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PESCANOVA

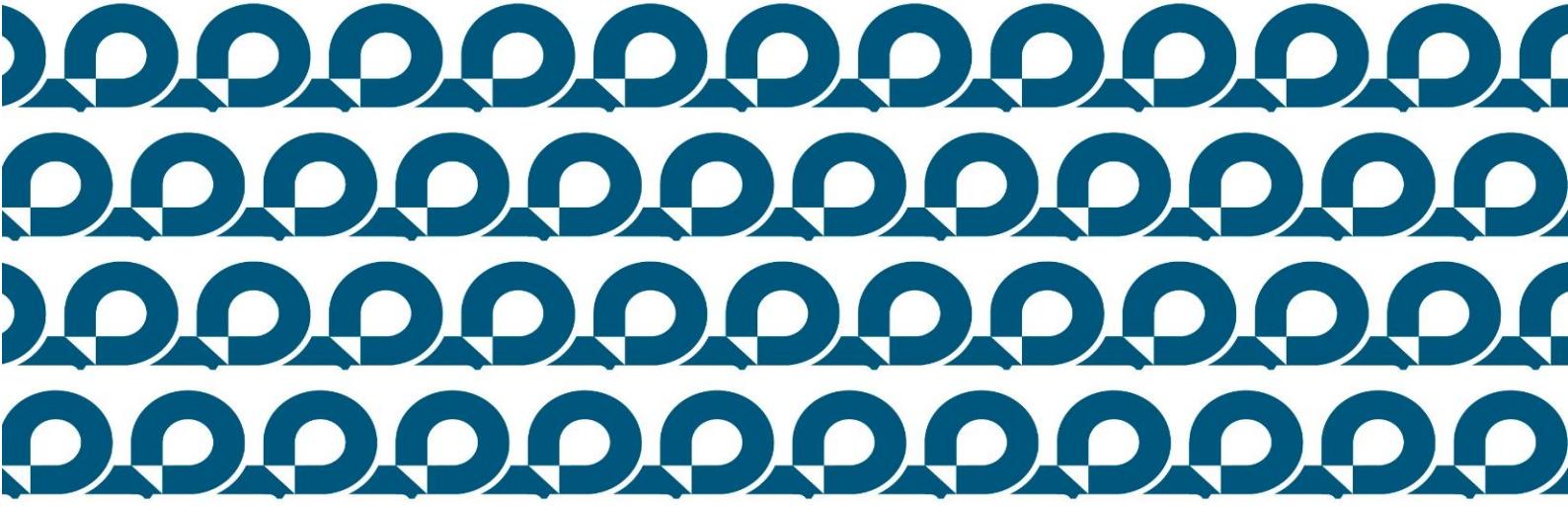
## DOUBLE MATERIALITY REPORT 2025

NUEVA PESCANOVA GROUP

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## DOUBLE MATERIALITY REPORT 2025

### NUEVA PESCANOVA GROUP

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## DOUBLE MATERIALITY REPORT 2025

### NUEVA PESCANOVA GROUP

#### EXECUTIVE SUMMARY

As part of our Double Materiality Assessment, we systematically identified and evaluated both the actual and potential impacts of our activities on the environment and society, as well as the sustainability-related financial risks and opportunities that may affect our business. Applying this framework across our operations and supply chain enabled us to develop a double materiality matrix, prioritising key Impacts, Risks, and Opportunities (IROs) and providing a foundation for ongoing monitoring and strategic decision-making.

In total, we assessed 116 IROs aligned with the subtopics defined in the European Sustainability Reporting Standards (ESRS). Of these subtopics, 19 exceeded the materiality threshold and are integrated into our sustainability strategy. Based on the relevance of the material IROs, 9 subtopics have been classified as *Crucial* and 10 as *Significant*.

The material subtopics encompass 37 positive impacts, 34 negative impacts, 23 risks, and 22 opportunities, reflecting both the breadth and depth of our sustainability challenges and contributions. Notably, 17 subtopics exhibit double materiality, meaning they have both significant environmental or social impacts and material financial implications for the company.

Our analysis highlights that the most strategically relevant sustainability topics include **E1 (Climate Change)**, **E3 (Water and Marine Resources)**, **E4 (Biodiversity and Ecosystems)**, **S1 (Own Workforce)**, and **S4 (Consumers and End-Users)**. These areas represent the company's most important subtopics, guiding our efforts to manage risks, seize opportunities, mitigate negative impacts, and enhance positive ones.

The insights gained from this assessment are closely aligned with our strategic vision to consolidate our position as a global leader in the seafood sector, while advancing sustainability, innovation, and environmental stewardship. By embedding the results of this double materiality exercise into our decision-making, reporting, and operational practices, we are better equipped to deliver long-term value for our business, our stakeholders, and the planet.

#### 1. NUEVA PESCANOVA GROUP

The Nueva Pescanova Group is a multinational company engaged in the capture, farming, production, and marketing of seafood, particularly fish and shellfish —for more details, visit [www.nuevapescanova.com/en/](http://www.nuevapescanova.com/en/).

The DNA of our Group is reflected in:

- “Together we work to be the best food company in the market by bringing the freshness of the sea to the consumer’s table.”
- “We rely on our brand and innovation to fish, farm, select and process the best product wherever it may be found.”
- “We believe our first responsibility is the sustainability of natural resources and of our partner communities, whose trust we build and maintain by acting ethically and creating value.”

Responsible conduct and the sustainable management of our activities—across biological, environmental, technological, economic, commercial, and social dimensions—are non-negotiable and core elements of the Group’s corporate culture. This is particularly important given the extractive nature of our operations and our consumption of natural resources, whether in fishing, aquaculture, or the processing and marketing of seafood products.



In this context, Corporate Social Responsibility (CSR) is a key element of our business strategy, always guided by the needs, legal requirements, and regulatory frameworks of the countries and communities where we operate. The Nueva Pescanova Group aligns its CSR strategy with the United Nations Sustainable Development Goals (SDGs), integrated into the 2030 Agenda, of which we are active members through the Spanish Network of the UN Global Compact.

## 2. GENERAL CONCEPTS OF MATERIALITY

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Materiality is a fundamental concept in business management, as it allows organisations to identify which aspects are most relevant, require prioritisation, and need to be actively managed—i.e., material aspects.

The concept of double materiality (DM) has become particularly important in the current regulatory context for corporate reporting. This approach focuses on how sustainability-related risks and opportunities—in the broadest sense—can significantly influence corporate value creation. Adopting a double materiality perspective enables a more holistic understanding of our impact on society and the natural environment, supporting strategic decision-making that aligns both with current regulations and the expectations of our stakeholders.

Integrating materiality analysis into our environmental, social, and governance (ESG) strategies provides deeper insights into our sustainability performance, helps mitigate risks, and identifies opportunities that contribute to long-term value creation. As regulatory frameworks such as the Corporate Sustainability Reporting Directive (CSRD) continue to evolve, the ability to assess and report on sustainability matters is increasingly critical to operating effectively in the global market.

## 3. DOUBLE MATERIALITY WITHIN THE CSRD FRAMEWORK

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The Corporate Sustainability Reporting Directive (CSRD), introduced by the European Union, establishes double materiality as a core principle in the design of sustainability strategies, focusing on the most relevant and priority issues.

Corporate sustainability reporting and the communication of our ESG performance are exercises in transparency and accountability towards our stakeholders. We recognise that the companies within the Nueva Pescanova Group can be affected by ESG factors while simultaneously generating impacts on society and the environment. For this reason, it is essential to apply validated and harmonised prioritisation criteria.

To ensure transparent reporting and effective implementation of materiality at the corporate level, the CSRD recommends assessing and communicating sustainability information from two complementary perspectives:

- **Impact Materiality:** This evaluates how our operations and business activities affect people, the environment, and society at large. Impact materiality assessment involves identifying information related to actual or potential, positive or negative, material impacts on people or the environment over the short, medium, or long term. These impacts may arise from our own operations, products, or services, as well as from our business relationships throughout the value chain, both upstream and downstream.
- **Financial Materiality:** This examines how sustainability matters influence financial performance, as well as the risks and opportunities for the Group. Financial materiality assessment focuses on information deemed relevant to primary users of general-purpose financial reports, who make decisions regarding the allocation of resources to the company. Additionally, information is considered material if its omission, misstatement, or concealment could reasonably influence decisions made by these users based on the company's sustainability status.



Adopting this dual perspective ensures that we consider not only the financial impacts arising from sustainability-related risks in our operations but also the broader social and environmental consequences, integrating them into our management reporting.

The CSRD-aligned double materiality assessment requires thorough processes to ensure that the information reported meets regulatory standards, providing a transparent and comprehensive view of our ESG performance. This strengthens accountability and promotes consistency in corporate sustainability reporting.

As a rigorous process for identifying and prioritising the most relevant sustainability aspects, double materiality assessment offers several key benefits:

- **Identification and prioritisation of key topics:** recognising sustainability issues with significant implications for both business and society.
- **Regulatory compliance:** ensuring alignment with the CSRD and other sustainability reporting frameworks.
- **Strengthening corporate resilience:** proactively addressing ESG risks and opportunities to minimise vulnerabilities.
- **Stakeholder trust and engagement:** demonstrating transparency and commitment to sustainability, reinforcing corporate reputation.
- **Improved decision-making:** integrating sustainability considerations into the Group's strategy and risk management.

The insights derived from this assessment are fundamental, providing the basis for clear, comprehensive, and action-oriented sustainability reporting.

## 4. METHODOLOGY AND PROCESS FOR ASSESSING DOUBLE MATERIALITY

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### 4.1. Identification and Prioritisation of Impacts, Risks, and Opportunities

Our Double Materiality Assessment (DMA) was initially conducted in alignment with the *Implementation Guidance on Materiality Assessment (IG1)* published by EFRAG in May 2024 and subsequently adapted to reflect the modifications proposed in the *Amended ESRS 1 Exposure Draft* of July 2025, ensuring full compliance with ESRS 2 (IRO-1) and related standards. This process establishes a robust and transparent framework to identify, assess, and prioritise the sustainability impacts, risks, and opportunities (IROs) most relevant to our business and stakeholders.

Our DMA followed a structured process—comprising stakeholder engagement, scoping and assessment of IROs, validation, calibration, and review and approval of results—preceded by a foundational stage of contextual understanding, as recommended by EFRAG IG1. We build on over six years of experience in materiality assessments and three previous materiality exercises, and we are supported by internal studies, benchmarking exercises, peer analysis, and continuous monitoring of the regulatory landscape.

The assessment is updated annually to ensure it remains aligned with evolving business priorities, stakeholder expectations, and regulatory requirements.

A key outcome of the DMA is the identification and prioritisation of IROs. These elements are essential for shaping our sustainability strategy and guiding corporate decision-making:

- **Impact:** how operations, products, and services affect environmental and social systems, either positively (⊕) or negatively (⊖). **Actual** (↓) impacts are those that have already occurred as a result



of the activities, products, or business relationships, while **Potential (➔)** impacts are those that could occur in the future, whether positive or negative, across its own operations or value chain relationships.

- **Risk (R):** sustainability-related threats that could affect the company financially or operationally, including regulatory changes, climate-related risks, or reputational risks.
- **Opportunity (O):** potential benefits arising from sustainability trends, such as innovations in green technologies, new market opportunities, or strengthened brand value.

For the significance scoring of each topic, we considered the likelihood, scope, scale, and irremediable character of impacts, as well as the likelihood and magnitude of risks and opportunities. All input factors were weighted equally in the assessment.

SIGNIFICANCE SCORING [range]	
IMPACT MATERIALITY	FINANCIAL MATERIALITY
For both positive and negative impacts: Scale [1-5] Scope [1-5] Irremediability [0.1-0.9] Likelihood [0.1-0.9]	For both risks and opportunities: Magnitude [1-5] Probability [1-5]

## 4.2. Impact Scoring

Following ESRS 1 and EFRAG guidance, the **Severity** of impacts was assessed using three key factors: scale, scope, and irremediable character:

- **Scale** (*size ranging from minimum to maximum [1-5]*): the seriousness of a negative impact or the significance of a positive impact on people or the environment, considering existing mitigation measures and compliance obligations. Scale range: [1] Very limited impact on individuals and/or the environment; [2] Limited impact on a group of people and/or the environment; [3] Moderate short-term impact on society and/or the environment; [4] Significant short-term impact on society and/or the environment; [5] Severe long-term impact on society and/or the environment.
- **Scope** (*size ranging from minimum to maximum [1-5]*): the extent to which impacts are widespread, such as the geographical reach in the case of environmental impacts or the number of individuals affected for social impacts. Scale range: [1] Very limited scope: affects very few individuals or a very small/localised area; [2] Limited scope: affects a limited group of people or a small/localised area; [3] Moderate scope: affects a moderate number of people, Group companies, or a wider/localised area; [4] Significant scope: affects a large number of people, multiple Group companies, regions, or local communities; [5] Severe scope: affects society at large, most Group companies, multiple regions, or has a global/regional reach.
- **Irremediable character** (*factor ranging from very low to very high [0.1-0.9]*): the extent to which negative impacts can—or cannot—be remediated, including the ability to restore affected individuals or the environment to their prior state. Scale range: [0.1] Very low irremediability: Impacts are easily remediated; affected individuals or environments can be fully restored to their prior state with minimal effort or resources, [0.9] Very high irremediability: Impacts are essentially irreversible; affected individuals or environments cannot be restored to their prior state, even with significant intervention.

Materiality was determined as follows:

- **Actual negative impacts:** assessed based solely on **Severity**.



- **Potential negative impacts:** assessed based on both **Severity** and **Likelihood**, with severity taking precedence in certain cases, such as potential human rights impacts; likelihood, or probability of occurrence, was added as a fourth factor.
- **Actual positive impacts:** assessed using scale and scope.
- **Potential positive impacts:** assessed based on scale, scope, and likelihood.
- **Likelihood** (*factor ranging from very low to very high [0.1–0.9]*): the extent to which a potential impact is expected to materialise. Scale range: [0.1] Very low likelihood or the impact is highly improbable. It is unlikely to occur, and the expectation of it materialising within the considered timeframe is minimal; [0.9] Very high likelihood or the impact is highly probable. It is expected to occur, and there is strong confidence that it will materialise within the considered timeframe.

This approach ensures a consistent and transparent evaluation of both positive and negative impacts, whether actual or potential, across all relevant dimensions.

#### 4.3. Risk and Opportunity Scoring

Sustainability-related risks and opportunities were evaluated along two key dimensions:

- **Magnitude** (*size ranging from minimum to maximum [1–5]*): the potential financial impact on key indicators such as revenue, CAPEX, or OPEX. Scale range: [1] Very low: Minimal financial impact; the effect on revenue, CAPEX, or OPEX is negligible and unlikely to affect overall business performance; [2] Low: Minor financial impact; the effect on key indicators is limited and manageable without significant adjustments; [3] Moderate: Moderate financial impact; the effect on revenue, CAPEX, or OPEX is noticeable and may require operational or budgetary adjustments; [4] High: Significant financial impact; the effect on key indicators could substantially affect business performance and requires active mitigation or management; [5] Very high: Severe financial impact; the effect on revenue, CAPEX, or OPEX could critically affect business performance and demands urgent strategic response.
- **Probability** (*size ranging from minimum to maximum [1–5]*): the probability that the risk or opportunity will materialise. Scale range: [1] Very unlikely or the event is very improbable within the next ten years, representing the lowest likelihood and minimal expectation of occurrence; [2] Unlikely or the event is improbable within the next ten years, indicating a low likelihood and a long timeframe before potential occurrence; [3] Possible or the event might occur within the next six years, reflecting a moderate likelihood over an intermediate timeframe; [4] Likely or the event is probable and could occur within the next three years, indicating a reasonably high chance over a shorter timeframe; [5] Very likely or the event is highly probable and expected to occur within the next year, reflecting both a high likelihood and a short timeframe for occurrence.

Financial effects were analysed through sustainability-specific scenarios. Existing mitigation measures were reflected by adjusting either magnitude or probability. While quantitative assessment was used wherever feasible, qualitative evaluation supplemented cases where reliable quantification was not possible due to the complexity of sustainability-related scenarios.

#### 4.4. Time Horizons

To maintain a forward-looking perspective, impacts, risks, and opportunities were assessed across three time horizons:

- **Short term (►►►):** current and following reporting year.
- **Medium term (►►►):** up to five years.
- **Long term (►►►):** beyond five years.



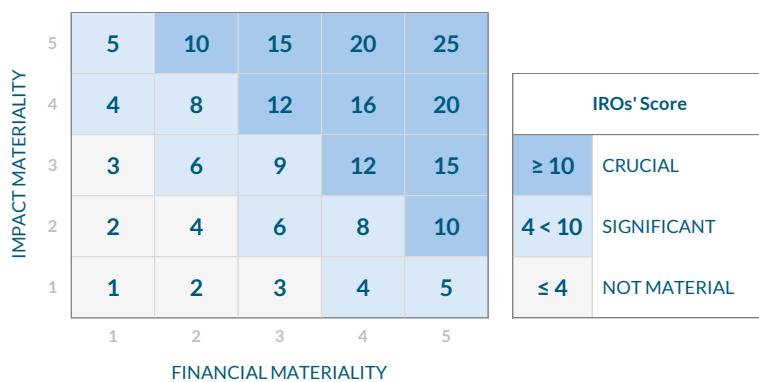
#### 4.5. Value chain approach

For a comprehensive assessment, IROs were analysed across the entire value chain, considering different levels:

- **Upstream Activities (▲)**: analysis of suppliers' sustainability practices, raw material sourcing, and pre-operational processes.
- **Own Operations (●)**: evaluation of resource consumption, working conditions, and environmental performance within the company's direct operations.
- **Downstream Activities (▼)**: analysis of the impact of product distribution, use, and disposal, as well as customer sustainability expectations.

#### 4.6. Materiality Thresholds

In line with ESRS 2, materiality thresholds were defined and validated. Three levels of materiality were established as a function of the IROs score—Score  $\geq 10$ : *Crucial*; Score  $4 < 10$ : *Significant*; Score  $\leq 4$ : *Not Material*. Additionally, an IRO is material if it is significant in either of the two dimensions.



The reporting threshold was set at the *Significant* level, meaning that IROs assessed as either *Significant* or *Crucial* were considered material and included in our disclosures.

#### 4.7. Understanding the Context

We began by reviewing applicable regulations, sector challenges, and internal sustainability priorities, integrating insights from previous assessments and ongoing initiatives.

To further support the assessment, we compiled a comprehensive list of potential sustainability matters that could be relevant to our double materiality analysis. Stakeholder input was a central consideration, combining both direct and indirect sources:

- **Direct input** was obtained through engagement in multistakeholder networks, dialogue with sector groups within the seafood industry, and consultations with key actors across our value chain, including fisheries and aquaculture producers, competitors, partners, collaborators, the processing industry, cold chain logistics and storage providers, transportation and distribution services, energy and utilities suppliers, and consumer associations and marketing focus groups.
- **Indirect input** included analyses of customer and capital market interests, informed by media and press coverage, prior materiality exercises, context and trends analysis, sectoral association reports, and benchmarking exercises and their thorough methodologies, such as those conducted by the World Benchmarking Alliance (WBA).

A comprehensive background and trends analysis was conducted, encompassing competitors in the fishing, aquaculture, industrial, and commercial sectors, as well as companies in related industries, including energy,



technology, banking, and scientific research. This analysis also incorporated insights from multinational food production and consumer goods companies, public administrations, governmental and non-governmental organisations, and academia.

The analysis identified trending topics of national and international relevance in corporate responsibility, technical and scientific developments, and sustainability priorities across key supply chains. These findings were then cross-referenced with the dependencies and impacts of the Nueva Pescanova Group's activities, from sourcing in fishing and farming countries to the processing and marketing of seafood products.

Based on this context analysis, information found particularly relevant for the Group was clustered in the following topics: Corporate Governance and Legislation; Fishing and Aquaculture; Decarbonisation and Renewable Energy; Environment and General Sustainability; Animal Welfare; Quality, Certifications, and Sustainability Evidence; Human Resources and Labour Responsibility; Occupational Health and Safety; Research, Innovation and Technological Development; Products, Innovation, and Market Trends; Sector Challenges and Trends; Economy and Business; Distribution and Retail; Consumers and Responsible Nutrition; Food Waste and Responsible Communication.

To strengthen our knowledge of current issues and topics that are most relevant to the Group's mission, we have considered various sources with relevant criteria for the materiality analysis, such as the indicators of the Dow Jones Sustainability Index or the Sustainability Accounting Standards Board (SASB), disclosures defined by the Global Reporting Initiative (GRI), issues covered by the Carbon Disclosure Project (CDP), recommendations of the Task Force on Climate-related Financial Disclosures (TNFD), the FAO, and the UN, among others, complemented by a press analysis and by permanent dialogue with our stakeholders. In addition, we have participated in various governance initiatives and scientific platforms on responsibility and sustainability, collaborating in discussion forums, working groups and conferences, seminars, both face-to-face and web-based:

- Active collaboration as participating members of the UN Global Compact initiative in several of their work platforms, such as the Ocean Stewardship Coalition<sup>1</sup>, CFO Coalition for the SDGs<sup>2</sup>, or Leaders' Summit, and in the initiatives launched by their Spanish Network, and similar collaborative platforms by UNCTAD<sup>3</sup>.
- Collaboration with international benchmarking exercises on relevant topics of Responsibility and Sustainability, such as the Seafood Stewardship Index and the Ocean, Food and Agriculture, Nature, Climate, Social and Gender Benchmarks (WBA), and the Global Child Forum (GCF) Benchmark.
- Participation in the Sustainability Committees of AECOC, ANFACO and the Galician Food Cluster (CLUSAGA), and the Galician Climate Alliance.
- Participation in the Steering Group and working committees of the Global Sustainable Seafood Initiative (GSSI) and in its accelerator platform for sustainability evidence Seafood MAP.
- Participation in the steering and work committees of the FISH Standard for Crew (Fairness, Integrity, Safety and Health Standard for Crew), the Global Dialogue on Seafood Traceability (GDST), and the development of the Certified Seafood International (CSI) Fisheries Standard as a global certification programme grounded on criteria set by the FAO guidelines.

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<sup>1</sup> UNGC-WWF 2022. Setting Science-Based Targets in the Seafood Sector: Best Practices to Date. United Nations Global Compact and World Wildlife Fund. <https://unglobalcompact.org/library/6050>

<sup>2</sup> UNGC 2020. CFO Principles on Integrated SDG Investments and Finance. United Nations Global Compact. <https://unglobalcompact.org/library/5788>

<sup>3</sup> UNCTAD 2024. Energy Transition of Fishing Fleets – Opportunities and Challenges for Developing Countries. United Nations Conference on Trade and Development. <https://unctad.org/publication/energy-transition-fishing-fleets-opportunities-and-challenges-developing-countries>



- Collaborative meetings and seminars with MSC, ASC, SFP, SSP, and participation in events organised by the FAO, universities, research groups, public administrations, and private companies.

#### 4.8. Stakeholder Engagement

We identified and engaged subject-matter experts across the organisation, including sustainability, legal and human resources teams. Training and information were shared to ensure a common understanding of CSRD objectives, ESRS requirements, and the DMA methodology.

Affected stakeholders are individuals or groups whose interests are, or could be, impacted—positively or negatively—by the undertaking's activities, including direct and indirect business relationships across both upstream and downstream segments of the value chain.

Past work by our Responsible Action Programme (RAP) provided a foundation, documenting projects and initiatives in CSR, sustainability, innovation, education, and social development with the support of CSR ambassadors in the countries where we operate.

Through stakeholder consultations—both internal and external—we identified the most relevant issues aligned with the Group's mission:

- **Governance, Ethics, and Compliance:** establishment of internal governance tools (policies, standards, procedures), adherence to the 10 Principles of the UN Global Compact, alignment with the UN SDGs, transparency, combating illegal, unreported, and unregulated (IUU) fishing, sectoral commitments (plastic reduction, circular economy, responsible communication), and ongoing stakeholder dialogue.
- **Environment:** optimisation of energy and water use, transition to clean energy, efficient raw material use, packaging design with reduced environmental impact, minimisation of emissions and effluents, circular economy for by-products, promotion of sustainable fisheries and aquaculture, responsible procurement, nature dependency and biodiversity conservation, animal welfare, and sustainable sourcing of feed ingredients.
- **Social and Labour:** responsible labour relations, occupational health and safety, equality and diversity, training and professional development, corporate volunteering, work-life balance, and promotion of healthy habits.
- **Product Development:** food safety and quality, food security, market access to healthy and nutritious products, clean-label innovation, traceability and transparency in product origins and processes, minimisation of food losses, and consumer-focused innovation.
- **Community Engagement and Partnerships:** investment in local infrastructure, job creation, professional training, education and awareness projects, local sourcing, recognition of local traditions, social development initiatives, environmental improvement projects, and mitigation of emergency or crisis impacts.

Stakeholder engagement is a cornerstone of our DMA. We maintain continuous dialogue with a wide range of stakeholders to understand their expectations, concerns, and evolving priorities. Insights from these interactions, combined with the expertise of internal specialists, informed the assessment and ensured that stakeholder perspectives were reflected throughout the process.

In-house experts applied professional judgement, supported by publicly available evidence, to evaluate materiality where further consultation was not required. Additionally, our long-standing engagement in the communities where we operate provided a strong basis for understanding social and environmental impacts at the local level.



#### 4.9. Stakeholders mapping

In this analysis stakeholders are defined as groups whose needs, interests, or expectations affect—or are affected by—the company's activities, directly or indirectly, and therefore have the capacity to influence, directly or indirectly, the development of its strategy, cf. Nueva Pescanova Group's [Corporate Policy on Institutional Relations](#).

The Group's vertically integrated strategy, spanning fisheries and aquaculture farming, establishes a long value chain from raw materials to final market-ready products, resulting in a diverse and extensive range of stakeholders with whom we interact.

The identification and classification of stakeholders—both internal and external—are the result of long-term engagement, open dialogue, and, fundamentally, the application of the principles and provisions outlined in our [Stakeholder Relationship Management](#) framework.

All employees are recognized as [internal stakeholders](#) with the capacity to influence the Group's strategy. Within this category, seven subgroups are distinguished based on their degree of influence in defining and implementing the strategy:

- 1) Members of the Board of Directors of Nueva Pescanova S.L.
- 2) Members of the Directors Committee (CODIR).
- 3) Members of the TOP35 group of country managers and directors.
- 4) CSR and Sustainability Departments, and equivalent roles in each company.
- 5) Business Units and Primary Areas, broken down into two levels:
  - Executives holding key positions, not members of the above committees.
  - Other employees in key positions, not members of the above groups.
  - The Business Units are Fishing, Aquaculture, Operations (Industry), and Commercial.
  - The Primary Areas are Marketing & Innovation; BTO; HR, Legal, Compliance & CSR/Sustainability.
- 6) Legal representatives of the workers ('Workers Committee').
- 7) Others: Employees not included in the above groups but who have contributed directly or indirectly to the Group's Responsibility and Sustainability programmes or participated in the development of related indicators or information.

The [external stakeholders](#) were aggregated into 10 subgroups: (1) Public Administration, intergovernmental bodies, international organisations; (2) Academia, research centres, scientists, experts, and training agents; (3) Shareholders, investors, and other financial sector participants; (4) Seafood industry stakeholders, including producers, manufacturers, fishing, and aquaculture actors; (5) Industry or sectoral associations, unions, or syndicates; (6) Suppliers of goods and services; (7) Customers, retailers, and wholesalers; (8) Non-governmental organisations (NGOs) and foundations; (9) Communication and media; (10) Consumers.

Nature (or, alternatively, the environment, ecosystems, or the ocean) is considered a silent stakeholder, as it can be affected by both negative and positive impacts and constitutes a relevant party—whether as an affected or benefiting entity—in the assessment and management of risks and opportunities.

Stakeholder mapping was a key step in our double materiality assessment under the CSRD. It enabled us to identify and prioritise the full range of impacts, risks, and opportunities linked to our operations and value chain. By systematically engaging with employees, local communities, customers, suppliers, regulators, investors, and civil society, we avoided bias towards internal views and ensured that both perspectives of materiality were covered: the impacts of our activities on people and the environment, and the financial



implications of sustainability issues for our business. This approach not only strengthens compliance with ESRS requirements but also builds transparency, trust, and accountability in the way we report and manage our most material topics.

#### 4.10. Scope

The DMA covered all sub-sub-topics defined in ESRS 1, adopting a comprehensive approach to both the inside-out and outside-in dimensions of materiality.

From an impact perspective, we assessed the positive and negative effects of our activities on people and the environment, considering both actual and potential outcomes. From a financial perspective, we assessed sustainability-related risks and opportunities that may influence business performance or the organisation's capacity to achieve its economic objectives, considering potential impacts on revenue, capital expenditure, and operating costs.

The assessment encompassed our own operations and extended across the value chain, with particular attention to upstream activities where sourcing and geographic exposure may present heightened risks to human rights, labour conditions, and environmental integrity. While first-tier suppliers were analysed in detail, we also incorporated insights from sector-wide assessments, industry benchmarks, and internal expertise developed through participation in relevant sustainability and regulatory forums.

#### 4.11. Validation and Calibration

Results were aggregated and analysed. Calibration reviewed preliminary outcomes, integrating further stakeholder expert judgement and perspectives to ensure alignment with strategic sustainability priorities.

#### 4.12. Final Review and Approval

The final DMA results were reviewed and approved by the Governance, Responsibility and Sustainability Committee and the Directors Committee, and subsequently endorsed by the Board of Directors. This final validation confirmed that the identified material topics accurately reflect both stakeholder expectations and the Group's strategic priorities.

A detailed description of each IRO, along with the corresponding management responses, is presented in [Chapter 6](#). These responses outline how we minimise negative impacts and mitigate risks, as well as how we enhance positive impacts and leverage opportunities.

### 5. RESULTS OF THE DOBLE MATERIALITY ASSESSMENT

#### 5.1. Assessment of IROs

A preliminary list of IROs was compiled across environmental, social, and governance topics, drawing on previous materiality assessments, internal reports, and stakeholder feedback, as per methodology previously described. This comprehensive list served as the basis for review and validation during the workshops. Additional company-specific IROs were added where relevant, and further consultation with regional or thematic experts ensured completeness.

#### 5.2. List of IROs and Scores

We analysed all IROs to produce a prioritised list of topics. Thresholds were applied (cf. section [4.6](#)) to categorise them, distinguishing subtopics that ranked exceptionally high from either an impact or financial perspective (*Crucial*), those of significant relevance/materiality (*Significant*), and those of lower significance (*Not Material*).



Through ongoing monitoring of emerging developments and necessary adjustments, our strategy and business model are considered well-positioned to address challenges and capitalise on the opportunities that arise.

Chapter 6 will present the significance results for each IRO and their associated characteristics. The summary table below provides an overview of the significance findings and the overall materiality assessment for the analysed subtopics.

ESRS E1 CLIMATE CHANGE	ESRS E2 POLLUTION	ESRS E3 WATER AND MARINE RESOURCES	ESRS E4 BIODIVERSITY AND ECOSYSTEMS																																																																
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### 5.3. Doble Materiality Matrix

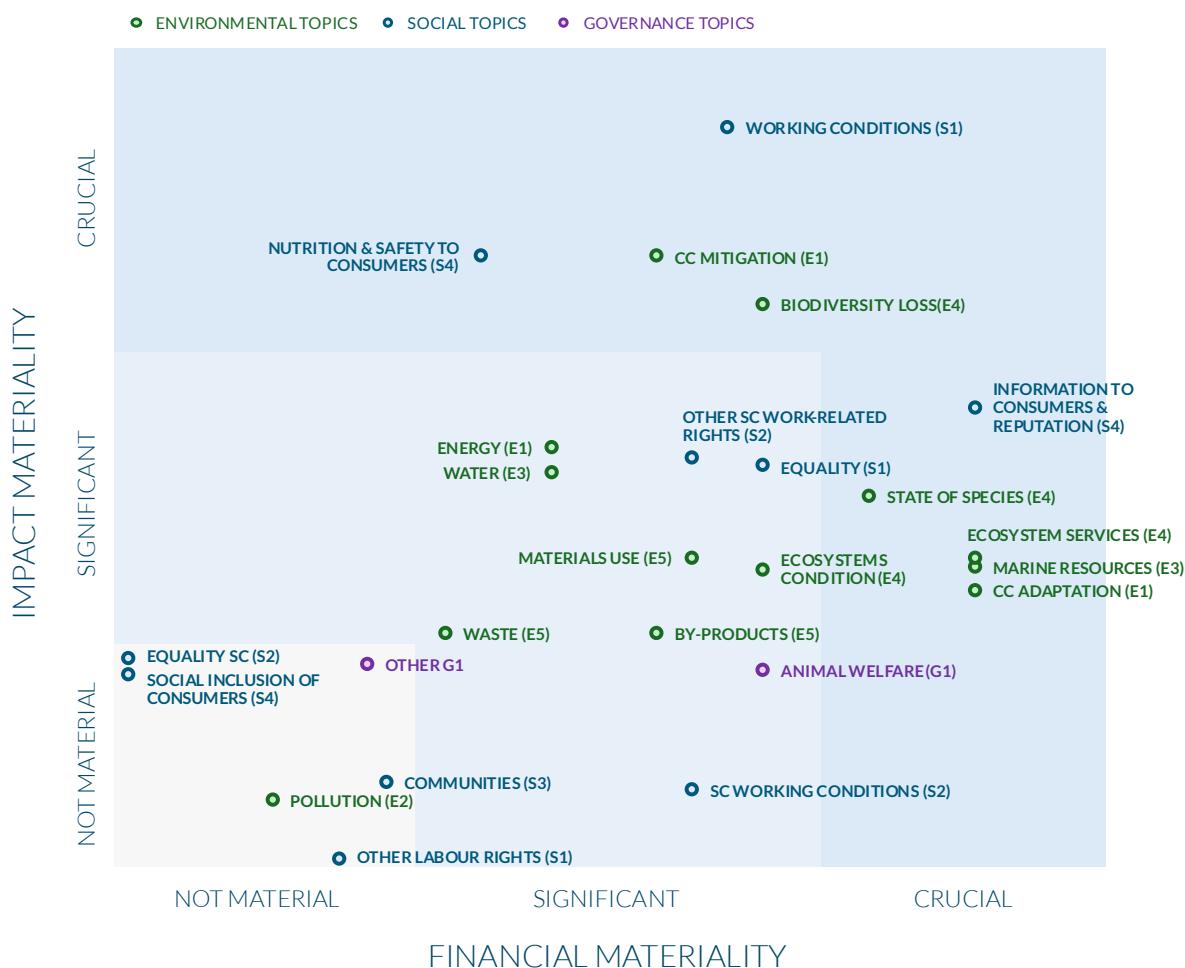
As part of our double materiality assessment, we identified and evaluated our actual and potential impacts on the environment and society, as well as the sustainability-related financial risks to which we are exposed and the opportunities we can leverage. By applying this systematic framework across our activities and supply chain, we developed a double materiality matrix that prioritises the identified Impacts, Risks, and Opportunities (IROs) and facilitates their analysis and ongoing monitoring.

In total, we assessed 116 IROs aligned with the subtopics defined in the European Sustainability Reporting Standards (ESRS). Of these subtopics, 19 exceeded the materiality threshold and are integrated into our sustainability strategy. Based on the relevance of the material IROs, 9 subtopics have been classified as *Crucial* and 10 as *Significant*.

The material subtopics identified comprise 37 positive impacts, 34 negative impacts, 23 risks, and 22 opportunities. Furthermore, 17 subtopics were found to present double materiality, as they entail both significant impacts on people or the environment and material financial effects for our company.

In line with our strategic vision, the sustainability topics **E1 (Climate change)**, **E3 (Water and marine resources)**, **E4 (Biodiversity and ecosystems)**, **S1 (Own workforce)**, and **S4 (Consumers and end-users)** encompass the most crucial—or highly relevant—subtopics for the Nueva Pescanova Group.

The impacts, risks, and opportunities associated with these topics are closely aligned with our ambition to consolidate our position as a global leader in the seafood sector, guided by the principles of sustainability, innovation, and environmental stewardship.





## 6. MATERIAL IMPACTS, RISKS, OPPORTUNITIES, AND RELATED DISCLOSURES

### 6.1. ESRS E1 – CLIMATE CHANGE

CATEGORY	IRO	ACTUAL / POTENTIAL	SUPPLY CHAIN	TIME FRAME	SCORE	MATERIALITY
<b>Subtopic 1 CLIMATE CHANGE ADAPTATION</b>						
• Climate-related physical risks (acute)	● (R)		●	▷▷▷	12	CRUCIAL
• Climate-related physical risks (acute)	● (–)	↓	●	▷▷▷	6	Significant
• Climate-related physical risks (chronic)	● (R)		●	▷▷▷	9	Significant
• Climate-related physical risks (chronic)	● (–)	→	●	▷▷▷	4	Significant
• Increased costs with GHG emission taxes, certifications and reports	● (R)		▲●▼	▷▷▷	9	Significant
<b>Subtopic 2 CLIMATE CHANGE MITIGATION</b>						
• Renewable energy generation	● (+)	↓	▲●	▷▷▷	6	Significant
• Carbon compensation by 'our' forests	● (+)	↓	●	▷▷▷	12	CRUCIAL
• Carbon compensation through new sequestration projects	● (+)	→	●	▷▷▷	6	Significant
• Scope 1 carbon emissions – processes efficiency	● (–)	↓	●	▷▷▷	14	CRUCIAL
• Scope 2 carbon emissions – use efficiency and electricity suppliers	● (–)	↓	▲●	▷▷▷	10	CRUCIAL
• Scope 3 carbon emissions – supply chain	● (–)	↓	▲▼	▷▷▷	8	Significant
• Carbon compensation projects	● (O)		●	▷▷▷	9	Significant
• Climate-related transition risks (taxes)	● (R)		●	▷▷▷	6	Significant
<b>Subtopic 3 ENERGY</b>						
• Energy consumption	● (+)	↓	●	▷▷▷	8	Significant
• Renewable energy consumption	● (+)	↓	●	▷▷▷	8	Significant
• Procurement of renewable energy	● (O)		▲	▷▷▷	6	Significant

#### 6.1.1. Subtopic: Climate Change Adaptation

This subtopic addresses the strategies and measures a company implements to anticipate, prepare for, and respond to the physical risks of climate change, such as extreme weather events, rising sea levels, or temperature fluctuations. Effective adaptation reduces operational vulnerabilities, protects assets and supply chains, and supports business resilience while safeguarding ecosystems and communities.

Both chronic and acute climate-related risks were considered in assessing IROs on climate change adaptation and mitigation, providing a comprehensive perspective in line with the recommendations of the Task Force on Climate-related Financial Disclosures (TNFD).

*Classification of climate-related hazards as per recommendations of the TNFD:*

Classification	Temperature-related	Wind-related	Water-related
Chronic	Changing seawater temperature	Changing wind patterns	Changing precipitation patterns and types (rain, hail, snow/ice)
	Heat stress		Precipitation or hydrological variability
	Temperature variability		Ocean acidification
	Permafrost thawing		Sea level rise
Acute	Heat wave	Cyclones, hurricanes, typhoons	Drought
	Cold wave/front	Storms	Heavy precipitation (rain, hail, snow/ice)
	Wildfire	Tornado	Flood (coastal, fluvial, pluvial, groundwater)

*Classification of climate-related transition events as per recommendations of the TNFD:*

Policy and legal	Technology	Market	Reputation
Increased pricing of GHG emissions	Substitution of existing products and services with lower emissions options	Changing customer behaviour	Shifts in consumer preferences
Enhanced emissions-reporting obligations	Costs of transition to lower emissions technology	Increased cost of raw materials	Negative stakeholder feedback
Mandates on and regulation of existing production, products and services			Increased stakeholder concern



#### 6.1.1.1. IRO: Climate-related Physical Risks (Acute) - Risk

Acute climate-related physical risks refer to the potential short-term, severe events caused or exacerbated by climate change, such as storms, floods, heatwaves, or other extreme weather events. These events can disrupt operations, supply chains, infrastructure, and logistics, leading to potential financial losses, production delays, and reputational damage. At the risk level, this represents a potential future exposure that could affect the company if preventive measures are not adequately implemented.

We manage acute climate-related physical risks through continuous monitoring of climate forecasts and local environmental conditions, enabling early warning and preparedness. Contingency plans and emergency response protocols are in place to minimize operational disruptions. Production facilities and logistics hubs are designed or retrofitted to withstand extreme weather events, and we engage with suppliers to assess their vulnerability and encourage mitigation measures, securing resilience across our supply chains.

#### 6.1.1.2. IRO: Climate-related Physical Risks (Acute) - Negative Actual Impact

When acute climate events occur, they can have a direct, negative impact on the company's operations, products, or stakeholders. For example, damage to production facilities, loss of raw materials due to extreme weather, or disruptions in transport and cold chain management for seafood products. This is the realized effect of the previously identified risk.

We manage the negative actual impacts of acute climate-related events through rapid response and recovery, activating emergency protocols to limit operational downtime, product loss, and environmental damage. Incidents are documented and evaluated to assess consequences on production, employees, and supply chains. Lessons learned are applied to improve infrastructure resilience, logistics planning, and climate adaptation strategies. Insurance coverage and other financial mitigation measures are in place to reduce exposure to climate-related damages. Both risk and actual impacts are integrated into our sustainability governance framework, ensuring continuous monitoring, implementation of mitigation measures, and the use of real events to inform future adaptation strategies.

#### 6.1.1.3. IRO: Climate-related Physical Risks (Chronic) - Risk

Chronic climate-related physical risks refer to long-term, gradual changes in climate conditions, such as rising temperatures, sea level rise, ocean acidification, changes in precipitation patterns, or shifts in marine ecosystems. These risks may affect the company's operations, raw material availability, supply chains, and overall business continuity over time. At the risk level, this represents potential exposure to future adverse effects if adaptive measures are not taken.

We manage chronic climate-related physical risks by assessing long-term climate trends and their potential impacts on operations, supply chains, and marine ecosystems. Climate adaptation is integrated into business planning through sourcing strategies, aquaculture practices, and supply chain diversification. We invest in research and innovation to develop climate-resilient aquaculture practices, sustainable fishing techniques, and species adaptation strategies. Additionally, we engage with suppliers, industry partners, and scientific organizations to anticipate and mitigate chronic climate risks collaboratively.

#### 6.1.1.4. IRO: Climate-related Physical Risks (Chronic) - Negative Potential Impact

The negative potential impact represents the anticipated consequences of these chronic risks, even if they have not yet fully materialized. Examples include reduced availability of key seafood species due to changing ocean conditions, long-term operational challenges, or increased production costs related to adaptation measures. While these impacts are not immediate, they could affect the company's financial and operational performance in the medium to long term.

We manage potential negative impacts from chronic climate-related physical risks by considering climate models and scenario analyses in identifying future impacts and adjust operational and sourcing strategies accordingly. Environmental indicators affecting key species and production sites are monitored. Adaptive operational measures, such as modifying production cycles, sourcing locations, or practices, are implemented to mitigate long-term impacts. Financial planning ensures resources are allocated for adaptation investments



and potential cost increases resulting from climate change. Both chronic climate risks and their potential negative impacts are embedded into the company's sustainability governance framework, ensuring long-term adaptation measures are implemented and updated based on the latest climate science and operational experience.

#### 6.1.1.5. *IRO: Increased costs with GHG emission taxes, certifications, and reports – Risk*

This IRO represents the financial and operational risks associated with increasing or stricter regulatory and voluntary climate-related obligations. These include GHG emission taxes or carbon pricing schemes, which can raise operational costs for energy consumption, transport, and production activities. Compliance with sustainability standards (e.g., MSC, ASC, ISO 14001, carbon footprint certifications) and mandatory climate reporting (e.g., EU CSRD, TCFD-aligned reporting) may require additional investments in systems, audits, and personnel. Collecting, processing, and verifying emissions and sustainability data can also increase administrative and compliance costs. At the risk level, this represents a potential increase in operating costs that could affect profitability and competitiveness if not proactively managed.

We manage this risk through continuous regulatory monitoring to track national and international climate-related regulations, carbon taxes, and reporting requirements, allowing us to anticipate cost impacts. GHG emissions are measured and monitored across operations and supply chains to identify reduction opportunities, while energy efficiency projects, renewable energy adoption, and process improvements help mitigate exposure to carbon pricing. Strategic planning of voluntary sustainability certifications ensures an optimal balance of credibility and cost-efficiency. Investment in reporting infrastructure, including systems and trained personnel, enables efficient and compliant data collection, verification, and reporting. We also engage with regulators, industry bodies, and peers to anticipate changes and adopt best practices in emissions management and reporting.

This risk is fully integrated into the company's sustainability governance and financial planning. By proactively managing emissions, certifications, and reporting, the company reduces exposure to unexpected costs while demonstrating a strong commitment to climate action and transparency.

#### 6.1.2. **Subtopic: Climate Change Mitigation**

This subtopic focuses on the actions a company takes to reduce or prevent greenhouse gas (GHG) emissions and other contributors to climate change. It includes strategies such as energy efficiency improvements, renewable energy adoption, process optimisation, and emission reductions across the value chain. Mitigation efforts help limit global warming, meet regulatory and stakeholder expectations, and contribute to long-term sustainability.

##### 6.1.2.1. *IRO: Renewable energy generation – Actual Positive Impact*

Generation of renewable energy reduces reliance on fossil fuels, lowering greenhouse gas (GHG) emissions and contributing positively to the company's carbon footprint. This directly supports the company's climate mitigation goals and demonstrates leadership in sustainable operations.

We manage renewable energy generation by investing in renewable energy projects at our production sites and integrating renewable sources into electricity consumption. Energy production and associated emissions reductions are closely monitored, and the contributions of renewable energy are transparently reported in our sustainability disclosures.

##### 6.1.2.2. *IRO: Carbon compensation by 'our' forests – Actual Positive Impact*

Managed company-owned forests act as carbon sinks, sequestering CO<sub>2</sub> from the atmosphere and offsetting operational emissions. This is a tangible, actual positive contribution to the company's net emissions balance.

We manage carbon compensation through our forests by maintaining and monitoring forest health and carbon stock and applying sustainable forestry practices. Sequestration rates are calculated and reported to provide transparent ESG disclosures on the climate benefits generated.



#### 6.1.2.3. *IRO: Carbon compensation through new sequestration projects – Potential Positive Impact*

Investment in new carbon sequestration projects, such as reforestation and blue carbon initiatives, has the potential to generate future carbon offsets. While the impact is positive and complementary to our existing carbon compensation efforts, it is currently anticipated rather than realized.

We manage potential carbon compensation projects by identifying and evaluating initiatives for environmental effectiveness and feasibility. We develop partnerships with credible carbon project developers, both internally and externally, and establish robust monitoring and verification systems to quantify anticipated carbon removal, ensuring transparency and alignment with our sustainability objectives.

#### 6.1.2.4. *IRO: Scope 1 Carbon Emissions – Process Efficiency – Actual Negative Impact*

Direct emissions from company operations (Scope 1) represent negative environmental impacts. Inefficiencies in processes can increase fuel use and GHG emissions.

We manage Scope 1 carbon emissions by implementing energy efficiency improvements across production and logistics, upgrading equipment, and optimizing processes to reduce fuel consumption. Emissions are regularly monitored, and performance is reported to ensure transparency and continuous improvement.

#### 6.1.2.5. *IRO: Scope 2 Carbon Emissions – Use Efficiency and Electricity Suppliers – Actual Negative Impact*

Indirect emissions from purchased electricity (Scope 2) contribute negatively to the company's carbon footprint. Inefficient use or reliance on carbon-intensive electricity increases emissions.

We manage Scope 2 carbon emissions by optimizing energy use in production and facilities and procuring electricity from low-carbon or renewable sources. Emissions are tracked and reported as part of our sustainability commitments, ensuring transparency and progress toward climate goals.

#### 6.1.2.6. *IRO: Scope 3 Carbon Emissions – Supply Chain – Actual Negative Impact*

Indirect emissions across the supply chain (Scope 3), including raw materials, transportation, and distribution, represent significant environmental impacts.

We manage Scope 3 carbon emissions by engaging suppliers on emissions reduction strategies and prioritizing low-carbon transportation and sourcing practices. Scope 3 emissions are measured and reported, along with progress on reduction initiatives, to ensure transparency and drive improvement across the value chain.

#### 6.1.2.7. *IRO: Carbon Compensation Projects – Opportunity*

Development or investment in carbon compensation projects (e.g., reforestation, mangrove restoration) represents an opportunity to generate positive environmental and reputational value, potentially creating offset credits and demonstrating climate leadership.

We manage carbon compensation opportunities by assessing initiatives for environmental quality and impact, mostly implementing internal projects and monitoring outcomes. The resulting offsets are integrated into our ESG reporting to ensure transparency and demonstrate our commitment to climate mitigation.

#### 6.1.2.8. *IRO: Climate-related Transition Risks (Taxes) – Risk*

Financial and operational risks arising from climate-related transition measures, such as carbon pricing, taxes on GHG emissions, or regulatory changes, can increase costs and affect competitiveness.

We manage climate-related transition risks and evolving climate legislation, by monitoring regulatory developments and assessing exposure to taxes and compliance costs. Emissions reduction strategies are implemented to minimize potential tax liabilities, and we actively engage with industry bodies and policymakers to anticipate changes and adopt best practices.



### 6.1.3. Subtopic: Energy

This subtopic addresses the consumption, efficiency, and sourcing of energy within company operations. It covers electricity, fuel, and heating/cooling requirements, including the transition to low-carbon energy sources. Effective energy management reduces operational costs, lowers GHG emissions, and supports climate mitigation targets while ensuring energy security and reliability.

#### 6.1.3.1. IRO: Energy Consumption – Actual Negative Impact

Total energy consumption from production, facilities, and logistics contributes directly to environmental impacts, primarily through greenhouse gas emissions if fossil fuels are used. High energy use increases operational costs and environmental footprint, representing an actual negative impact.

We manage energy consumption by implementing efficiency measures across production processes and facilities, monitoring and optimizing energy use, and upgrading equipment and infrastructure to reduce energy intensity. Integrated energy management systems support continuous improvement and help achieve our sustainability and climate goals.

#### 6.1.3.2. IRO: Renewable Energy Consumption – Actual Positive Impact

Consumption of renewable energy (from on-site generation or purchased renewable electricity) reduces dependency on fossil fuels, lowering emissions and contributing positively to climate mitigation goals. This is an actual positive impact on the company's environmental performance.

We manage renewable energy consumption by tracking and reporting usage across operations and prioritizing the use of renewable energy in production and facilities. Energy sourcing is optimized to maximize the share of renewables, and renewable energy usage is integrated into our ESG reporting and sustainability disclosures to ensure transparency and demonstrate progress toward climate goals.

#### 6.1.3.3. IRO: Procurement of Renewable Energy – Opportunity

Strategic procurement of renewable energy (e.g., through PPAs, green tariffs, or off-site renewable generation) represents an opportunity to enhance sustainability performance, reduce emissions, and potentially secure cost advantages.

We manage renewable energy procurement by identifying and evaluating opportunities and negotiating agreements with electricity suppliers for green energy supply. Renewable procurement is integrated into our long-term energy strategy, and outcomes are monitored and incorporated into ESG and climate reporting to ensure transparency and demonstrate progress toward sustainability objectives.

### 6.1.4. Summary of Responses

Topic / Subtopic	IRO / Materiality Type	Description	How We Manage
E1 – Climate Change / Climate Change Adaptation	Climate-related Physical Risks (Acute) – Risk (Potential Future Impact) – <b>CRUCIAL</b>	Short-term severe events (storms, floods, heatwaves) that may disrupt operations, supply chains, and infrastructure, potentially causing financial and reputational damage.	<ul style="list-style-type: none"><li>• Continuous monitoring and early warning systems.</li><li>• Business continuity and emergency response plans.</li><li>• Infrastructure resilience measures.</li><li>• Supplier engagement to secure supply chains.</li></ul>
E1 – Climate Change / Climate Change Adaptation	Climate-related Physical Risks (Acute) – Negative Actual Impact (Realized and Future Impact)	Direct consequences of acute events: facility damage, raw material loss, or logistics disruptions, with operational and financial effects.	<ul style="list-style-type: none"><li>• Rapid response and recovery protocols - Incident assessment and reporting.</li><li>• Adaptive operational measures.</li><li>• Insurance coverage and financial mitigation.</li></ul>
E1 – Climate Change / Climate Change Adaptation	Climate-related Physical Risks (Chronic) – Risk (Potential Future Exposure)	Long-term gradual changes (temperature rise, sea level rise, ocean acidification, shifts in marine ecosystems) affecting operations, raw material availability, supply chains, and business continuity.	<ul style="list-style-type: none"><li>• Regular climate risk assessments.</li><li>• Integration of adaptation strategies into business planning.</li><li>• R&amp;D for climate-resilient aquaculture and sustainable fishing.</li><li>• Supplier and stakeholder engagement.</li></ul>



Topic / Subtopic	IRO / Materiality Type	Description	How We Manage
E1 - Climate Change / Climate Change Adaptation	Climate-related Physical Risks (Chronic) – Negative Potential Impact (Anticipated Consequences)	Anticipated consequences: reduced availability of key species, long-term operational challenges, increased production costs over medium to long term.	<ul style="list-style-type: none"> <li>Scenario planning and climate modelling - Monitoring ecosystem changes.</li> <li>Adaptive operational measures.</li> <li>Financial planning for adaptation investments.</li> </ul>
E1 - Climate Change / Climate Change Adaptation	Increased costs with GHG emission taxes, certifications, and reports – Risk (Potential Future Impact)	Financial and operational exposure from regulatory carbon pricing, voluntary sustainability certifications, and reporting obligations, potentially increasing operating costs and administrative burden.	<ul style="list-style-type: none"> <li>Monitor climate-related regulations and carbon pricing.</li> <li>GHG emissions measurement and reduction initiatives.</li> <li>Energy efficiency and renewable energy adoption.</li> <li>Strategic certification planning.</li> <li>Investment in reporting systems and personnel.</li> <li>Engagement with regulators and industry bodies.</li> </ul>
E1 - Climate Change / Climate Change Mitigation	Renewable energy generation – Actual Positive Impact	Generation of renewable energy reduces reliance on fossil fuels, lowering GHG emissions and contributing positively to the company's carbon footprint.	<ul style="list-style-type: none"> <li>Invest in renewable energy projects.</li> <li>Monitor energy production and emissions reductions.</li> <li>Report renewable energy contributions in ESG disclosures.</li> </ul>
E1 - Climate Change / Climate Change Mitigation	Carbon compensation by 'our' forests – Actual Positive Impact – <b>CRUCIAL</b>	Company-owned forests act as carbon sinks, sequestering CO <sub>2</sub> and offsetting operational emissions.	<ul style="list-style-type: none"> <li>Maintain and monitor forest health and carbon stock.</li> <li>Apply sustainable forestry practices.</li> <li>Calculate and report sequestration rates.</li> </ul>
E1 - Climate Change / Climate Change Mitigation	Carbon compensation through new sequestration projects – Potential Positive Impact	Investment in reforestation, soil carbon, or other projects that could generate future carbon offsets.	<ul style="list-style-type: none"> <li>Identify and evaluate potential projects.</li> <li>Partner with credible project developers.</li> <li>Establish monitoring and verification systems.</li> </ul>
E1 - Climate Change / Climate Change Mitigation	Scope 1 carbon emissions – process efficiency – Actual Negative Impact – <b>CRUCIAL</b>	Direct emissions from operations, with inefficiencies increasing fuel use and GHG emissions.	<ul style="list-style-type: none"> <li>Implement energy efficiency improvements.</li> <li>Upgrade equipment and optimize processes.</li> <li>Monitor and report Scope 1 emissions.</li> </ul>
E1 - Climate Change / Climate Change Mitigation	Scope 2 carbon emissions – use efficiency and electricity suppliers – Actual Negative Impact – <b>CRUCIAL</b>	Indirect emissions from purchased electricity; inefficient use or carbon-intensive electricity increases footprint.	<ul style="list-style-type: none"> <li>Optimize energy use in facilities.</li> <li>Procure low-carbon or renewable electricity.</li> <li>Track and report Scope 2 emissions.</li> </ul>
E1 - Climate Change / Climate Change Mitigation	Scope 3 carbon emissions – supply chain – Actual Negative Impact	Indirect emissions across the supply chain, including raw materials, transport, and distribution.	<ul style="list-style-type: none"> <li>Engage suppliers on emissions reduction strategies.</li> <li>Prioritize low-carbon transportation and sourcing.</li> <li>Measure and report Scope 3 emissions.</li> </ul>
E1 - Climate Change / Climate Change Mitigation	Carbon compensation projects – Opportunity	Development or investment in carbon offset projects to generate positive environmental and reputational value.	<ul style="list-style-type: none"> <li>Assess high-quality compensation opportunities.</li> <li>Implement internal compensation projects.</li> <li>Monitor outcomes and integrate into ESG reporting.</li> </ul>
E1 - Climate Change / Climate Change Mitigation	Climate-related transition risks (taxes) – Risk	Exposure to financial and operational impacts from carbon pricing, taxes, and climate-related regulations.	<ul style="list-style-type: none"> <li>Monitor regulatory developments and climate legislation.</li> <li>Assess exposure to taxes and compliance costs.</li> <li>Implement emissions reduction strategies.</li> <li>Engage with industry bodies and policymakers.</li> </ul>
E1 - Climate Change / Energy	Energy consumption – Actual Negative Impact	Total energy use contributes to GHG emissions and operational costs.	<ul style="list-style-type: none"> <li>Implement energy efficiency measures.</li> <li>Monitor and optimize energy use.</li> <li>Upgrade equipment and infrastructure.</li> <li>Integrate energy management systems.</li> </ul>
E1 - Climate Change / Energy	Renewable energy consumption – Actual Positive Impact	Use of renewable energy reduces emissions and improves environmental performance.	<ul style="list-style-type: none"> <li>Track and report renewable energy consumption.</li> <li>Prioritize renewable energy in operations.</li> <li>Optimize energy sourcing.</li> <li>Integrate into ESG reporting.</li> </ul>
E1 - Climate Change / Energy	Procurement of renewable energy – Opportunity	Strategic procurement of renewable electricity represents an opportunity to reduce emissions and enhance sustainability performance.	<ul style="list-style-type: none"> <li>Identify and evaluate procurement opportunities.</li> <li>Negotiate agreements with suppliers.</li> <li>Integrate procurement into long-term energy strategy.</li> <li>Monitor outcomes and ESG reporting.</li> </ul>

## 6.2. ESRS E2 – POLLUTION

CATEGORY	IRO	ACTUAL / POTENTIAL	SUPPLY CHAIN	TIME FRAME	SCORE	MATERIALITY
<b>Subtopic 1 POLLUTION OF AIR</b>						
• Non-GHG emissions (ODP, NO <sub>x</sub> , SO <sub>x</sub> , PM)	–	↓	●	➡➡	1	Not material
<b>Subtopic 2 POLLUTION OF WATER</b>						
• Chemicals in wastewater	–	↓	●	➡➡	1	Not material



CATEGORY	IRO	ACTUAL / POTENTIAL	SUPPLY CHAIN	TIME FRAME	SCORE	MATERIALITY
• Organics in wastewater	–	⬇	●	➡➡➡	1	Not material
Subtopic 3 POLLUTION OF SOIL						
• Organics	–	⬇	●	➡➡➡	1	Not material
• Organics, compost and fertilizers	○		●	➡➡➡	2	Not material
Subtopic 4 POLLUTION OF LIVING ORGANISMS AND FOOD RESOURCES						
• Waste and litter	–	⬇	●	➡➡➡	2	Not material
Subtopic 5 SUBSTANCES OF CONCERN						
• Carcinogenic, mutagenic, toxic for reproduction, PBT, vPvB, others	–	➔	●	➡➡➡	0	Not material
Subtopic 6 SUBSTANCES OF VERY HIGH CONCERN						
• Carcinogenic, mutagenic, toxic for reproduction, PBT, vPvB, others	–	➔	●	➡➡➡	0	Not material
Subtopic 7 MICROPLASTICS (MP)						
• MP in seafood	–	⬇	▲●	➡➡➡	4	Not material
• MP in seafood - reputational and food safety risk	R		▲●	➡➡➡	2	Not material

As all IROs assessed within this ESRS fell below the significance threshold, no subtopics were identified as material.

### 6.3. ESRS E3 – WATER AND MARINE RESOURCES

CATEGORY	IRO	ACTUAL / POTENTIAL	SUPPLY CHAIN	TIME FRAME	SCORE	MATERIALITY
Subtopic 1: WATER CONSUMPTION						
• Water consumption	–	⬇	●	➡➡➡	7	Significant
• Water withdrawals	–	⬇	●	➡➡➡	3	Not material
• Water discharges	–	⬇	●	➡➡➡	8	Significant
• Water discharges in the oceans	–	⬇	●	➡➡➡	4	Not material
• Operations in water-stressed areas	R		●	➡➡➡	6	Significant
Subtopic 2: MARINE RESOURCES						
• Extraction and use of marine resources	–	➔	●	➡➡	6	Significant
• Extraction and use of marine resources	R		●	➡➡➡	12	CRUCIAL
• Valorisation of by-products	+	⬇	●▼	➡➡➡	6	Significant
• Sustainable procurement	○		▲	➡➡➡	9	Significant

#### 6.3.1. Subtopic: Water Consumption

This subtopic addresses the use of freshwater resources in company operations, including direct withdrawals from rivers, lakes, and aquifers. Understanding water consumption is critical to managing risks related to scarcity, ecosystem impacts, and community water access. It also supports efforts to optimise efficiency, reduce environmental footprint, and comply with regulatory and stakeholder expectations.

##### 6.3.1.1. IRO: Water Consumption – Actual Negative Impact

Total water consumption in operations, including processing, cleaning, and production, represents an actual negative environmental impact. Excessive water use can strain local water resources, especially in regions where water availability is limited.

We manage water consumption by monitoring usage across all production sites and implementing efficiency measures and equipment. Employee awareness and best practices for water conservation are actively promoted to ensure responsible use at every level of the organisation. In addition, we benchmark water consumption and set reduction targets aligned with our broader sustainability goals, driving continuous improvement in water stewardship.



#### 6.3.1.2. IRO: Water Withdrawals – Actual Negative Impact

Water withdrawals from local sources, including rivers, lakes, and groundwater, can impact ecosystems, reduce availability for communities, and disrupt aquatic habitats.

We manage water withdrawals by assessing local water availability before extraction and optimizing processes to minimize intake. Wherever possible, we reuse and recycle water to reduce demand on natural resources. Withdrawal volumes are closely monitored, and their impacts are reported transparently through our ESG disclosures.

#### 6.3.1.3. IRO: Water Discharges – Actual Negative Impact

Discharges from operations, such as effluents from processing facilities, can affect water quality if not properly treated. This represents a direct negative environmental impact.

We manage water discharges by treating effluents to meet or exceed regulatory standards before release. Continuous water quality monitoring is implemented to ensure compliance and safeguard ecosystems. Best practices are applied to minimize pollutant loads in discharges, and both volumes and quality are transparently reported in our sustainability disclosures.

#### 6.3.1.4. IRO: Water Discharges in the Oceans – Actual Negative Impact

Discharges directly into marine environments, such as effluents, cooling water, or cleaning residues, can negatively affect marine ecosystems, biodiversity, and local communities.

We manage water discharges into the oceans by monitoring effluent quality to ensure compliance with marine protection standards and by operating treatment systems that reduce harmful substances. In addition, we comply with all applicable national water quality and environmental regulations, and we adhere to international requirements such as the International Convention on Oil Pollution Preparedness, Response and Co-operation (OPRC) and the International Convention for the Prevention of Pollution from Ships (MARPOL). For sites located near sensitive areas, we conduct environmental impact assessments to identify and mitigate potential risks. In addition, we collaborate with stakeholders to strengthen collective efforts to reduce marine pollution and protect ocean health.

#### 6.3.1.5. IRO: Operations in Water-Stressed Areas – Risk

Operating in water-stressed regions exposes the company to potential risks including regulatory restrictions, operational constraints, reputational impacts, and competition with local communities for limited water resources.

We manage operations in water-stressed areas by assessing water stress levels for all sites using recognized tools such as the WRI Aqueduct and WWF Water Risk Filter. In high-risk areas, we implement water-saving technologies and recycling programs to minimize consumption. We actively engage with local communities and authorities to promote sustainable water use, and integrate water risk assessments into site planning, investment decisions, and our broader ESG strategy.

### 6.3.2. Subtopic: Marine Resources

This subtopic focuses on the extraction, use, and management of marine resources, including fisheries, aquaculture, and other ocean-based activities. It considers the sustainability of these resources, impacts on marine biodiversity, and long-term ecosystem health. Responsible management ensures resource availability, supports marine conservation, and reduces negative environmental and reputational risks.

#### 6.3.2.1. IRO: Extraction and Use of Marine Resources – Actual Potential Impact

The extraction and utilization of marine resources (e.g., fish, crustaceans, molluscs) can potentially impact marine ecosystems, biodiversity, and the long-term availability of target species. Although sustainable practices may mitigate these effects, the potential for overfishing, habitat disruption, or ecosystem imbalance remains an actual potential negative impact.



We manage the extraction and use of marine resources by implementing sustainable fishing and aquaculture practices aligned with GSSI-recognized certification schemes. Stock levels and fishing quotas are monitored to prevent overexploitation, and environmental impact assessments are conducted for operations affecting marine habitats. In addition, we develop robust traceability systems to ensure responsible sourcing throughout our supply chain.

#### 6.3.2.2. IRO: Extraction and Use of Marine Resources – Risk

Operating in marine resource extraction carries potential risks including regulatory changes, supply limitations, environmental degradation, and reputational damage if unsustainable practices occur.

We manage risks related to marine resources by complying with national and international fisheries regulations and actively engaging with authorities and industry bodies on sustainable resource management. To reduce dependence and avoid vulnerable species or regions, we diversify sourcing and incorporate marine resource risks into operational planning and our broader ESG strategy.

#### 6.3.2.3. IRO: Valorisation of By-products – Actual Positive Impact

Processing marine resources generates by-products (e.g., heads, skin, spines, offal, exoskeletons) that, when valorised, contribute positively by reducing waste, generating additional revenue streams, and promoting circular economy principles.

We manage by-products by developing and implementing processing and reuse initiatives, converting them into value-added products such as animal feed, fertilizers, or other bioproducts. The environmental and economic benefits of by-product valorisation are systematically tracked and reported. We foster innovation to continuously improve circularity in our operations and collaborate with sector alliances, research institutions, academia, and NGOs to enhance sustainability outcomes.

#### 6.3.2.4. IRO: Sustainable Procurement – Opportunity

Description: Sourcing marine resources sustainably (e.g., certified fisheries, responsibly farmed species) represents an opportunity to enhance environmental performance, secure long-term supply, and strengthen brand reputation.

We manage sustainable procurement by prioritizing sourcing from certified suppliers aligned with GSSI-recognized standards and maintaining robust traceability and verification systems for all marine inputs. We actively engage suppliers to enhance sustainability practices across the supply chain and incorporate sustainable procurement targets into our sourcing strategies and ESG reporting.

### 6.3.3. Summary of Responses

Topic / Subtopic	IRO / Materiality Type	Description	How We Manage
E3 – Water and Marine Resources / Water Consumption	Water consumption – Actual Negative Impact	Total water use in production, cleaning, and processing, which can strain local water resources, especially in water-scarce regions.	<ul style="list-style-type: none"><li>Monitor water use across production sites - Implement water efficiency measures and equipment.</li><li>Promote employee awareness and best practices.</li><li>Set reduction targets aligned with sustainability goals.</li></ul>
E3 – Water and Marine Resources / Water Consumption	Water withdrawals – Actual Negative Impact – BELOW SIGNIFICANCE THRESHOLD	Extraction of water from rivers, lakes, or groundwater may reduce availability for ecosystems and local communities.	<ul style="list-style-type: none"><li>Assess local water availability before withdrawals.</li><li>Optimize processes to minimize water intake.</li><li>Reuse and recycle water.</li><li>Monitor withdrawal volumes and report in ESG disclosures.</li></ul>
E3 – Water and Marine Resources / Water Consumption	Water discharges – Actual Negative Impact	Effluents from operations can degrade water quality if untreated, negatively affecting ecosystems.	<ul style="list-style-type: none"><li>Treat effluents to meet or exceed regulatory standards.</li><li>Continuous water quality monitoring.</li><li>Apply best practices to minimize pollutant loads.</li><li>Report discharge volumes and quality.</li></ul>
E3 – Water and Marine Resources / Water Consumption	Water discharges in the oceans – Actual Negative Impact – BELOW SIGNIFICANCE THRESHOLD	Discharges directly into marine environments can harm biodiversity and ecosystems.	<ul style="list-style-type: none"><li>Monitor effluent quality and comply with marine protection standards.</li><li>Implement treatment systems to reduce harmful substances.</li><li>Comply with specific national regulations, OPRC and MARPOL requirements.</li><li>Conduct environmental impact assessments near sensitive areas.</li><li>Collaborate with stakeholders to mitigate marine pollution.</li></ul>



Topic / Subtopic	IRO / Materiality Type	Description	How We Manage
E3 – Water and Marine Resources / Water Consumption	Operations in water-stressed areas – Risk	Operating in water-stressed regions exposes the company to potential regulatory, operational, and reputational risks.	<ul style="list-style-type: none"> <li>Assess water stress using tools like WRI Aqueduct.</li> <li>Implement water-saving and recycling programs in high-risk areas.</li> <li>Engage with local communities and authorities.</li> <li>Include water risk in site planning and ESG strategy.</li> </ul>
E3 – Water and Marine Resources / Marine Resources	Extraction and use of marine resources – Potential Negative Impact	Utilization of marine resources (fish, crustaceans, molluscs) may impact marine ecosystems, biodiversity, and long-term species availability.	<ul style="list-style-type: none"> <li>Implement sustainable fishing and aquaculture practices aligned with GSSI-recognized certification schemes.</li> <li>Monitor stock levels and quotas.</li> <li>Conduct environmental impact assessments.</li> <li>Develop traceability systems.</li> </ul>
E3 – Water and Marine Resources / Marine Resources	Extraction and use of marine resources – Risk – CRUCIAL	Potential risks from extraction include regulatory changes, supply limitations, environmental degradation, and reputational damage.	<ul style="list-style-type: none"> <li>Comply with fisheries regulations.</li> <li>Engage with authorities and industry bodies.</li> <li>Diversify sourcing to reduce dependence and avoid vulnerable species or regions.</li> <li>Integrate marine resource risks into ESG strategy.</li> </ul>
E3 – Water and Marine Resources / Marine Resources	Valorisation of by-products – Actual Positive Impact	Processing by-products (e.g., heads, skin, spines, offal, exoskeletons) reduces waste, generates additional revenue, and supports circular economy principles.	<ul style="list-style-type: none"> <li>Implement by-product processing and reuse initiatives.</li> <li>Convert by-products into value-added products (animal feed, fertilizers, bioproducts).</li> <li>Track environmental and economic benefits.</li> <li>Foster innovation to improve circularity and collaborate with sector alliances, research institutions, academia, and NGOs to enhance sustainability outcomes.</li> </ul>
E3 – Water and Marine Resources / Marine Resources	Sustainable procurement – Opportunity	Sourcing marine resources sustainably enhances environmental performance, secures long-term supply, and strengthens brand reputation.	<ul style="list-style-type: none"> <li>Prioritize certified suppliers (GSSI-recognized certification schemes).</li> <li>Maintain traceability and verification systems.</li> <li>Engage suppliers to improve sustainability practices.</li> <li>Set sustainable procurement targets in sourcing strategy and ESG reporting.</li> </ul>

## 6.4. ESRS E4 – BIODIVERSITY AND ECOSYSTEMS

CATEGORY	IRO	ACTUAL / POTENTIAL	SUPPLY CHAIN	TIME FRAME	SCORE	MATERIALITY
<b>Subtopic 1 DIRECT IMPACT DRIVERS OF BIODIVERSITY LOSS</b>						
• Direct natural resources exploitation in our activities	–	→	●	▷▷▷	10	CRUCIAL
• Sea-use change from fishing activities	–	→	●	▷▷▷	3	Not material
• Land-use and freshwater-use change from aquaculture activities	–	↓	●	▷▷▷	3	Not material
• Sustainable sourcing of fishing and aquaculture raw materials	+	↓	▲●	▷▷▷	12	CRUCIAL
• Biodiversity protection and conservation projects	+	↓	●	▷▷▷	6	Significant
• Sustainability certifications in fishing and aquaculture, and other evidence of sustainability.	○		▲●	▷▷▷	9	Significant
<b>Subtopic 2 IMPACTS ON THE STATE OF SPECIES</b>						
• Habitat loss from land-use changes in fisheries and aquaculture	–	↓	▲●	▷▷▷	8	Significant
• Marine species distribution shifts due to global warming	–	→	▲●	▷▷▷	8	Significant
• Biodiversity restoration initiatives	+	↓	▲●	▷▷▷	6	Significant
• Biodiversity restoration initiatives	○		▲●	▷▷▷	9	Significant
• Sustainability certifications in fishing and aquaculture, and other evidence of sustainability.	○		▲●	▷▷▷	12	CRUCIAL
<b>Subtopic 3 IMPACTS ON THE EXTENT AND CONDITION OF ECOSYSTEMS</b>						
• Wild species population 'health' and extinction risk	–	→	▲●	▷▷▷	6	Significant
• Land and seafloor degradation	–	→	●	▷▷▷	6	Significant
• Support of sustainable fishing and aquaculture initiatives	○		▲●	▷▷▷	9	Significant
• Sustainability certifications in fishing and aquaculture, and other evidence of sustainability.	○		▲●	▷▷▷	9	Significant
<b>Subtopic 4 IMPACTS AND DEPENDENCIES ON ECOSYSTEM SERVICES</b>						
• Protection of coastal features	+	↓	●	▷▷▷	6	Significant
• Enhanced marine productivity	○		●	▷▷▷	9	Significant
• Dependence on nature and ecosystem services	R		●	▷▷▷	12	CRUCIAL

### 6.4.1. Subtopic: Direct Impact Drivers of Biodiversity Loss

This subtopic addresses the activities and operations that directly contribute to biodiversity loss, such as land conversion, habitat destruction, overfishing, pollution, and introduction of invasive species. Understanding



these drivers is essential to identifying where business practices may negatively affect ecosystems and to designing effective mitigation measures.

#### *6.4.1.1. IRO: Direct Natural Resources Exploitation in Our Activities – Potential Negative Impact*

Extraction and use of natural resources (e.g., wild fish, marine organisms, and raw materials for aquaculture) in our operations can negatively affect local ecosystems, leading to habitat degradation, species depletion, and reduced ecosystem resilience.

We manage the extraction and use of marine resources by applying sustainable fishing and aquaculture practices aligned with GSSI-recognized standards. Extraction levels are monitored and managed to prevent overexploitation, and environmental impact assessments are conducted for all resource-intensive operations. Robust traceability systems are implemented to ensure responsible sourcing throughout the supply chain.

#### *6.4.1.2. IRO: Sea-Use Change from Fishing Activities – Potential Negative Impact*

Fishing operations can modify marine habitats, affect seabed structures, and disturb benthic ecosystems, potentially leading to biodiversity loss and ecosystem imbalance.

We manage sea-use change from fishing activities by adopting low-impact fishing techniques and gear to minimize seabed disturbance. Fishing activities are planned to avoid sensitive marine habitats, and marine ecosystems near operational areas are closely monitored. We also collaborate with research institutions and NGOs to support habitat protection initiatives.

#### *6.4.1.3. IRO: Land-Use and Freshwater-Use Change from Aquaculture Activities – Actual Negative Impact*

Aquaculture infrastructure (ponds, tanks, facilities) can lead to land conversion, freshwater use, and alteration of surrounding ecosystems, potentially impacting terrestrial and aquatic biodiversity.

We manage land- and freshwater-use change from aquaculture activities by optimizing site selection to minimize ecosystem disruption and implementing water-efficient, low-impact farming techniques. Local terrestrial and freshwater ecosystems are closely monitored, and affected areas are restored wherever possible. Biodiversity considerations are integrated into planning to ensure sustainable aquaculture operations.

#### *6.4.1.4. IRO: Sustainable Sourcing of Fishing and Aquaculture Raw Materials – Actual Positive Impact*

Sourcing raw materials responsibly (certified fisheries, sustainably farmed species) helps protect biodiversity, maintain ecosystem services, and ensure long-term resource availability.

We manage the sustainable sourcing of fishing and aquaculture raw materials by prioritizing GSSI-recognized certification schemes and maintaining robust traceability and verification systems. Suppliers are actively engaged to improve sustainability practices across the supply chain, and sustainable sourcing criteria are incorporated into procurement policies and ESG reporting to ensure transparency and continuous improvement.

#### *6.4.1.5. IRO: Biodiversity Protection and Conservation Projects – Actual Positive Impact*

Projects aimed at protecting or restoring ecosystems (e.g., habitat restoration, mangrove planting, coral reef protection) provide tangible benefits to biodiversity, ecosystem services, and long-term environmental resilience.

We manage biodiversity protection and conservation by identifying and investing in initiatives that safeguard ecosystems. Ecological outcomes are closely monitored and reported, and we collaborate with local communities, NGOs, and scientific institutions to enhance impact. Conservation efforts are fully integrated into our corporate sustainability strategy to ensure long-term environmental stewardship.



#### 6.4.1.6. *IRO: Sustainability Certifications in Fishing and Aquaculture, and Other Evidence of Sustainability – Opportunity*

Participation in GSSI-recognized certification schemes (e.g., MSC, ASC, ISO 14001) or other sustainability initiatives represents an opportunity to enhance environmental performance, build trust with stakeholders, and drive continuous improvement in biodiversity management.

We manage sustainability certifications in fishing and aquaculture by pursuing relevant certifications for our operations and supply chains. Robust monitoring and reporting systems are maintained to demonstrate compliance, and certifications are used as tools for supplier engagement and capacity building. Sustainability performance and certification achievements are communicated transparently to stakeholders.

#### 6.4.2. **Subtopic: Impacts on the State of Species**

This subtopic focuses on how corporate activities influence the abundance, distribution, and survival of species, including threatened or endangered ones. Monitoring impacts on species helps identify risks to biodiversity, assess conservation priorities, and ensure that business operations do not contribute to species decline or extinction.

##### 6.4.2.1. *IRO: Habitat Loss from Land-Use Changes in Fisheries and Aquaculture – Actual Negative Impact*

Land-use changes for aquaculture infrastructure, facilities, or fisheries operations can lead to habitat degradation or loss, negatively affecting terrestrial and aquatic species, their populations, and ecosystem functions.

We manage habitat loss from land-use changes in fisheries and aquaculture by optimizing site selection to minimize ecosystem disruption and implementing low-impact aquaculture practices. Environmental impact assessments are conducted prior to expansion or new developments, and affected habitats are restored wherever possible.

##### 6.4.2.2. *IRO: Marine Species Distribution Shifts Due to Global Warming – Potential Negative Impact*

Climate change and rising ocean temperatures may cause shifts in the distribution of marine species, affecting their availability, ecosystem balance, and long-term resilience. This represents a potential negative impact, as it may not yet be fully realized.

We manage the potential negative impacts of marine species distribution shifts due to global warming by monitoring populations and distribution patterns and conducting scenario planning and climate impact modelling. Sourcing and aquaculture practices are adapted to evolving species distributions, and we actively engage in research initiatives to improve understanding of climate-related ecological changes.

##### 6.4.2.3. *IRO: Biodiversity Restoration Initiatives – Actual Positive Impact*

Active initiatives to restore habitats and ecosystems (e.g., mangrove reforestation, coral reef restoration) provide tangible benefits to species conservation, ecosystem resilience, and ecological services.

We manage biodiversity restoration initiatives by identifying and investing in projects with positive ecological outcomes. Progress is monitored and reported, and we collaborate with scientific institutions, NGOs, and local communities to maximize impact. Restoration projects are fully integrated into our corporate sustainability and ESG strategy.

##### 6.4.2.4. *IRO: Biodiversity Restoration Initiatives – Opportunity*

Restoration projects also represent an opportunity to enhance corporate environmental credentials, stakeholder engagement, and potential for partnerships in conservation initiatives.

We manage biodiversity restoration opportunities by expanding projects where feasible and promoting their visibility in sustainability communications. Initiatives are leveraged to build collaborations with conservation organizations, and restoration efforts are aligned with broader sustainability and climate strategies to maximize environmental and social impact.



#### 6.4.2.5. *IRO: Sustainability Certifications in Fishing and Aquaculture, and Other Evidence of Sustainability – Opportunity*

Participation in certification schemes (e.g., MSC, ASC, GSA BAP, ISO 14001) or other recognized sustainability initiatives provides an opportunity to demonstrate leadership in protecting species, promoting ecosystem health, and ensuring responsible sourcing.

We manage sustainability certifications in fishing and aquaculture by maintaining and pursuing relevant certifications across operations and supply chains. Robust monitoring and reporting systems ensure compliance, and suppliers are engaged to adopt sustainable practices. Sustainability achievements are communicated to stakeholders, with certifications serving as a driver for continuous improvement.

#### 6.4.3. **Subtopic: Impacts on the Extent and Condition of Ecosystems**

This subtopic examines how company operations affect the size, fragmentation, and health of ecosystems. Changes in ecosystem extent and condition can result from land use, pollution, resource extraction, and other pressures, impacting ecological functions, resilience, and biodiversity conservation.

##### 6.4.3.1. *IRO: Wild Species Population 'Health' and Extinction Risk – Potential Negative Impact*

Operations that indirectly or directly affect species populations (e.g., overfishing, habitat degradation) can threaten the health of wild populations and increase the risk of extinction, negatively impacting ecosystem balance and resilience.

We manage wild species population health and extinction risk by monitoring key species and ecosystem indicators and applying sustainable fishing and aquaculture practices aligned with GSSI-recognized standards to reduce pressure on wild populations. Environmental impact assessments are conducted to identify risks to species, and we collaborate with scientific institutions and NGOs to support species protection initiatives.

##### 6.4.3.2. *IRO: Land and Seafloor Degradation – Potential Negative Impact*

Activities such as aquaculture expansion, fishing gear use, or infrastructure development can degrade terrestrial and marine habitats, including seafloor ecosystems, reducing ecosystem functionality and biodiversity.

We manage land and seafloor degradation by adopting low-impact aquaculture and fishing practices to minimize habitat disturbance. The condition of land around operational sites is closely monitored, and restoration or mitigation measures are implemented for degraded areas. Ecosystem protection considerations are fully integrated into site planning and operational decision-making.

##### 6.4.3.3. *IRO: Support of Sustainable Fishing and Aquaculture Initiatives – Opportunity*

Engagement in and support for sustainable fisheries and aquaculture initiatives represents an opportunity to improve ecosystem condition, promote best practices, and enhance biodiversity outcomes.

We manage support for sustainable fishing and aquaculture initiatives by participating in industry programmes and initiatives that promote best practices. We collaborate with suppliers and stakeholders to adopt sustainable techniques and support education and capacity-building for sustainable fisheries and aquaculture. These initiatives are aligned with our corporate sustainability strategy and integrated into ESG reporting.

##### 6.4.3.4. *IRO: Sustainability Certifications in Fishing and Aquaculture, and Other Evidence of Sustainability – Opportunity*

Participation in recognized sustainability certification schemes (e.g., MSC, ASC, ISO 14001) provides an opportunity to demonstrate leadership in maintaining healthy ecosystems and improving the environmental performance of operations.

We manage sustainability certifications in fishing and aquaculture by maintaining and pursuing relevant certifications across operations and supply chains. Robust monitoring and reporting systems ensure



compliance, while certifications are used to engage suppliers and promote continuous improvement. Sustainability achievements are communicated to stakeholders and integrated into ESG disclosures.

#### 6.4.4. Subtopic: Impacts and Dependencies on Ecosystem Services

This subtopic captures both the effects that business activities have on ecosystem services (provisioning, regulating, cultural, and supporting services) and the company's dependency on these services for operations. Understanding these interactions is crucial for managing risks, ensuring sustainable resource use, and maintaining long-term business resilience.

##### 6.4.4.1. IRO: Protection of Coastal Features – Actual Positive Impact

Activities that contribute to the protection and restoration of coastal features (e.g., mangroves, dunes, coral reefs) provide tangible benefits to ecosystems and local communities, enhancing resilience against erosion, storms, and sea-level rise. This is an actual positive impact.

We manage the protection of coastal features by implementing and investing in habitat protection and restoration projects. Ecological outcomes are monitored to assess improvements in coastal resilience, and we collaborate with local communities, NGOs, and scientific institutions to ensure effective protection. Coastal protection initiatives are integrated into our corporate sustainability and ESG strategy.

##### 6.4.4.2. IRO: Enhanced Marine Productivity – Opportunity

Initiatives that improve marine ecosystem productivity (e.g., habitat restoration, sustainable fishing practices) represent an opportunity to enhance biodiversity, ecosystem health, and long-term availability of marine resources.

We manage initiatives to enhance marine productivity by supporting programs that improve habitat quality and biodiversity. Sustainable aquaculture and fisheries practices are promoted to boost ecosystem productivity, while ecosystem productivity indicators are monitored to assess positive outcomes. Opportunities are leveraged to partner with stakeholders on initiatives that enhance marine ecosystems.

##### 6.4.4.3. IRO: Dependence on Nature and Ecosystem Services – Risk

The company relies on healthy ecosystems and ecosystem services (e.g., fish stocks, water quality, coastal protection) for its operations. Degradation or loss of these services represents a risk to operational continuity, resource availability, and business resilience.

We manage dependencies on ecosystem services by conducting assessments across operations and supply chains and integrating ecosystem health considerations into risk management and operational planning. Sustainable resource management practices are implemented to reduce dependency risks, and we actively engage in restoration, conservation, and protection initiatives to safeguard essential ecosystem services.

#### 6.4.5. Summary of Responses

Topic / Subtopic	IRO / Materiality Type	Description	How We Manage
E4 – Biodiversity and Ecosystems / Direct Impact Drivers of Biodiversity Loss	Direct natural resources exploitation in our activities – Potential Negative Impact – <b>CRUCIAL</b>	Extraction and use of natural resources (fish, marine organisms, aquaculture raw materials) can degrade habitats, deplete species, and reduce ecosystem resilience.	<ul style="list-style-type: none"><li>• Apply sustainable fishing and aquaculture practices (GSSI-recognized standards).</li><li>• Monitor and manage extraction levels.</li><li>• Conduct environmental impact assessments.</li><li>• Implement traceability systems.</li></ul>
E4 – Biodiversity and Ecosystems / Direct Impact Drivers of Biodiversity Loss	Sea-use change from fishing activities – Potential Negative Impact – <b>BELOW SIGNIFICANCE THRESHOLD</b>	Fishing operations may modify marine habitats, disturb seabed structures, and affect benthic ecosystems, potentially leading to biodiversity loss.	<ul style="list-style-type: none"><li>• Use low-impact fishing gear and techniques.</li><li>• Plan operations to avoid sensitive habitats.</li><li>• Monitor marine ecosystems near operational areas.</li><li>• Collaborate with research institutions and NGOs for habitat protection.</li></ul>



Topic / Subtopic	IRO / Materiality Type	Description	How We Manage
E4 - Biodiversity and Ecosystems / Direct Impact Drivers of Biodiversity Loss	Land-use and freshwater-use change from aquaculture activities – Actual Negative Impact – BELOW SIGNIFICANCE THRESHOLD	Aquaculture infrastructure can alter land and freshwater ecosystems, impacting terrestrial and aquatic biodiversity.	<ul style="list-style-type: none"> <li>Optimize site selection to minimize ecosystem disruption.</li> <li>Implement water-efficient and low-impact farming techniques.</li> <li>Monitor local terrestrial and freshwater ecosystems.</li> <li>Restore affected areas where possible.</li> </ul>
E4 - Biodiversity and Ecosystems / Direct Impact Drivers of Biodiversity Loss	Sustainable sourcing of fishing and aquaculture raw materials – Actual Positive Impact – CRUCIAL	Responsible sourcing protects biodiversity, maintains ecosystem services, and ensures long-term resource availability.	<ul style="list-style-type: none"> <li>Prioritize GSSI-recognized certification schemes.</li> <li>Maintain traceability and verification.</li> <li>Engage suppliers to improve sustainability practices.</li> <li>Incorporate sustainable sourcing into procurement policies and ESG reporting.</li> </ul>
E4 - Biodiversity and Ecosystems / Direct Impact Drivers of Biodiversity Loss	Biodiversity protection and conservation projects – Actual Positive Impact	Projects to restore or protect ecosystems provide tangible benefits to biodiversity and ecosystem services.	<ul style="list-style-type: none"> <li>Invest in biodiversity protection and conservation initiatives.</li> <li>Monitor ecological outcomes and report impacts.</li> <li>Collaborate with local communities, NGOs, and scientific institutions.</li> <li>Integrate conservation into corporate sustainability strategy.</li> </ul>
E4 - Biodiversity and Ecosystems / Direct Impact Drivers of Biodiversity Loss	Sustainability certifications in fishing and aquaculture, and other evidence of sustainability – Opportunity	Certification schemes (MSC, ASC, GSA BAP, ISO 14001) enhance environmental performance and stakeholder trust.	<ul style="list-style-type: none"> <li>Pursue relevant certifications for operations and supply chains.</li> <li>Maintain monitoring and reporting systems.</li> <li>Use certifications to engage suppliers and promote continuous improvement.</li> <li>Communicate achievements to stakeholders.</li> </ul>
E4 - Biodiversity and Ecosystems / Impacts on the State of Species	Habitat loss from land-use changes in fisheries and aquaculture – Actual Negative Impact	Land-use changes can degrade habitats, affecting species populations and ecosystem functions.	<ul style="list-style-type: none"> <li>Optimize site selection.</li> <li>Implement low-impact practices.</li> <li>Conduct environmental impact assessments.</li> <li>Restore affected habitats.</li> </ul>
E4 - Biodiversity and Ecosystems / Impacts on the State of Species	Marine species distribution shifts due to global warming – Potential Negative Impact	Climate change may shift marine species distribution, impacting ecosystem balance and availability of resources.	<ul style="list-style-type: none"> <li>Monitor species populations and distribution.</li> <li>Conduct scenario planning and climate modelling.</li> <li>Adapt sourcing and aquaculture practices.</li> <li>Engage in research initiatives.</li> </ul>
E4 - Biodiversity and Ecosystems / Impacts on the State of Species	Biodiversity restoration initiatives – Actual Positive Impact	Restoration projects enhance species conservation, ecosystem resilience, and ecological services.	<ul style="list-style-type: none"> <li>Invest in restoration projects.</li> <li>Monitor and report biodiversity gains.</li> <li>Collaborate with NGOs and communities.</li> <li>Integrate restoration into ESG strategy.</li> </ul>
E4 - Biodiversity and Ecosystems / Impacts on the State of Species	Biodiversity restoration initiatives – Opportunity	Restoration projects provide opportunities for environmental reputation, stakeholder engagement, and partnerships.	<ul style="list-style-type: none"> <li>Expand restoration projects.</li> <li>Promote initiatives in communications.</li> <li>Build collaborations.</li> <li>Align with broader sustainability strategy.</li> </ul>
E4 - Biodiversity and Ecosystems / Impacts on the State of Species	Sustainability certifications in fishing and aquaculture, and other evidence of sustainability – Opportunity – CRUCIAL	Certifications demonstrate leadership in species protection and ecosystem health.	<ul style="list-style-type: none"> <li>Maintain and pursue relevant certifications.</li> <li>Ensure monitoring and reporting systems.</li> <li>Engage suppliers in sustainable practices.</li> <li>Communicate achievements and drive continuous improvement.</li> </ul>
E4 - Biodiversity and Ecosystems / Impacts on the Extent and Condition of Ecosystems	Wild species population 'health' and extinction risk – Potential Negative Impact	Operations affecting species populations can threaten wild species' health and increase extinction risk.	<ul style="list-style-type: none"> <li>Monitor populations and ecosystem indicators.</li> <li>Apply sustainable fishing and aquaculture practices.</li> <li>Conduct environmental impact assessments.</li> <li>Collaborate for species protection.</li> </ul>
E4 - Biodiversity and Ecosystems / Impacts on the Extent and Condition of Ecosystems	Land and seafloor degradation – Potential Negative Impact	Aquaculture expansion, fishing gear use, and infrastructure can degrade habitats, reducing ecosystem functionality.	<ul style="list-style-type: none"> <li>Adopt low-impact practices.</li> <li>Monitor land condition.</li> <li>Implement restoration and mitigation measures.</li> <li>Integrate ecosystem protection into planning.</li> </ul>
E4 - Biodiversity and Ecosystems / Impacts on the Extent and Condition of Ecosystems	Support of sustainable fishing and aquaculture initiatives – Opportunity	Engagement in sustainable fisheries and aquaculture improves ecosystem condition and biodiversity outcomes.	<ul style="list-style-type: none"> <li>Participate in industry programs.</li> <li>Collaborate with suppliers and stakeholders.</li> <li>Support education and capacity-building.</li> <li>Align initiatives with corporate sustainability strategy.</li> </ul>
E4 - Biodiversity and Ecosystems / Impacts on the Extent and Condition of Ecosystems	Sustainability certifications in fishing and aquaculture, and other evidence of sustainability – Opportunity	Certification schemes demonstrate leadership in maintaining healthy ecosystems and improving environmental performance.	<ul style="list-style-type: none"> <li>Maintain and pursue relevant certifications.</li> <li>Ensure monitoring and reporting systems.</li> <li>Engage suppliers and promote continuous improvement.</li> <li>Communicate achievements to stakeholders.</li> </ul>



Topic / Subtopic	IRO / Materiality Type	Description	How We Manage
E4 - Biodiversity and Ecosystems / Impacts and Dependencies on Ecosystem Services	Protection of coastal features - Actual Positive Impact	Protection and restoration of coastal features (mangroves, dunes, reefs) enhance ecosystem resilience and benefit communities.	<ul style="list-style-type: none"> <li>Implement coastal habitat protection and restoration projects.</li> <li>Monitor ecological outcomes.</li> <li>Collaborate with communities, NGOs, and institutions.</li> <li>Integrate initiatives into ESG strategy.</li> </ul>
	Enhanced marine productivity - Opportunity	Initiatives improving marine ecosystem productivity enhance biodiversity, ecosystem health, and resource availability.	<ul style="list-style-type: none"> <li>Support programs enhancing marine habitat quality.</li> <li>Promote sustainable aquaculture and fisheries.</li> <li>Monitor ecosystem productivity.</li> <li>Partner with stakeholders on ecosystem enhancement initiatives.</li> </ul>
	Dependence on nature and ecosystem services - Risk - CRUCIAL	Reliance on healthy ecosystems and services (fish stocks, water quality, coastal protection) poses operational and business risks if degraded.	<ul style="list-style-type: none"> <li>Conduct ecosystem service dependency assessments.</li> <li>Integrate ecosystem health into risk management and planning.</li> <li>Implement sustainable resource management practices.</li> <li>Engage in restoration, conservation, and protection initiatives.</li> </ul>

## 6.5. ESRS E5 – RESOURCE USE AND CIRCULAR ECONOMY

CATEGORY	IRO	ACTUAL / POTENTIAL	SUPPLY CHAIN	TIME FRAME	SCORE	MATERIALITY
Subtopic 1 RESOURCES INFLOWS, INCLUDING RESOURCE USE						
• Packaging materials - plastics and fibre	O		▲●	▶▶▶	9	Significant
• Use and consumption of virgin materials	R		▲●	▶▶▶	6	Significant
• Use and consumption of virgin materials	-	↓	▲●	▶▶▶	6	Significant
• Sustainable packaging	O		▲●	▶▶▶	9	Significant
Subtopic 2 RESOURCE OUTFLOWS RELATED TO PRODUCTS AND SERVICES						
• R&D projects and circular economy	O		▲●	▶▶▶	6	Significant
• Valorisation of by-products	O		●▼	▶▶▶	9	Significant
• Valorisation of by-products	+	→	●▼	▶▶▶	5	Significant
Subtopic 3 WASTE						
• Responsible management of generated waste	R		●▼	▶▶▶	6	Significant
• Responsible management of generated waste	-	↓	●▼	▶▶▶	5	Significant
• Reduction of food loss and waste	O		●▼	▶▶▶	4	Not material

### 6.5.1. Subtopic: Resources Inflows, including Resource Use

#### 6.5.1.1. IRO: Packaging Materials – Plastics and Fibre – Opportunity

Optimizing the use of packaging materials, including plastics and fibre, provides an opportunity to reduce environmental footprint, improve recyclability, and create value through innovative sustainable packaging solutions.

We manage packaging materials by evaluating and redesigning packaging to reduce material use and prioritizing recyclable or reusable materials wherever possible. We collaborate with suppliers to develop innovative and sustainable packaging solutions, and progress on packaging sustainability initiatives is systematically tracked and reported.

#### 6.5.1.2. IRO: Use and Consumption of Virgin Materials – Risk

Dependence on virgin materials exposes the company to risks related to resource scarcity, price volatility, supply chain disruptions, and reputational concerns regarding unsustainable sourcing.

We manage the use and consumption of virgin materials by prioritizing the sourcing of recycled or alternative materials and monitoring consumption to identify reduction opportunities. Suppliers are engaged to improve sustainable sourcing practices, and material risk assessments are integrated into procurement strategy and ESG reporting to ensure responsible resource use.



#### 6.5.1.3. IRO: Use and Consumption of Virgin Materials – Actual Negative Impact

Using virgin materials contributes to environmental degradation, including resource depletion, energy-intensive production, and higher carbon emissions, representing an actual negative environmental impact.

We manage the negative impact of virgin material use by reducing consumption through process optimization and circular design and implementing recycling and reuse programs across operations. Innovation in material substitution and efficiency is promoted, while virgin material use is tracked and environmental impacts are reported in ESG disclosures.

#### 6.5.1.4. IRO: Sustainable Packaging – Opportunity

Implementing sustainable packaging practices presents an opportunity to reduce environmental impacts, improve recyclability, and enhance brand reputation by aligning with circular economy principles.

We manage sustainable packaging by prioritizing recyclable, reusable, or compostable solutions and collaborating with suppliers and partners to scale these initiatives. Measurable targets are set for sustainable packaging adoption, and progress is communicated to stakeholders and integrated into ESG reporting.

### 6.5.2. Subtopic: Resource Outflows Related to Products and Services

#### 6.5.2.1. IRO: R&D Projects and Circular Economy – Opportunity

Research and development projects focused on circular economy solutions present an opportunity to design products and processes that minimize waste, enhance resource efficiency, and create sustainable business models.

We manage circular economy opportunities through investment in R&D projects focused on circular design, product longevity, and recycling innovations. Collaboration with academic institutions, startups, and industry partners accelerates the development of circular solutions. Successful R&D initiatives are evaluated and scaled across operations, and circular economy objectives are fully integrated into corporate strategy and ESG reporting.

#### 6.5.2.2. IRO: Valorisation of By-Products – Opportunity

Transforming by-products from operations into valuable resources represents an opportunity to reduce waste, generate new revenue streams, and support a circular economy.

We manage by-products by identifying and assessing those with potential for reuse or valorisation and developing partnerships with companies that can use them as raw materials. New uses are innovated for by-products in food, feed, fertilizer, or other bioproducts, and the environmental and economic benefits of valorisation initiatives are monitored and reported.

#### 6.5.2.3. IRO: Valorisation of By-Products – Potential Positive Impact

By-products that are successfully valorised deliver an actual positive impact by reducing waste sent to disposal, contributing to circularity, and generating environmental and economic benefits.

We manage by-product valorisation by implementing systematic recovery and processing across operations. The quantity and type of by-products valorised are tracked, and environmental benefits, such as reduced landfill use and lower carbon footprint, are measured. Processes are continuously improved, and initiatives are expanded wherever feasible to maximize circularity and sustainability impact.

### 6.5.3. Subtopic: Waste

#### 6.5.3.1. IRO: Responsible Management of Generated Waste – Risk

Improper management of operational and post-consumer waste exposes the company to regulatory, environmental, and reputational risks, including fines, sanctions, and stakeholder criticism.



We manage generated waste by implementing policies compliant with local regulations and training employees in proper waste handling and segregation. Waste streams are monitored to identify risks and opportunities for improvement, and waste risk management is integrated into operational processes and our ESG framework.

#### 6.5.3.2. IRO: Responsible Management of Generated Waste – Actual Negative Impact

Waste that is not properly treated or diverted from disposal (landfill or incineration without energy recovery) represents an actual negative impact on the environment, contributing to pollution, greenhouse gas emissions, and resource inefficiency.

We manage the negative impacts of operational waste by applying waste hierarchy principles—reduce, reuse, recycle, recover—and implementing sorting, treatment, and valorisation processes. Waste volumes and environmental impacts are monitored, and performance is reported in ESG disclosures, with reduction targets established to drive continuous improvement.

#### 6.5.3.3. IRO: Reduction of Food Loss and Waste – Opportunity

Reducing food loss and waste represents an opportunity to enhance operational efficiency, reduce environmental footprint, and generate social and economic benefits across the value chain.

We manage food loss and waste by optimizing production, storage, and logistics to minimize losses, and implementing improvements in inventory management and forecasting. Edible surplus is recovered through donation programs or alternative uses, and initiatives are monitored, reported, and tracked against reduction targets to ensure continuous improvement.

### 6.5.4. Summary of Responses

Topic / Subtopic	IRO / Materiality Type	Description	How We Manage
E5 – Resource Use and Circular Economy / Resources Inflows, including Resource Use	Packaging materials – plastics and fibre – Opportunity	Optimizing the use of packaging materials provides opportunities to reduce environmental footprint, improve recyclability, and develop innovative sustainable packaging solutions.	<ul style="list-style-type: none"><li>Evaluate and redesign packaging to reduce material use.</li><li>Use recyclable or reusable packaging materials.</li><li>Collaborate with suppliers on innovative sustainable solutions.</li><li>Track and report progress on packaging sustainability initiatives.</li></ul>
E5 – Resource Use and Circular Economy / Resources Inflows, including Resource Use	Use and consumption of virgin materials – Risk	Dependence on virgin materials exposes the company to risks related to resource scarcity, price volatility, supply chain disruptions, and reputational concerns regarding unsustainable sourcing.	<ul style="list-style-type: none"><li>Prioritize sourcing of recycled or alternative materials.</li><li>Monitor virgin material consumption and identify reduction opportunities.</li><li>Engage suppliers to improve sustainable sourcing practices.</li><li>Integrate material risk assessment into procurement strategy and ESG reporting.</li></ul>
E5 – Resource Use and Circular Economy / Resources Inflows, including Resource Use	Use and consumption of virgin materials – Actual Negative Impact	Using virgin materials contributes to resource depletion, energy-intensive production, and higher carbon emissions, representing an actual negative environmental impact.	<ul style="list-style-type: none"><li>Reduce virgin material consumption through process optimization and circular design.</li><li>Implement recycling and reuse programs across operations.</li><li>Promote innovation in material substitution and efficiency.</li><li>Track virgin material use and report environmental impacts in ESG disclosures.</li></ul>
E5 – Resource Use and Circular Economy / Resources Inflows, including Resource Use	Sustainable packaging – Opportunity	Implementing sustainable packaging practices reduces environmental impacts, improves recyclability, and enhances brand reputation.	<ul style="list-style-type: none"><li>Prioritize recyclable, reusable, or compostable packaging solutions.</li><li>Collaborate with suppliers and partners to scale solutions.</li><li>Set measurable targets for sustainable packaging adoption.</li><li>Communicate initiatives to stakeholders and integrate into ESG reporting.</li></ul>
E5 – Resource Use and Circular Economy / Resource Outflows Related to Products and Services	R&D projects and circular economy – Opportunity	R&D projects focused on circular economy solutions present opportunities to design products and processes that minimize waste, enhance resource efficiency, and create sustainable business models.	<ul style="list-style-type: none"><li>Invest in R&amp;D targeting circular design, product longevity, and recycling innovations.</li><li>Collaborate with academic institutions, startups, and industry partners.</li><li>Evaluate and scale successful R&amp;D initiatives.</li><li>Integrate circular economy objectives into corporate strategy and ESG reporting.</li></ul>
E5 – Resource Use and Circular Economy / Resource Outflows Related to Products and Services	Valorisation of by-products – Opportunity	Transforming by-products from operations into valuable resources reduces waste, generates new revenue streams, and supports a circular economy.	<ul style="list-style-type: none"><li>Identify and assess by-products with reuse potential.</li><li>Develop partnerships for by-product utilization.</li><li>Innovate new uses for by-products in food, feed, fertilizer, or bioproducts.</li><li>Monitor and report benefits of valorisation initiatives.</li></ul>



Topic / Subtopic	IRO / Materiality Type	Description	How We Manage
E5 – Resource Use and Circular Economy / Resource Outflows Related to Products and Services	Valorisation of by-products – Potential Positive Impact	Successfully valorised by-products reduce waste sent to disposal, contribute to circularity, and generate environmental and economic benefits.	<ul style="list-style-type: none"> <li>Implement systematic by-product recovery and processing.</li> <li>Track quantity and type of valorised by-products.</li> <li>Measure environmental benefits, such as reduced landfill use and lower carbon footprint.</li> <li>Continuously improve valorisation processes and expand initiatives.</li> </ul>
E5 – Resource Use and Circular Economy / Waste	Responsible management of generated waste – Risk	Improper waste management exposes the company to regulatory, environmental, and reputational risks, including fines and stakeholder criticism.	<ul style="list-style-type: none"> <li>Implement waste management policies compliant with regulations.</li> <li>Train employees in correct waste handling and segregation.</li> <li>Monitor waste streams to identify risks and improvement areas.</li> <li>Integrate waste risk management into operational and ESG frameworks.</li> </ul>
E5 – Resource Use and Circular Economy / Waste	Responsible management of generated waste – Actual Negative Impact	Waste not properly treated or diverted from disposal contributes to pollution, greenhouse gas emissions, and resource inefficiency, representing an actual negative impact.	<ul style="list-style-type: none"> <li>Apply waste hierarchy principles: reduce, reuse, recycle, recover.</li> <li>Implement sorting, treatment, and valorisation of operational waste.</li> <li>Monitor waste volumes and environmental impact.</li> <li>Report waste management performance and set reduction targets.</li> </ul>
E5 – Resource Use and Circular Economy / Waste	Reduction of food loss and waste – Opportunity – BELOW SIGNIFICANCE THRESHOLD	Reducing food loss and waste enhances operational efficiency, lowers environmental footprint, and creates social and economic benefits.	<ul style="list-style-type: none"> <li>Optimize production, storage, and logistics to minimize losses.</li> <li>Implement inventory management and forecasting improvements.</li> <li>Recover edible surplus through donation or alternative uses.</li> <li>Monitor, report, and set targets for food loss and waste reduction.</li> </ul>

## 6.6. ESRS S1 OWN WORKFORCE

CATEGORY	IRO	ACTUAL / POTENTIAL	SUPPLY CHAIN	TIME FRAME	SCORE	MATERIALITY
<b>Subtopic 1 WORKING CONDITIONS</b>						
• Secure employment	+	↓	●	►►►	16	CRUCIAL
• Working time	+	↓	●	►►►	12	CRUCIAL
• Adequate wages	+	↓	●	►►►	10	CRUCIAL
• Social dialogue	○		●	►►►	9	Significant
• Freedom of association, existence of works councils, and information, consultation, and participation rights of workers	+	↓	●	►►►	9	Significant
• Collective bargaining, including rate of workers covered by collective agreements	+	↓	●	►►►	9	Significant
• Work-life balance	+	↓	●	►►►	6	Significant
• Health and safety - Work-related accidents	-	➔	●	►►►	20	CRUCIAL
• Health and safety - Financial risk	R		●	►►►	8	Significant
<b>Subtopic 2 EQUAL TREATMENT AND OPPORTUNITIES FOR ALL</b>						
• Gender equality and equal pay for work of equal value	-	↓	●	►►►	8	Significant
• Training and skills development	+	↓	●	►►►	8	Significant
• Employment and inclusion of persons with disabilities	+	➔	●	►►►	3	Not material
• Measures against violence and harassment in the workplace	+	➔	●	►►►	8	Significant
• Diversity	○		●	►►►	9	Significant
<b>Subtopic 3 OTHER WORK-RELATED RIGHTS</b>						
• Child labour	R		●	►►►	4	Not material
• Forced labour	R		●	►►►	4	Not material
• Adequate housing (living conditions in vessels and camp sites)	-	↓	●	►►►	3	Not material
• Privacy (personal data protection and nature and extent of worker surveillance)	-	➔	●	►►►	3	Not material

### 6.6.1. Subtopic: Working Conditions

This subtopic addresses the key aspects of employment that ensure fair, safe, and stable work conditions. It covers secure employment, fair compensation, reasonable working hours, social dialogue, collective bargaining, work-life balance, and occupational health and safety. Promoting high-quality working conditions



enhances employee satisfaction, reduces turnover, improves productivity, and mitigates risks related to workplace accidents and financial exposure from unsafe practices.

#### 6.6.1.1. *IRO: Secure Employment – Actual Positive Impact*

Stability in employment fosters workforce commitment, reduces turnover, and promotes long-term organizational knowledge.

We prioritise the use of permanent contracts wherever possible and limit temporary or casual employment to ensure stability and security for our workforce. Recruitment and onboarding procedures are designed to be fair, transparent, and inclusive, helping new employees integrate effectively into the organisation. We closely monitor workforce retention rates and actively develop career path plans to support professional growth. In addition, we provide assistance during career transitions, such as redeployment opportunities or reskilling programmes, to help employees adapt to evolving business needs.

#### 6.6.1.2. *IRO: Working Time – Actual Positive Impact*

Managing working hours appropriately ensures compliance with labour laws, prevents burnout, and promotes well-being.

We monitor and regulate working hours in line with local legislation and collective agreements to safeguard employee well-being. Wherever possible, we provide flexible scheduling options to support work-life balance. Overtime is carefully tracked and compensated in accordance with legal and contractual requirements. In addition, we encourage regular breaks and rest periods to promote health, safety, and productivity in the workplace.

#### 6.6.1.3. *IRO: Adequate Wages – Actual Positive Impact*

Fair and adequate compensation is fundamental to workforce motivation, financial stability, and social well-being.

We ensure that wages meet or exceed legal minimums and industry benchmarks, providing fair compensation for all employees. Transparent payroll systems are implemented to guarantee accuracy and accountability. Regular wage reviews are conducted to maintain competitiveness and equity. Furthermore, our remuneration policies are integrated with performance management and career progression, aligning rewards with individual contributions and professional development opportunities.

#### 6.6.1.4. *IRO: Social Dialogue – Opportunity*

Active communication and engagement between employees and management fosters trust, collaboration, and continuous improvement.

We establish regular meetings between management and employee representatives to facilitate meaningful dialogue and collaboration. Formal consultation channels are maintained to address operational changes and ensure employee input is considered. We promote feedback mechanisms, including surveys, to capture employee perspectives and drive continuous improvement. Additionally, we encourage a culture of open dialogue at all levels, fostering transparency, trust, and engagement throughout the organisation.

#### 6.6.1.5. *IRO: Freedom of Association, Works Councils, and Information, Consultation, and Participation Rights of Workers – Actual Positive Impact*

Respecting worker representation rights strengthens governance, participation, and workplace democracy.

We guarantee freedom of association in line with ILO standards and actively support the establishment and functioning of works councils. Transparent practices for information sharing, consultation, and participation are maintained to ensure employees can engage meaningfully in decision-making. Additionally, we provide training to management on effective engagement with employee representatives, fostering constructive dialogue and collaboration across all levels of the organisation.



#### 6.6.1.6. IRO: Collective Bargaining, Including Rate of Workers Covered by Collective Agreements – Actual Positive Impact

Collective agreements contribute to fair wages, benefits, and working conditions, enhancing workforce stability and satisfaction.

We negotiate and maintain collective agreements in accordance with local legislation, ensuring that all workforce categories are inclusively covered. Coverage rates are monitored to maintain fairness and representativeness across the organisation. Agreements are periodically reviewed to align with evolving business and social needs, while open dialogue between unions and management is actively facilitated to promote mutual understanding and collaboration.

#### 6.6.1.7. IRO: Work-Life Balance – Actual Positive Impact

Supporting work-life balance improves well-being, reduces stress, and enhances productivity.

We implement flexible working arrangements wherever feasible to support employees in balancing professional and personal responsibilities. The use of leave entitlements, including parental and vacation leave, is actively encouraged to promote rest and well-being. We also promote initiatives that prevent work from encroaching on personal time, helping to safeguard boundaries between work and home life. Employee satisfaction with work-life balance is regularly monitored to identify opportunities for improvement and ensure a supportive working environment.

#### 6.6.1.8. IRO: Health and Safety – Work-Related Accidents – Potential Negative Impact

Workplace accidents pose risks to employee health, disrupt operations, and may lead to legal and reputational consequences.

We conduct regular risk assessments and safety audits to identify and mitigate potential hazards in the workplace. Mandatory health and safety training is provided to all employees, ensuring awareness and compliance with established standards. Protective equipment and safety protocols are implemented to minimise risks, while incident reporting systems are maintained to capture and investigate accidents or near misses. Corrective actions are followed up systematically to prevent recurrence and strengthen our safety culture.

#### 6.6.1.9. IRO: Health and Safety – Financial Risk – Risk

Unsafe working conditions can result in financial losses due to accidents, compensation claims, regulatory fines, and operational disruptions.

We invest in preventive measures and workplace safety systems to reduce occupational risks and protect our workforce. Operations are insured against potential workplace hazards, and incident-related costs are systematically monitored and analysed to inform improvements. Health and safety considerations are fully integrated into our financial and operational risk management processes, ensuring that safety remains a central component of business decision-making.

### 6.6.2. Subtopic: Equal Treatment and Opportunities for All

This subtopic addresses the fair and equitable treatment of all employees, ensuring opportunities are accessible regardless of gender, disability, or other personal characteristics. It encompasses practices to promote gender equality, diversity, inclusion, skills development, and safe work environments free from harassment or discrimination. Promoting equal treatment and opportunities strengthens employee engagement, enhances organizational performance, and supports compliance with labour standards and global ESG commitments.

#### 6.6.2.1. IRO: Gender Equality and Equal Pay for Work of Equal Value – Actual Negative Impact

Unequal treatment or pay gaps between genders can negatively impact workforce morale and may reflect systemic discrimination. Gender equality and equitable pay are essential to foster fairness and retention.



We conduct regular pay audits to identify and address gender pay gaps, ensuring equitable compensation across all employee groups. Policies are in place to promote gender equality in recruitment, promotion, and career development. Awareness campaigns and training sessions are provided to managers to address unconscious bias and foster inclusive decision-making. Key gender equality KPIs are monitored across departments and geographies to track progress and drive continuous improvement.

#### *6.6.2.2. IRO: Training and Skills Development – Actual Positive Impact*

Opportunities for employee training and development improve skills, career growth, and job satisfaction, benefiting both employees and organizational performance.

We offer structured training programs tailored to specific roles and career paths, ensuring employees acquire the skills needed for success. Investments are made in both technical and soft skills development to support holistic professional growth. Performance reviews are linked to individual development plans, helping to align learning with career progression. Additionally, mentoring and coaching initiatives are provided across all levels of the organisation to foster continuous learning and knowledge sharing.

#### *6.6.2.3. IRO: Employment and Inclusion of Persons with Disabilities – Potential Positive Impact*

Promoting employment and inclusion of persons with disabilities increases workforce diversity and ensures equal opportunity. While currently a potential positive impact, its implementation can drive measurable social value.

We implement policies designed to facilitate the recruitment and career development of persons with disabilities. Reasonable workplace accommodations are provided to ensure accessibility and enable full participation. Awareness and sensitivity training is delivered to colleagues and managers to foster an inclusive culture. Progress on inclusion initiatives is regularly monitored and reported to ensure continuous improvement and accountability.

#### *6.6.2.4. IRO: Measures Against Violence and Harassment in the Workplace – Potential Positive Impact*

Preventing violence and harassment creates a safe and respectful workplace, enhancing employee well-being and productivity. Proactive measures have the potential to deliver strong positive impacts.

We maintain clear anti-harassment and anti-violence policies to ensure a safe and respectful workplace. Accessible reporting channels and whistleblowing mechanisms are in place to allow employees to raise concerns confidentially. Training programs on workplace behaviour and conflict management are provided to all staff to promote positive interactions. Reported incidents are thoroughly investigated, and corrective actions are implemented promptly to prevent recurrence and maintain a safe working environment.

#### *6.6.2.5. IRO: Diversity – Opportunity*

Diversity in the workforce, including cultural, gender, and generational differences, provides opportunities for innovation, better decision-making, and stronger organizational culture.

We integrate diversity policies into recruitment, retention, and promotion practices to ensure equitable opportunities for all employees. Employee resource groups and inclusion initiatives are established to foster a supportive and diverse workplace. Workforce composition and diversity KPIs are regularly monitored to track progress and inform improvement efforts. Leadership demonstrates a strong commitment to cultivating a diverse and inclusive culture throughout the organisation.

### **6.6.3. Subtopic: Other Work-Related Rights**

This subtopic covers fundamental work-related rights beyond standard employment conditions, including the protection of workers from child and forced labour, ensuring adequate living conditions for employees, and safeguarding personal data and privacy. In the context of our operations—spanning industrial centres, vessels, and camp sites—these rights are essential to promote a safe, dignified, and ethical working environment. Respecting these rights supports compliance with international labour standards and contributes to a responsible and sustainable workforce.



#### 6.6.3.1. IRO: Child Labour – Risk

The risk of child labour exists in some regions within our supply chain or temporary workforce, especially in operations with seasonal or low-skilled work. While our direct workforce does not employ minors, vigilance is required to ensure that no underage workers are involved in our operations or subcontracted activities.

We enforce strict recruitment policies that verify age documentation for all workers to prevent child labour. Supplier and subcontractor audits are conducted regularly to ensure compliance with child labour laws and international standards. HR and operational teams receive training to recognize and report potential child labour risks. If any instances of child labour are identified, immediate remediation measures are implemented to address the situation and prevent recurrence.

#### 6.6.3.2. IRO: Forced Labour – Risk

Forced or compulsory labour, including debt bondage or coercion, is a potential risk in certain operational contexts or among subcontracted labour, particularly in remote fishing vessels or camp sites.

We ensure that employment contracts are clear, transparent, and freely signed by all workers. Regular audits of working conditions, including those of subcontracted suppliers, are conducted to verify compliance with labour standards. Policies strictly prohibit the retention of personal documents, such as IDs or passports, by management. Training programs are provided to raise awareness among workers and supervisors of forced labour risks. In addition, mechanisms are in place for workers to report concerns anonymously, ensuring protection and timely resolution.

#### 6.6.3.3. IRO: Adequate Housing / Living Conditions – Actual Negative Impact

Living conditions on vessels or in camp sites can significantly affect worker health, safety, and well-being. Inadequate housing, overcrowding, poor sanitation, or lack of proper facilities constitutes an actual negative impact.

We ensure compliance with local and international standards for housing and accommodation, covering space, hygiene, ventilation, access to potable water, and sanitation. Regular inspections of vessels and camp sites are conducted to verify that living conditions meet these standards. Worker feedback mechanisms are in place to report any issues related to accommodation, and continuous improvement plans are implemented to upgrade facilities as needed, ensuring safe and healthy living environments for all employees.

#### 6.6.3.4. IRO: Privacy (Personal Data Protection and Worker Surveillance) – Potential Negative Impact

Collecting and processing personal data or monitoring workers carries potential risks to privacy. Improper handling of sensitive information or excessive surveillance could harm employee trust and violate regulations.

We comply with data protection laws, such as GDPR, for all personal data processing activities. Clear policies define the scope and purpose of monitoring and surveillance to ensure transparency and fairness. Access to personal data is strictly limited to authorized personnel, and workers receive training to raise awareness of their privacy rights. Periodic audits are conducted to verify that surveillance practices are ethical, necessary, and aligned with legal requirements.

#### 6.6.4. Summary of Responses

Topic / Subtopic	IRO / Materiality Type	Description	How We Manage
S1 – Own Workforce / Working Conditions	Stable employment – Actual Positive Impact – <b>CRUCIAL</b>	Stability in employment fosters workforce commitment, reduces turnover, and promotes long-term organizational knowledge.	<ul style="list-style-type: none"><li>• Use permanent contracts wherever possible and limit temporary employment.</li><li>• Implement fair recruitment and onboarding procedures.</li><li>• Monitor workforce retention rates and develop career path plans.</li><li>• Provide support for transitions, e.g., redeployment or reskilling programs.</li></ul>
S1 – Own Workforce / Working Conditions	Working time – Actual Positive Impact – <b>CRUCIAL</b>	Managing working hours appropriately ensures compliance with labour laws, prevents burnout, and promotes well-being.	<ul style="list-style-type: none"><li>• Monitor and regulate working hours in compliance with local legislation and collective agreements.</li><li>• Provide flexible schedules where possible.</li><li>• Track overtime and ensure proper compensation.</li><li>• Encourage regular breaks and rest periods.</li></ul>



Topic / Subtopic	IRO / Materiality Type	Description	How We Manage
S1 - Own Workforce / Working Conditions	Adequate wages – Actual Positive Impact – <b>CRUCIAL</b>	Fair and adequate compensation is fundamental to workforce motivation, financial stability, and social well-being.	<ul style="list-style-type: none"> <li>• Ensure wages meet or exceed legal minimums and industry benchmarks.</li> <li>• Implement transparent payroll systems.</li> <li>• Conduct regular wage reviews.</li> <li>• Integrate remuneration policies with performance management and career progression.</li> </ul>
S1 - Own Workforce / Working Conditions	Social dialogue – Opportunity	Active communication and engagement between employees and management fosters trust, collaboration, and continuous improvement.	<ul style="list-style-type: none"> <li>• Establish regular meetings between management and employee representatives.</li> <li>• Maintain formal consultation channels for operational changes.</li> <li>• Promote feedback mechanisms and employee surveys.</li> <li>• Encourage a culture of open dialogue at all levels.</li> </ul>
S1 - Own Workforce / Working Conditions	Freedom of association, works councils, and information, consultation, and participation rights of workers – Actual Positive Impact	Respecting worker representation rights strengthens governance, participation, and workplace democracy.	<ul style="list-style-type: none"> <li>• Guarantee freedom of association in line with ILO standards.</li> <li>• Support the establishment and functioning of works councils.</li> <li>• Ensure transparent information, consultation, and participation practices.</li> <li>• Provide training to management on engagement with employee representatives.</li> </ul>
S1 - Own Workforce / Working Conditions	Collective bargaining, including rate of workers covered by collective agreements – Actual Positive Impact	Collective agreements contribute to fair wages, benefits, and working conditions, enhancing workforce stability and satisfaction.	<ul style="list-style-type: none"> <li>• Negotiate and maintain collective agreements in line with local legislation.</li> <li>• Monitor coverage rates and ensure inclusivity of workforce categories.</li> <li>• Periodically review agreements to align with business and social needs.</li> <li>• Facilitate dialogue between unions and management.</li> </ul>
S1 - Own Workforce / Working Conditions	Work-life balance – Actual Positive Impact	Supporting work-life balance improves well-being, reduces stress, and enhances productivity.	<ul style="list-style-type: none"> <li>• Implement flexible working arrangements where feasible.</li> <li>• Encourage use of leave entitlements, including parental and vacation leave.</li> <li>• Promote initiatives to prevent work encroachment on personal time.</li> <li>• Monitor employee satisfaction related to work-life balance.</li> </ul>
S1 - Own Workforce / Working Conditions	Health and safety – Work-related accidents – Potential Negative Impact – <b>CRUCIAL</b>	Workplace accidents pose risks to employee health, disrupt operations, and may lead to legal and reputational consequences.	<ul style="list-style-type: none"> <li>• Conduct regular risk assessments and safety audits.</li> <li>• Provide mandatory health and safety training.</li> <li>• Implement protective equipment and safety protocols.</li> <li>• Maintain incident reporting systems and corrective action follow-up.</li> </ul>
S1 - Own Workforce / Working Conditions	Health and safety – Financial risk – Risk	Unsafe working conditions can result in financial losses due to accidents, compensation claims, regulatory fines, and operational disruptions.	<ul style="list-style-type: none"> <li>• Invest in preventive measures and workplace safety systems.</li> <li>• Insure operations against occupational risks.</li> <li>• Monitor and analyse incident-related costs.</li> <li>• Integrate health and safety into financial and operational risk management processes.</li> </ul>
S1 - Own Workforce / Equal Treatment and Opportunities for All	Gender equality and equal pay for work of equal value – Actual Negative Impact	Unequal treatment or pay gaps between genders can negatively affect workforce morale and reflect systemic discrimination.	<ul style="list-style-type: none"> <li>• Conduct regular pay audits to identify and address gaps.</li> <li>• Implement policies promoting gender equality in recruitment, promotion, and career development.</li> <li>• Provide training for managers on unconscious bias.</li> <li>• Monitor gender equality KPIs across departments and regions.</li> </ul>
S1 - Own Workforce / Equal Treatment and Opportunities for All	Training and skills development – Actual Positive Impact	Access to training and development improves skills, career growth, and job satisfaction, benefiting both employees and organizational performance.	<ul style="list-style-type: none"> <li>• Structured training programs tailored to roles and career paths.</li> <li>• Invest in both technical and soft skills development.</li> <li>• Link performance reviews to individual development plans.</li> <li>• Implement mentoring and coaching initiatives.</li> </ul>
S1 - Own Workforce / Equal Treatment and Opportunities for All	Employment and inclusion of persons with disabilities – Potential Positive Impact – <b>BELOW SIGNIFICANCE THRESHOLD</b>	Promoting employment and inclusion of persons with disabilities increases workforce diversity and ensures equal opportunity.	<ul style="list-style-type: none"> <li>• Policies facilitating recruitment and career development for persons with disabilities.</li> <li>• Provide reasonable workplace accommodations.</li> <li>• Conduct awareness and sensitivity training.</li> <li>• Monitor and report on inclusion progress.</li> </ul>
S1 - Own Workforce / Equal Treatment and Opportunities for All	Measures against violence and harassment in the workplace – Potential Positive Impact	Preventing violence and harassment ensures a safe and respectful work environment.	<ul style="list-style-type: none"> <li>• Establish clear anti-harassment and anti-violence policies.</li> <li>• Maintain reporting channels and whistleblowing mechanisms.</li> <li>• Conduct training programs on workplace behaviour and conflict management.</li> <li>• Investigate and apply corrective actions when incidents occur.</li> </ul>
S1 - Own Workforce / Equal Treatment and Opportunities for All	Diversity – Opportunity	Diversity across cultural, gender, and generational dimensions supports innovation, better decision-making, and a stronger organizational culture.	<ul style="list-style-type: none"> <li>• Integrate diversity policies in recruitment, retention, and promotion.</li> <li>• Support employee resource groups and inclusion initiatives.</li> <li>• Monitor workforce composition and diversity KPIs.</li> <li>• Ensure leadership commitment to fostering an inclusive culture.</li> </ul>
S1 - Own Workforce / Other Work-Related Rights	Child labour – Risk – <b>BELOW SIGNIFICANCE THRESHOLD</b>	Risk of employing underage workers in direct operations or subcontracted activities, particularly in regions with seasonal or low-skilled work.	<ul style="list-style-type: none"> <li>• Verify age documentation for all workers.</li> <li>• Conduct supplier and subcontractor audits.</li> <li>• Train HR and operational teams to identify child labour risks.</li> <li>• Implement immediate remediation if child labour is detected.</li> </ul>



Topic / Subtopic	IRO / Materiality Type	Description	How We Manage
S1 - Own Workforce / Other Work-Related Rights	Forced labour – Risk – BELOW SIGNIFICANCE THRESHOLD	Risk of coercion, debt bondage, or involuntary work, especially in remote vessels or camp sites.	<ul style="list-style-type: none"> <li>Clear, transparent, and freely signed employment contracts.</li> <li>Regular audits of working conditions.</li> <li>Prohibit retention of worker personal documents.</li> <li>Awareness training for supervisors and workers.</li> <li>Anonymous reporting mechanisms.</li> </ul>
S1 - Own Workforce / Other Work-Related Rights	Adequate housing / living conditions – Actual Negative Impact – BELOW SIGNIFICANCE THRESHOLD	Poor living conditions on vessels or camp sites can negatively affect worker health, safety, and well-being.	<ul style="list-style-type: none"> <li>Ensure compliance with accommodation standards (space, hygiene, ventilation, potable water, sanitation).</li> <li>Conduct regular inspections of vessels and camp sites.</li> <li>Maintain worker feedback mechanisms.</li> <li>Implement continuous improvement plans for facilities.</li> </ul>
S1 - Own Workforce / Other Work-Related Rights	Privacy (personal data protection & worker surveillance) – Potential Negative Impact – BELOW SIGNIFICANCE THRESHOLD	Risk of mishandling personal data or excessive monitoring of workers, which may harm privacy and trust.	<ul style="list-style-type: none"> <li>Comply with data protection regulations (e.g., GDPR).</li> <li>Define clear policies on monitoring and surveillance.</li> <li>Limit access to personal data to authorized personnel.</li> <li>Provide worker training on privacy rights.</li> <li>Conduct periodic audits of surveillance practices.</li> </ul>

## 6.7. ESRS S2 WORKERS IN THE VALUE CHAIN

CATEGORY	IRO	ACTUAL / POTENTIAL	SUPPLY CHAIN	TIME FRAME	SCORE	MATERIALITY
<b>Subtopic 1 WORKING CONDITIONS</b>						
• Working conditions	–	→	▲	▶▶▶	2	Not material
• Health and safety	R		▲	▶▶▷	8	Significant
<b>Subtopic 2 EQUAL TREATMENT AND OPPORTUNITIES FOR ALL</b>						
• Measures against violence and harassment in the workplace	+	↓	▲	▶▶▶	4	Not material
<b>Subtopic 3 OTHER WORK-RELATED RIGHTS</b>						
• Child labour	R		▲	▶▶▷	8	Significant
• Forced labour	R		▲	▶▶▷	8	Significant

### 6.7.1. Subtopic: Working Conditions

This subtopic addresses the working conditions of employees across our value chain, including suppliers, contractors, and subcontractors. Ensuring safe, fair, and compliant work practices is critical to uphold labour standards, prevent exploitation, and maintain the sustainability and reputation of the supply chain. Poor working conditions can negatively affect worker well-being, productivity, and social license to operate, while effective management supports ethical sourcing and long-term partnerships.

#### 6.7.1.1. IRO: Working Conditions – Potential Negative Impact

Suppliers and contractors may have inadequate working conditions, including excessive hours, lack of benefits, unsafe environments, or unfair treatment, which could negatively impact workers in the value chain.

We define and implement a supplier code of conduct that sets minimum standards for labour and working conditions. Supplier assessments and audits are conducted regularly to ensure compliance with these standards. Guidance, training, and support are provided to suppliers to help them meet expectations, and corrective action plans are implemented for any non-compliant suppliers. Progress on supplier compliance is continuously monitored and reported to ensure accountability and improvement throughout the supply chain.

#### 6.7.1.2. IRO: Health and Safety – Risk

Workers in the value chain may be exposed to unsafe or hazardous conditions, leading to occupational injuries, illness, or fatalities. These risks can have operational, reputational, and legal consequences.

We require suppliers to implement robust health and safety management systems that comply with local regulations and international standards. Health and safety criteria are incorporated into supplier selection and contract agreements to ensure alignment with our expectations. Regular audits, inspections, and risk assessments are conducted at supplier sites to identify and mitigate potential hazards. Suppliers receive



training and awareness programs on occupational health and safety, and incidents are tracked with corrective measures enforced to address unsafe practices.

#### 6.7.2. Subtopic: Equal Treatment and Opportunities for All

This subtopic addresses the protection of workers in the value chain from discrimination, harassment, and violence, promoting a safe, respectful, and inclusive work environment. Measures to prevent and address workplace violence and harassment enhance worker well-being, reduce turnover, and support compliance with labour standards. Respecting these rights strengthens ethical practices across suppliers and contractors.

##### 6.7.2.1. *IRO: Measures Against Violence and Harassment in the Workplace – Actual Positive Impact*

Implementing proactive measures to prevent violence and harassment in supplier and contractor workplaces promotes safe and respectful working conditions and protects workers from abuse and discrimination.

We require suppliers and contractors to implement anti-violence and anti-harassment policies aligned with international standards. Guidance and training are provided to help suppliers prevent workplace violence and harassment. Reporting mechanisms are established within the supply chain to ensure incidents can be raised confidentially, with protection from retaliation. Supplier compliance is monitored through audits and assessments, and we work collaboratively with suppliers to implement corrective actions and continuous improvement plans whenever issues are identified.

#### 6.7.3. Subtopic: Other Work-Related Rights

This subtopic addresses fundamental labour rights for workers in the value chain, including the prevention of child and forced labour. Respecting these rights is essential to prevent exploitation, uphold human rights, and ensure ethical practices among suppliers and contractors. Monitoring and managing these risks reduce reputational, legal, and operational impacts for the company and its partners.

##### 6.7.3.1. *IRO: Child Labour – Risk*

There is a risk that child labour may occur within supplier or contractor operations, particularly in regions with weaker labour law enforcement.

We require suppliers and contractors to adhere to a supplier code of conduct that strictly prohibits child labour. Regular audits and assessments are conducted to verify compliance with age requirements. Suppliers receive training and guidance on child labour prevention to strengthen understanding and adherence to standards. If instances of child labour are identified, corrective actions are implemented promptly, including remediation measures and engagement with the supplier to prevent recurrence.

##### 6.7.3.2. *IRO: Forced Labour – Risk*

Workers in the value chain may be subject to forced labour practices, such as involuntary work, debt bondage, or coercion, which can lead to negative social and operational impacts.

We require suppliers to implement policies prohibiting forced labour in line with international standards, including ILO conventions. Forced labour criteria are incorporated into supplier selection and contractual agreements to ensure compliance. Risk-based audits and assessments are conducted to detect any forced labour practices within the supply chain. Suppliers are provided with guidance and training on recognizing and preventing forced labour, and corrective actions are applied with monitoring of remediation plans whenever issues are identified.



#### 6.7.4. Summary of Responses

Topic / Subtopic	IRO / Materiality Type	Description	How We Manage
S2 – Workers in the Value Chain / Working Conditions	Working conditions – Potential Negative Impact – BELOW SIGNIFICANCE THRESHOLD	Suppliers and contractors may have inadequate working conditions, including excessive hours, lack of benefits, unsafe environments, or unfair treatment, negatively impacting workers in the value chain.	<ul style="list-style-type: none"> <li>Define and implement a supplier code of conduct specifying minimum labour and working condition standards.</li> <li>Assess or audit suppliers focusing on working conditions.</li> <li>Provide guidance, training, and support to suppliers to meet standards.</li> <li>Implement corrective action plans for non-compliant suppliers.</li> <li>Monitor and report progress regularly on supplier compliance.</li> </ul>
S2 – Workers in the Value Chain / Working Conditions	Health and safety – Risk	Workers in the value chain may be exposed to unsafe or hazardous conditions, leading to occupational injuries, illness, or fatalities, with operational, reputational, and legal consequences.	<ul style="list-style-type: none"> <li>Require suppliers to implement robust health and safety management systems in line with local regulations and international standards.</li> <li>Include health and safety criteria in supplier selection and contracts.</li> <li>Conduct regular audits, inspections, and risk assessments at supplier sites.</li> <li>Provide training and awareness programs on occupational health and safety.</li> <li>Track incidents and enforce corrective measures for unsafe practices.</li> </ul>
S2 – Workers in the Value Chain / Equal Treatment and Opportunities for All	Measures against violence and harassment in the workplace – Actual Positive Impact – BELOW SIGNIFICANCE THRESHOLD	Implementing proactive measures to prevent violence and harassment in supplier and contractor workplaces promotes safe and respectful working conditions and protects workers from abuse and discrimination.	<ul style="list-style-type: none"> <li>Require suppliers and contractors to implement anti-violence and anti-harassment policies aligned with international standards.</li> <li>Provide guidance and training to suppliers on preventing workplace violence and harassment.</li> <li>Establish reporting mechanisms for incidents within the supply chain, ensuring confidentiality and protection from retaliation.</li> <li>Monitor supplier compliance through audits and assessments.</li> <li>Work with suppliers to implement corrective actions and continuous improvement plans when issues are identified.</li> </ul>
S2 – Workers in the Value Chain / Other Work-Related Rights	Child labour – Risk	There is a risk that child labour may occur within supplier or contractor operations, particularly in regions with weaker labour law enforcement.	<ul style="list-style-type: none"> <li>Require suppliers and contractors to adhere to a supplier code of conduct prohibiting child labour.</li> <li>Conduct regular supplier audits and assessments to verify age compliance.</li> <li>Provide training and guidance to suppliers on child labour prevention.</li> <li>Implement corrective actions if child labour is identified, including remediation and supplier review.</li> </ul>
S2 – Workers in the Value Chain / Other Work-Related Rights	Forced labour – Potential Negative Impact – Risk	Workers in the value chain may be subject to forced labour practices, such as involuntary work, debt bondage, or coercion, which can lead to negative social and operational impacts.	<ul style="list-style-type: none"> <li>Require suppliers to implement policies prohibiting forced labour in accordance with international standards (ILO conventions).</li> <li>Include forced labour criteria in supplier selection and contractual agreements.</li> <li>Conduct risk-based supplier audits and assessments to detect forced labour practices.</li> <li>Provide guidance and training to suppliers on recognizing and preventing forced labour.</li> <li>Apply corrective actions and monitor remediation plans when issues are identified.</li> </ul>

#### 6.8. ESRS S3 AFFECTED COMMUNITIES

CATEGORY	IRO	ACTUAL / POTENTIAL	SUPPLY CHAIN	TIME FRAME	SCORE	MATERIALITY
Subtopic 1 COMMUNITIES' ECONOMIC, SOCIAL, AND CULTURAL RIGHTS						
• Adequate housing	+	→	▲●	►►►	3	Not material
• Adequate food	○		●	►►►	4	Not material
• Water and sanitation	+	→	▲●	►►►	3	Not material
• Land-related impacts	+	→	▲●	►►►	3	Not material
• Security-related impacts	R		●	►►►	3	Not material
Subtopic 2 COMMUNITIES' CIVIL AND POLITICAL RIGHTS						
• Freedom of expression	+	→	▲●	►►►	3	Not material
• Freedom of assembly	+	→	▲●	►►►	3	Not material
• Impacts on human rights defenders	+	→	▲●	►►►	3	Not material
Subtopic 3 RIGHTS OF INDIGENOUS PEOPLES						
• Free, prior, and informed consent	R		▲●	►►►	4	Not material



CATEGORY	IRO	ACTUAL / POTENTIAL	SUPPLY CHAIN	TIME FRAME	SCORE	MATERIALITY
• Self-determination	+	→	●	▶▶▶	1	Not material
• Cultural rights	+	→	●	▶▶▶	2	Not material

As all IROs assessed within this ESRS fell below the significance threshold, no subtopics were identified as material.

## 6.9. ESRS S4 CONSUMERS AND END-USERS

CATEGORY	IRO	ACTUAL / POTENTIAL	SUPPLY CHAIN	TIME FRAME	SCORE	MATERIALITY
<b>Subtopic 1 INFORMATION-RELATED IMPACTS FOR CONSUMERS AND/OR END-USERS</b>						
• Privacy	R		▼	▶▶▶	4	Not material
• Freedom of expression	+	↓	▼	▶▶▶	1	Not material
• Access to (quality) information	+	↓	▼	▶▶▶	9	Significant
• Brand and/or products reputation	O		▼	▶▶▶	12	CRUCIAL
<b>Subtopic 2 PERSONAL SAFETY OF CONSUMERS AND/OR END-USERS</b>						
• Health and safety	+	↓	▼	▶▶▶	12	CRUCIAL
• Security of a person and reputational impact (food safety and quality)	R		▼		5	Significant
• Protection of children / Responsible action towards children's rights	+	→	▼	▶▶▶	6	Significant
• Nutritional benefits for consumers	+	↓	▼	▶▶▶	12	CRUCIAL
<b>Subtopic 3 SOCIAL INCLUSION OF CONSUMERS AND/OR END-USERS</b>						
• Non-discrimination	+	→	▼	▶▶▶	3	Not material
• Access to products and services	+	↓	▼	▶▶▶	4	Not material
• Responsible marketing practices	+	↓	▼	▶▶▶	4	Not material

### 6.9.1. Subtopic: Information-Related Impacts for Consumers and/or End-Users

This subtopic addresses how the company communicates and manages information affecting consumers and end users. It includes privacy, freedom of expression, access to accurate and relevant information, and the influence of brand or product reputation. Ensuring transparency, protecting data, and supporting informed decision-making enhance consumer trust, safety, and satisfaction while strengthening the company's reputation and competitive advantage.

#### 6.9.1.1. IRO: Privacy – Risk

Risks arise from mishandling personal data of consumers and end users, potentially leading to breaches, reputational damage, and regulatory sanctions.

We implement data protection policies in full compliance with relevant regulations, such as GDPR. The collection, storage, and processing of personal data are limited to what is strictly necessary, and secure handling and storage practices are enforced to protect consumer information. Employees receive training on privacy and data protection practices to ensure awareness and compliance. Data incidents and breaches are closely monitored and audited, with prompt responses taken to mitigate risks and protect stakeholders.

#### 6.9.1.2. IRO: Freedom of Expression – Actual Positive Impact

Protecting consumer rights to express opinions, feedback, and complaints contributes to transparency, continuous improvement, and stakeholder engagement.

We maintain accessible channels for consumer feedback, complaints, and inquiries, ensuring that consumers can easily share their perspectives. Consumer rights to express opinions about products, services, or the brand are respected and actively supported. Feedback is systematically integrated into product development, quality assurance, and customer service improvements to enhance overall consumer experience. Additionally,



we communicate openly about how the company responds to concerns and suggestions, fostering transparency and trust.

#### 6.9.1.3. *IRO: Access to (Quality) Information – Actual Positive Impact*

Providing accurate, relevant, and transparent information enables consumers to make informed choices and promotes trust and loyalty.

We ensure that product labels, marketing materials, and communications comply with legal requirements and meet quality standards. Clear, accessible, and accurate product information is provided, including nutritional, safety, and usage data. Information is regularly reviewed and updated to maintain accuracy and relevance. Digital platforms are also leveraged to enhance transparency and improve consumer access to reliable information.

#### 6.9.1.4. *IRO: Brand and/or Products Reputation – Opportunity*

A strong brand and product reputation can enhance consumer trust, loyalty, and market differentiation, representing an opportunity for sustainable growth.

We monitor consumer perception and feedback across multiple channels to understand stakeholder expectations and concerns. Responsible marketing and communication practices are implemented to ensure transparency, accuracy, and ethical engagement. Brand values are aligned with our ESG commitments and responsible business practices to reinforce trust and credibility. Additionally, proactive reputation management and transparent crisis communication are employed to address issues effectively and maintain stakeholder confidence.

### 6.9.2. Subtopic: Personal Safety of Consumers and/or End-Users

This subtopic addresses the physical and nutritional safety of consumers and end-users, focusing on food safety, product quality, responsible practices toward children, and the provision of nutritional benefits. Ensuring personal safety protects consumer health, builds trust, and reduces reputational and regulatory risks while supporting positive health outcomes.

#### 6.9.2.1. *IRO: Health and Safety – Actual Positive Impact*

Ensuring that products do not pose health hazards to consumers protects them from injury or illness and enhances trust in the brand.

We implement comprehensive food safety and quality management systems, such as HACCP and ISO standards, to ensure product safety. Rigorous testing and quality control are conducted throughout production and supply chains to prevent hazards. Employees receive training in hygiene, handling, and safety practices to maintain high standards. Incidents are closely monitored, and products are promptly recalled if any risks are identified, ensuring consumer protection and compliance.

#### 6.9.2.2. *IRO: Security of a Person and Reputational Impact – Risk (Food Safety and Quality)*

Unsafe products can pose direct risks to consumers' health and safety and damage the company's reputation.

We maintain strict compliance with legal requirements and industry standards to ensure product safety. Traceability systems are implemented to quickly identify and isolate any unsafe products. Regular audits of suppliers and production facilities are conducted to verify adherence to safety standards. In addition, a crisis management and communication plan is developed and maintained to respond effectively to any safety incidents, protecting consumers and the company's reputation.

#### 6.9.2.3. *IRO: Protection of Children / Responsible Action Towards Children's Rights – Potential Positive Impact*

Taking responsible action to protect children from harm in relation to products, marketing, and communications promotes ethical practices and social responsibility.



We establish policies and guidelines for responsible marketing and product design specifically aimed at children. Labelling and product communications are carefully designed to be age-appropriate and safe. Employees and suppliers receive training on responsible practices related to children's rights. Compliance is closely monitored, and progress on initiatives protecting children is regularly reported to ensure accountability and continuous improvement.

#### 6.9.2.4. *IRO: Nutritional Benefits for Consumers – Actual Positive Impact*

Providing products that contribute to healthy diets supports consumer well-being and strengthens brand credibility.

We develop products with balanced nutritional profiles and provide clear nutritional labelling to support informed consumer choices. Research and innovation are conducted to continuously improve the health benefits of our products. Educational materials and guidance on healthy consumption are offered to empower consumers to make healthier decisions. Consumer feedback and scientific evidence are closely monitored to inform ongoing enhancements to product nutrition and quality.

#### 6.9.3. **Subtopic: Social Inclusion of Consumers and/or End-Users**

This subtopic addresses ensuring that all consumers, regardless of age, gender, socio-economic status, or abilities, can access products and services safely and equitably. It also covers responsible marketing practices to avoid misleading or discriminatory communication. Promoting social inclusion enhances consumer trust, supports ethical business practices, and strengthens market access and brand reputation.

##### 6.9.3.1. *IRO: Non-Discrimination – Potential Positive Impact*

Ensuring that all consumers are treated fairly and without bias prevents exclusion and promotes equal access to products and services.

We develop policies that promote equal access and prevent discrimination across marketing, sales, and service delivery. Employees and partners receive training on inclusive practices and anti-discrimination principles to ensure awareness and consistent application. Customer interactions and feedback are monitored to identify and address any potential discrimination. Product design, packaging, and communications are regularly reviewed to ensure accessibility and inclusivity for all consumers.

##### 6.9.3.2. *IRO: Access to Products and Services – Actual Positive Impact*

Facilitating broad access to safe, affordable, and quality products and services supports consumer well-being and inclusion.

We ensure that distribution networks reach diverse consumer groups, including underserved communities, to promote equitable access. Where feasible, product affordability options are offered without compromising quality. Products and services are adapted to meet the needs of different populations, including considerations for age-appropriateness and dietary restrictions. Availability and accessibility metrics are regularly monitored across markets to identify gaps and drive continuous improvement.

##### 6.9.3.3. *IRO: Responsible Marketing Practices – Actual Positive Impact*

Transparent, accurate, and ethical marketing promotes informed decision-making and protects consumers from misleading or harmful messaging.

We ensure compliance with advertising regulations and industry codes of conduct to uphold ethical marketing standards. Product information is presented clearly, honestly, and based on evidence, enabling consumers to make informed choices. Marketing practices are carefully designed to avoid misleading content, exploitation of vulnerable consumers, or inappropriate targeting of children. Marketing campaigns are regularly monitored and audited to ensure alignment with responsible and transparent practices.



#### 6.9.4. Summary of Responses

Topic / Subtopic	IRO / Materiality Type	Description	How We Manage
S4 – Consumers and End Users / Information-Related Impacts	Privacy – Risk – BELOW SIGNIFICANCE THRESHOLD	Risks may arise if consumer personal data is mishandled, misused, or inadequately protected, leading to loss of trust, regulatory penalties, or reputational harm.	<ul style="list-style-type: none"> <li>Implement strict data protection policies aligned with GDPR and other privacy regulations.</li> <li>Apply secure systems for collection, storage, and processing of consumer data.</li> <li>Train employees on data protection and responsible use of personal information.</li> <li>Provide consumers with transparent information about how their data is used and their rights.</li> </ul>
S4 – Consumers and End Users / Information-Related Impacts	Freedom of expression – Actual Positive Impact – BELOW SIGNIFICANCE THRESHOLD	Respecting consumer freedom of expression fosters trust and enables consumers to voice concerns, opinions, or feedback without undue restriction.	<ul style="list-style-type: none"> <li>Establish accessible feedback and grievance channels for consumers.</li> <li>Ensure transparent and respectful engagement with consumer voices, including in digital platforms.</li> <li>Monitor and respond to consumer feedback to inform continuous improvement.</li> </ul>
S4 – Consumers and End Users / Information-Related Impacts	Access to (quality) information – Actual Positive Impact	Providing accurate, clear, and accessible product information empowers consumers to make informed choices and strengthens transparency.	<ul style="list-style-type: none"> <li>Ensure compliance with labelling and product information regulations.</li> <li>Communicate nutrition, sourcing, and sustainability information clearly and accessibly.</li> <li>Develop awareness campaigns to inform consumers about responsible and healthy consumption.</li> </ul>
S4 – Consumers and End Users / Information-Related Impacts	Brand and/or product reputation – Opportunity – CRUCIAL	Strong brand reputation based on trust, safety, and transparency strengthens consumer loyalty and market competitiveness.	<ul style="list-style-type: none"> <li>Consistently uphold high product quality and safety standards.</li> <li>Engage in transparent communication about corporate responsibility initiatives.</li> <li>Monitor public perception and address reputational risks proactively.</li> </ul>
S4 – Consumers and End Users / Personal Safety of Consumers and/or End-Users	Health and safety – Actual Positive Impact – CRUCIAL	Ensuring that products do not pose health hazards to consumers protects them from injury or illness and enhances trust in the brand.	<ul style="list-style-type: none"> <li>Implement comprehensive food safety and quality management systems (e.g., HACCP, ISO standards).</li> <li>Conduct rigorous testing and quality control throughout production and supply chains.</li> <li>Train employees in hygiene, handling, and safety practices.</li> <li>Monitor incidents and recall products promptly if risks are identified.</li> </ul>
S4 – Consumers and End Users / Personal Safety of Consumers and/or End-Users	Security of a person and reputational impact (e.g., Food safety and quality) – Risk	Unsafe products can pose direct risks to consumers' health and safety and damage the company's reputation.	<ul style="list-style-type: none"> <li>Maintain strict compliance with legal requirements and industry standards for product safety.</li> <li>Implement traceability systems to quickly identify and isolate unsafe products.</li> <li>Conduct regular audits of suppliers and production facilities.</li> <li>Develop and maintain a crisis management and communication plan in case of safety incidents.</li> </ul>
S4 – Consumers and End Users / Personal Safety of Consumers and/or End-Users	Protection of children / Responsible action towards children's rights – Potential Positive Impact	Taking responsible action to protect children from harm in relation to products, marketing, and communications promotes ethical practices and social responsibility.	<ul style="list-style-type: none"> <li>Establish policies and guidelines for responsible marketing and product design aimed at children.</li> <li>Ensure labelling and product communications are age-appropriate and safe.</li> <li>Train employees and suppliers on responsible practices related to children's rights.</li> <li>Monitor compliance and report progress on initiatives protecting children.</li> </ul>
S4 – Consumers and End Users / Personal Safety of Consumers and/or End-Users	Nutritional benefits for consumers – Actual Positive Impact – CRUCIAL	Providing products that contribute to healthy diets supports consumer well-being and strengthens brand credibility.	<ul style="list-style-type: none"> <li>Develop products with balanced nutritional profiles and clear nutritional labelling.</li> <li>Conduct research and innovation to improve health benefits.</li> <li>Provide educational materials and guidance on healthy consumption.</li> <li>Monitor consumer feedback and scientific evidence to continuously enhance product nutrition.</li> </ul>
S4 – Consumers and End Users / Social Inclusion of Consumers and/or End-Users	Non-discrimination – Potential Positive Impact – BELOW SIGNIFICANCE THRESHOLD	Ensuring that all consumers are treated fairly and without bias prevents exclusion and promotes equal access to products and services.	<ul style="list-style-type: none"> <li>Develop policies promoting equal access and non-discrimination in marketing, sales, and service delivery.</li> <li>Train employees and partners on inclusive practices and anti-discrimination principles.</li> <li>Monitor customer interactions and feedback to identify and address potential discrimination.</li> <li>Review product design, packaging, and communication to ensure accessibility and inclusivity.</li> </ul>
S4 – Consumers and End Users / Social Inclusion of Consumers and/or End-Users	Access to products and services – Actual Positive Impact – BELOW SIGNIFICANCE THRESHOLD	Facilitating broad access to safe, affordable, and quality products and services supports consumer well-being and inclusion.	<ul style="list-style-type: none"> <li>Ensure distribution networks reach diverse consumer groups, including underserved communities.</li> <li>Offer product affordability options, where feasible, without compromising quality.</li> <li>Adapt products and services to meet the needs of different populations (e.g., age-appropriate, dietary restrictions).</li> <li>Monitor availability and accessibility metrics across markets.</li> </ul>
S4 – Consumers and End Users / Social Inclusion of Consumers and/or End-Users	Responsible marketing practices – Actual Positive Impact	Transparent, accurate, and ethical marketing promotes informed decision-making and	<ul style="list-style-type: none"> <li>Ensure compliance with advertising regulations and industry codes of conduct.</li> <li>Provide clear, honest, and evidence-based product information.</li> </ul>



Topic / Subtopic	IRO / Materiality Type	Description	How We Manage
Consumers and/or End-Users	- BELOW SIGNIFICANCE THRESHOLD	protects consumers from misleading or harmful messaging.	<ul style="list-style-type: none"> <li>Avoid marketing that could mislead, exploit vulnerable consumers, or target children inappropriately.</li> <li>Monitor and audit marketing campaigns to ensure alignment with responsible practices.</li> </ul>

## 6.10. ESRS G1 – BUSINESS CONDUCT

CATEGORY	IRO	ACTUAL / POTENTIAL	SUPPLY CHAIN	TIME FRAME	SCORE	MATERIALITY
Subtopic 1 CORPORATE CULTURE	O	●	►►►	3	Not material	
Subtopic 2 PROTECTION OF WHISTLE-BLOWERS	R	▲●▼	►►►	4	Not material	
Subtopic 3 ANIMAL WELFARE	O	▲●	►►►	9	Significant	
Subtopic 3 ANIMAL WELFARE	-	→	▲●	►►►	4	Not material
Subtopic 4 POLITICAL ENGAGEMENT AND LOBBYING ACTIVITIES	R	●	►►►	3	Not material	
Subtopic 5 MANAGEMENT OF RELATIONSHIPS WITH SUPPLIERS, INCLUDING PAYMENT PRACTICES	O	▲●	►►►	4	Not material	
Subtopic 6 CORRUPTION AND BRIBERY						
• Prevention and detection, including training	O	▲●▼	►►►	4	Not material	
• Incidents	R	▲●▼	►►►	3	Not material	

### 6.10.1. Subtopic and IRO: Corporate Culture – Opportunity

A strong, ethical corporate culture promotes transparency, accountability, and integrity across the organisation, strengthening stakeholder trust and long-term business resilience.

We define and communicate our corporate values and code of ethics to guide employee behaviour and decision-making. Regular training is provided to reinforce ethical standards and support responsible choices. Leadership is encouraged to role-model ethical conduct, demonstrating commitment to integrity across the organisation. The corporate culture is monitored through employee surveys and engagement tools to assess alignment with values and identify opportunities for improvement.

### 6.10.2. Subtopic and IRO: Protection of Whistle-blowers – Risk

Inadequate protection for whistle-blowers could discourage reporting of unethical behaviour, leading to unresolved misconduct, legal risks, and reputational damage.

We maintain confidential and accessible whistle-blowing channels to allow employees and suppliers to report concerns safely. Non-retaliation policies are guaranteed for individuals reporting in good faith, ensuring protection and trust in the system. Employees and suppliers are trained on how to use reporting mechanisms effectively. Reported cases are closely monitored and followed up to ensure timely resolution and appropriate corrective actions.

### 6.10.3. Subtopic and IRO: Animal Welfare – Opportunity

Ensuring high animal welfare standards promotes responsible practices, enhances brand reputation, and aligns with increasing consumer and regulatory expectations.

We implement animal welfare policies that align with international standards to ensure the humane treatment of animals. Staff and suppliers receive training in best practices to uphold these standards. Compliance is monitored through regular audits and third-party certifications. Additionally, we innovate practices that enhance animal well-being while maintaining operational efficiency, balancing ethical responsibility with business needs.

### 6.10.4. Subtopic and IRO: Animal Welfare – Potential Negative Impact

Poor animal welfare practices may harm animal health and ecosystems, create regulatory non-compliance, and erode stakeholder trust.



We enforce strict compliance with animal welfare policies across all operations and supply chains. Regular inspections are conducted to assess handling, transport, and processing practices. Corrective action plans are established whenever non-conformities are identified to ensure issues are promptly addressed. Animal welfare performance is reported transparently to maintain accountability and stakeholder trust.

#### 6.10.5. Subtopic and IRO: Political Engagement and Lobbying Activities – Risk

Mismanagement of political engagement or lobbying could result in perceived conflicts of interest, regulatory breaches, or reputational risks.

We develop a transparent policy on political engagement and lobbying to guide responsible participation in public affairs. Lobbying activities and positions on policy matters are disclosed to ensure accountability and transparency. All engagement is aligned with ethical principles and stakeholder expectations, promoting integrity in our interactions. Compliance with lobbying regulations is regularly reviewed and audited to maintain adherence to legal and ethical standards.

#### 6.10.6. Subtopic and IRO: Management of Relationships with Suppliers, including Payment Practices – Actual Positive Impact

Fair and responsible management of supplier relationships, including timely payments, supports supply chain resilience, fosters long-term partnerships, and enhances reputation.

We establish supplier codes of conduct and integrate ESG criteria into our procurement processes to promote responsible practices. Supplier performance is monitored through audits and assessments to ensure compliance with standards. We commit to transparent and fair payment terms, supporting financial stability across the supply chain. Additionally, we engage in capacity-building initiatives to help suppliers strengthen their sustainability practices and align with our ESG expectations.

#### 6.10.7. Subtopic: Corruption and Bribery

##### 6.10.7.1. IRO: Prevention and Detection, including Training – Opportunity

Proactively preventing and detecting corruption through policies and training builds integrity, reduces legal risks, and strengthens trust with stakeholders.

We implement comprehensive anti-corruption and anti-bribery policies to promote ethical business conduct. Regular training is provided to employees and suppliers to ensure awareness and compliance with these policies. Due diligence is conducted on high-risk transactions and partnerships to identify potential risks. Practices are continuously monitored and audited to detect, address, and mitigate any instances of corruption or bribery.

##### 6.10.7.2. IRO: Incidents – Risk

Corruption or bribery incidents could lead to financial penalties, reputational harm, and loss of stakeholder confidence.

We maintain robust incident reporting and investigation procedures to address potential cases of corruption and bribery. A zero-tolerance policy is enforced to ensure strict compliance with ethical standards. Corrective and disciplinary actions are taken whenever incidents occur. Material incidents are transparently disclosed in accordance with regulatory requirements, reinforcing accountability and stakeholder trust.

#### 6.10.8. Summary of Responses

Topic / Subtopic	IRO / Materiality Type	Description	How We Manage
G1 – Business Conduct	Corporate culture – Opportunity – BELOW SIGNIFICANCE THRESHOLD	A strong, ethical corporate culture promotes transparency, accountability, and integrity across the organisation, strengthening stakeholder trust and long-term business resilience.	<ul style="list-style-type: none"><li>Define and communicate corporate values and code of ethics.</li><li>Provide regular training on ethical behaviour and decision-making.</li><li>Encourage leadership to role-model ethical conduct.</li><li>Monitor culture through employee surveys and engagement tools.</li></ul>



Topic / Subtopic	IRO / Materiality Type	Description	How We Manage
G1 – Business Conduct	Protection of whistle-blowers – Risk – BELOW SIGNIFICANCE THRESHOLD	Inadequate protection for whistle-blowers could discourage reporting of unethical behaviour, leading to unresolved misconduct, legal risks, and reputational damage.	<ul style="list-style-type: none"> <li>Maintain confidential and accessible whistle-blowing channels.</li> <li>Guarantee non-retaliation policies for individuals reporting in good faith.</li> <li>Train employees and suppliers on the use of reporting mechanisms.</li> <li>Monitor and follow up on reported cases to ensure timely resolution.</li> </ul>
G1 – Business Conduct	Animal welfare – Opportunity	Ensuring high animal welfare standards promotes responsible practices, enhances brand reputation, and aligns with increasing consumer and regulatory expectations.	<ul style="list-style-type: none"> <li>Implement animal welfare policies aligned with international standards.</li> <li>Train staff and suppliers in best practices for humane treatment.</li> <li>Monitor compliance through audits and third-party certifications.</li> <li>Innovate practices that improve animal well-being while maintaining efficiency.</li> </ul>
G1 – Business Conduct	Animal welfare – Potential Negative Impact – BELOW SIGNIFICANCE THRESHOLD	Poor animal welfare practices may harm animal health and ecosystems, create regulatory non-compliance, and erode stakeholder trust.	<ul style="list-style-type: none"> <li>Enforce strict compliance with welfare policies across operations and supply chains.</li> <li>Conduct regular inspections of handling, transport, and processing practices.</li> <li>Establish corrective action plans when non-conformities are identified.</li> <li>Report transparently on animal welfare performance.</li> <li>Develop a transparent policy on political engagement and lobbying.</li> </ul>
G1 – Business Conduct	Political engagement and lobbying activities – Risk – BELOW SIGNIFICANCE THRESHOLD	Mismanagement of political engagement or lobbying could result in perceived conflicts of interest, regulatory breaches, or reputational risks.	<ul style="list-style-type: none"> <li>Disclose lobbying activities and positions taken on public policy matters.</li> <li>Ensure engagement is aligned with ethical principles and stakeholder expectations.</li> <li>Regularly review and audit compliance with lobbying regulations.</li> </ul>
G1 – Business Conduct	Management of relationships with suppliers, including payment practices – Actual Positive Impact – BELOW SIGNIFICANCE THRESHOLD	Fair and responsible management of supplier relationships, including timely payments, supports supply chain resilience, fosters long-term partnerships, and enhances reputation.	<ul style="list-style-type: none"> <li>Establish supplier codes of conduct and integrate ESG criteria into procurement.</li> <li>Monitor supplier performance through audits and assessments.</li> <li>Commit to transparent and fair payment terms.</li> <li>Engage in capacity-building initiatives to strengthen supplier sustainability practices.</li> </ul>
G1 – Business Conduct / Corruption and Bribery	Prevention and detection, including training – Opportunity – BELOW SIGNIFICANCE THRESHOLD	Proactively preventing and detecting corruption through policies and training builds integrity, reduces legal risks, and strengthens trust with stakeholders.	<ul style="list-style-type: none"> <li>Implement anti-corruption and anti-bribery policies.</li> <li>Provide regular employee and supplier training on compliance.</li> <li>Conduct due diligence on high-risk transactions and partnerships.</li> <li>Monitor and audit practices to identify and mitigate risks.</li> </ul>
G1 – Business Conduct / Corruption and Bribery	Incidents – Risk – BELOW SIGNIFICANCE THRESHOLD	Corruption or bribery incidents could lead to financial penalties, reputational harm, and loss of stakeholder confidence.	<ul style="list-style-type: none"> <li>Maintain incident reporting and investigation procedures.</li> <li>Enforce zero-tolerance policies for corruption and bribery.</li> <li>Take corrective and disciplinary actions when incidents occur.</li> <li>Disclose material incidents transparently in line with regulations.</li> </ul>

## 7. INTEGRATION OF THE ESRS IN OUR STRATEGY

### 7.1. SBM-1 – Strategy, Business Model, and Value Chain

(following EFRAG's Amended ESRS 2 Exposure Draft – July 2025)

Nueva Pescanova Group operates a vertically integrated seafood business covering fishing, aquaculture, industrial centres, processing, logistics, and distribution, supported by a structured supply chain including raw material procurement and supplier engagement – see figure below.

Our vertical integration across the seafood value chain enables us to capture efficiencies, guarantee product quality, and embed sustainability in operations. Fishing fleets and aquaculture farms supply raw materials, supported by internal R&D in genetics, feed, and animal welfare. Industrial centres process and package products using advanced technologies for energy efficiency, refrigeration, and food safety. Global logistics and distribution networks deliver products to retailers, wholesalers, and foodservice operators worldwide. Supplier partnerships, innovation programmes, and governance mechanisms aligned with the UN Global Compact, GRI, CSRD, FAO, and ILO embed ESG commitments across the value chain.



Our strategy focuses on producing sustainable, high-quality seafood while progressively reducing environmental impacts and embedding ESG considerations across all operations. Decarbonisation, biodiversity protection, and circularity guide investments, operational practices, and innovation, ensuring resilience and alignment with global sustainability goals.

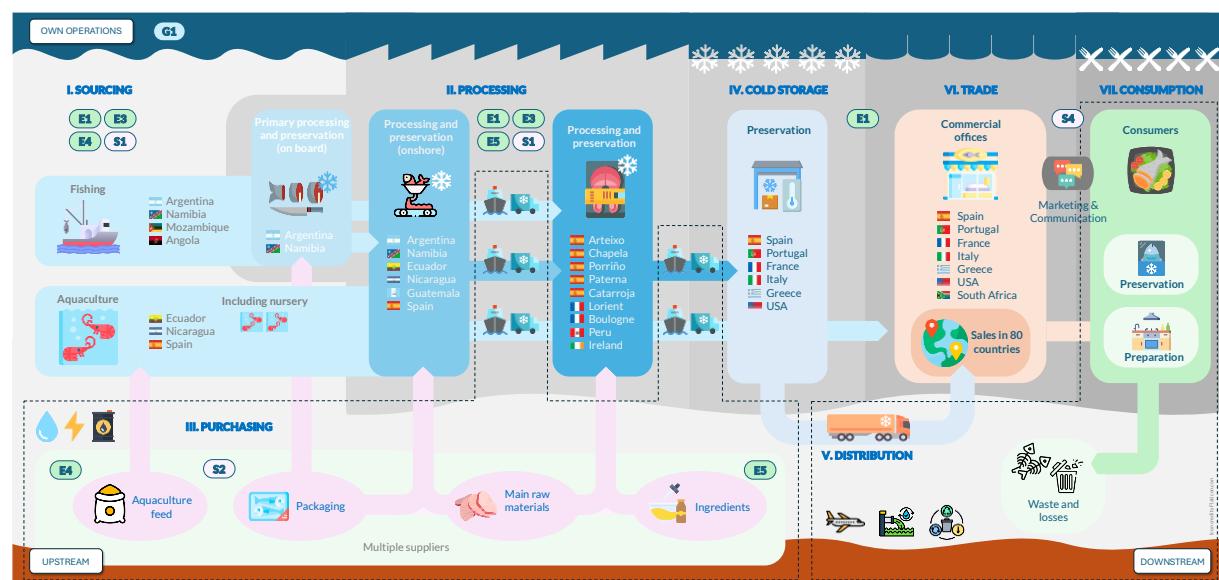
Our business model combines direct production with value-added processing, cold storage, and logistics services for domestic and international markets, serving retail chains, foodservice providers, and wholesalers across 80 countries. Revenue streams include wild-caught and farmed seafood, processed products, and by-products, with diversification across species and formats to balance market and environmental risks. We are not active in fossil fuels, chemicals, controversial weapons, or tobacco sectors.

Sustainability goals include a 30% reduction in Scope 1 and 2 GHG emissions by 2030 and net zero in direct operations by 2040; sourcing all seafood from responsible fisheries and aquaculture (GSSI-recognised standards); improving packaging circularity; and valorising processing by-products. In the last three years, shrimp aquaculture capacity was expanded in Latin America, while new value-added product ranges were launched in retail markets across Europe and the United States. No products or services are banned in jurisdictions where we operate.

We operate primarily in Marine fishing (NACE Rev.2 A03.1), Aquaculture (NACE Rev.2 A03.2), and Processing and preserving of fish, crustaceans, and molluscs (NACE Rev.2 C10.2), significant sectors due to their climate, biodiversity, water, and waste implications. Activities internal to the Group—fleet, farms, industrial centres—are material due to GHG emissions and biodiversity impacts. We clarify we are not active in sectors of upstream or downstream value chain counterparts.

We adopt a circular, resource-efficient approach, valorising by-products, reducing waste, and integrating renewable energy solutions to reinforce value chain resilience. Operational efficiency programmes, low-carbon technologies, renewable energy, and feed/processing innovation reduce Scope 1, 2, and 3 emissions. Supplier engagement ensures alignment with climate commitments, traceability, and best practices. Governance is ensured through standardised policies, monitoring systems, and sustainability KPIs.

Our material Impacts, Risks, and Opportunities (IROs) span the full value chain and relate to ESRS topics identified through double materiality: Climate Change (E1), Water and Marine Resources (E3), Biodiversity and Ecosystems (E4), Resource Use and Circular Economy (E5), Own Workforce (S1), Workers in the Value Chain (S2), Consumers and End-Users (S4), and Business Conduct (G1).





## 7.2. SBM-2 – Interests and Views of Stakeholders

Stakeholder engagement is critical to understand expectations, concerns, and priorities, and to integrate these into strategy and operations.

We implement a structured engagement programme across fishing, aquaculture, industrial centres, logistics, and supply chain operations. Key stakeholders include employees, suppliers, customers, investors, regulators, communities, NGOs, and industry associations, engaged via consultations, surveys, workshops, and continuous dialogue through initiatives such as GSSI, GDST, FISH, and SSP – Our [Stakeholder Relationship Management Plan](#) can be accessed on the corporate website, under the [Materiality](#) section.

Insights from stakeholders inform strategic planning, investment decisions, and operational priorities. Employees focus on efficiency, health & safety, and workforce development; suppliers on sustainable sourcing and ESG compliance; customers on traceability, quality, and climate action; investors on ESG performance and long-term value.

Feedback is communicated to management, the Governance, Responsibility and Sustainability Committee (GRSC), and the Board, ensuring stakeholder perspectives influence governance, operational, and strategic decisions. The Board, through the GRSC, oversees sustainability, ESG objectives, climate and green transition issues, and compliance, while the Audit, Control and Finance Committee addresses risk management, ESG strategy, and disclosure processes.

## 7.3. SBM-3 – Interaction of Material Impacts, Risks, and Opportunities with Strategy and Financial Effects

We systematically assess the interaction of material environmental, social, and governance impacts, and related risks and opportunities, with our strategy and business model.

Impacts originate from key operations: fishing, aquaculture, industrial centres, processing, logistics, and supply chain sourcing. Environmental impacts include GHG emissions, water/energy use, and biodiversity; social impacts include labour practices, community engagement, and human rights. Risks and opportunities—from regulatory change and supply chain disruption to food safety and sustainable seafood demand—are integrated into strategic planning.

Decarbonisation measures, renewable energy integration, low-carbon feed, and circularity initiatives mitigate impacts and support strategic objectives. Biodiversity protection and sustainable sourcing reduce regulatory and reputational risks while creating market opportunities.

Financial effects are assessed for current and anticipated impacts on position, performance, and cash flows, including energy/fuel cost variations and operational expenditure. Investments in low-carbon technology, fleet/farm electrification, R&D, and renewables are evaluated across short-, medium-, and long-term horizons.

## 7.4. IRO-1 – Process to Identify and Assess Material Impacts, Risks, and Opportunities

A structured process identifies and assesses material environmental, social, and governance impacts, risks, and opportunities, supporting strategic decisions and disclosures.

The process includes comprehensive screening of all operations and value chain activities, considering geographic, operational, and sector-specific factors, as well as dependencies on natural resources. Materiality is assessed using qualitative and quantitative criteria based on severity, likelihood, risk registers, and operational data, aligned with GHG Protocol and TNFD guidance.

Expert stakeholders' consultation validates identified impacts and informs business model adjustments and sustainability targets. Sustainability risks are considered relative to other business risks, using risk tools, scenario analysis, and portfolio reviews. Governance procedures ensure findings influence senior



management, the Governance, Responsibility and Sustainability Committee, and Board decisions. Continuous improvement is documented annually.

## 7.5. IRO-2 – Material Impacts, Risks, Opportunities, and Related Disclosures

We disclose materiality outcomes, including positive/negative environmental, social, and governance impacts, and associated risks/opportunities.

Environmental impacts include GHG emissions, energy/water use, waste, and marine biodiversity. Social impacts cover health & safety, community engagement, and responsible labour. Positive outcomes arise from sustainable seafood production, biodiversity support, and local economic/social contributions.

Risks include climate change, regulatory/compliance changes, food safety, resource scarcity, and reputational exposure. Opportunities include decarbonisation, circularity, low-carbon feed, and stakeholder engagement, improving efficiency, reducing emissions, and creating market differentiation.

We describe connections to the business model, operations, product lines, and markets, including emissions on the 3 scopes, circularity, and renewable energy effects. Changes from prior periods, including operational, regulatory, or climate-related updates, are documented. Human rights risks, including forced/child labour exposure, are disclosed by geography and operation type.

Through our [Transparency in Sustainability Programme](#), we provide comprehensive information on our four-pillar CSR and sustainability strategy—Planet, People, Products, and Communities—via dedicated reports and supporting documentation.

## 7.6. General Disclosure Requirements – Policies, Actions, Metrics, Targets

Through our work within cross-cutting programmes (see below) and the associated published reports, we disclose policies, actions, metrics, and targets at the topic/sub-topic level, explicitly identifying gaps to ensure audit readiness.

Comprehensive policies cover decarbonisation, biodiversity, circularity, sustainable sourcing, and social responsibility. Descriptions include contents/objectives, scope, references to third-party standards, and human rights alignment. Updates during the reporting period are highlighted.

Actions are disclosed individually or aggregated, including scope/timeframe, expected outcomes, and resources allocated. Classification follows environmental mitigation hierarchy; sector collaboration is indicated.



Metrics track performance and effectiveness via dedicated reports and supporting documentation, detailing definitions, units, methodology, sources, assumptions, site-specific conditions, value chain data quality, and contextual information. Financial metrics use reporting currency.

Targets are measurable, time-bound, outcome-oriented, linked to policies/actions and material impacts, including relationship to policy, value/unit, scope, baseline, timeline/milestones, methodology/alignment, and ecological/scientific basis. Where no targets exist, effectiveness is still tracked.



## 8. CONCLUSIONS

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### 8.1. Insights on Our Value Creation and Dependencies

Our double materiality assessment has reinforced the interconnected nature of our business model, demonstrating how our key inputs and dependencies underpin both the creation of value and our ability to deliver positive environmental, social, and economic impacts. Understanding these linkages strengthens resilience, supports better decision-making, and accelerates progress toward our sustainability goals.

The operations of the Nueva Pescanova Group rely on a combination of natural, human, social, intellectual, and manufactured capitals. These resources are essential not only for delivering products and services but also for ensuring long-term sustainability and the ability to respond to emerging challenges across our value chain.

Our natural capital includes marine ecosystems, which provide sustainable fish stocks, biodiversity, and healthy oceans foundational to our aquaculture and fishing activities. Access to clean freshwater and seawater is critical for aquaculture operations, industrial centres, and product quality. Reliable energy sources, increasingly derived from renewable sources, are necessary across vessels, farms, and processing facilities. Additionally, responsible sourcing of feed ingredients, packaging, and other auxiliary materials helps reduce environmental impacts while securing supply continuity.

Human capital is equally vital. The expertise of our employees in aquaculture, fisheries management, research and development, processing, and commercialisation represents a core strategic asset. Ensuring motivated, safe, and healthy teams is fundamental for operational continuity, while ongoing training and capacity-building initiatives enable adaptation to emerging technologies and sustainability requirements. Social and relationship capital underpins our interactions with local communities, suppliers, and partners. Strong community ties foster mutual benefits and support our social licence to operate, while trusted supply chain relationships ensure traceability, continuity, and sustainable sourcing. Meeting evolving consumer expectations for safe, nutritious, and responsibly sourced seafood depends on these enduring relationships.

Intellectual capital drives innovation and competitiveness. Investments in research and development, traceability, and digital systems support product and operational innovation, sustainability, and compliance, while our brand and reputation, built on responsible practices, remain a critical intangible asset. Manufactured capital, including modern vessels, farms, industrial centres, and logistics infrastructure, ensures production efficiency, global distribution, and responsiveness to market demands.

The outputs of our activities generate tangible and intangible value for customers, shareholders, communities, and ecosystems. We supply high-quality, safe, and nutritious seafood products—including fish, shrimp, cephalopods, and value-added offerings—across retail, foodservice, and wholesale channels worldwide. Through these products, we contribute to food security, providing reliable and affordable protein to millions of consumers. Circular economy initiatives enhance value creation by transforming by-products into fishmeal, collagen, nutraceuticals, and animal feed.

Our operations also generate environmental and sustainability benefits. Responsible aquaculture and fisheries practices, certified through ASC, MSC, and other programmes, ensure sustainable production based on science-driven management. Biodiversity is supported through restoration programmes, marine protected areas, and feed innovations that reduce pressure on wild fish stocks. Efficiency improvements, renewable energy adoption, and emission reduction measures further contribute to climate mitigation and overall environmental performance.

Human capital and employee benefits include direct and indirect employment across multiple regions, capacity-building initiatives, and continuous improvements in workplace health and safety. Social benefits extend to community investments in education, infrastructure, and social programmes, while sustainable supply chain practices create opportunities for small-scale fishers and farmers. Transparent labelling and responsible practices further enhance consumer trust. Economic and financial benefits include revenue



generation, contributions to GDP, responsible growth, tax payments, and expansion of sustainable seafood categories that promote healthier diets globally.

## 8.2. Next Steps and Key Implications for Strategy

For future assessments, we plan to broaden both the number and diversity of expert stakeholders to capture a wide range of perspectives across our value chain. This is particularly important given our global footprint and the complexity of our operations, spanning resource management, industrial production, and commercial activities.

In today's interconnected supply chains, greater emphasis is required on due diligence, social and labour conditions, and environmental sustainability commitments, supported by effective monitoring and follow-up mechanisms. We also recognise that some stakeholders may need additional information or support to contribute meaningfully. Engaging a broader range of technical and business units will ensure that all parts of the organisation share insights into operational impacts, dependencies, risks, and opportunities. Incorporating financial perspectives early in the process will further strengthen the assessment and improve the quality of conclusions.

The double materiality assessment serves as a catalyst to advance sustainability commitments, engaging teams across the Group in addressing emerging challenges. These include our GHG reduction roadmap, climate transition and adaptation plans, just transition initiatives, due diligence processes, and CSRD-aligned reporting frameworks. As CSRD and ESRS standards evolve, we anticipate greater stability, enabling them to become practical tools for ensuring full regulatory alignment.

The assessment also highlighted the interconnections between topics and the importance of people and communities throughout our value chain, even when these are not classified as top-priority material issues. We are embedding this social perspective across operations and relationships with suppliers, partners, and local communities, while fostering an inclusive and respectful culture that supports our teams and reinforces our shared commitment to sustainable growth.

## 8.3. Looking Ahead

The double materiality assessment has provided insights that are guiding the refinement of our sustainability and responsibility strategies, while reaffirming the robustness of our current approach. Key lessons include the importance of strengthening our foundations and core commitments, ensuring compliance with essential requirements, and remaining ambitious in areas where we can create the greatest positive impact.

We remain committed to best practices and continuous improvement, addressing the topics that most affect both our business and the ecosystems and communities on which we depend. Transparency will continue to be central to our approach through the [Transparency in Sustainability Programme](#) and the annual [Sustainability Progress Report](#), which serve as key instruments for monitoring performance and disclosing relevant indicators. These initiatives will also underpin future Sustainability Statements and CSRD-aligned disclosures for the Nueva Pescanova Group.

The insights gained from this assessment will continue to shape our sustainability strategy, investment decisions, and reporting practices, ensuring the Nueva Pescanova Group maintains leadership in responsible seafood production and sustainable business practices.