



Communication on Progress no. 006

Participant: Royal Danish Fish Group A/S

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Mission Statement Self-assessment:

- Includes an explicit statement of continued support for the UN Global Compact and its ten principles
- Description of actions or relevant policies related to Human Rights
- Description of actions or relevant policies related to Labour
- Description of actions or relevant policies related to Environment
- Description of actions or relevant policies related to Anti-Corruption
- Includes a measurement of outcomes

Statement of continued support by the Chief Executive Officer

Statement of the company's chief executive (CEO or equivalent) expressing continued support for the Global Compact and renewing the company's ongoing commitment to the initiative and its principles.

To our stakeholders

I am again pleased to confirm that Royal Danish Fish Group A/S still reaffirms its support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption. This is our fourth Communication on Progress; we express again our intent to advance those principles within our sphere of influence. We are still committed in making the Global Compact and its principles part of the strategy, culture and day-to-day operations of our company Groups, and to engage in collaborative projects that advance the broader development goals of the United Nations, particularly the Millennium Development Goals. Royal Danish Fish Group A/S wants to make a clear statement of this commitment to our stakeholders and the general public.

We continue our great commitment to CSR. Especially in Ghana, we have again been working on how to develop this area and to provide a safe & fair working environment for employees.



As one of the leading fish producers in Ghana, West African Fish LTD strives to be a leader in social and environmental performance. Our stakeholders rely on us to protect and preserve the natural environment. We believe that everyone must do his or her part. We are convinced that we do ours. Our intention is to keep focus on environmental issues, concerns on sustainability and efforts to make the best possible conditions for our employees.

We inform all our employees ongoing about the importance of the Company strategy concerning these Global Compact principles and the CSR activities.

Royal Danish Fish and West African Fish are trusted names in our industry and we take that trust very seriously. It is important for us also in relation to our development in the future.

We are very proud of the goals we have achieved also this year, but we will strive to still stay on the forefront in our line of business. In our name, logo and in our daily work we keep focus on balance between quality and efficiency in our production on one side - and environmental issues, the welfare of our employees, CSR and sustainability on the other side.

There are lots of challenges but with all the progresses, we make every year we believe that we can make a difference and be part of a good development.

Sincerely yours

Royal Danish Fish Group A/S

Mogens Mathiasen

Chief Executive Officer

Key Activities in Ghana for 2017

West African Fish Ltd intend to adopt a precautionary approach to operate and manage a fish farm in an environmentally friendly and sound manner using best practise guidelines that **meet all regulatory requirements** with a view of **maintaining our commitment** to both environmental and socio-economic targets.

Our general Policy statement as defined in our WAF Health & Safety Policy is that “West African Fish intend to safeguard the health and safety of all employees on site. Every effort is in place to ensure that all preventative procedures are carried out effectively in the general day to day running of the farm and all protocol adhered to in the event of any emergency”. Commitment to this Policy statement forms an integral part of the company.

Our principle objectives are:

- Management commitment to establish Health and Safety in the workplace
- Minimize all potential hazards in the working environment
- Commitment to comply with legal requirements
- Establish a good working relationship with employees where the responsibility of Health & Safety becomes a shared duty.

Our Health & Safety framework is achieved through the following:

- Farm Cleanliness, staff hygiene & general safety procedures
- Registration of workers under NHIS, and annual Health screening (Asuogyaman District Council).
- Emergency Insurance Cover (all workers protected under SAHAM Workman’s Compensation Insurance Policy).
- First Aid Training and Accident Log Book
- Establishing a Health and Safety Committee
- Fixed Site measures/mitigation for Hazard Elimination/likelihood reduction
- Fire Assembly Points, annual fire safety training, and Caution Points



Human Rights Principles

Principle 1: Businesses should support and respect the protection of internationally proclaimed Human rights

Principle 2: Make sure that they are not complicit in human rights abuses

Assessment, Policy and Goals

Royal Danish Fish Group A/S approves and respects the Universal Declaration of Human Rights. Moreover, we have established some core values that underline the company's devotion to the Human Rights principles. Since we are operating internationally, the conditions are diverse. In our Danish factories as well as in our African fish farm we live up to any law as well as ethics concerning these matters. In Denmark, there is high level of control and we assess to have low risk for violation of these areas due to code of conduct and legislation.

Creating of jobs is an investment to have a direct impact on the community, benefitting the families of each employee through increased disposable income and job security. Many other establishments work on a high employee turnover to get around the labour law but West African Fish prefer to invest in candidates with a potential for training who can provide longevity in the Industry and a solid skill base from which further recruitment can be built on.

In Africa, we have introduced the following guidelines:

- Non-discrimination in the workplace
- Inclusion
- Harassment
- Security
- Accommodation
- Grievance
- Health & Safety
- Creation of Jobs
- Income development
- Business development
- Donations
- Health Promotion
- Strategy for HIV/AIDS
- Compliance with Labour law

But we do not accept any kind of child labour, forced labour or other violations of fundamental human rights.

Implementation

In Ghana, our company West African Fish Ltd. has joined the Ghana Business Code. On the African continent, the best thing we can do for human rights is to establish long term collaborations - and try to move things in the right direction, one step at a time. We make sure in all our companies that our employees are treated equal and have the same conditions independent of gender.

Gender equality is promoted through the preferential selection for female workers to grade and gut our product at the sorting table. Physical harvest labour is principally for men and limited to those who can safely work on the water. Skilled work in the Hatchery where attention to detail is vital promotes employment for women in this industry where females are preferentially selected.

A written Health & Safety Protocol was established in 2014 concerning; hazard elimination, risk management, fire & safety, first aid response and training. This framework provides the basis for safety in the workplace. Protocol is reviewed regularly and updated where applicable. We have a good and a secure working place in Ghana.

Implementation of the above guidelines is as follows:

- **Non-discrimination**

West African Fish where possible & in consideration for our safety framework recruit in a non-discriminatory fashion; all applicants are recruited based on their potential for development and passion for hard work. Physical disabilities or a mere lack of education does not dismiss candidates on this basis. Annual reviews for existing staff follow a score-rating system to ensure fair and equal comparisons for both position and end year salary negotiations. Performance ratings will cover: cooperation, dependency, Initiative, Knowledge, Judgment, Planning and Problem solving, quality of work, Leadership and flexibility.

- **Inclusion**

West African Fish believe that all employees should be actively involved in the progress of our operations. Regular meetings, notices and personal incentive schemes in recognition for

hard work are all ways by which we work to include workers to be passionate about our vision.

- **Harassment**

Employees have two avenues to address personal issues. They can either liaise directly with the farm coordinator or speak confidentially to the workers Union representatives depending on the nature of the matter at hand. All issues of harassment are strictly confidential with no set protocol as each case is nature specific. It may require simple emotional reassurance if not directly in the workplace, assistance with housing, sanctions placed on individuals where known employees are causing discontentment, compassionate leave of absence, or in some cases financial assistance to resolve family issues. Disciplinary issues in the workplace, such as physical violence is not tolerated and warrants an immediate dismissal as laid out in the company rules and regulations.

- **Security**

All employees handling cash will have security and police guard presence. Final payments from customers must follow a strict protocol to ensure all monies are sent to the bank the same day to avoid risk.

- **Accommodation**

West African Fish will where possible house those employees on site whom are required for night shifts and/or those whose home base is too far for a reasonable daily commute. Housing conditions will be reviewed yearly and provisions made to add comfort and basic necessities.

- **Grievance**

Employees will be given up to five casual leave days/annum to attend to family emergency situations without financial deductions. Upon proof documentation of a formal death certificates for immediate family members only, WAF policy will contribute 150GHC for funeral assistance.

- **Health & Safety in the workplace**

A written Health & Safety protocol will be in place to cover aspects of hazard elimination, risk avoidance, farm cleanliness & hygiene, water and waste management, and basic safety-first aid. A First Aid officer will be in place with adequate training in basic first aid. One additional employee will be trained for every additional 50 employees recruited at the farm site. All procedures and measures are to conform to occupational health standards.

- **Creation of Jobs**

Employees are recruited on a casual basis with a six-month review period; thereafter workers are made permanent with a view to offering a formal contract.

A progress review is held after 3 months to give feedback on any improvements needed and training provided both through the employer and other colleagues in the department.

West African Fish prefer to invest in candidates with a potential for training who can provide longevity in the Industry and a solid skill base from which further recruitment can be built on.

Each employee is monitored for attendance in relation to; absenteeism or ill-health from which a “fitness for duty” rating is determined.

- **Income development**

Approximately 90% of our weekly sales are sold locally in Asikuma. With ladies at the market place offering gutting services independently and selling block ice, and those who work in retail to sell the fish product onto other customers per piece or as a smoked product; it is estimated that over 400 families in the area have the potential to earn their main income from our product.

- **Business development**

Our policy is to support local businesses and retailers where possible with Accra purchases only made for specialized equipment. Key items such as office equipment, tools, canteen food supplies and staff water provision will all be bought locally.

From a socio-economic point of view, the farm recruits +/-100 employees supporting a secure financial income to workers, which indirectly supports their families in Asikuma and as far as Mpakadam. Local businesses are supported through weekly trade, and town infrastructure is supported through on-going maintenance and donation contributions.

- **Donations**

During farm implementation and establishment in the community WAF will sponsor community led projects. Thereafter, focus will shift to employee training, health & safety in the workplace, and environmental monitoring of the land on which our operations are based. The focus on employee benefits will aim to indirectly benefit the community.

- **Health Promotion**

Health promotion will focus directly on employees working at the site. Health information boards will be posted up in the office concerning basic hygiene, dangers of dehydration, as well as what to do in the event of an accident emergency in the workplace. Annual health visits will be supported for routine typhoid testing in association with the Asuogyaman

District Assembly. All employees will be registered with a national health insurance card for use at prescribed clinics in the region.

- **Strategy for HIV/AIDS**

No current policy in place given the low prevalence rate for Ghana. However, by adopting a clear policy on medical assistance and helping employees with health care, we can safeguard workers by ensuring they visit reputable clinics for e.g. safe blood testing. Also, other human rights issues such as gender equality and recruitment in a non-discriminatory fashion indirectly provides a code of practice conducive to HIV/AIDS policies.

- **Compliance with Labour law**

No worker shall exceed an 8hr working day. Where the nature of the work requires flexibility in the time of day work is carried out, suitable breaks are provided to comply with labour law. All employees will be granted 15 days annual leave for basic workers and 21 days for more senior supervisors. Workers shall have the choice for flexible leave days. All annual leave, casual leave and attendance will be monitored in a staff database. All salaries will exceed government regulations to provide a decent standard of living for our workforce. Overtime pay for contract employees and temporary workers will meet government regulations.

Measurement of outcomes

We try to monitor the welfare for our employee and the people we are doing business with, and will not accept any kind of human rights abuses. We choose other business partners if they not are working after our standards. We have never been involved – neither directly nor indirectly in any issues regarding human right abuses in our business affairs. In our organization, everyone can talk free and have the right to express themselves in any situation.



Activities 2017:

Farm Cleanliness, staff hygiene and general safety procedures

Noise & Hearing loss

This issue is not applicable on our farm. There is minimal noise from the generators when there is a power outage and sometimes noise from the welding machine, but the noise is temporary and well under the limit for safe hearing, so no ear protection is required.

The work siren in place to control working hours operates at 80Db, which is below the threshold for noise that can be harmful (above 85Db). Exposure is short to only 5-10 seconds per time.

Plant Lighting

Much of the operations are done during the day with little/no additional lighting required. At night, we operate security lighting over the lake to illuminate the periphery of the farm. Torches and fixed spot lights are in place for security to both deter intruders and enhance safety while working on the water. Security uniforms are fitted with fluorescent strips to make them visible to both intruders and their superior who monitors their activities through the night.

Work environment Temperature

Most of the work is done outdoors, which although hot is managed through the provision of shade shelters, sun hat protection, drinking water and appropriate break times. Much of the strenuous work is done early in the morning before midday when the sun is not so hot. In 2016, we added a shade shelter behind the canteen area for the cooks to provide a more comfortable working environment for food preparation.

All office personnel have AC and ceiling fans in place.

Ventilation

The feed warehouse in 2015 was fitted with ventilation panels at either end in order that we could lock the feed store during the day for increased security measures. This ensures adequate airflow through the building.

All hatchery operations involving the use of chemicals for cleaning and/or treatment are prepared outside in a well-ventilated area. Hormone mixing, and application is done in the lab with windows open and safety protective mask in place to avoid inhalation.

The majority of work is outdoor based. This safety aspect requires little by way of Management control.

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Activities 2017:

Personal Protective Equipment

Sun protection hats, eye protection goggles, rain coats, aprons, wellington boots, gloves and life safety vests are all provided and replaced as and when required.

Areas where such equipment is required may be reviewed in the occupational bio-security measures detailed in section 5 for each farm operation.

Current dress code

There is no set uniform or dress code on the farm other than our advice for practical clothing, no jewelry, and to adhere to the rules to wear protective safety clothing for certain operations.

Management have provided on a few occasions company T shirts for work purposes, but staff choose to keep them for home use.

Registration of workers under NHIS, and annual Health screening

Medical Monitoring

Since 2014 all workers undergo annual Health screening run by the Asuogyaman District Council through Aidmed Diagnostics based in Atimpoko. The screening principally looks at the prevalence of Typhoid as an indication of Health, which is a requirement for all workers that are directly in contact with a consumable product. In 2015, we had 3 cases of Typhoid among workers. By 2016, no workers were reported to have the disease. In 2017 the number of cases increased to 8 workers. It was reported that in Asikuma the prevalence of Typhoid was high by comparison to neighboring towns for all residents concerned. The Asuogyaman District Health Team reported that action needed to be taken on a wider scale with greater awareness to Public Health concerns.

In general, all workers are monitored for ill-health throughout each contract year as part of our performance monitoring policy. Attendance is tracked. Relations are maintained with the doctors at prescribed clinics to ensure the correct treatment and after-care is followed. More often than not, workers are diagnosed with Malaria, which is an issue outside the scope of our Management other than basic awareness talks. In general, the average number of days lost to ill-health per worker is 3 days per contract year.

Hygiene & Sanitation

The farm coordinator together with the Domestic department coordinate the weekly

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Activities 2017:

purchasing of all cleaning items to provide workers with liquid soap and Dettol for personal use. Hand washing stations have been established in both the canteen area and grading area to promote frequent hand washing, which are prepared throughout the day with clean water and disinfectant.

Rotas are in place for daily cleaning of the staff toilets, which is a shared responsibility by the workforce. Toilet paper, and soap is provided in the bathrooms. Safe drinking water is provided per week amounting to 3L per person per day.

Emergency Insurance Cover (all workers protected under SAHAM Workman's Compensation Insurance Policy)

West African Fish, as part of internal Health Promotion run education talks led by Salvation army clinic to support Health awareness.

Quarterly medical checks are also in place for our Divers at Akosombo Hospital; full examination of chest, ears, and back. Blood tests are done to check for any water borne diseases. All expenses and transport are covered by WAF. Divers play an important role in the company with a view to maintaining their good Health and Fitness.

Health & Safety Action Plan

An action plan for health and safety was made to ensure that operations to run smoothly with minimal impact to the environment.

- To maximize employment creation whilst maintaining a select team that best supports our vision.
- To provide facilities that optimize the welfare of our employees.

Management Strategy to meet requirements

- To ensure that all employees are following routine procedures to the standard required.
- To promote and encourage best practice operations as standard such that they become

First Aid Training and Accident Log Book

As part of our on-going Health Awareness Policy, Health Talks led by external Health Professionals from the Salvation Army Clinic (Anum) are conducted on-site periodically to address basic hygiene practices; when/how to wash hands, safe food preparation, and

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Activities 2017:

spread of disease. This gives employees the opportunity to ask questions and interact with Health professionals plus address any issues/grievances where Management can help to improve conditions.

Health & Safety education

Information sheets have been posted in the Laboratory pertaining to First Aid advice including:

- Action in an emergency
- A big bang to the head at work
- Dehydration facts
- How to recognize a heart attack
- Breathing difficulties
- Bleeding
- A Stroke
- Treating for shock

Establishing a Health and Safety Committee

Health & Safety Committee

The committee consists of one member of Management and two delegated employees. Decisions regarding the safety of all workers on site are principally controlled by the Farm Coordinator in association with the CEO of West African Fish. Delegates work to assist the Farm Coordinator by evaluating the effectiveness of actions taken and report any issues on an ad hoc basis as and when they are presented. Meetings arranged on request.

Employees are contractually obliged to conform to safety regulations to wear protective clothing, follow safety advise and adhere to regulations in place that are designed to limit any adverse impacts from human activities.

The role of the employee

Employees have a shared responsibility to maintain clean sanitary conditions in the staff toilet & shower block daily with a rota in place managed by the Assistant Farm Coordinator. Departmental leaders have a responsibility to manage given sections of the farm for waste reduction each week, and land management (weeding, general cleaning).

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Activities 2017:

Fixed Site measures/mitigation for Hazard Elimination/likelihood reduction

Corporate responsibility

A written Health & Safety protocol has been in place since 2014, which covers aspects of hazard elimination, risk avoidance, farm cleanliness & hygiene, water & waste management, and first aid in the workplace. All procedures and measures conform to occupational health standards. This forms part of our philanthropic responsibility, which may be reviewed in our WAF Corporate Social Responsibility Policy.

Fire Assembly Points, annual fire safety training, and Caution Points

Preparedness

- Sign in/out register for workers and visitors to account for all persons present on the farm.
- Specific fire assembly points for safe evacuation.
- 6m buffer zone around fuel store/canteen area (remove combustible material).
- Serviced fire safety cylinders in place at critical locations.
- Hessian sack in store for bush fire preparedness.
- Safety notice near flammable units – e.g. no smoking near fuel store/generators.
- Fire detection units in offices and apartments.
- Routine Fire drill practice.
- Annual Fire safety training

Response/Action

- Evacuate all personnel to safety zone fire assembly point.
- Appointed trained fire safety employees to assess area & act.
- Contact Ghana National Fire Service in event of wildfire where external support is required.

Emergency Preparedness & Response Plan

The overall scope of this plan covers any hazard, emergency or disaster that is considered sudden or unanticipated. Whether natural or man-made they have the potential to bring humanitarian, economic and environmental consequences.

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Activities 2017:

Objectives

- To plan a timely and coordinated response to any unanticipated event on the farm or neighboring land.
- To ensure the company is as prepared as possible to withstand any hazard.

Emergency Action Plan includes Preparedness and Response/Action as:

- Flood
- Severe Storm/Lightning
- Accidental Oil/chemical spill
- Fish disease outbreak
- Fish escapees
- Hypoxia/Algal Bloom
- Fire – natural/man-made
- Electrical Hazards
- Theft/Attack
- Vehicle/road accidents

Creation of Jobs:

In 2017, our investment in human capital increased by +/-20% as more employees were put onto formal contracts (contract workers total 80% of the workforce). Only 7% of workers are sourced outside of the main town of Asikuma. The organogram of our employee structure may be viewed in Appendix 5, which details the chain of command by which our company is structured.

Labour Principles

Principle 3: Businesses should uphold the freedom of association and the effective
Recognition of the Right to collective bargaining

Principle 4: The elimination of all forms of forced and compulsory labour

Principle 5: The effective abolition of child labour

Principle 6: The elimination of discrimination in respect of employment and occupation

Assessment, Policy and Goals

We have a strong focus on ensuring the best possible work environment and conditions for our employees. That includes the freedom to organize themselves as they wish. We respect the ILO Core Conventions and any local and international standard on this issue. We want every employee to feel comfortable and to have ownership in our corporate culture. Furthermore, we try to make room for everyone.

In Denmark, our employees are covered by one of the major national collective labour agreement (Danish Industry) which demand that we as employer follow certain rules. In Ghana, we provide for documentations from our business partners that they do not use for example child labour.

In Ghana, we have introduced the following guidelines:

- Gender equality
- Maternity policy
- Child labour
- Workers Union

The CSR activities in Ghana are very different from Denmark due to the level difference between the two countries.

Implementation

In our Danish companies, we have some employees, who despite lesser handicaps, prove to be important members of our team. That is part of a long-term strategy to give a large group of people, who is often underrated, an opportunity to show their worth. Furthermore, we participate in education and self-development programs. Last year all the employees in Denmark based factory participated in an ambitious project aiming to implement an understanding on sustainability in our corporate culture.

We have furthermore enrolled the Danish staff to a special health insurance to help them fast in case of illness. We have a code of conduct, which our employees are committed to follow with policy made by themselves. We have policy to handle any kind of reduced labour, alcohol, absence, pregnancy and so on.

West African Fish where possible & in consideration for our safety framework recruit in a non-discriminatory fashion; all applicants are recruited based on their potential for development and passion for hard work. Physical disabilities or a mere lack of education does not dismiss

candidates on this basis. Annual reviews for existing staff follow a score-rating system to ensure fair and equal comparisons for both position and end year salary negotiations. Performance ratings will cover cooperation, dependency, Initiative, Knowledge, Judgment, Planning and Problem solving, quality of work, Leadership and flexibility.

Implementation of the above guidelines is as follows:

- **Gender equality**

Gender equality is promoted through the preferential selection for female workers to grade and gut our product at the sorting table. Physical harvest labour is principally for men and limited to those who can safely work on the water. Skilled work in the Hatchery where attention to detail is vital promotes employment for women in this industry where females are preferentially selected.

- **Maternity policy**

Where females are employed, a clear maternity policy is in place to both support the employee and ensure our farm operations can continue smoothly without the need to lose key personnel. Women are granted 84 days paid maternity leave and also granted days off throughout pregnancy for routine scans and check-ups. We do however have a strict “no child policy on farm premises” for health and safety reasons. In compensation for this, lactating mothers may leave work 1hr earlier than scheduled to attend to childcare.

- **Child labour**

Strict policy on the use of child labour. No employee is recruited under the age of 18 yrs. of age. All workers regardless of age are paid according to the “equal pay for equal work” policy stated in the labour law, section 68, part IX. Longevity & commitment is awarded outside of basic salary tiers.

- **Workers Union**

All workers have the right to join a worker’s trade Union; a union to promote the social and economic rights for employees in their workplace. Upon formal presentation by Union and employee representatives all issues are to be dealt with directly and within a timeframe to ensure matters are resolved swiftly.

Measurement of outcomes

Our Danish employees understand that focus on sustainability, environmental protection and welfare and that it is a common task in the company. We have a stab in Denmark where illness much minimized is and our employees are quarantined help in case they need it no matter what situation it is required. Currently we create jobs and livelihoods for about four hundred families I Ghana, which benefit either directly, or indirectly, through spin-off in resale of our fish or similar practices. We give due to our many CSR projects many opportunities to the people in Ghana.

Environmental Principles

Principle 7: Businesses should support a precautionary approach to environmental challenges

Principle 8: Undertake initiatives to promote greater environmental responsibility

Principle 9: Encourage the development and diffusion of environmentally friendly technologies

Assessment, Policy and Goals

Environmental concerns and focus on sustainability are still among our highest priorities. Right from the start we knew, that we wanted to do everything possible to act responsible regarding the environment – on a local basis as well as a global. Fish farms can have a major, negative impact on the ecosystems in which they are placed. We do not want to be part of that problem. Instead, we want to be part of the solution. Furthermore, we feel worried by the decline in the population of the European eel, which part of our business is based on. We want to do our best to help the eel back to European waters. Our goal is to still be a big part of the restocking program. We are committed to breeding fish in the best possible conditions. Our goal is furthermore to be more effective on the energy saving initiatives. Due to our competence and knowhow about aquaculture, we are also able to advise other producers regarding the way of building and running friendly farms. Therefore, in this way our expertise is very useful.

West African Fish Ltd recognizes that it has a responsibility beyond legal and regulatory requirements. We therefore strive to; “implement, operate and manage a fish farm that is committed to reducing our environmental impact and continually monitoring our environmental performance to improve operations, which forms an integral part of our on-going business strategy”. WAF commits itself to safeguarding the natural environment on which the farm is so dependent for future generations to appreciate.

Implementation

Our Danish fish farm, RDF Aquaculture is among the world's largest recirculating land-based aquaculture plants. At present, the company consists of the main department in Hanstholm. The technology is separate, recirculating tanks with a daily water exchange of less than 2%. About 10.000 m³ of water swirls around the system every hour, and the water is circulated through internal cleaning systems, thus maintaining the recirculation degree of 98%. That all makes up for a minimum of influence on the environment. The company is Eco-Healthy certified.

We are once again in 2017 voluntarily taking big part in the restocking program for the glass eel in Europe. As we still are committed to breeding fish at the highest quality and to ensure the best possible conditions for the fish we are still a proud member of the Sustainable Eel Group. Which is an organization in where environmental organizations, politicians, NGO's, science and industry are working together to nurture the stock of European eel.

The culmination of a long and determined effort is the launch of the Sustainable Eel Standard - which is a tool designed to ensure a sustainable production of eels. The standard will be followed up by a labeling of products that meet the Sustainable Eel Group's requirements for sustainable production.

The label will guarantee that:

- The gentlest methods are used to catch elvers
- There is a low mortality rate during rearing
- Fish meal / oil in the diet comes from a sustainable resource
- Food is used optimally
- Environmental impact meets statutory requirements
- Handling, transport and slaughter of fish meets fish welfare requirements
- The company actively helps nurturing fish stocks, which could be used by restocking programs

Our breeding facility in Ghana is based on many of the same principles. The farm is built as environmentally friendly as possible, and makes use of modern technology and equipment. On shore are the hatcheries, where we grow our own fingerlings, that is, fish about the size of a finger. Those are bred from our own broodstock. Currently we only produce fingerlings for our own use; however, soon we will be able to provide top quality fingerlings for other fish farmers, and for restocking Lake Volta. This will benefit the dwindling Tilapia stock that is causing great problems for local fishing communities. The hatcheries are constructed with state of the

art recirculation technologies. This allows us to produce fingerlings with almost no water exchange, which reduce our effect on the environment to a minimum. At the farm, we use the most ecologically friendly floating fish food.

Annual environmental reports combined with a structured monitoring program coordinated by the farm coordinator, ensures we maintain our legal and ethical responsibility to preserve and protect our natural resource.

West African Fish strive to be the most environmentally aware and responsible fish farm in Ghana.

We have introduced the following guidelines:

- Recycle where possible as much farm waste as feasibly possible
- Comply with environmental monitoring programmer in association with WRC
- Optimize transport, use of raw materials and energy consumption
- Responsible use of potentially hazardous materials

Measurement of outcomes

Any test made by local water authority in Denmark shows fantastic positive results. We have never had any remarks regarding the quality of the water that leaves our fish farm.

Our Aquaculture in Denmark achieved the honor of being the first eel farm in the world able to meet the stringent requirements of the prestigious Sustainable Eel Standard. The certification for Sustainable Eel default is handled by an independent third party, namely McAlister Elliott & Partners Ltd. in Hampshire.

From our environmental Management in Ghana, the annual environmental report was submitted in 2017 to both the Water Resources Commission and Environmental protection Agency detailing the main operational activities for the previous year centered on water & waste management. Mitigation measures and a clear health & safety policy framework was submitted for review, which met approval and recognition for being well organized with a clear management structure.

Continued water/sludge sampling is carried out every 2-3 months in compliance with guidelines set out by the WRC and sent for routine analysis. To perform in a manner consistent with legal requirements. All permits and licensing shall be in place for all operations and updated periodically as and when compliance laws or company circumstances change.

Implementation of the guidelines is as follows:

- **Recycle where possible as much farm waste as feasibly possible**
 - Recycle all water bottles and water sachets
 - Sell feed sacks to the community to avoid landfill.
 - Donate all scrap metal and old equipment to employees for recycling in the town.
 - Regular safe burning of biological/limited non-biological waste in dedicated waste pits located at a suitable distance away from food and flammable sources.

- **Comply with environmental monitoring programmer in association with WRC**
 - Timely monitoring of samples and prompt analyses
 - Develop response protocol for adverse impacts
 - Annual reports to the EPA and WRC concerning our activities
 - Support Government research groups collecting environmental data
 - Keep logs of production and monitor this in relation to changing environmental conditions.

- **Optimize transport, use of raw materials and energy consumption**
 - Use of high quality low polluting feed in packaging that can be recycled or put to good use.
 - Coordinate transport efficiently to minimize frequency of movement.
 - Land maintenance on road from Asikuma to farm to prevent soil erosion and economies truck maintenance issues.

- **Responsible use of potentially hazardous materials**
 - Store hazardous chemicals under lock & key
 - Thorough training and restricted access in the use of hazardous material
 - Safe waste disposal that prevents adverse environmental impacts

Activities 2017:

Environmental Management

Our current environmental management practices are centered on 6 key areas where mitigation measures can aim to minimize any adverse environmental impacts:

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Activities 2017:

1. **Land Management: Soil erosion & Control**
2. Wildlife Habitat Management: Impact on native Flora/Fauna
3. **Waste Disposal Management: Non-biological/Biological waste**
4. **Fish Health & Disease Management**
5. **Water Quality Management**
6. Energy Consumption Management

Meanwhile focuses on measures 1,3.4 and 5.

Erosion Control

Areas that are vulnerable to soil erosion such as the embankment behind the bath house leading to the bay and the cove behind the feed shed have all been planted with maize and Paw. Paw trees to prevent landslides by providing a stable root structure underground. By providing a resource that is consumable we are also able to provide food to our employees as a reward in return for managing the land responsibly.

Waste Management

Two categories of waste are generated by the farm's operations; office type waste and biological waste from production activities.

Non-biological waste is largely: paper, empty feed sacks, water plastic sachets, and general household waste.

Biological waste includes: washroom/toilet discharge, dead fish, unconsumed feed, and fish metabolic waste.

Our policy for waste Management is below:

- To reduce the volume of waste produced where possible
- To promote recycling and re-use of usable items
- To prevent litter contamination to the environment – discharge waste in a way that cannot contaminate the surrounding land.

Fish Health & Disease Management

- To identify risks and define strategies for risk elimination. To encourage internal awareness of how diseases are easily spread.

Continue...

Activities 2017:

- Support external education visits by Health Visitors on known diseases in the area.

Fish Health Monitoring 2017

WAF invested in a high-tech vaccine machine as part of a long-term sustainable emergency response plan to target the sudden disease outbreak of *Streptococcus agalactiae* that was introduced into Ghana through the illegal importation of fingerlings from China the long-term objective being to reduce losses further through innovation and improvement of the vaccination processes and hopefully overcome the problem in its entirety.

Water Quality Management

Work in collaboration with WRC and WRI to monitor water/sludge samples on the lake periodically and to share information with research bodies studying the impacts of aquaculture on the lake. Bench mark data is key for long-term sustainability.

- To prevent the discharge of any contaminated surface water to the surrounding environment.
- To prevent contamination to the groundwater supply.
- To apply best practice operations to prevent environmental harm.
- Not to contravene the water quality criteria beyond acceptable limits as guided by the WRC (physical, chemical, microbiological).

Anti-Corruption Principles

Principle 10: Businesses should work against corruption in all its forms, including extortion and briber.

Assessment, Policy and Goals

Our policy is clear on this matter. We adhere to the strongest anti-corruption principles – and will work against corruption in all its forms, including extortion and bribery. We fully support the UN Convention against Corruption. We refuse to work with anyone who takes part in such matters. We believe that running a successful business is to run it properly.



Implementation

Royal Danish Fish Group A/S has a zero tolerance for any form of corruption and tries to educate all employees in this regard. We have a string policy regarding this matter, which we inform our partners and customers about before we are doing business. To comply with all regulations in a formal manner with a strict "No bribe" policy. Documentation for all areas of operation will be transparent and available for inspection.

Measurement of outcomes

We do not have any problems with our policy in Denmark. In Ghana, it can be a slightly different matter. It can cause some delays, but this is the price we are willing to pay. We feel that our anti-corruption attitude in the long run is met with respect. We have never been involved directly or indirectly in matters of these issues neither in Denmark nor in Ghana. We act in accordance with applicable legislation and rules where we operate and we do business with partners who have the same policy regarding anti-corruption.

Implementation of the guidelines is as follows:

- **Anti-corruption ethics:**
To comply with all regulations in a formal manner with a strict "No bribe" policy. Documentation for all areas of operation will be transparent and available for inspection.

