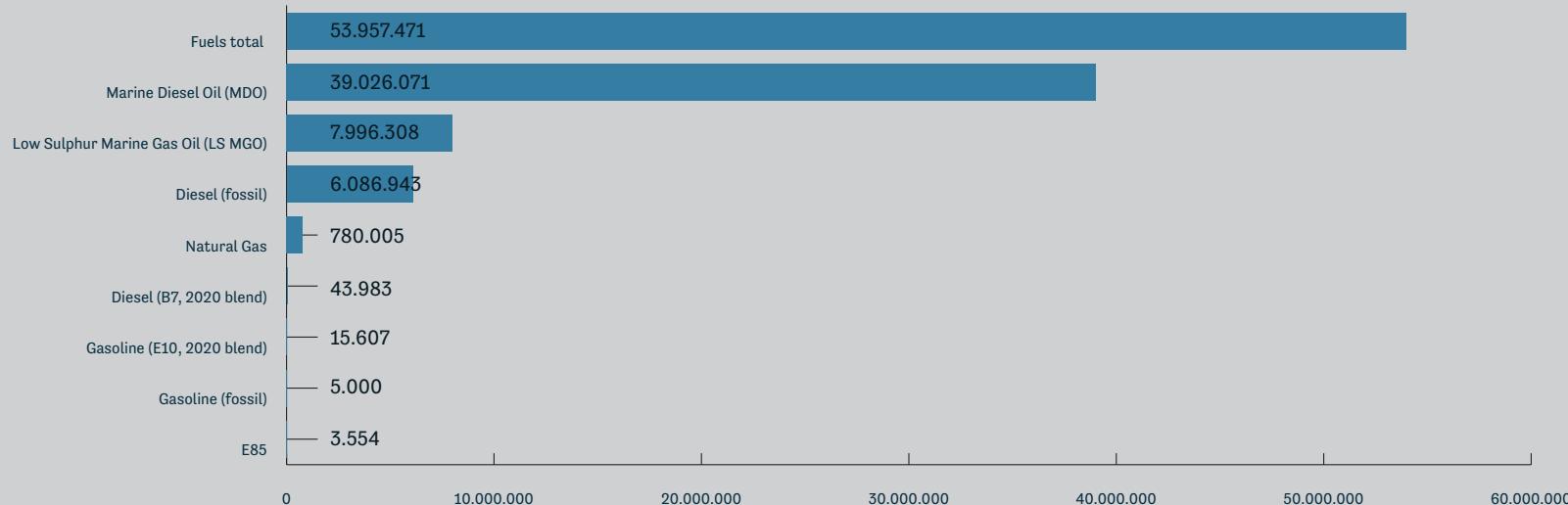
Employees at Icefresh GmbH processing facility in Groß-Gerau, near Frankfurt, a vital logistical hub in Germany. Icefresh benefits from its strategic position where distribution from the south, west, north, and east converge.



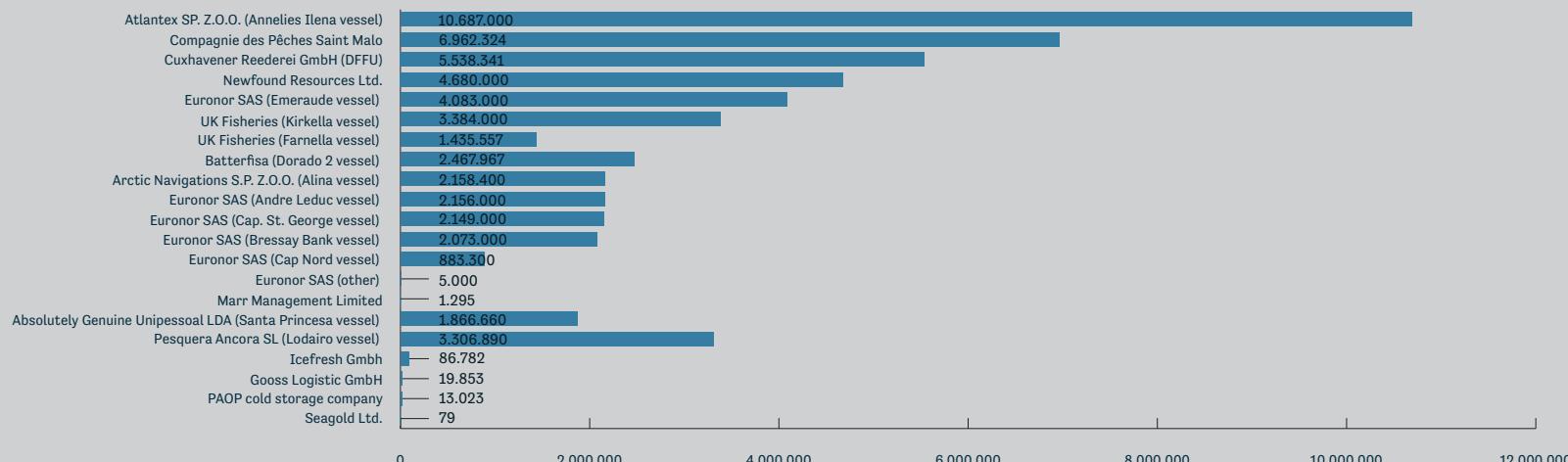
## Fuel usage

In 2022, our companies used 53.957.471 litres of fuel. Most of the fuel used is Marine Diesel Oil (MDO). The second most used fuel is Low Sulphur Marin Gas Oil (LS MGO), which has a sulphur content of less than 0.1%. The total fuel usage in 2022 is broken down by fuel types, entities, and vessels in the accompanying tables.

### Fuel usage in 2022 in litres by fuel types



### Fuel usage in 2022 in litres by entities and vessels



## Carbon footprint by scope

A carbon footprint measures the total amount of greenhouse gases, primarily carbon dioxide emitted directly or indirectly by an individual, organisation, event, or product over its lifecycle. It's usually expressed in carbon dioxide equivalents (CO<sub>2</sub>e) units to aggregate the impacts of different greenhouse gases.

Analysing a company's greenhouse gas emissions according to their scope is fundamental in gauging these emissions. This step is pivotal for any organisation aiming to diminish its impact on climate change.

Carbon footprint is divided into three scopes:

### Scope 1

This includes direct emissions from sources owned or controlled by Alda Seafood. For example, emissions from vessels operated by our companies fall under Scope 1.

### Scope 2

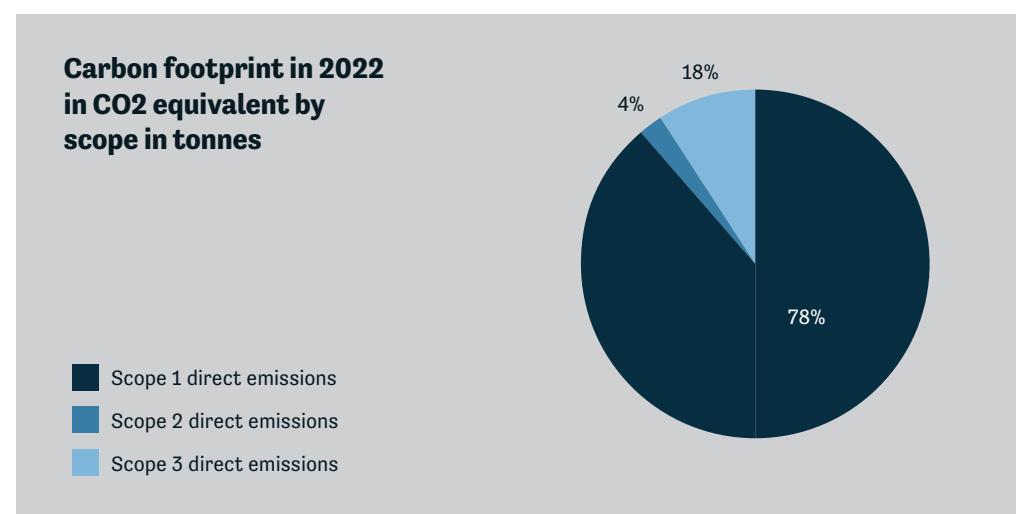
These are indirect emissions from the consumption of purchased electricity, heat, or steam. This includes emissions associated with the generation of electricity or heat that an organisation buys from an external source. For instance, if a company purchases electricity from a utility company, the emissions associated with the production of that electricity fall under Scope 2.

### Scope 3

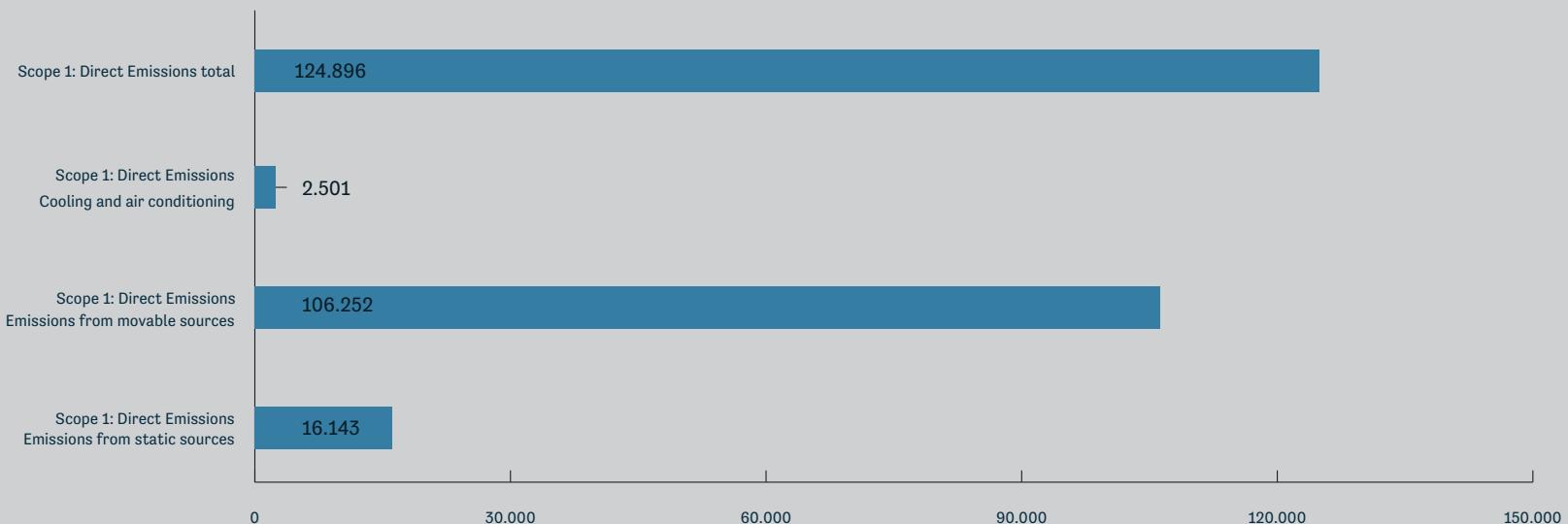
This category encompasses all other indirect emissions that occur in the value chain of the reporting company but are not owned or controlled by it. This includes emissions associated with activities such as business travel, transportation and distribution, employee commuting, and the production and disposal of purchased goods and services.

**Our carbon footprint in 2022 was 160.627 tonnes, with the largest volume in the form of Scope 1 direct emissions, which counted for 124.896 tonnes. Our Scope 2 indirect emissions were 6.308 tonnes in total, and our Scope 3 indirect emissions amounted to 29.423 tonnes.**

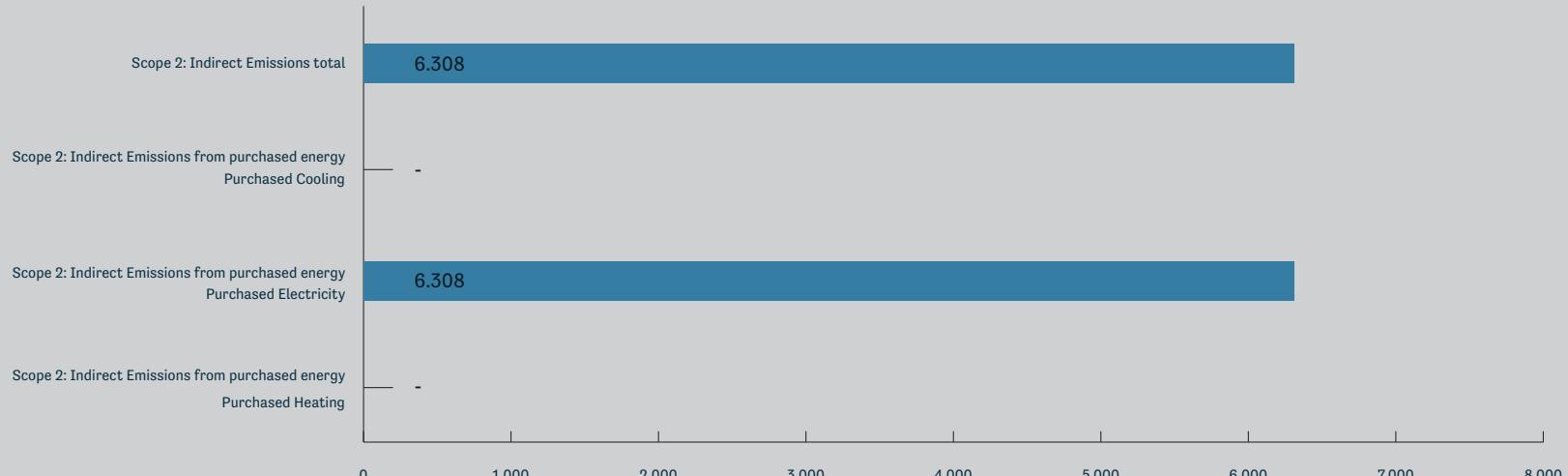
The breakdown of our carbon footprint can be viewed in the accompanying tables, which show the CO<sub>2</sub> equivalent by scope in tonnes.



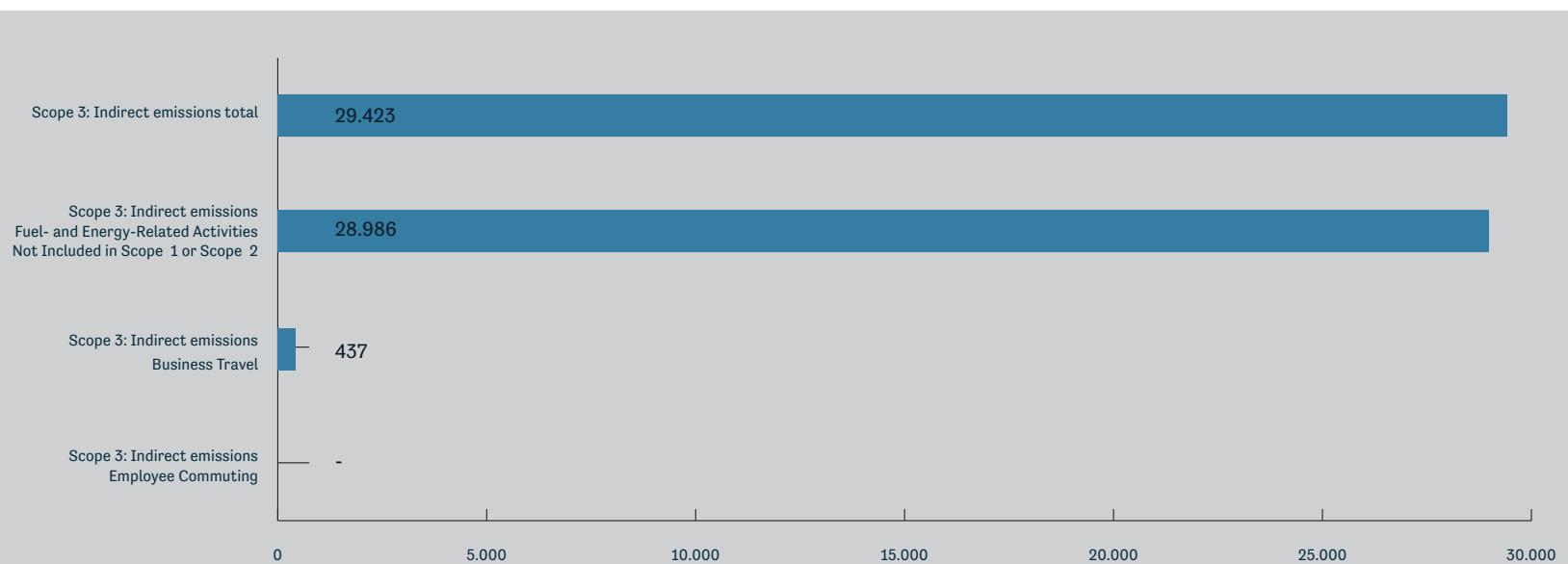
## Scope 1 direct emissions co2 equivalent in tonnes



## Scope 2 indirect emissions co2 equivalent in tonnes



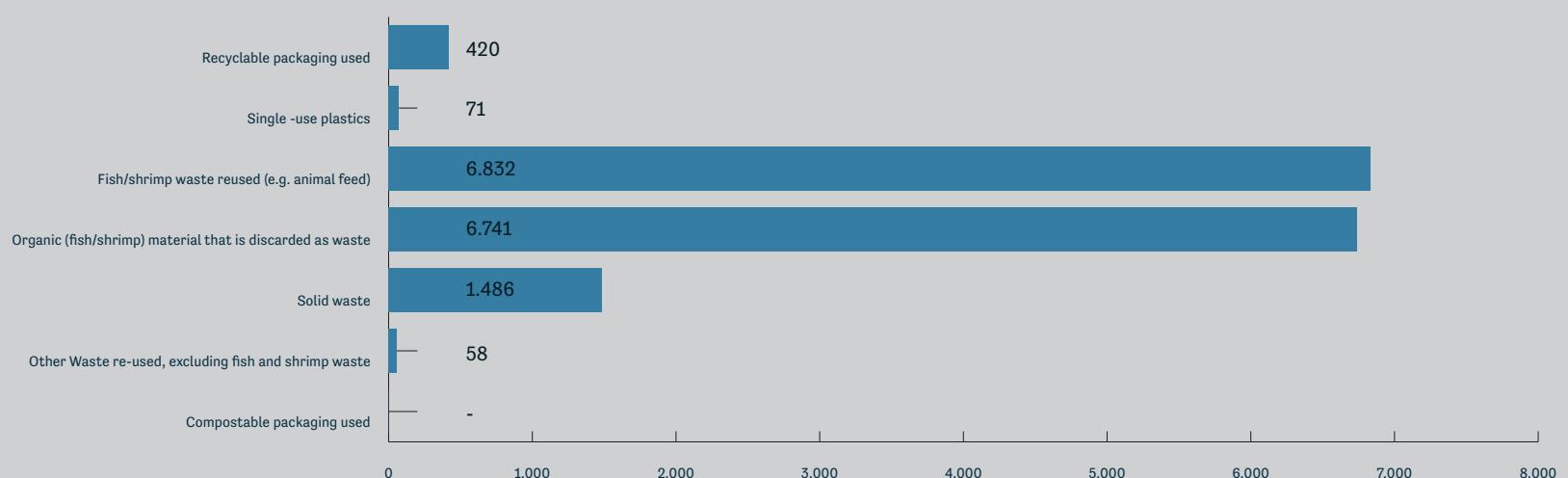
## Scope 3 indirect emissions co2 equivalent in tonnes



## Waste

As outlined in our Environmental Policy, we consider waste management an essential factor concerning our environmental impact. Alda strives to reduce waste and increase waste sorting and emphasises the responsible disposal of waste. In 2022, our solid waste and organic (fish/shrimp) material discarded as waste amounted to 8.227 tonnes in total. This excludes effluent. Our waste, broken down by various metrics, can be accessed in the accompanying table.

## Waste by various metrics in tonnes



## Plastics

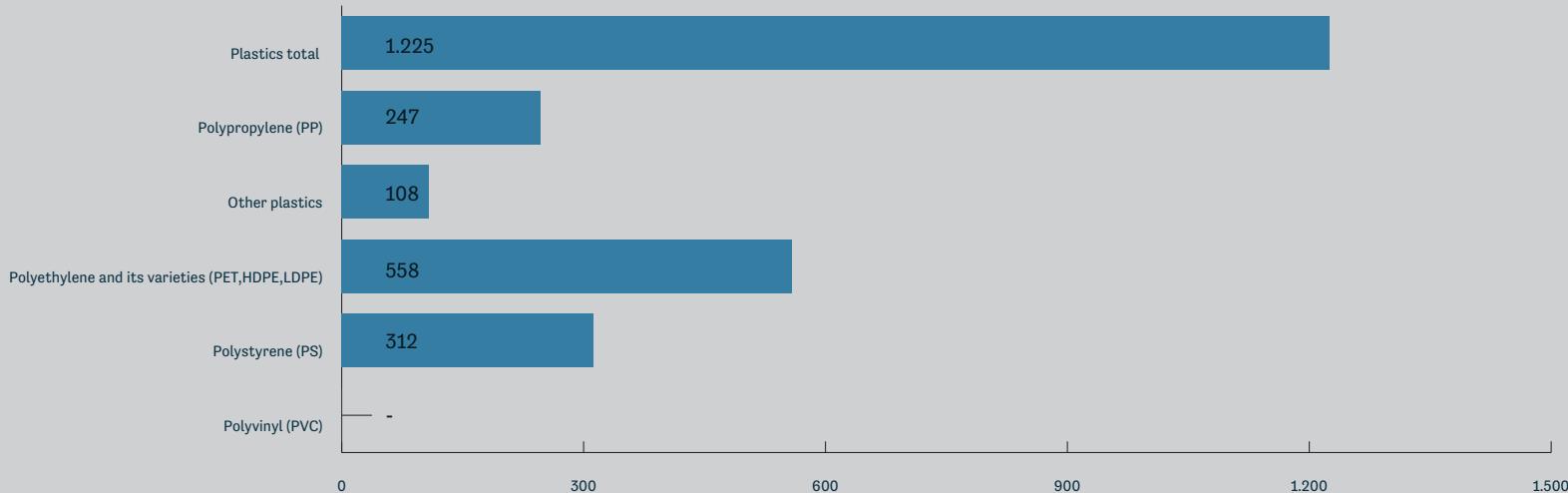
Companies in our group are increasingly transitioning to reusable and recyclable packaging. Last year, 86% of the packaging used by our companies was recyclable. Our long-term goal is to use only reusable and recyclable packaging in our operations.

Due to the excellent thermal insulation properties, boxes made from expanded polystyrene (Styrofoam) are widely used in our industry as containers for transporting and storing fresh fish and other seafood. In many instances, our clients request boxes made from Styrofoam while there is a limited supply of other packaging that guarantees the same product quality. The downside to using this material is that even though it is recyclable, it is not accepted by all recycling facilities.

In 2022, companies in our group used 1.225 tonnes of plastic materials in total, which is broken down in the accompanying table.



### Plastic use in 2022 in tonnes

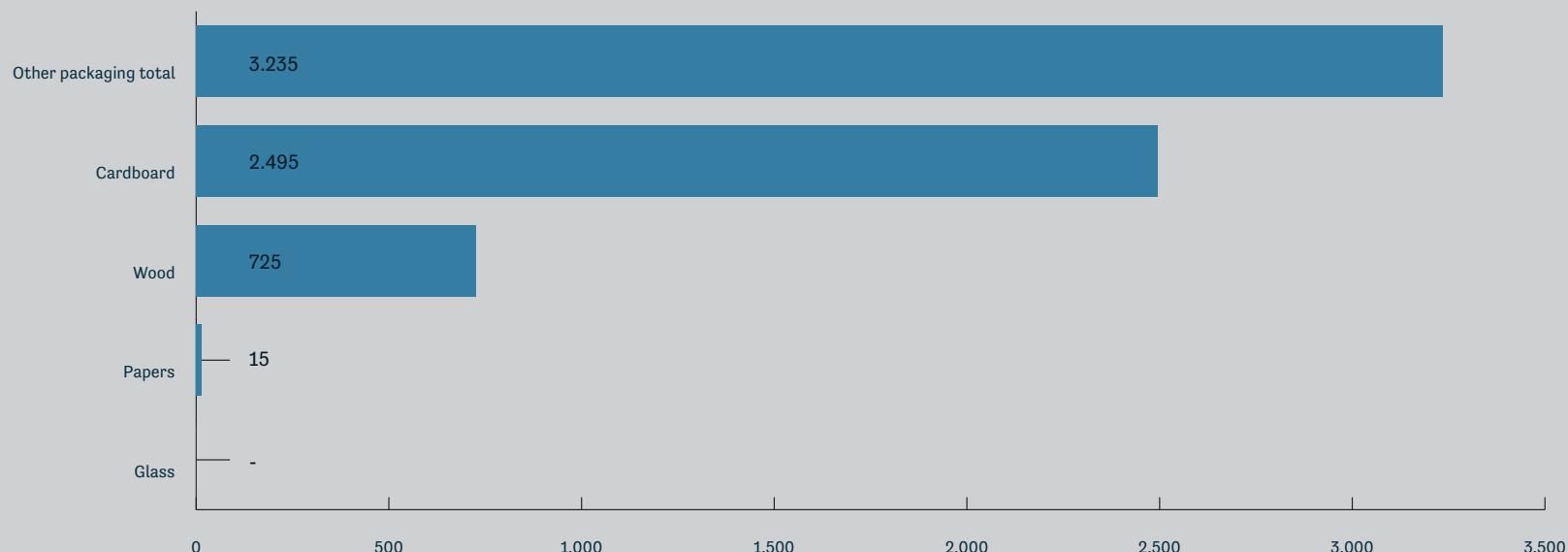


Recycling is a big part of reducing the negative impact on the environment. In 2022, 86% of the packaging used in our operations was recyclable. Our goal is to get this rate to 100%.

## Other packaging

Our companies used a total of 3.235 tonnes of paper, wood and cardboard packaging in 2022. This consisted of 15 tonnes of paper, 725 tonnes of wood and 2.495 tonnes of cardboard.

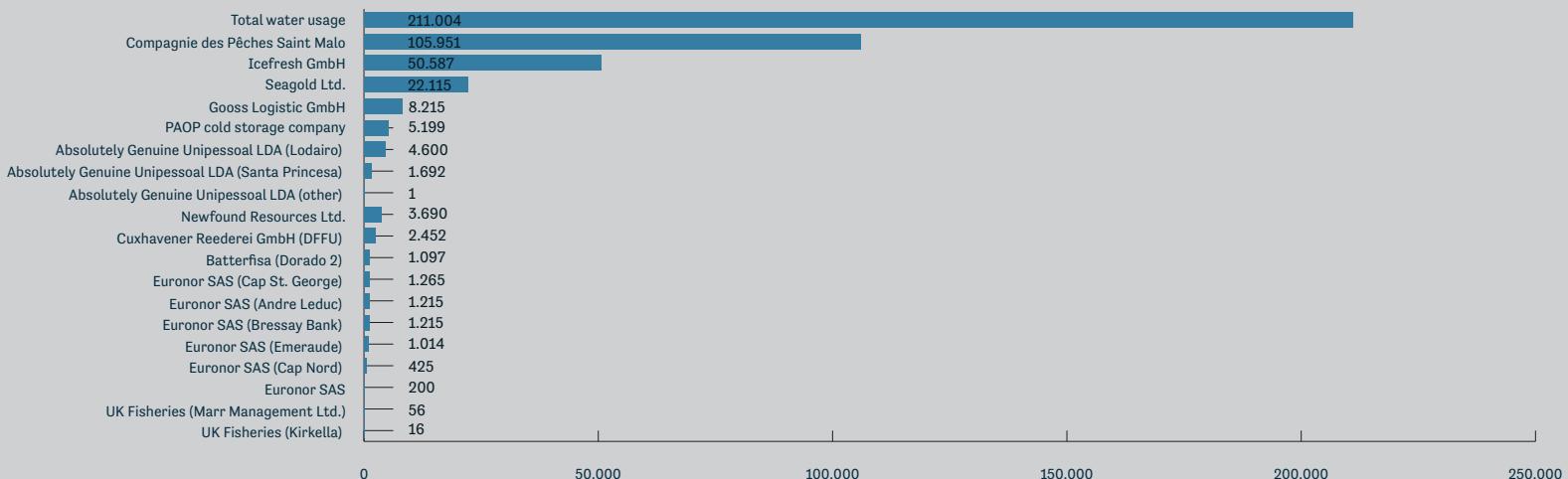
**Other packaging in 2022  
in tonnes**



## Water

In 2022, our companies used 211.004 tonnes of water in total. Companies operating land-based production facilities, such as processing factories, used the largest share of the total volume. Compagnie des Pêches Saint Malo in Saint Malo, France, Icefresh GmbH in Groß-Gerau, Germany, and UK-based Segold Ltd use the most significant share of the total volume. The water usage of our companies and individual vessels operated by them is broken down in the accompanying table.

**Water usage in 2022 by entity in tonnes**



Two of our companies, Icefresh GmbH in Germany and Segold Ltd. in the UK, withdrew water from water-stressed areas during the reporting period. Icefresh GmbH withdrew 50.587 tonnes of water from an area defined as a low to medium-stress area. Segold Ltd. withdrew 22.115 tonnes of water from a low-stress area.

# 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, such as fishing gear, fishing area, catch volume, bycatch, etc., is recorded on our vessels. By reading the label of the finished goods, we can provide full traceability to the origin. All 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.

# About our sustainability governance

Alda's Compliance Officer serves as the Sustainability Officer for the group and reports directly to the Managing Director and the Supervisory Board of Alda. The Sustainability Officer is responsible for developing and implementing our sustainability strategy alongside the Managing Director.

As mentioned in the letter from the Chairman, during the preparation of this report, we used, for the first time, a software tool to manage our data. This is the Microsoft-based application Beezzz which we use to collect and manage all data related to our sustainability pillars in one central place. Beezzz allows us to analyse and report sustainability data more efficiently and effectively.

Each subsidiary and affiliated company included in the report was responsible for submitting data for the report through specific surveys in Beezzz. We are committed to improving our performance with regards to ESG-related matters. Having all our data mapped out in one central place allows us to track our progress and shows where we need to improve.

For further information regarding this Sustainability Report, or about ESG-related matters in general, please get in touch with us at [sustainability@aldaholding.com](mailto:sustainability@aldaholding.com)



Newfoundland Victor (NRL)

# Sustainable Development Goals

Our sustainability strategy aligns with 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.”



## 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.”



## 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, 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

The companies in the group covered by the report employed 867 employees in fourteen separate operations in 2022. As previously stated, employee safety is a material topic for Alda Seafood and one of the four principles that form the pillars of our sustainability strategy. This means that employee safety and well-being are one of our utmost priorities. In this chapter, we disclose various facts about our employees, their work environment, and our efforts to improve the working conditions for our workers, regardless of their employment relationship.

## Keeping the crew happy is the goal

Carmen Wienberg, personnel manager at Deutsche Fischfang-Union (DFFU), recently celebrated three decades at the company. As a personnel manager, Carmen manages and organises work for all crews on vessels operated and managed by DFFU. This includes all different types of travel, accommodation, and other work-related arrangements.

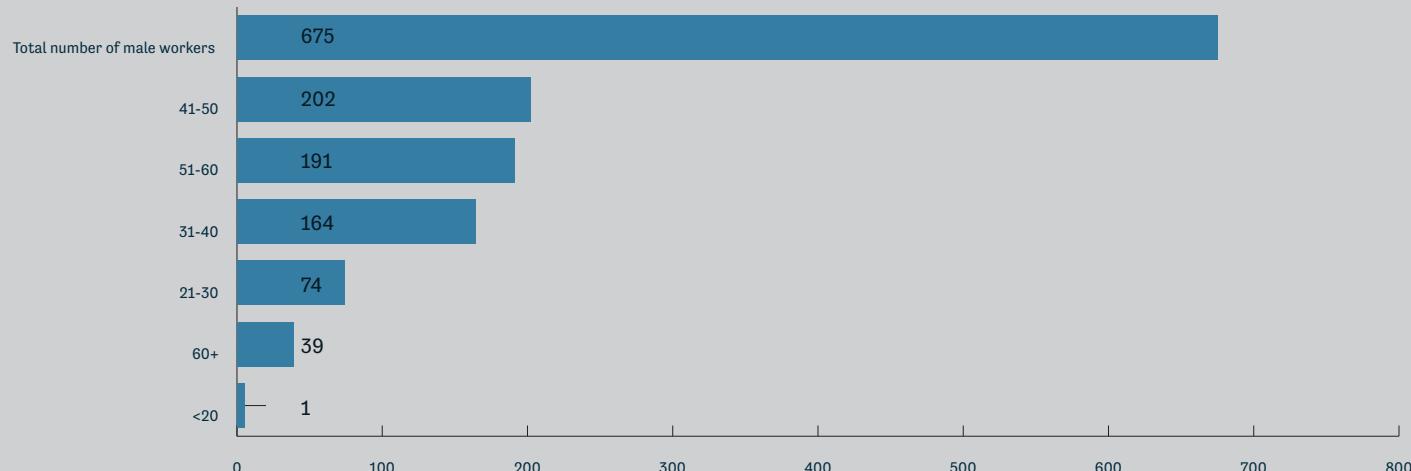
"A critical aspect of the job is keeping the crew happy, so they want to return for the next trip. This is our long-term commitment. We are building relationships with these crewmembers, and they and their families must have faith that we are doing everything in our power so that they can return safely and efficiently to their families after each trip. We try to limit discomfort. Normally, these crews go on 50-60-day trips and then go home for one trip. Sometimes, we have crewmembers with young children who have to attend special events or be home when the child's school vacation starts, and we try to be adjustable and organise their work based on these requests," says Carmen Wienberg.



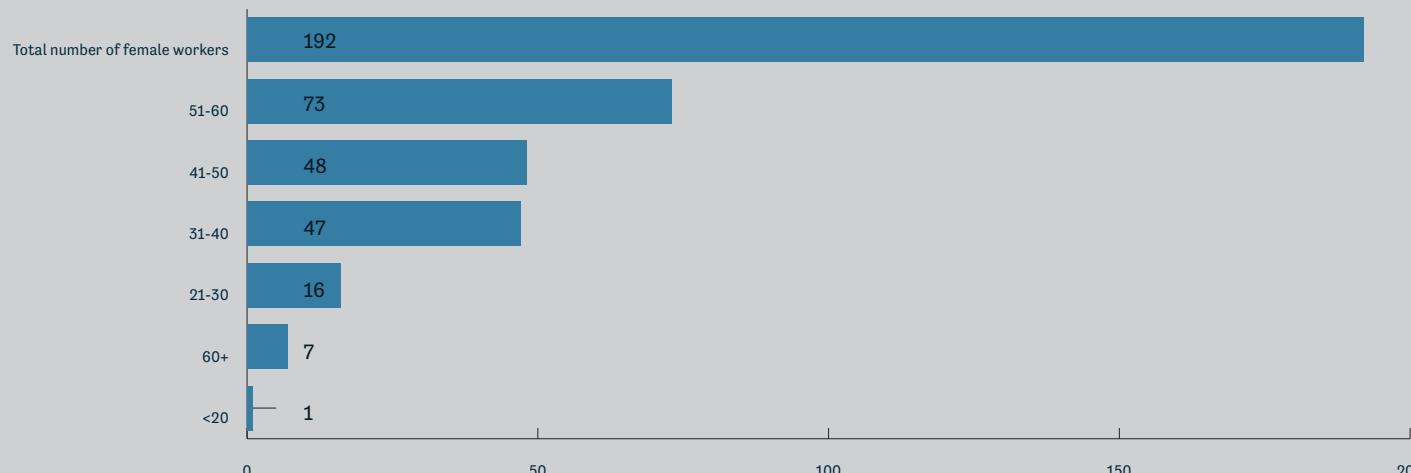
## Number of employees by age group and gender

In 2022, our companies employed 867 people in fourteen separate operations. This number covers employees under contracts and does not include temporary workers and hired workers. The table below shows the total number of workers by gender and age categories by the end of the year 2022.

### Total number of male workers

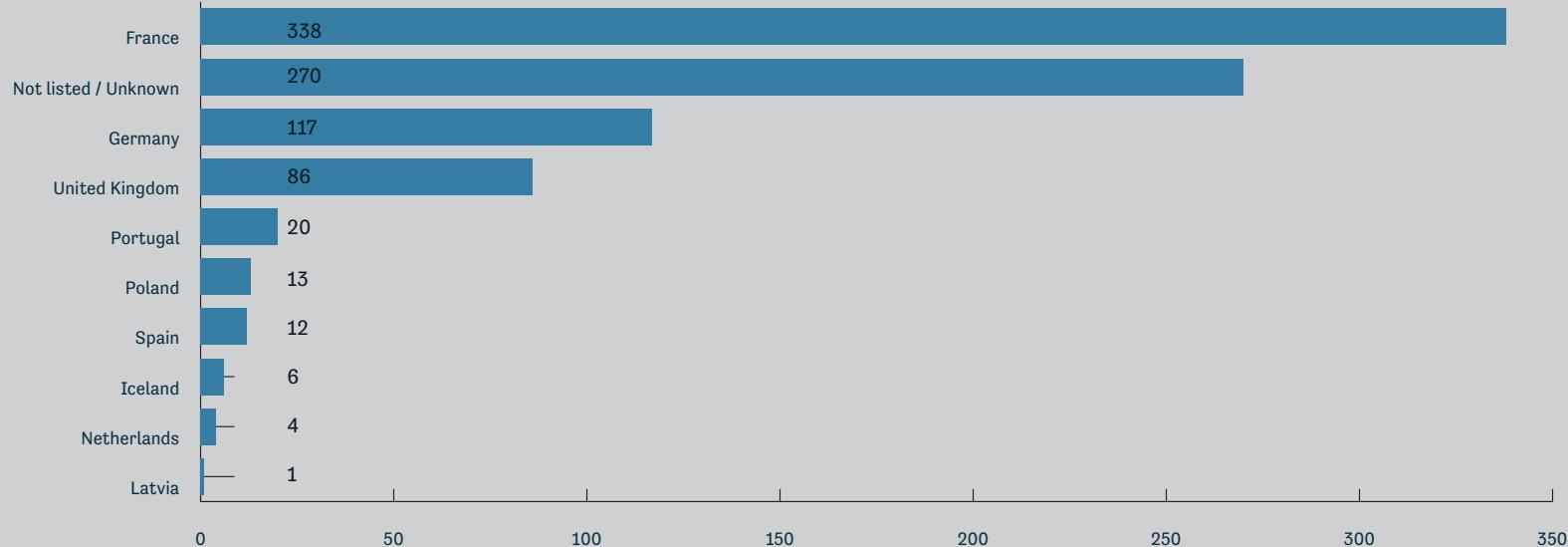


### Total number of female workers



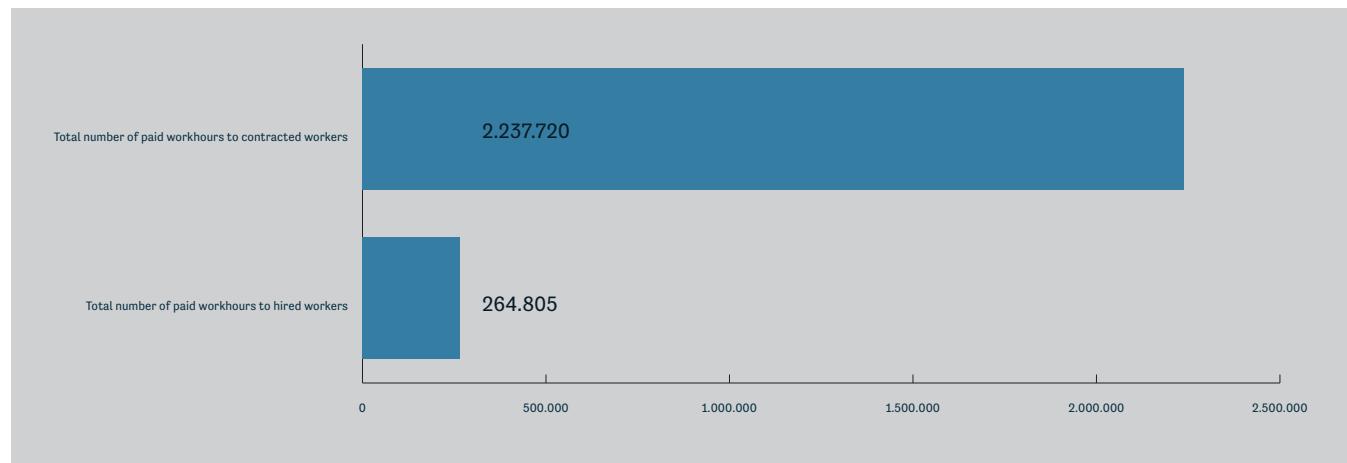
Most of the employees that have a known registered address reside in France, where 338 of them live or 39% of the total.

### Employees of residence



### Number of paid work hours

In 2022, our companies paid for more than 2.2 million work hours to contracted workers and 265 thousand work hours to hired workers.

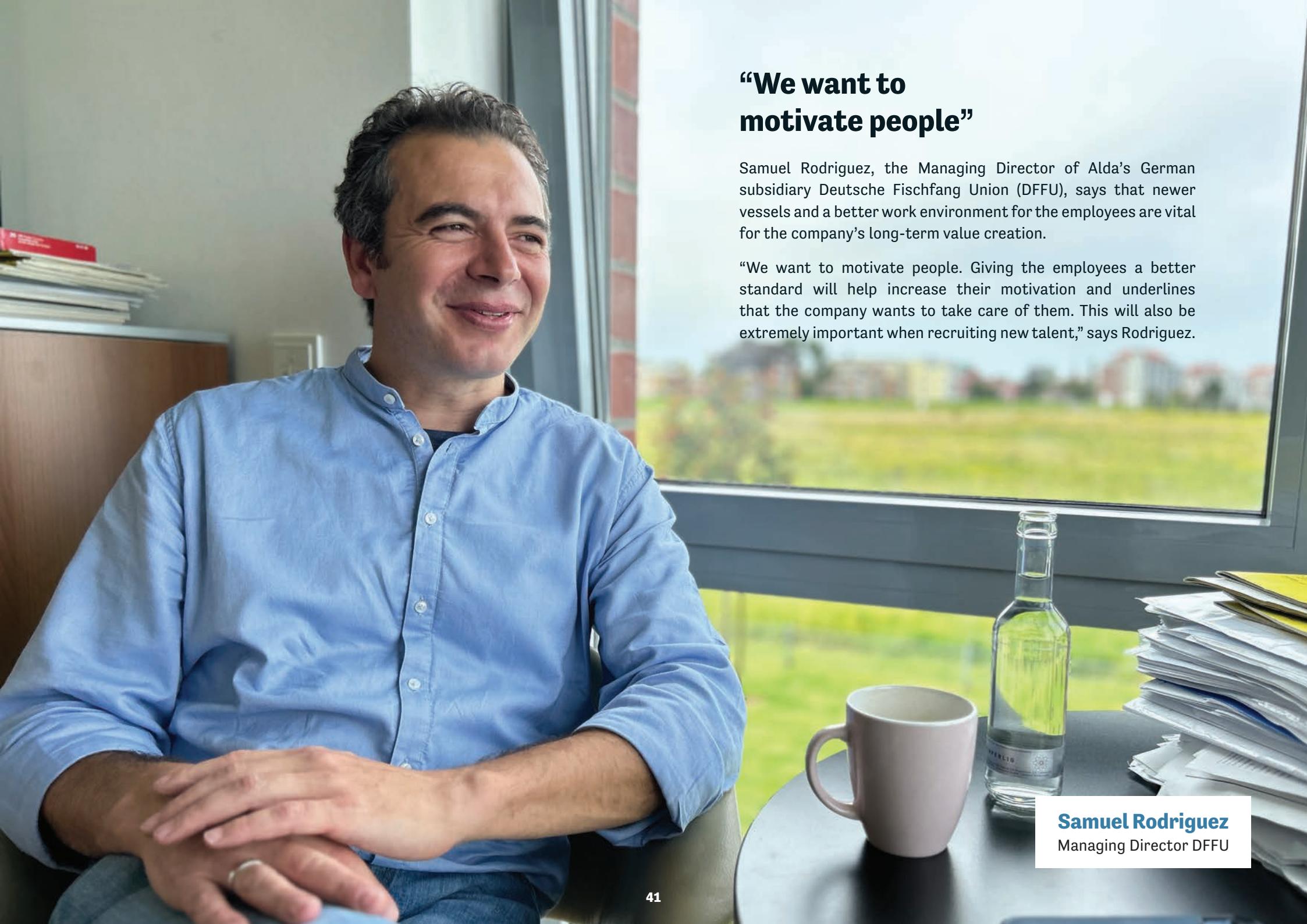


A photograph of a large industrial ship, likely a fishing vessel, at sunset. The ship's funnel is prominent, featuring yellow and red horizontal stripes. The sky is a gradient of blue and orange. The ship's deck is visible in the foreground, showing various equipment and cables. The water is calm.

## Absenteeism

We understand that a workplace with better health and less stress among employees reduces absenteeism. In 2022, our companies reported 463 absenteeism cases, and the total number of absenteeism days was 7.237. This is the first time we have reported absenteeism cases because this statistic was not included in our first sustainability report, which covered 2021. Our companies are constantly looking for ways to reduce absenteeism. We understand that absenteeism goes down with the increased general well-being of our employees. We are, therefore, perpetually looking for methods and ways to contribute to its improvement.

As outlined in more detail in our chapter on compliance and corporate governance, Alda believes that providing employees with a safe and healthy working environment is essential. Our priorities in this regard impact our decision-making process when new investments are made. We understand that better vessels and production facilities contribute to the increased overall well-being of our employees. This is why we prioritise a good working environment when ordering new vessels, aiming for enhanced onboard accommodation, and when investing in production facilities, seeking improved acoustics and lighting in our factories.



## **“We want to motivate people”**

Samuel Rodriguez, the Managing Director of Alda's German subsidiary Deutsche Fischfang Union (DFFU), says that newer vessels and a better work environment for the employees are vital for the company's long-term value creation.

“We want to motivate people. Giving the employees a better standard will help increase their motivation and underlines that the company wants to take care of them. This will also be extremely important when recruiting new talent,” says Rodriguez.

**Samuel Rodriguez**  
Managing Director DFFU



Berlin NC 107 at VARD's site in Braila, Romania

## Better accommodation for crews on the new Berlin NC 107

In 2022, Alda's German subsidiary, Deutsche Fischfang Union GmbH (DFFU), signed an investment contract with Norwegian shipbuilder VARD for the design and construction of a new one stern trawler, the Berlin NC 107. At the time of writing, the construction of the vessel is progressing well, and the vessel is expected to be delivered on time in the first quarter of 2024. The building of the vessel hull and installation of the main components took place at VARD's site in Braila, Romania. In August 2023, the vessel was towed to VARD's yard in Brattvåg, Norway, to enter the final stage of the building process.

Sigurdur Kristjánsson, the captain of Baldvin NC, will be captain of the new Berlin NC 107. Kristjánsson says that the most crucial difference for the crew is a more comfortable working environment and accommodations.



Sigurdur  
Kristjánsson

"This new vessel has a higher level of automation in production, which means a more comfortable working environment for the crew. It is a different level of intensity where machines are replacing manual work. We hope the daily processing capacity will be higher so that the ship can produce higher daily product volumes, saving energy. Therefore, the vessel should be more fuel efficient," says Kristjánsson. He also mentions acoustics on the vessel, stability during challenging weather and light onboard. "These new vessels are much better at sea, so harder winds or storms have much less effect on the crew. I would also like to mention the crew's quarters, designed to let in more light so the quarters are much brighter, which should contribute to the increased well-being of the crew at sea," says Kristjánsson.

## Work-related injuries

In 2022, a total of 143 work-related injuries were registered in connection with the operations of our vessels or in our production facilities. Five of those were with hired workers, but the overwhelming majority of the cases, or 138, involved contracted workers. The numbers cover not only accidents and injuries sustained while performing work but also ailments that arose during work hours but are not directly associated with the work performed. For example, when a crew member becomes sick during a trip and needs to return to land, that incident is reported as a work-related injury even though the said ailment is not directly associated with his work.

A further breakdown of injuries involving contracted workers reveals that 79 of them were reported by the Lodairo vessel operated by Pesquera Ancora SL in Spain. It should be noted that these injuries among the vessel's crew members were not accidents on board the ship but work-related sick leaves and ailments that occurred during the trip, such as a heart condition, but were not directly associated with work on board. None of these injuries were classified as severe or life-threatening.

Compagnie des Pêches Saint-Malo reported fifteen injuries. None of them were classified as serious except one in which a crewmember had to be evacuated to a hospital in Norway after becoming seriously ill after contracting COVID-19.

A total of 27 work-related injuries were reported by Seagold Ltd. in the UK. Twenty-four of those were in the Seachill factory in Grimsby. They were all classified as minor injuries and resulted in two days of absenteeism in total. The other three accidents Seagold reported involved distribution staff and were also classified as minor, not resulting in any absenteeism.

Icefresh GmbH, a fish processing company in Groß-Gerau, reported six injuries. Four of these cases involved contracted workers, while the remaining two involved hired workers. These incidents primarily consisted of minor injuries, such as slight finger cuts and a situation where an employee fell from a low height.

None of the reported work-related injuries by any of the companies were life-threatening or fatal.



# Compliance and corporate governance

Since Alda Seafood was established, it has been the goal of the shareholders that the company implements a robust compliance structure and has in place the necessary corporate governance procedures to limit risk in the group's operations. In April 2023, the Supervisory Board of Alda Seafood Holding B.V. adopted a new compliance structure for the group. The compliance structure consists of the following written policies and procedures:

- Alda's Code of Conduct
- Alda's Business Partner Code of Conduct
- Alda's Procedures for Corruption Bribery and Money Laundering
- Alda's Procedures for Sanctions and Trade Controls
- Alda's Policy and Contingency Plan against Bullying, Sexual and Gender-based Harassment and Violence
- Alda's Personnel Policy
- Alda's Environmental Policy
- Alda's Human Rights Policy
- Alda's Equal Plan
- Alda's Procedure for Reporting Concerns

Therefore, many of these policies were in place when we published our first Sustainability Report, which covers the reporting period from 1 January 2021 to 31 December 2021.

## Alda's Code of Conduct

Alda Seafood adopted a Code of Conduct to describe the ethical commitments and requirements related to our business. The Code 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, and social responsibility.

## 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.



Workers at the Icefresh GmbH processing plant in Groß-Gerau, close to Frankfurt.

## **Alda's 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 and prevent 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.

## **Alda's Procedures for Sanctions and Trade Controls**

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 complying 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 procedures state 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.

## **Alda's Personnel Policy**

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, providing them with appropriate introduction and training before their work commences, and 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. These systems cover both workers that are employees and workers that are contractors. 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 worker's travel costs and living expenses related to the training are covered by the employer.

## Human Rights

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.

## **Alda's Equal Plan**

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 complies 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.

## **Alda's 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.

The whistleblower channel is accessible online at the following URL:

<https://www.al daholding.com/whistleblower-channel/>

## Our Compliance Officer

In 2022, Alda hired a Compliance Officer for the group. Alongside Alda's Managing Director, the Compliance Officer is responsible for managing our compliance structure and making sure that the different policies and procedures are correctly implemented within the various organisations.

The Compliance Officer can be reached via email at [compliance@aldaholding.com](mailto:compliance@aldaholding.com)

## General summary regarding compliance

Most of the companies in Alda's group are joint ventures or affiliates where Alda owns 50% or less of the shares. This means that a compliance structure covering the whole group would need the approval of our business partners and shareholders in the relevant companies. Therefore, Alda does not control the corporate governance and compliance policy in the aforementioned joint ventures and affiliates.

At the time of writing, our compliance structure had only been adopted in the companies where Alda owns 50% or more of the shares. In September 2023, we organised compliance training for the employees of these companies. The training was in the form of web seminars via Teams, where the employees were introduced to the different policies and procedures, what they mean and what duties and obligations they create for our staff, contractors, representatives, and business partners. The compliance training was completed in December 2023.

Our compliance structure is a living instrument in the sense that we are perpetually trying to adjust our compliance and governance work with our business and regulatory environment. The company's goal is to be exemplary with regard to governance. This means that we want to adjust our corporate governance so that it reflects the best practices in our industry.

# Our Communities

Alda emphasises the importance of community engagement. This means that we encourage the companies in our group to do their utmost to support the communities where they operate.

In late 2023, Alda adopted the Community Policy for the group, which outlines our emphasis on community support. The policy is a guideline that the managing directors of Alda's subsidiaries are expected to know and adhere to. It applies to companies where we own 50% of the shares or more.

At Alda, we believe that supporting the communities where we operate is not only a responsibility but also an opportunity to build sustainable and meaningful relationships. We recognise that our success is linked to the well-being of local communities, and we strive to avoid any negative impacts on them.

The policy states that we encourage our companies to provide financial support to local communities through sponsorships and donations. We encourage our companies to prioritise projects that deliver measurable results and positively impact the community's economic, social, or environmental well-being.

The policy further states that we recognise that education and training can be powerful tools for empowering individuals and communities. Alda's companies are encouraged to offer training programs and community outreach initiatives that focus on developing skills, promoting entrepreneurship, and fostering social cohesion.

Alda's companies may provide resources such as land or real estate to support community projects that align with our sustainability goals. The policy states that Alda's subsidiaries are expected to implement a budget for community support.

## Procurement from local suppliers

In addition to the above, Alda Seafood recognises the importance of supporting local economies and fostering relationships with local suppliers in the regions where our companies operate. In this context, 'local' refers to the area or region where the relevant company primarily conducts the majority of its operations.

We encourage the companies in our group to procure products and services from local suppliers whenever feasible and economically viable. When possible and without compromising quality, cost-effectiveness, or compliance with applicable laws and regulations, entities within Alda's group should give preference to local suppliers for the procurement of goods and services.

In the accompanying table, we have outlined the percentage of our companies' procurement budget spent on local suppliers and what countries or regions are defined as local by the relevant companies.



Cuxtrawl is currently making a new trawl for one of the vessels serviced by DFFU.

## Cuxtrawl is a producer of high-quality fishing gear in Cuxhaven

Our German subsidiary, Deutsche Fischfang Union GmbH (DFFU), located in Cuxhaven, has built a successful relationship with Cuxtrawl, a local maker of high-quality fishing gear such as trawls and nets, for the past several years. Established in 1992 and located in the harbour directly at the waterfront, the company is also a supplier of workwear and safety clothing for DFFU and other companies in the region.

Vilhelm Thór Hardarson, fleet manager at DFFU, has worked with Cuxtrawl when ordering spare parts for DFFU's own vessels as well as ships serviced by the company.

"We have had a successful business relationship with Cuxtrawl for many years. The companies are in close proximity to each other and have an in-depth understanding of each other's operations and business. We buy a lot of fishing gear from Cuxtrawl and have been satisfied with the products, especially the service. The company has been flexible to respond to our needs. In this business, it's all about flexibility and being able to respond and deliver the desired product within the specified timeframe, which can sometimes be challenging for our suppliers. We have bought large quantities of certain items, including rockhoppers, hammerlocks, etc. and have thus been able to negotiate a favourable price. Cuxtrawl has then used that stock and set up fishing gear for us based on our needs. The relationship has been a big success, and we consider it an important plus to work closely with a local supplier and therefore indirectly contribute to him thriving in our society here in Cuxhaven," says Vilhelm Thór Hardarson, fleet manager at DFFU.



Vilhelm Thór Hardarson

## Proportion of spending on local suppliers in 2022

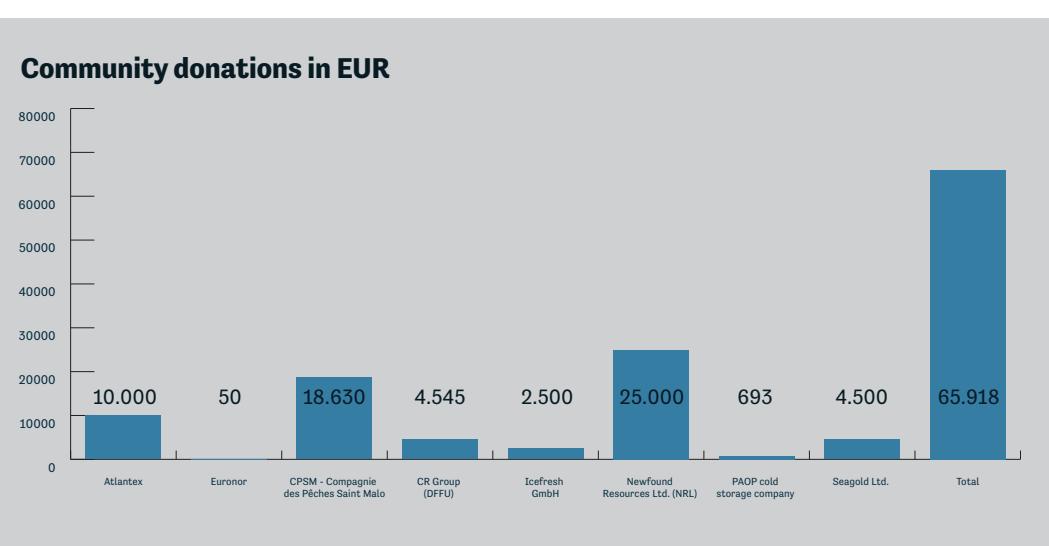
Name of company	Definition of local	Percentage of spending
Arctic Navigations	EU	99.50%
Atlantex	EU	86.90%
PAOP (Coldstore Gdańsk)	Poland	97.30%
Deutsche Fischfang Union GmbH	Elbe-Weser region (Germany)	39%*
Icefresh GmbH	Germany	16%
UK Fisheries	UK	55.95%
Seagold Ltd.	UK, Ireland, France	2.90%
Compagnie des Pêches Saint-Malo	France	71.20%
Euronor	France	28%
Pesquera Áncora SLU	Spain	20.10%
Absolutely Genuine- Unipessoal		N/A
Newfound Resources Ltd.	Newfoundland (Canada)	80.70%

\*If intra-group transactions are excluded, the proportion is 14%.

## Donations

As outlined in Alda's Community policy, we encourage the companies in our group to do their utmost to support their local communities. Most of the companies in our group support their communities in one form or another. This includes grants, sponsorships, and donations. In 2022, our companies donated a total of EUR 65.918 to charities, cultural organisations, and sports teams.

The accompanying table outlines the total amount of donations in 2022 with a breakdown of contributions by individual companies.



# Membership of associations

Companies in our group are members of several different organisations. These are:

- The North Atlantic Producers Organization (NAPO)
- The European North Atlantic Fisheries Association (ENAFA)
- The Long Distance Fleet Advisory Council (LDAC)
- The North Sea Advisory Council (NSAC)
- The Pelaic Advisory Council
- The European Association of Fish Producers Organizations (EAPO)
- Europêche, European Fisheries Alliance
- Polish Association of Fish Processors
- The Pelagic Freezer-trawler Association (PFTA)
- French Association of Processed Food Products Companies
- Deutscher Fischerei Verband e.V.
- European Bottom Fisheries Alliance
- Union des Armateurs à la Pêche de France
- Association nationale des Organisation de Producteurs (ANOP)
- Comité National des Pêches et des Elevages Marins (CNPMEM)
- Canadian Association of Prawn Producers
- Northern Shrimp Research Foundation
- The National Federation of Fishermen's Organisations (NFFO)
- The United Kingdom Association of Fish Producers Organisations

# GRI content index

Alda Seafood Holding B.V. has reported the information cited in this GRI content index for the period from 1 January 2022 to 31 December 2022 with reference to the GRI Standards.

## GRI 102: General Disclosures

Disclosure	Disclosure title	Reported	Section in report	Reported on page	Additional reference
<b>102-1</b>	<b>Name of the organisation</b>	Yes	Front page	1	
<b>102-2</b>	<b>Activities, brands, products and services</b>	Yes	About the company	12	
<b>102-3</b>	<b>Location of headquarters</b>	Yes		3	
<b>102-5</b>	<b>Ownership and legal form</b>	Yes	Alda Organisational chart, Our shareholders	15, 18	
<b>102-6</b>	<b>Markets served</b>	Yes	About the company	12	
<b>102-7</b>	<b>Scale of the organization</b>	Yes	The scale of the organisation	12	
<b>102-8</b>	<b>Information on employees and other workers</b>	Yes	Our employees	38-40	
<b>102-9</b>	<b>Supply chain</b>	Yes	About the company	12	
<b>102-10</b>	<b>Significant changes to the organization and its supply chain</b>	Yes	About the company	12	
<b>102-11</b>	<b>Precautionary Principle or approach</b>	No			
<b>102-12</b>	<b>External initiatives</b>	Yes	Sustainable Development Goals	37	
<b>102-13</b>	<b>Membership of associations</b>	Yes	Membership of associations	54	
<b>102-14</b>	<b>Statement from senior decision-maker</b>	Yes	A letter from the Chairman	6	

<b>102-15</b>	<b>Key impacts, risks and opportunities</b>	<b>No</b>		
<b>102-16</b>	<b>Values, principles, standards and norms of behavior</b>	<b>Yes</b>	Compliance and corporate governance	45-50
,	<b>Mechanisms for advice and concerns about ethics</b>	<b>Yes</b>	Compliance and corporate governance	45-50
<b>102-18</b>	<b>Governance structure</b>	<b>Yes</b>	Alda organisational chart	15
<b>102-19</b>	<b>Delegating authority</b>	<b>Yes</b>	About our sustainability governance	35
<b>102-20</b>	<b>Executive-level responsibility for economic, environmental, and social topics</b>	<b>Yes</b>	About our sustainability governance	35
<b>102-21</b>	<b>Consulting stakeholders on economic, environmental, and social topics</b>	<b>No</b>		
<b>102-22</b>	<b>Composition of the highest governance body and its committees</b>	<b>Yes</b>	Alda organisational chart	15-18
<b>102-23</b>	<b>Chair of the highest governance body</b>	<b>Yes</b>	A letter from the Chairman	6
<b>102-24</b>	<b>Nominating and selecting the highest governance body</b>	<b>Yes</b>	Alda organisational chart	16-17
<b>102-25</b>	<b>Conflicts of interest</b>	<b>No</b>		
<b>102-26</b>	<b>Role of highest governance body in setting purpose, values, and strategy</b>	<b>Yes</b>	Alda organisational chart	16
<b>102-27</b>	<b>Collective knowledge of highest governance body</b>	<b>No</b>		
<b>102-28</b>	<b>Evaluating the highest governance body's performance</b>	<b>No</b>		
<b>102-29</b>	<b>Identifying and managing economic, environmental, and social impacts</b>	<b>Yes</b>	About our sustainability governance	35
<b>102-30</b>	<b>Effectiveness of risk management processes</b>	<b>No</b>		
<b>102-31</b>	<b>Review of economic, environmental, and social topics</b>	<b>No</b>		
<b>102-32</b>	<b>Highest governance body's role in sustainability reporting</b>	<b>Yes</b>	About this report	
<b>102-33</b>	<b>Communicating critical concerns</b>	<b>No</b>		
<b>102-34</b>	<b>Nature and total number of critical concerns</b>	<b>No</b>		
<b>102-35</b>	<b>Remuneration policies</b>	<b>No</b>		
<b>102-36</b>	<b>Process for determining remuneration</b>	<b>No</b>		

<b>102-37</b>	<b>Stakeholders' involvement in remuneration</b>	No	
<b>102-38</b>	<b>Annual total compensation ratio</b>	No	
<b>102-39</b>	<b>Percentage increase in annual total compensation ratio</b>	No	
<b>102-40</b>	<b>List of stakeholder groups</b>	No	
<b>102-41</b>	<b>Collective bargaining agreements</b>	No	
<b>102-42</b>	<b>Identifying and selecting stakeholders</b>	No	
<b>102-43</b>	<b>Approach to stakeholder engagement</b>	No	
<b>102-44</b>	<b>Key topics and concerns raised</b>	No	
<b>102-45</b>	<b>Entities included in the consolidated financial statements</b>	No	
<b>102-46</b>	<b>Defining report content and topic Boundaries</b>	Yes	About this report
<b>102-47</b>	<b>List of material topics</b>	Yes	About this report, Sustainability at Alda
<b>102-48</b>	<b>Restatements of information</b>	Yes	About this report
<b>102-49</b>	<b>Changes in reporting</b>	No	
<b>102-50</b>	<b>Reporting period</b>	Yes	A letter from the Chairman January 1st 2022 - December 31st 2022
<b>102-51</b>	<b>Date of most recent report</b>	Yes	About this report
<b>102-52</b>	<b>Reporting cycle</b>	Yes	About this report Annual
<b>102-53</b>	<b>Contact point for questions regarding the report</b>	Yes	About this report Alda's Sustainability Officer Email: sustainability@aldaholding.com Mailing address: Leidsestraatweg 2 2341 GR Oegstgeest Netherlands
<b>102-54</b>	<b>Claims of reporting in accordance with the GRI Standards</b>	Yes	A letter from the Chairman
<b>102-55</b>	<b>GRI content index</b>	Yes	GRI content index
<b>102-56</b>	<b>External assurance</b>	Yes	About this report The sustainability report was reviewed by two members of Alda's Supervisory Board but not by an external party.

### **GRI 103: Management approach**

			About this report, Sustainability at
103-1	Explanation of the material topic and its Boundary	Yes	Alda
103-2	The management approach and its components	Yes	Sustainability at Alda
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
	Financial implications and other risks and opportunities due		
201-2	to climate change	No	
201-3	Defined benefit plan obligations and other retirement plans	No	
201-4	Financial assistance received from government	No	

### **GRI 202: Market Presence**

202-1	Ratios of standard entry level wage by gender compared to local minimum wage	No
202-2	Proportion of senior management hired from the local community	No

### **GRI 203: Indirect Economic Impacts**

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

## GRI 204: Procurement Practices

204-1	Proportion of spending on local suppliers	Yes	Procurement from local suppliers
-------	---	-----	----------------------------------

## 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 and corporate governance
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	
-------	---	----	--

## GRI 207: Tax

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	Yes	Other packaging
301-2	Recycled input materials used	Yes	Environmental footprint
301-3	Reclaimed products and their packaging material	No	

### **GRI 302: Energy**

302-1	Energy consumption within the organization	Yes	Environmental footprint
302-2	Energy consumption outside of the organization	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	Yes	Environmental footprint, Water

## GRI 304: Biodiversity

	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	
304-1	Significant impacts of activities, products and services on biodiversity	No
304-2	Habitats protected or restored	No
304-3	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	Yes	Carbon footprint by scope
305-2	Energy indirect (Scope 2) GHG emissions	Yes	Carbon footprint by scope
305-3	Other indirect (Scope 3) GHG emissions	Yes	Carbon footprint by scope
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 2016**

306-1	Water discharge by quality and destination	No	
306-2	Waste by type and disposal method	Yes	Waste
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 307 Environmental Compliance 2016**

307-1	Non-compliance with environmental laws and regulations	Yes	Environmentally responsible operations
-------	--	-----	--

### **GRI 308: Supplier Environmental Assessment 2016**

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

### **GRI 404: Training and Education**

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

## **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
-------	--	----

## **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
-------	--	----

## **GRI 408: Child Labor 2016**

408-1	Operations and suppliers at significant risk for incidents of child labor	Yes	Human Rights
-------	---	-----	--------------

## **GRI 409: Forced or Compulsory Labor 2016**

409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	Yes	Human Rights
-------	--	-----	--------------

## GR 410: Security Practices 2016

410-1	Security personnel trained in human rights policies or procedures	No
-------	---	----

## GRI 411: Rights of Indigenous Peoples

411-1	Incidents of violations involving rights of indigenous peoples	No
-------	--	----

## GRI 413: Local Communities

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

## GRI 414: Supplier Social Assessment 2016

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 2016

415-1	Political contributions	No
-------	-------------------------	----

### **GRI 416: Customer Health and Safety 2016**

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

### **GRI 417: Marketing and Labeling**

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

### **GRI 418: Customer Privacy**

418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	No	
-------	--	----	--

## **Alda Seafood Holding B.V.**

Leidsestraatweg 2  
2341 GR Oegstgeest  
Netherlands

**+31 615 62 61 25**

**info@aldaholding.com**

**www.aldaseafood.nl**

2023 © Alda Seafood Holding B.V.

If you have any inquiries regarding the report,  
please contact us at **sustainability@aldaholding.com**

