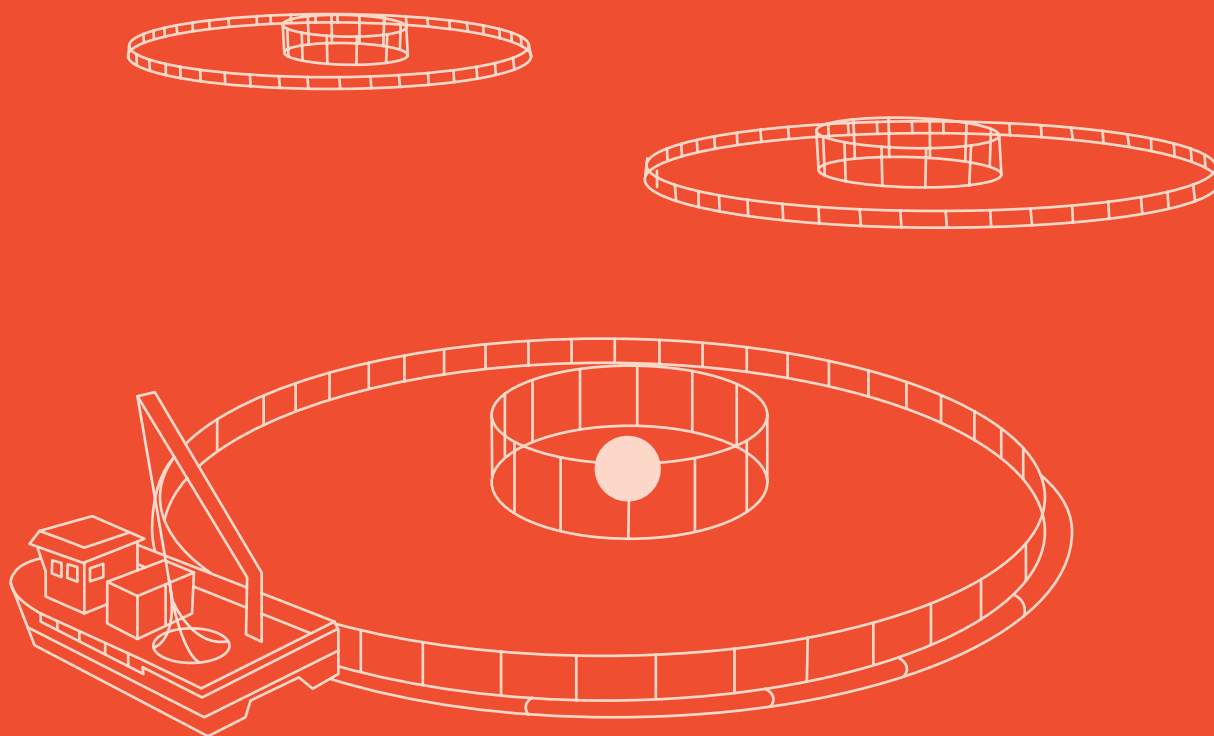


2021

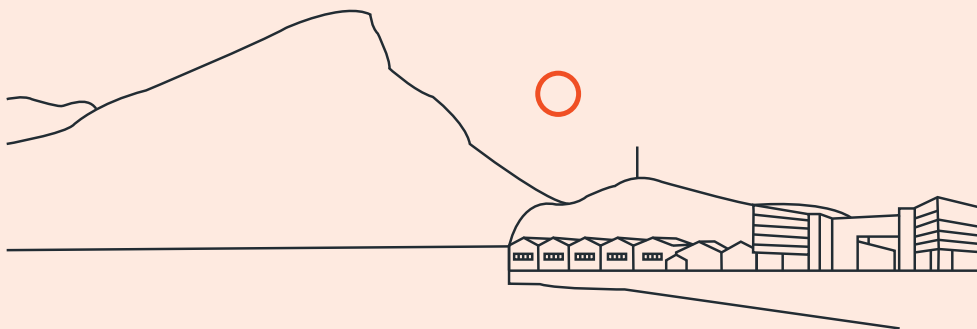
Sustainability report



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CEO's statement

At Nova Sea we create jobs and contribute to the communities around us, and we produce healthy, nutritious and climate-friendly seafood for a growing world population. All this takes place locally in Helgeland, Norway.

Here, along the coast of Helgeland, is where we live and work, and here too is where we want to contribute to positive development for ourselves and the local communities around us. Local ownership and growth, together with sustainable operations, have always been the foundation of Nova Sea. During 2021, we established our sustainability strategy, which will be our guideline in the work involved in finding a balance between environment, society and economy towards 2030 and beyond.

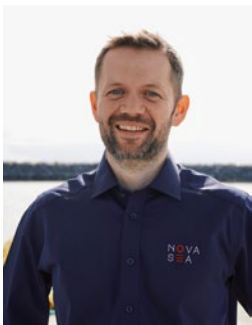
Our value chain generates a footprint that we are actively trying to limit. With our strong commitment to the climate and environment, we want to take a leading position in sustainability.

Ever since the first salmon arrived in Lovund in 1972, which was packed in plastic bags aboard a small seaplane, Nova Sea has operated according to the philosophy of honesty and level-headedness in its operations, and with a focus on quality and sustainability. Nevertheless, the journey from the first 1,200 smolt to the more than 12 million salmon today would never have been possible without competent and dedicated employees, a supportive local environment and clean fjords.

In this report we describe all the work we have done during the past year to ensure a more sustainable future, reduced greenhouse gas emissions and a smaller footprint.

I hope you will read the report and find out about the results we have achieved in the last year and, not least, about the way forward.

Happy reading!



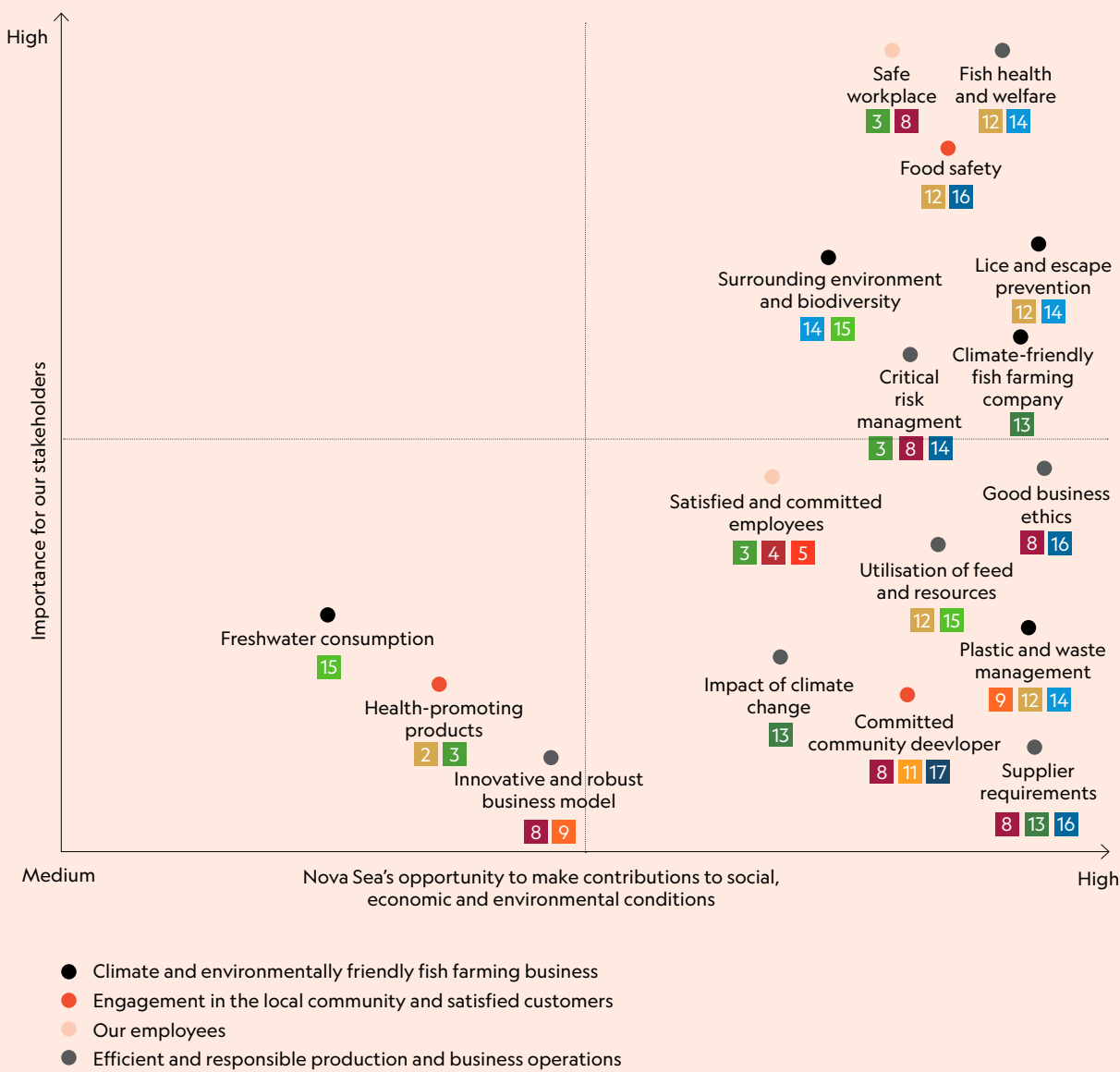
Tom Eirik Aasjord
CEO/Managing Director,
Nova Sea

Introduction

Important topics for us

This year we have performed a an internal materiality analysis to see which areas we rank as most important for our stakeholders, combined with which areas we can influence most within our business area. Towards next years report we will involve chosen stakeholders to create a more thorough analysis. You can view the results of

the analysis in the graph below. We have also chosen to base the entire report on the results and you will find the topics in the chapter “Our contribution”. To ensure a structured report design, we have also followed the Global Reporting Initiative (GRI) standard for sustainability reporting. You will find GRI references in all topics and as their own index at the end of the report.



The UN's sustainable development goals and other obligations

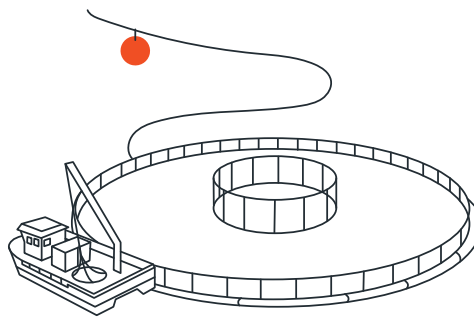


Cold, fresh water and wild, beautiful nature – the perfect balance

We operate our business according to an international framework. The salmon is produced locally on the community's common land in 11 municipalities along the coast of Helgeland, and it is exported to and sold in more than 30 countries all over the world. This value chain generates a footprint that we are actively trying to limit. Nova Sea works according to the UN's sustainable development goals and, with our strong commitment to the climate and environment, we will strive to take a leading position in sustainable farming.

Through our membership in the Global Salmon Initiative and the UN's Global Compact, we are committed to working to increase sustainability in farming.

From the moment the first salmon was put in net pens, we have had just one vision: the perfect balance. This balance, between people, biology and environment, has formed the basis for how we operate.



Key figures



22,7

Injuries with absence
(number per million hours worked)



51 457

Tonnes biomass
harvested (gutted)



83%

Environmental status in locations
(% Score 1 Mom B)



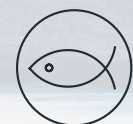
-2%

Reduced greenhouse gas
emissions compared with 2020

CO₂

247 957

Tonnes Total greenhouse
gas emissions 2021



0,145

Salmon lice per fish
(average 2021)



NOK 1,3 million

for local organisations
and associations



3 014 million

Revenue in
NOK million



3 fish

Escapes

The Perfect Balance Nova Sea in 2021

Our main challenge is to make the right choices in operations and investments, in light of the existing biological conditions and challenges at any time and out of consideration for our employees, the sustainable use of resources, demand and market prices, and production costs. Our vision and values should reflect everything we do at Nova Sea. Our values can be summed up by the perfect balance: Local, Responsible, Competent and Proud.

Local: We belong to the local environments in which we operate. We are important to our local environment and the local environments are important to us.

Responsible: We are responsible for each other, for the fish and for the environment, and we will manage this in the best way possible.

Competent: We have excellent competence in the specialist fields we work in, and we will always acquire and recruit the right competence within our value chain.

Proud: We are proud of Nova Sea, we are proud of the industry, the ripple effects we create, and we are proud of working with our perfect balance!

Based in Lovund, directly below the Arctic Circle on the coast of Helgeland, Nova Sea AS is currently one of the largest producers of farmed salmon in Northern Norway. We have 33.33 fully owned and four shared salmon licences and fish farms along the entire Helgeland coast, from Vega in the south to Gildeskål in the north.

Key figures for Nova Sea and affiliated companies in 2021

- Production: 53,000 tonnes harvested in 2021
- Employees: 325 person-years in 2021
- Revenue: NOK 3.0 billion/3,014 million
- Certificates: Global GAP, ASC, HACCP and BRC
- Licences: 33.33
- Harvesting plant: N-1041

Local ownership

- Vigner Olaisen 51,5%
- Mowi 42,50%
- Other 5,89%

Nova Sea has joint enterprises with the local salmon farming companies in Tomma Laks AS, VegaLaks AS and Vega Sjøfarm AS (affiliated companies).

Climate- and environment-friendly farming activities

We will be among Norway's most climate-friendly farming companies

GRI 304

Lice and escape prevention

In recent years, Nova Sea has used only farmed lumpfish in its facilities. The number of lumpfish has increased as they have become more available. In 2019, we put out the indisputably highest number, while in 2021 we put out a lot less than previous years. The quantity is due to increase again in 2022.

Throughout 2021 we used lice skirts for our fish in some locations to reduce the spread of lice. In the run-up to 2022, we worked with alternative production technologies for prevention, and we look forward to testing the "tubenot", among other things, in 2022.

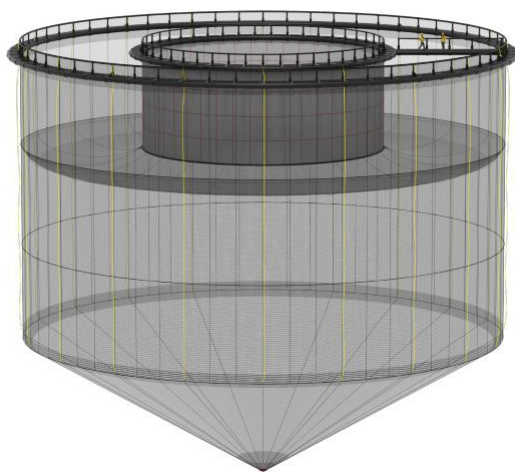


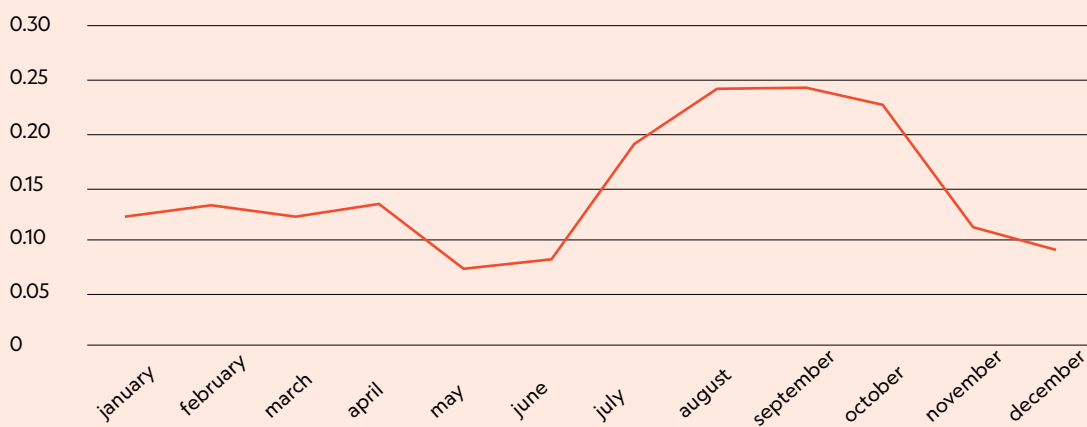
Illustration of tubenot. (Akvagroup Egersund Net)

An important tool for keeping lice under control is access to effective and good treatment methods against salmon lice. We have therefore worked hard throughout 2021 to improve the infrastructure for non-drug methods, which has resulted, among other things, in the phasing in of the treatment vessel Bukkholmen through the service boat company Sleneset Aquaservice, which allows us to administer treatment at an earlier stage, thereby ensuring prevention of a large number of lice.

We maintain a continuous focus on escape prevention through the risk management of critical processes, among other things. Over time we have developed a good system for the inspection and maintenance of our installations at sea to limit the risk of escape. We have requirements, among other things, for filming each square metre of nets in all locations in Nova Sea at a maximum interval of six weeks. In order to manage this major task, we have dedicated employees on board the vessels in our service companies Nova Sea Aquaservice and Nova Master and with our important external suppliers, where Sleneset Aquaservice is central.



Average female lice per month



GRI 304

Surrounding environment and biodiversity

The main environmental pressure on our sites is related to faeces from our production animals, additionally the sea lice challenge has an environmental impact in the form of the release of salmon lice larvae into the surrounding environment and among wild fish and the release of drugs used to treat the salmon lice. In order to reduce the environmental impact in the form of salmon lice infestation and the release of drugs, work has been carried out at all stages, from prevention, methodology and treatment to overall strategy for several years.

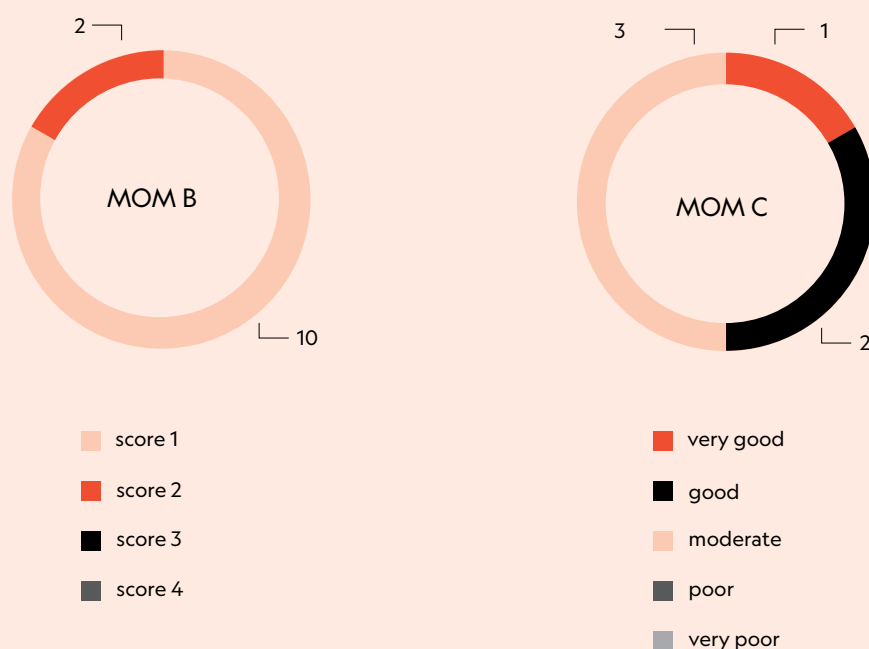
Phasing out of drug treatments and phasing in of non-drug treatments against salmon lice was started in 2015, and during the last six years the use of NMM (non-medicinal methods) has become a well-implemented method. Increased investment in preventive measures, along with the phasing in of NMM, has over several years led to a reduction in the use of drugs to treat salmon lice. In 2021, 84% of all net pen treatments in Nova Sea were performed with NMM.

This figure has remained relatively stable over the last few years where the development started between 2016 and 2017. In 2016, only 25% of treatments were so-called NMM.

Environmental studies are assessed based on the presence/absence of fauna, sensory parameters such as odour and appearance, and chemical parameters such as pH and Eh. Environmental monitoring is performed in accordance with NS9410:2016 and assessed on conditions 1, 2, 3 or 4, where 1 is little or no impact and 4 is major impact. Environmental monitoring (MOM B) is performed for the maximum load each generation, and more comprehensive environmental monitoring (MOM C) is performed every third production cycle in a larger area around the locations. If results show a load at and/or below the facility, monitoring will be performed more frequently.

For locations that are ASC-certified, ASC environmental studies will be performed at maximum load for each generation.

Results of environmental surveys 2021 (MOM B og MOM C)



GRI 302/305

Climate-friendly fish farming company

Over the last few years, we have mapped and reported the company's energy consumption and greenhouse gas emissions quarterly. This mapping has illustrated the role of feed as the largest contributor to our CO₂ footprint. That is why last year we put in place clear criteria for feed to ensure quality and limit environmental impact. This has resulted, among other things, in good effects in reducing greenhouse gas emissions on feed compared with previous years and will account for the majority of reductions in greenhouse gas emissions in 2021. We have also developed the company's sustainability strategy in line with the company's main strategy for 2020–2025.

During 2021, we had 247,957 tonnes of greenhouse gas emissions from Scopes 1, 2 and 3. It is Scope 3 that certainly provides the highest emissions, making around 90% of the contribution. Within Scope 3 it is the feed contribution that is definitely

the greatest. We managed to reduce our total emissions by 2% from 2020 to 2021, and the intensity of emissions per kg fish produced was reduced by a whole 6%. The reduction is due in large part to the criteria for feed and the work in switching to green propulsion solutions and energy.

Scope 1

Emissions from combustion of fossil fuels

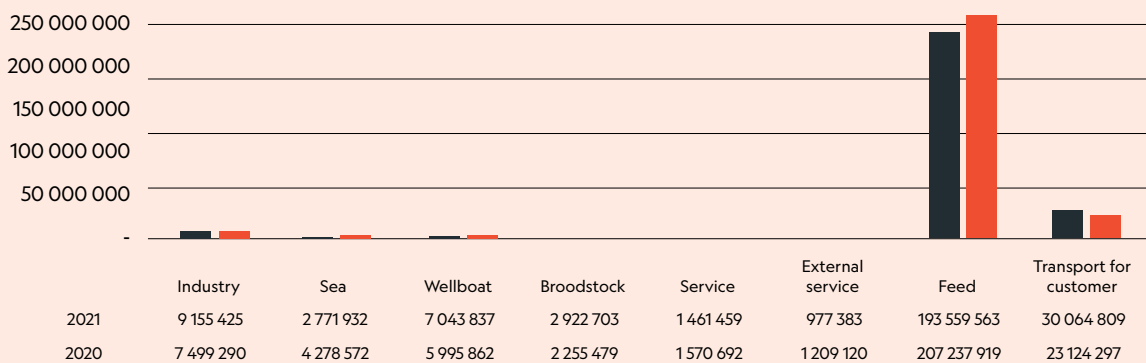
Scope 2

Indirect emissions from the use of electricity

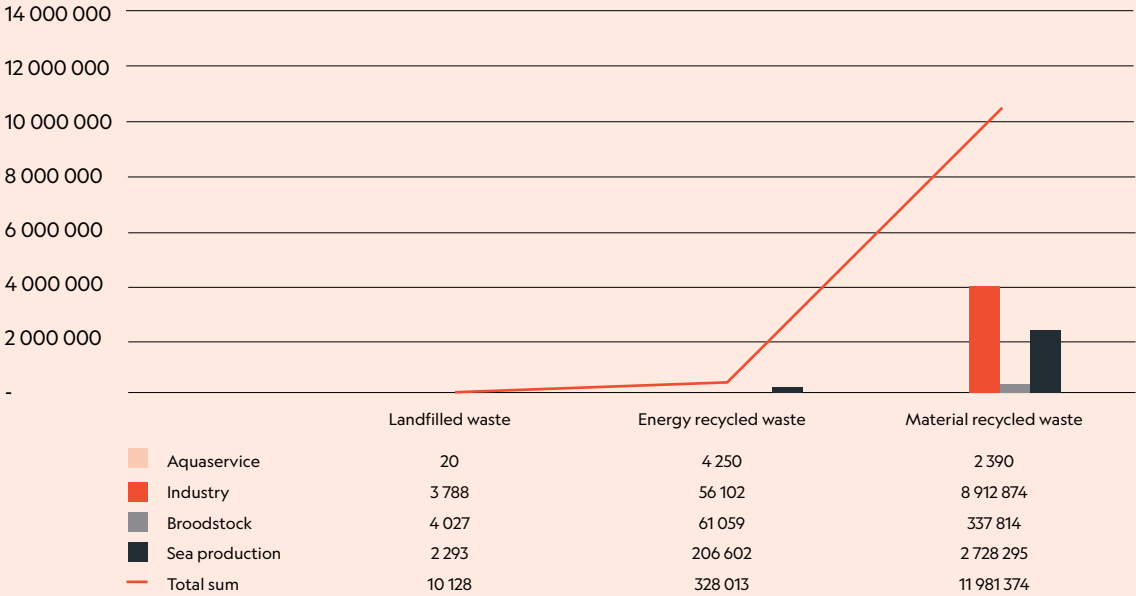
Scope 3

Emissions generated from purchasing resources

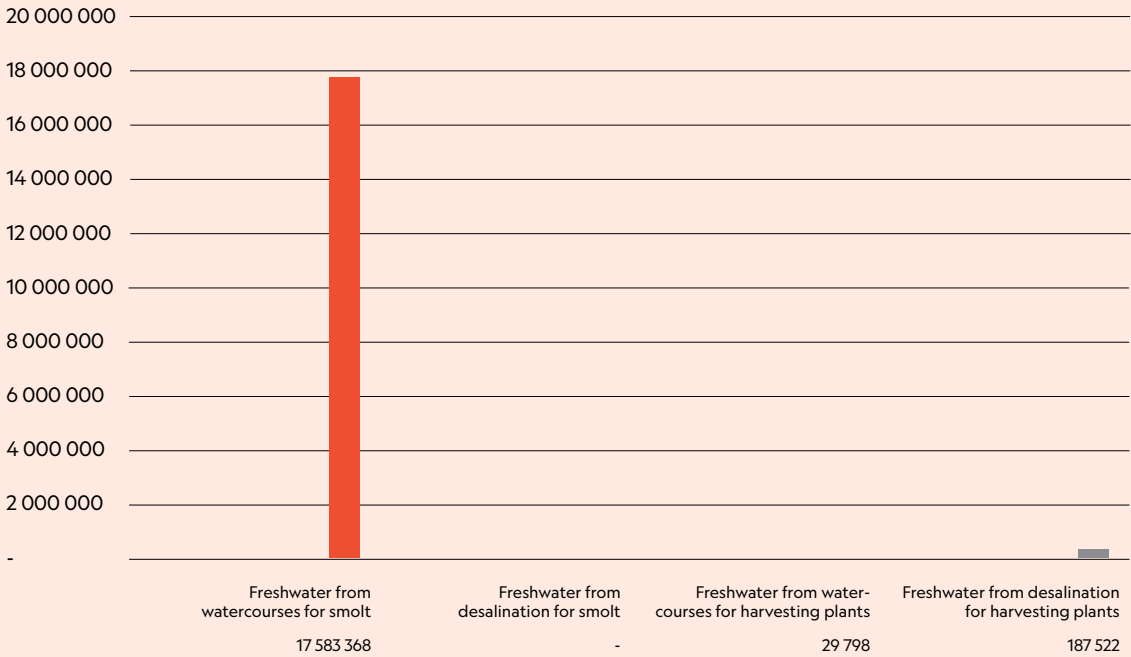
Climate emissions per area 2020 and 2021



Plastic and waste management in kg



Freshwater consumption in litres



GRI 306

Plastic and waste management

Over the course of many years, we have worked to increase the reuse and recycling of plastic and other waste fractions from our operations and elsewhere in the immediate value chain. The average recycling rate in the company was at 92% in 2021 and was primarily derived from the material recycling of biological waste (harvesting plants), dead fish (sea production) and production sludge (broodstock).

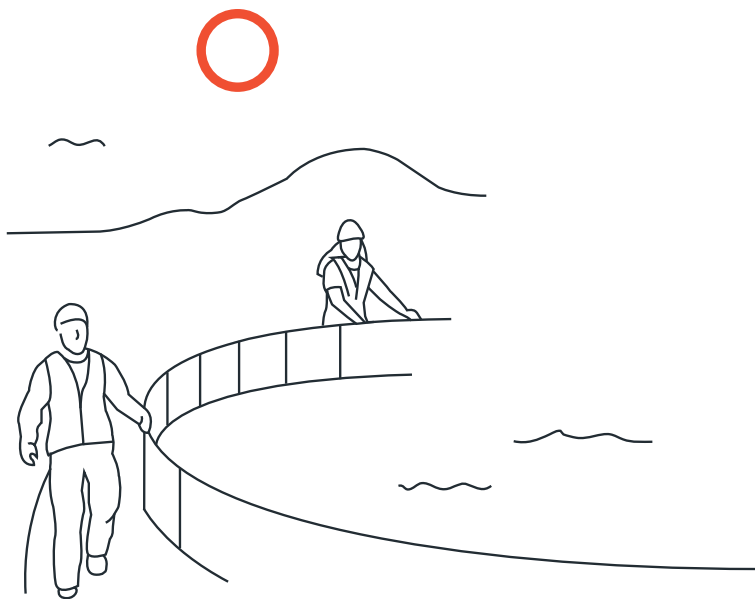
During 2021, we discarded 395 tonnes of used nets that went to NOFIR for material recycling. These will become entirely new products due to the fact that we do not use copper to impregnate nets, which is an example of how one choice affects other parts of our value chain.

GRI 303

Freshwater consumption

Our freshwater consumption is primarily associated with broodstock production and industry. The broodstock facilities mainly use recirculation technology to reduce the need for freshwater. The industry mainly uses saltwater in production, but freshwater is used for washing and cleaning.

The main source of freshwater is desalinated seawater combined with some municipal water as shown in the graph on the right-hand side. We are so conscious of our freshwater consumption in the industry that we have our own subsidiary, Djupvatn AS, which desalinates seawater for our production. As a consequence of this, we use only a very small amount of the municipality water source in our production.





Local community engagement and satisfied customers

We are engaged in local and regional development.
We work best when we work together for Helgeland.

GRI 204/GRI 413

Committed community developer

We are involved in community development along Helgeland and we have a focus on the development of our local, regional and national suppliers and partners. We focus on supporting local and regional organisations/associations and during 2021 we allocated funds to around 90 individuals, organisations and associations.

Fully 68% of our purchases were made through local suppliers in Nordland in 2021, and we allocated NOK 1.3 million to local organisations and associations.

In 2021 we made the decision to develop and construct a new harvesting plant in Lovund. This is a billion kroner project that will create major and important ripple effects locally. We will involve around 90 people in connection with the most intensive parts of the construction phase. This amounts to more than 15% of Lovund's entire population and will be a huge boon to industry in the municipality. We are delighted to continue working on the next chapter of community development in Helgeland.



Sørbygd Festival received NOK 20,000 in sponsorship in 2021 – a great, low-threshold offer for children, young people and adults in our important production area in Vega.



3D drawing of the new harvesting plant at Lovund which is under development.

GRI 102

Food safety

We have a major focus on food safety through the production, further processing and distribution of fish for our customers. The main challenges with salmon are associated with the presence of the disease-causing bacteria *Listeria monocytogenes*. Analysing *Listeria* is one of our “important basic conditions” for ensuring safe food for consumers. We take samples from a total of 2500 fish a year, which results in a total of 500 samples of fish meat that are sent to an external lab.

Out of 500 samples, we had no positive tests in 2021. It is more than five years since the last positive meat sample (*Listeria*).

GRI 102

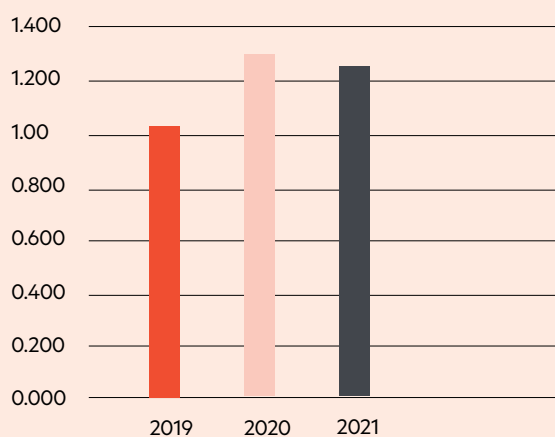
Health-promoting products

Salmon is an important source of Omega 3 fatty acids within a varied diet. The level of Omega 3 in salmon has been challenged since 2010. Since April 2021, we have had our own clear criteria for Omega 3 content in our feed, which is reflected in a consistently higher level of Omega 3, and more specifically, EPA and DHA fatty acids, in our fish. Based on external analyses from 2019 to 2021, we can see that we have stabilised EPA and DHA at a higher level than before.



Our filleting line at the harvesting plant in Lovundt

EPA/DHA in grams/100 gram product



Our employees

We will be a safe, inclusive and stimulating workplace.

GRI 403

Safe workplace

We have focused on ensuring that Nova Sea and affiliated companies are safe and positive workplaces. The company wants active and efficient safety representatives. They have an important role in the efforts to improve the working environment and safety at the workplace. Unfortunately, there is a negative overall trend of absence due to injuries at the company, from two injuries with absence in 2019 to nine absences due to injuries in 2020 and 16 absences due to injuries in 2021. Nova Sea has a major focus on absence due to injuries and several measures have been implemented in the HSE action plan for 2022.

Reducing absence due to illness is an overall aim for Nova Sea for the 2019–2022 period. In accordance with the inclusive working life agreement, the aim is to reduce absence due to illness in this period by 10%, from 5.24% to 4.72%. Absence due to illness in 2021 was 5.58%, an increase compared to 2020, when the figure was 4.5%. This negative trend is something we take with the utmost seriousness and are working focused to turn this trend in the future.

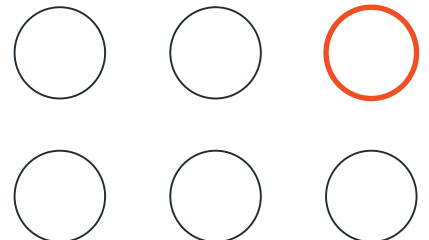
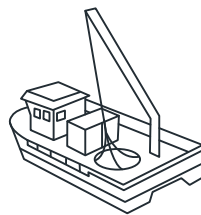
GRI 405

Satisfied and committed employees

Employees are Nova Sea's most important resource. Nova Sea strives to be an employer that attracts motivated applicants with excellent skills. Nova Sea conducts annual employee appraisals with its employees to map well-being and skills requirements, among other things. In addition, we perform annual anonymous employee surveys to identify what we need to work on next. The 2021 survey gave us important insights into and direction in terms of what we as a company have to do in future.



One of our talented YSK students at work in Forvik.



Efficient, responsible production and business operations

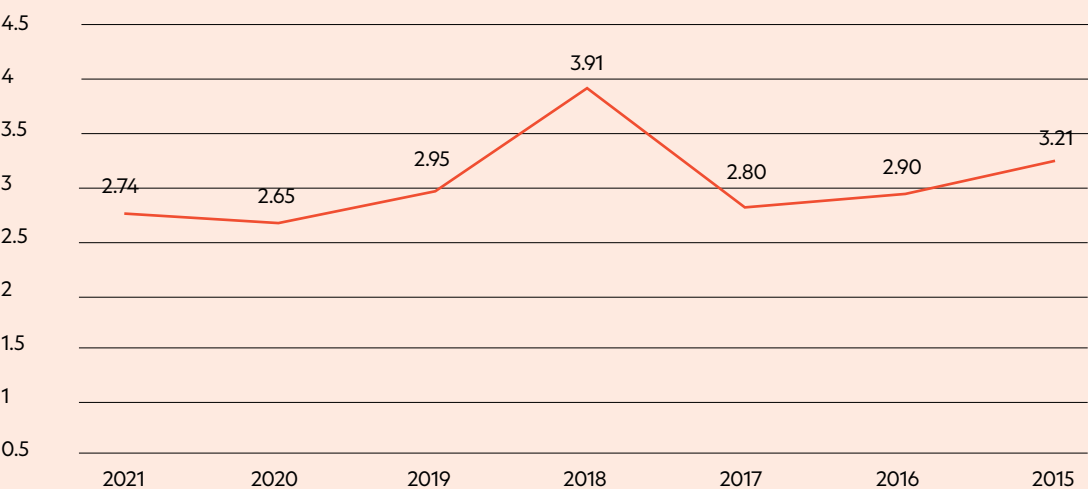
GRI 102

Fish health and welfare

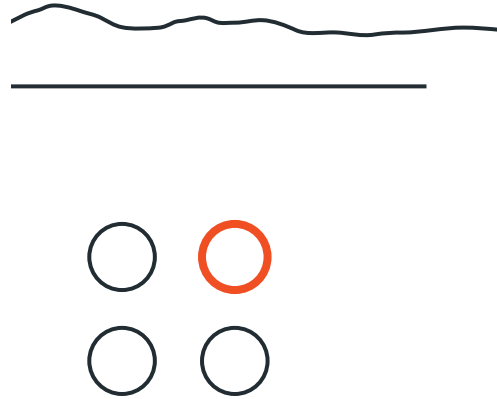
We have skilled employees who monitor our fish every day throughout the year, both at the borders of the net pens and via video surveillance at our feeding centres. They are observant and give feedback to the veterinarians if they observe abnormal behaviour. As a preventive measure and in accordance with Norwegian law and the requirements of the ASC standard, the veterinarian/fish health biologist follows up our fish at monthly intervals to check their health and give advice to local personnel. Necessary samples are taken regularly to rule out disease. Based on the experience of the fish group and fish health follow-up, we strive to adapt the treatment of our fish to ensure the best possible fish welfare. Good fish welfare is one of the most important factors for healthy and positive

production. Nova Sea is of the opinion that health and the welfare of the cleaner fish used in production, is just as important as it is for our salmon. We therefore continue to work purposefully towards improvements with respect to for the use of cleaner fish. One of the measures that has been remedied in 2021, the development of a gentle and effective method for extracting lumpfish from cages, to spare the lumpfish for unnecessary stress during operations such as delousing. The goal is practice and improve this method through 2022. In 2021 we have focused on reducing mortality to lumpfish, and the result has been almost halving mortality from 2020 of 41.08% to 24.33% in 2021. The mortality rate is still too high, and we will continue to work purposefully to reduce the mortality of lumpfish in 2022.

% annual salmon mortality (% of biomass)



Figures according to GSI standard: (total number of dead fish last year) / (total number of fish at year end + total number of dead fish + total number of slaughtered fish + total number of destroyed fish)



GRI 304

Utilisation of feed and resources

We work actively to utilise the feed for the production of our fish. This covers everything from our own criteria for our growth feed to the use of the feed at our various locations. We have dedicated people who control and monitor feeding throughout the feeding day. Good feed combined with good locations and good feeding follow-up gives us excellent conditions for achieving good growth and feed utilisation for our fish.

In 2021 we had a total biological feed conversion rate of harvested fish of 1.12 and a financial feed conversion rate of 1.17. We achieved a VF3 of 3.41. We are very satisfied with the results for 2021, but we are still striving to improve.

We demand that all the feed we use be produced according to ASC criteria, and our own feed criteria require a lower consumer fish index than ASC requires. Therefore, we go further than ASC in demanding sustainable marine raw materials in the feed.

GRI 102

Stringent supplier requirements

We have strict requirements for our suppliers. We perform regular supplier assessments, and all suppliers must be approved. All subcontractors that work directly with our fish must have a third-party Global GAP approval or must submit to a supplier audit. All feed must be produced according to the ASC standard and our own feed criteria, which are among the strictest requirements for climate reporting.

GRI 102/GRI 419

Good business ethics

In 2021, we developed new code of conduct guidelines. The new guidelines will be followed by all our employees and by our suppliers.

Excerpts from our ethical guidelines:

"Our ethical guidelines set clear expectations for our business conduct and ethical standards and will help us to make the right choices every day.

Our ethical guidelines apply to everyone throughout the organisation as well as to subsidiaries, hired consultants and others acting on behalf of the company. We are responsible for making Nova Sea a reliable company, and our ethical principles must always be reflected in the way we behave and the way we conduct business.”

GRI 102/GRI 302/GRI 305

Innovative and robust business model

At Nova Sea we have a major focus on developing operations, and for a long time we have used our resources to test new technology. For example, we tested new technology for counting lice, lice development, electric boats, alternative fuels and plastic recycling. Throughout 2021 we spend a lot of time on developing the Spidercage project, a sea farming concept, and much has been learnt through this process. Unfortunately, we ended up having to put the project on hold due to the overall level of risk in the project.

Over the course of 2021 we began the construction of another two work vessels with hybrid electric propulsion. This development has been supported by Enova and will give us two new vessels in 2022.

Our work with energy and climate efficiency has shown us the need to streamline the wellboat link. We have therefore worked with Grønt Skipsfartssprogram [the Green Shipping Programme] to assess which alternative fuels are relevant for our boats in future. We also see a significant challenge in increasing the circularity of our waste streams in future. We have therefore spent a lot of time working with Sintef to investigate the opportunities for establishing our own terminal for receiving plastic waste from the aquaculture industry. We are pleased with the progress made in this regard in 2021 and look forward to its continuation.

All this activity has resulted in our using 0.82% of our revenue on R&D in 2021.

GRI 102/GRI 302/GRI 305

Impact of climate change

Our company is situated on the coast and much of our production takes place in open net pens in the sea. This means that we are exposed to changes in water level, temperature and weather conditions with stronger and more frequent storms.

We plan to complete our own risk assessments for how climate change will affect our own company. This work has started and will be completed for the first time in 2022. We will then update the assessments regularly in the years to come based on our improved experience and knowledge.




GRI 403




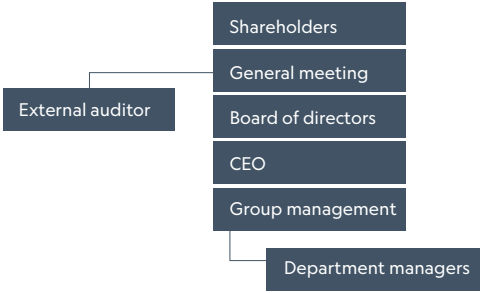
Critical risk management




Understanding risk and the ability to mitigate risk are important in terms of affecting the outcome of all processes we are involved in. We have spent several years trying to understand the risk in our processes by encouraging all of our employees to register non-conformities. This has improved our managers' understanding of what can go wrong and the consequences of this. There were 2,437 non-conformities recorded in 2021, which in turn were associated with our risk assessments. Based on the frequency and the consequence of the non-conformities, annual risk assessments are performed in our core processes regarding HSE, Fish Welfare and Escapes both centrally and locally at our various production sites, among other things. In 2021 we discovered, among other things, that work with a rig and crane is especially prone to accidents, and we have undertaken to make these processes safer.









GRI Content index




Module	Section	Requirements	Description
<p>GRI 102</p>   	Organizational profile	1	Nova Sea AS
		2	Farming and business to business sales of Atlantic salmon (<i>Salmo salar</i>) under the brand of Nova Sea AS.
		3	Naustholmveien 32, 8764, Lovund, Norway
		4	Nova Sea AS has 25 farms along the coast of the Helgeland region of Norway, from the municipality of Gildeskål in the north to Vega in the south. All of them are within production area 8. Our processing facilities and administrative offices are on the island of Lovund in the municipality of Lurøy.
		5	Nova Sea is a limited company. Majority owner is Vigner Olaisen Ltd (52%). The ultimate parent company is Steinar Olaisen Ltd, who owns 51% of Vigner Olaisen Ltd
		6	<p>i. The principle geographic locations receiving our products are Hong Kong, Singapore, Peoples Republic of China, Taiwan, Vietnam, U.A.E., Thailand, United Kingdom, France, Italy, Germany, Poland, the Netherlands, Norway, the United States of America, Sweden, Lithuania, Denmark, Finland, Spain, Estonia, Ukraine and Canada</p> <p>ii. Businesses interested in the purchase of salmon.</p> <p>iii. Business to business</p>
		7	<p>i. 325 employees</p> <p>ii. Administrative, fish farming and processing facilities</p> <p>iii. MNOK 3 014 062</p> <p>iv. Equity MNOK 3 116 , debt MNOK 700</p> <p>v. 51 457 net tons processed</p>
		8	<p>a. 289 permanent, 16 permanent half-time, 36 hired as full-time substitutes, 17 hired as call-outs.</p> <p>b. Not able to report (our system does not allow us to filter for this metric yet. We will work to be able to achieve this on next year's report).</p> <p>c. Full time: Woman 81, men 244.</p> <p>d. N/A</p> <p>e. Permanent workers are mainly Norwegians, while contracted employees are not.</p> <p>f. The numbers are compiled from the company's payroll system and includes employees of Nova Sea and connected companies (Tomma Laks og Vega Sjøfarm).</p>
		9	Nova Sea partners with Cermaq, Nordlaks and AquaGen in the production of broodstock salmon via Nord Norsk Stamfisk, which provides us with the roe which eventually becomes our smolt. We are the majority owner of Helgeland smolt, consisting of facilities in Sundsfjord (Gildeskål municipality) and at Reppen in Rødøy municipality, which produces all of the smolt to our seafarms. These facilities have the capacity to produce smolt up to 600 grams in size. We have 25 farms within production area 8 on the coast of Helgeland, from Gildeskål municipality in the north to Vega municipality in the south. We also own via North Salmon Service AS (a partly owned company) multiple wellboats, which are used to transport our fish from smolt facilities to the farms and from our farms to the processing facilities. We process and pack the fish at our facilities on Lovund, where we have the capacity to process and pack 300 tons of fresh fish per day. We have our own sales department which sells our salmon in a business to business model, to customers all over the world.






Module	Section	Requirements	Description
GRI 102   	Organizational profile	10	i. N/A (no major changes for 2021) ii. N/A (no major changes for 2021) iii. N/A (no major changes for 2021)
		11	Nova Sea AS applies the precautionary principle in multiple ways, but it is most evident via risk assessments, covering the most vital aspects of our operations (fish health / welfare, the environment, escape prevention, food safety, product quality, food fraud, sabotage and HSE). Representatives from the individual departments carry out local risk assessments annually. Teams are established for each risk area that discuss the results of these assessments, identify high and critical risks and plan concrete action to minimize these risks as much as possible in the future. The involvement of company leadership in risk assessment work is crucial, and their responsibilities and involvement are specifically described in our company procedures dictating risk assessments.
		12	Signatories to the Statement of Support for the Cerrado Manifesto and to the UN Global Compact Sustainable Ocean Principles.
		13	Members of the Global Salmon Initiative
	Strategy	14	See attached CEO statement at the start of this report.
	Ethics and Integrity	16	Nova Sea has developed a policy for HSE, food safety, animal welfare, quality, the environment, energy use and the climate. It covers our ethical approaches to issues from these various categories, can be found in our HSE / quality management system and is available on request.
		18	a. See graphic b. The company follows an authority matrix which says who can decide purchasing based on the amount. Environmental and social topics decided on by various representatives at all levels of the company. <div style="text-align: center;">  <pre> graph TD Shareholders --> GeneralMeeting[General meeting] GeneralMeeting --> BoardOfDirectors[Board of directors] BoardOfDirectors --> CEO CEO --> GroupManagement[Group management] GroupManagement --> DepartmentManagers[Department managers] ExternalAuditor[External auditor] --- GeneralMeeting </pre> </div>
	Stakeholder Engagement	40	Municipal authorities where we have farms Customers, Local communities: ASC meetings, beach cleanups, "open days" at our farms Regional / national authorities: FD, MT, KV, etc. Fiskarlaget: local and regional Research organisations / Universities: help with masters thesis, bachelor thesis/work, job placements and research projects.
		41	All employees are allowed to be represented, uninhibited, by the labor union of their choice. This is covered by Norwegian labor laws, it is declared in our company statement "Selverklæring god sosial praksis." This percentage is hypothetically 100% of our employees. We do not have statistics showing what percentage of them actively participates in a labor union, as this information is not something employers normally track in Norway.
		42	Our stakeholders are chosen based on individual evaluations to find individuals or groups that can be affected directly or indirectly by our activities.

Module	Section		Description
GRI 102   	Stakeholder Engagement	43	<p>Municipal authorities: ASC meetings (one per certified farm per year), when applying for new farms / changes to current farms (biomass or area).</p> <p>Local communities: ASC meetings (one per certified farm per year), when applying for new farms / changes to current farms (biomass or area), "open days" at our farms (approx. 6 farms per year), sponsorship of local athletes or events.</p> <p>Fishermans unions: ASC meetings (one per certified farm per year), when applying for new farms / changes to current farms (biomass or area), Occasional meetings between our company and the central organization in Bodø (last done in 2017). All changes that effects fishermen will be communicated through Nordland fylkesfiskarlag (NFF).</p> <p>Customers: An ongoing basis, via consultations with sales representatives / other company employees.</p> <p>Regional authorities: ASC meetings (one per certified farm per year), when applying for new farms / changes to current farms (biomass or area), occasional meetings between our company and the regional authorities (County governor in 2017 and sporadically through NCE activities, FD in 2021 (yearly dialogue meeting)).</p>
		44	<p>All concerns have been raised through local open meetings in each of the communities where we operate or through meetings we have had one on one or in groups with stakeholders.</p> <p>Local communities / municipal governments: Positive effect of our operations on the local community, in the job market and through direct spending. A general desire for an increase in our operations locally (construction of more smolt / processing facilities, more farms, etc.).</p> <p>Our response: We have policies and a desire to employ locally, and thereby do our best to support the local workforce in the community. Expansions / construction of projects for smolt, farms, etc., have always taken place within the Helgeland region, and we will continue to invest only in this local region in the near future. Local communities: Area conflicts regarding zoning, or the use of areas that were designated differently previously. Our response: These conflicts are covered in the application process for new farms or changes to current ones. We hold meetings in the local community in regards to both of these, and contact stakeholders who will be potentially effected, both to hear their concerns and to attempt to work with them to minimize conflicts through for example changes to the placement or outlay of the farms.</p> <p>Local communities: Desire to see us involved in community projects such as sponsorship and beach cleaning efforts. Our response: We have been directly involved extensively in beach cleanups in 2018, 2019 and 2021, including organizing an effort in Vevelstad kommune. No beach cleanups organized in 2020 due to the covid-19 situation, however we did collect garbage from a local small cleanup in Træna during 2020. We have direct partnerships with the waste processing companies of HAF and SHMIL whereby we deliver rubbish from beaches to these companies for disposal/recycling.</p> <p>Customers: Concerns about how we follow up environmental impacts as a result of our farming. Our response: The majority of our farms are certified with the ASC salmon standard, a standard with a strong environmental focus. All of our farms are GlobalGap certified. Our customers are welcome to (and many do) visit / audit us directly.</p> <p>Local fishermans unions: Area conflicts based on a need for both of us to use the same locations. Concerns about the effects of our operations, through effluents and parasiticide use, on shrimp.</p> <p>Our response: Fishermans unions representatives are invited to meetings in local communities every year. We inform them ahead of planned changes to farms / applications for new farms, to gather input on how the changes can be done in a way that will negate or minimize difficulties / impediments for their operations. We inform them ahead of time in the event that a medicinal treatment is planned, allowing them to be aware of any unintentional side-effects or to let us know if there are any circumstances to be aware of that should make us reconsider.</p> <p>Anglers: Concerns about the effects of our farms (lice, sickness, escapes) on wild salmon stocks. Our response: We are participants in Nordland 2023, a forum for meeting with local anglers unions / land owners / river owners. Dialogue in this group is focused on minimizing impacts from salmon farming on wild stocks, and looking for opportunities to collaborate through research or funding of local groups. We are involved in numerous research projects (Sila and Flostrand, Insight, Beiarelv regionen, etc.) looking at wild fish stocks in rivers in our region and effects from farming or climate on them.</p> <p>Regional government (Statsforvalteren): Concerns about the effects of our farms on wildlife (wild salmon, sensitive species and seabirds).</p> <p>Our response: Assessments on this are carried out as a part of the application process for new farms or changes to existing ones. All predator mortalities are treated as deviations and followed up as such.</p>













Module	Section	Requirements	Description
GRI 102   	Reporting Practice	45	<p>a. Nova Sea Ltd >20% ownership: Tomma Laks Ltd Vega Sjøfarm Ltd Vegalaks Ltd Nova Sea Aquaservice Ltd Nova Master Ltd Djupvatn Ltd Helgeland Smolt Ltd Lax Expo Ltd Hamnholmvalen Eiendom Ltd Nova Sea Service Ltd Nordnorsk stamfisk Ltd Viewpoint Seafarm Ltd Tomma Rensefisk Ltd Nordland Rensefisk Ltd Jacobsen mekaniske verksted Ltd</p> <p>b. For the most part Nova Sea AS and companies under operational control data is reported. Some sections contain data from the other companies where it is deemed important (for example: CO2 emissions from external service fleet involved in delousing operations).</p>
		46	<p>a. The process for defining the material topics for the report was based on previous reporting methodology, interactions with and feedback from stakeholders and consensus with members of the energy and climate leadership group.</p> <p>b. The four reporting principles for defining report content were included various ways. As previously mentioned, feedback from both employees on all levels in the company and stakeholders from the local community were vital.</p> <p>It was also important to include as much information that is audited (via certification schemes) as possible, and to ensure that the metrics that are included reflect the areas most impacted (positively, as well as negatively) by our production of salmon.</p>
		47	<p>1. Fish health and welfare a) Sea lice b) Preventative measures against sea lice c) Fish health</p> <p>2. People and communities a) Community engagement b) HSE</p> <p>3. Sustainability a) Feed and sustainability b) Waste management c) Certifications</p> <p>4. Environment a) Sediment testing b) Biodiversity c) Escape prevention</p>
		48	No restatements
		49	No significant changes
		50	Reporting period is a calendar year. For the 2021 report this will be 1.1.21 - 31.12.21
		51	Nova Sea has released a sustainability report annually via the company webpage since 2012 ("Sustainability report 2011-2020"). This year's report (Sustainability report 2021) will be the third to be in accordance with the GRI Standard.
		52	Calendar year. For the 2021 report this will be 1.1.21-31.12.21.
		53	Stian Berge Amble, Head of Feed and Sustainability, stian@novasea.no, +47 974 66 342
		54	i. This report has been prepared in accordance with the GRI Standards: Core option






Module	Section		Description
GRI 102   	Reporting Practice	55	<p>The reporting organization shall report the following information:</p> <ul style="list-style-type: none"> a. The GRI content Index can be found on pages 22-32 of the report b. All disclosures that were used are listed in the GRI content index i. The number for the disclosure reported is listed in the GRI content index ii. Where applicable, page numbers are given referencing other locations in the report where information can be found. iii. In the event of omissions, these have been described in the appropriate sections in the GRI content index.
		56	<ul style="list-style-type: none"> a. The report in its entirety will not be externally assured. We are positive to having this done in the future, but are realistic in what is feasible given that this is the second year we will be publishing in accordance with the GRI standard. b. Some data from the report will be externally assured via our GSI sustainability report (DNV/GL). A letter of assurance (from DNV/GL) is available upon request. i. A letter of assurance (from DNV/GL) is available upon request. ii. No conflicts of interest (externally assured) iii. External assurance of the GSI sustainability report was approved by the head of the quality department and the CEO



Module	Section	Requirements	Description
GRI 201   	Economic Performance	1	<p>. Numbers for 2021, all numbers in 1000 NOK</p> <p>i. 3 014 062</p> <p>ii. 2 219 304</p> <p>iii. 794 758</p> <p>b. N/A</p>
		2	<p>a. i-iv. Feed: Feed used in the production of our salmon consist primarily of soy, fish meal and fish oil. All three of these ingredients can be negatively affected by climate change. Higher temperatures leading to unfavorable conditions for either soy production or fish stocks would inevitably mean more scarcity and therefore higher production costs for farmers. Purchasing responsibly sourced soy (deforestation free) is a way to partially manage this risk, as soy farmed in deforested areas of the Amazon biome is a driver of climate change. Reducing our own GHG-emissions is a way to mediate the risk for the climate as a whole; however this needs to be a global effort.</p> <p>Extreme weather events: The IPCC has written extensively about the connection between anthropogenic driven climate change and an increase in extreme weather including droughts, floods, extreme sea levels, waves and the El Niño-Southern Oscillation among other events. While changes to El Niño have been discussed previously (regarding fish stocks and soy production), the other events are of more importance for local production on our farms. Extreme storms, with more than normal water levels and powerful waves, can lead to extensive damage to our sea cages or our smolt facilities (placed near sea level on the shore). Storm events can also lead to negative effects for fish health and welfare, increasing stress, injuries and even mortality in severe instances. Finally, stormy conditions at sea are a safety risk for our employees in what is already Norway's second most dangerous industry.</p> <p>Extreme droughts are not projected to be an issue in Norway (current climate modelling projects increases in precipitation), but localized events have happened previously (like the drier than average winter leading to water rationing in the Bergen area in 2010). Rationing or a lack of access to freshwater would have significant impacts on smolt production and could also inadvertently have impacts on access to electricity for our smolt facilities, processing facilities and feeding barges (the vast majority of electricity in Norway comes from hydroelectric power). More extreme weather could put pressure on the regulatory side of our production as well. There is already a regulatory push to move salmon farms out of the fjords and further from the coast to avoid area and possible environmental conflicts. Stronger than average weather conditions might have the opposite effect and require the placement of farms in more sheltered areas along the coast.</p> <p>Source: Seneviratne, S.I., N. Nicholls, D. Easterling, C.M. Goodess, S. Kanae, J. Kossin, Y. Luo, J. Marengo, K. McInnes, M. Rahimi, M. Reichstein, A. Sorteberg, C. Vera, and X. Zhang, 2012: Changes in climate extremes and their impacts on the natural physical environment. In: <i>Managing the Risks of Extreme Events and Disasters to Advance Climate Change Adaptation</i> [Field, C.B., V. Barros, T.F. Stocker, D. Qin, D.J. Dokken, K.L. Ebi, M.D. Mastrandrea, K.J. Mach, G.-K. Plattner, S.K. Allen, M. Tignor, and P.M. Midgley (eds.)]. A Special Report of Working Groups I and II of the Intergovernmental Panel on Climate Change (IPCC). Cambridge University Press, Cambridge, UK, and New York, NY, USA, pp. 109-230.</p> <p>Increased sea temperatures: The recently completed project Climefish looked at climate modelling coupled with production data from farms for different types of aquaculture (we were a stakeholder in the project and provided data from our farms for the NE Atlantic salmon study). The results from the project showed increases in production in the more northern areas of Norway (in area 8 where our farms are located for example) on account of increases in sea temperature leading to more favorable conditions for farming. However, reflection is given in the study to other effects of warming temperatures (increases in disease, increases in sea lice outbreaks), and when these are taken into account (reductions in feeding due to illness, loss of feeding due to de-licing operations) any hypothetical gains in production due to warmer sea temperatures are lost. Increases in sea temperatures would therefore have a hypothetical net-neutral impact for our farms. During 2020 we decided to actively contribute in a project that builds on the Climefish project to produce knowledge regarding fish health and the effects by climate change (the project is called Insight and is EU funded).</p> <p>Source: https://climefish.eu/</p> <p>Regulation: Apart from the previously mentioned hypotheticals regarding regulation and spatial planning, the majority of risks associated with regulatory issues resulting from climate change are related to GHG-emissions and costs of purchased electricity or diesel. A carbon tax on GHG emissions from our company could have significant economic consequences. Likewise, increased taxes on diesel or electricity coming from non-renewable sources could lead to a significant surge in production costs. We are attempting to mitigate these consequences through our Energy management group, which is tasked with collecting detailed data on GHG-emissions and fuel use and the creation of concrete goals to reduce consumption and emissions on a company-wide basis.</p> <p>v. We have not yet calculated the costs of management / risk planning related to climate change. But are planning to pursue risk assessments related to climate change in the years to come.</p>

Module	Section	Requirements	Description
GRI 204 	Procurement Practices	1	The reporting organization shall report the following information: a. 68,0 % b. Suppliers with legal address in Nordland county. c. All Nova Sea fish farming locations, including Head office and processing facility on Lovund. Incorporate sales are excluded.
GRI 301  	Materials	1	a. Total weight or volume of materials that are used to produce and package the organization's primary products and services during the reporting period, by: i. 56 394 060 kg product in styropor packaging, 266 616 kg product packed in cardboard packaging. ii. 0 kg
		2	a. 100% virgin materials used in processing of isopor containers, meaning 0% of recycled input materials.
		3	a. We reclaim 0% from customers. Waste disposal is their responsibility. Questionnaire that was sent to European customers in 2020 revealed that Styropor packaging was recycled. We are currently looking at other packaging options. b. Data for 301-1 collected from internal accounting systems, 301-2 through conversations with our supplier (Atlantic Styro).
GRI 302  	Energy	1	See section Energy use and CO2 Emissions, pages 11.
		2	a. Energy consumption outside of the organization, in joules or multiples. b. We base our reporting on a production approach, trying to include all factors contributing to the fish produced all the way from hatching throughout the production until the factory gate (loading for transport to customer). This covers energy consumption from: Hatchery/Smolt (Controlled by Nova Sea), Wellboat (Nova Sea is shareholder) Service wessels, (controlled by Nova Sea), Sea production (owned by Nova Sea) and Industry (owned by Nova Sea) c. Included in our energy leadership report, available upon request.
		3	a. Energy intensity ratio for the organization. b. This is reported via quarterly reporting. The energy intensity ratios reported are from electricity and diesel. The following energy intensity ratios are calculated: Energy use per produced ton (GJ / ton LWE produced farms and smolt) Processing facilities (LWE processed total) Farms (LWE produced) Wellboats (lwe produced) Smolt (LWE produced) Service boats (LWE produced) External service (LWE produced) c. Electricity use and diesel d. Takes into account energy use for Scope 1 and 2.
		4	a. Reductions shown is included Energy and climate report for 2021. b. Electricity and diesel c. 2019 is the basis year for 2021 reports (Scope 1 and 2) d. Included in our energy management report, available upon request.

Module	Section	Require-ments	Description
<div><div><div>GRI 304</div><div><div>14</div><div>LIFE BELOW WATER</div><div></div></div><div><div>15</div><div>LIFE ON LAND</div><div></div></div></div></div>	Biodiversity	2	<p>i. N/A</p> <p>ii. Effluent from farming operations, followed up via sediment testing (MOM B, MOM C, ASC). Release of parasiticides to the environment, followed up via sediment testing.</p> <p>iii. Sea lice numbers monitored on farms, reported on the company website for ASC farms and for all farms on "Barentswatch". We only produce salmon, naturally occurring species. Pathogens monitored on farms, OIE – related illnesses reported by the Food Safety Authority (Mattilsynet) and on the company webpage for ASC farms.</p> <p>iv. Predator interactions are logged on all farms. Reporting of these on company webpage for ASC farms.</p> <p>v. N/A</p> <p>vi. N/A</p> <p>i. Many species affected positively by the farms (regarding input of feed and nutrients). Negatively affected species are some local benthic organisms (followed up via sediment testing), individuals in predator interactions (limited, local), speculative effects on wild salmon populations (followed up via research projects and risk assessments).</p> <p>ii. Very localized (<1 km from the farms). Described on many farms via AZE modelling / MOM C models.</p> <p>iii. Limited. Farms follow at a minimum of two months between production cycles, and longer at farms where sediment testing shows it is necessary.</p> <p>iv. All our farms can be removed in their entirety and any effected local areas will return to their natural state in a short period of time.</p>
		4	<p>a. Total number of IUCN Red List species and national conservation list species with habitats in areas affected by the operations of the organization, by level of extinction risk:</p> <p>i. 0</p> <p>ii. 0</p> <p>iii. 7</p> <p>iv. 13</p> <p>v. 5</p>
<div><div><div>GRI 305</div><div><div>3</div><div>GOOD HEALTH AND WELL-BEING</div><div></div></div><div><div>12</div><div>RESPONSIBLE CONSUMPTION AND PRODUCTION</div><div></div></div><div><div>13</div><div>CLIMATE ACTION</div><div></div></div><div><div>14</div><div>LIFE BELOW WATER</div><div></div></div><div><div>15</div><div>LIFE ON LAND</div><div></div></div></div></div>	Emissions	1	<p>a. Gross direct (Scope 1) GHG emissions in metric tons of CO2 equivalent.</p> <p>b. Only CO2 equivalents</p> <p>c. Biogenic CO2 emissions in metric tons of CO2 equivalent is not included. System in development through the GSI initiative.</p> <p>d. 2019 (scope 1 and 2), 2020 (Scope 3)</p> <p>i. The year we began with our wellboat Steinar Olaisen (a major CO2 emitter) and including external service vessels as well as many other Scope 3 contributions (like feed).</p> <p>ii. Emissions in the base year; 2019: 21 505 tons CO2eq (Scope 1 and 2) and 2020: 242 304 tons CO2eq (Scope 3).</p> <p>iii. We have well established factors for Scope 1 and 2. Scope 3 emission factors are under development (feed and transport to customer is covered).</p> <p>e. Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source.</p> <p>f. Operational control.</p> <p>g. Standards, methodologies, assumptions, and/or calculation tools used</p>

Module	Section	Require- ments	Description
GRI 305     	Emissions	2	a. Gross market-based energy indirect (Scope 2) GHG emissions in metric tons of CO2 equivalent.
			b. If applicable, gross market-based energy indirect (Scope 2) GHG emissions in metric tons of CO2 equivalent.
			c. CO2
			d. 2019
			i. The year we adjusted production contribution for smolt (77%)
			ii. Emissions in the base year; 11 941
			iii. N/A: Emissions factors in place for Scope 2. Adjusted to NVE guidelines (market approach).
			e. Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source.
			f. Operational control.
			g. Standards, methodologies, assumptions, and/or calculation tools used
		4	a. CO2 emissions (kg) per kg produced (CO2-eqv / kg lwe produced sea and smolt)
			b. kg lwe produced sea and smolt
			c. Scope 1, 2 and 3
			d. Gases as CO2eq based on emission factors
GRI 306   	Effluent and Waste	2	See section Waste Management page 12 and 13.
		3	a. 0 in 2021
		b. N/A	
			i.N/A
			ii. N/A
			iii. N/A
			c. N/A
GRI 307    	Environmental Compliance	1	a. 0 in 2021
			i. N/A
			ii. N/A
			iii. N/A
			b.The organization has not identified any non-compliance with environmental laws and/or regulations.

Module	Section	Requirements	Description
<div>GRI 403</div> <div></div> <div></div>	Occupational Health and Safety	1	<p>a. Nova Sea uses Landax as an occupational quality / HSE system. We also use Meng with is a comparable system for our boats. The quality / HSE system is implemented to ensure that our employees health and safety is cared for, as well as the environment and other materials. Landax contains a number of modules for planning, a document library, detailed archives per farm, etc. It also contains a deviance system where non-compliances can be followed up, and a system for risk assessments (previously mentioned under 102-11 describing our application of the precautionary principle.</p> <p>i. Norwegian law stipulates that each organization is responsible for the planning and implementation of self-monitoring within the organization, and that this is done in cooperation with employees and their representatives. Organizations are allowed to define the scope of self-monitoring and the way in which these systems are planned and implemented.</p> <p>ii. The system for dealing with non-compliances within Landax is used to actively improve risk management. The risk points are updated and adjusted based on reported non-compliances, and the dialogue / work done by various representatives from each department as well as other employee representatives. This system is based on the requirements in ISO 31 000.</p> <p>b. Employees are involved in annual local risk assessments (HSE, environment, fish health, etc.). Risk assessments are carried out for new and unknown activities (SJA). All departments and employees are covered by the risk assessments.</p>
		2	<p>a. Nova Sea has developed a methodology for risk assessments which describes our approach to the subject. This can be found within our quality / HSE system and is available on request.</p> <p>i. The document “methodology for risk assessments” is regularly updated. Risk assessments are updated annually. The HSE advisor for Nova Sea creates new risk assessments together with the HSE risk team.</p> <p>ii. Risks are classified as low, medium and high via risk evaluations. We work following the ALARP principle and attempt where possible to reduce “red” risks down to an acceptable level.</p> <p>b. Our employees have received training in how to register non-compliances, how to carry out root-analysis on them and how to treat / prevent them. Our company policies dictate that employees cannot be reprimanded for registering non-compliances.</p> <p>c. HSE courses are carried out annually. An important point that is reiterated in the HSE courses that are carried out annually is the ability that all employees or their supervisors have to stop any work operation at any time when it is judged to be unsafe. This is also named in the risk assessments that are carried out prior to any critical work operations. This shows partially the duty of contribution that each employee has according to Norwegian law regarding self-monitoring (internkontrollforskriften). Employees will not be reprimanded if work operations are stopped due to HSE concerns.</p> <p>d. Adverse events leading to absenteeism are investigated. An investigation team is established consisting of the HSE advisor, the relevant manager, safety delegates and the employees that were involved. An investigation report is written. The report includes a timeline of events, root cause, corrective action and lessons to be learned from the incident. This is attached to the non-conformity and distributed to the other employees in the organization so that the organization as a whole can learn from the incident.</p>
		3	<p>a. Nova Sea is affiliated with the corporate health service Stamina Health Department Helgeland (Stamina Helse bedriftshelsetjenesten avd. Helgeland). The HSE service is consulted during processes in the business resulting in changes that involve risk. As an example, the occupational health service was included in cases where line tails (equipment) were to be introduced on our boats. Occupational health services have also participated in, for example, planning measures against the Corona virus outbreak that is currently underway in 2021. All employees are informed about the occupational health service and how they can be reached via HSE courses and the personnel handbook.</p>
<div>GRI 405</div> <div></div> <div></div> <div></div>	Diversity and Equal Opportunity	1	<p>The reporting organization shall report the following information:</p> <p>a. Board of directors</p> <p>i. 7 men and 3 women</p> <p>ii. 1 persons < 30 years , 6 persons 30-50 years , 3 persons >50 years</p> <p>iii. N/A</p> <p>b. Employees</p> <p>i. 70 % men, 30 % women</p> <p>ii. 30 % < 30 yeras , 45 % 30-50 years and 25 % > 50 years</p> <p>iii. N/A</p>

Module	Section	Requirements	Description
GRI 413 	Local Communities	1	<p>The reporting organization shall report the following information:</p> <ul style="list-style-type: none"> i. Not carried out. ii. Sediment testing at farms, projects for monitoring of wild salmon / trout (145, 198), MON project (165) iii. All of our most recent sediment tests (MOM B, C, ASC) are on the company webpage. Lice data, predator interactions, disease outbreaks, escape data etc. is available for all ASC farms on the company webpage (>70% of our production). Working with web developers to expand this even more to include other environmental and testing data (O2, information about red-listed species, results from research in the area regarding wild salmon, etc.) iv. Involved in a number of sponsorship programs for athletes, NGOs, youth clubs, etc. v. Local meetings annually in every community where we have farms or other operations (smolt production, etc.) vi. Indigenous representatives invited to meetings. vii. We have an HSE representative in the company, workers unions, etc. These are not involved in environmental impacts specifically, more via risk assessment teams. viii. We have a procedure which describes our approach.
GRI 419 	Socioeconomic Compliance		<p>The reporting organization shall report the following information:</p> <ul style="list-style-type: none"> a. Significant fines and non-monetary sanctions for non-compliance with laws and/or regulations in the social and economic area in terms of: <ul style="list-style-type: none"> i. 0 NOK ii. 0 iii. 0 b. N/A c. No fines received.

GRI Standard description

(Appendix 1)

102: General Disclosures

1. Organizational profile

These disclosures provide an overview of an organization's size, geographic location, and activities. This contextual information is important to help stakeholders understand the nature of the organization and its economic, environmental and social impacts.

Disclosure 102-1 Name of the organization

The reporting organization shall report the following information:

- a. Name of the organization.

Disclosure 102-2 Activities, brands, products, and services

The reporting organization shall report the following information:

- a. A description of the organization's activities.
- b. Primary brands, products, and services, including an explanation of any products or services that are banned in certain markets.

Disclosure 102-3 Location of headquarters

The reporting organization shall report the following information:

- a. Location of the organization's headquarters.

Disclosure 102-4 Location of operations

The reporting organization shall report the following information:

- a. Number of countries where the organization operates, and the names of countries where it has significant operations and/or that are relevant to the topics covered in the report.

Disclosure 102-5 Ownership and legal form

The reporting organization shall report the following information:

- a. Nature of ownership and legal form.

Disclosure 102-6 Markets served

The reporting organization shall report the following information:

- a. Markets served, including:
 - i. geographic locations where products and services are offered;
 - ii. sectors served;
 - iii. types of customers and beneficiaries.

Disclosure 102-7 Scale of the organization

The reporting organization shall report the following information:

- a. Scale of the organization, including:
 - i. total number of employees;
 - ii. total number of operations;
 - iii. net sales (for private sector organizations) or net revenues (for public sector organizations); iv. total capitalization (for private sector organizations) broken down in terms of debt and equity;
 - v. quantity of products or services provided.

Disclosure 102-8 Information on employees and other workers

- a. Total number of employees by employment contract (permanent and temporary), by gender.
- b. Total number of employees by employment contract (permanent and temporary), by region.
- c. Total number of employees by employment type (full-time and part-time), by gender.

d. Whether a significant portion of the organization's activities are performed by workers who are not employees. If applicable, a description of the nature and scale of work performed by workers who are not employees.

e. Any significant variations in the numbers reported in Disclosures 102-8-a, 102-8-b, and 102-8-c (such as seasonal variations in the tourism or agricultural industries).

f. An explanation of how the data have been compiled, including any assumptions made.

Disclosure 102-9 Supply chain

The reporting organization shall report the following information:

- a. A description of the organization's supply chain, including its main elements as they relate to the organization's activities, primary brands, products, and services.

Disclosure 102-10 Significant changes to the organization and its supply chain

The reporting organization shall report the following information:

a. Significant changes to the organization's size, structure, ownership, or supply chain, including:

- i. Changes in the location of, or changes in, operations, including facility openings, closings, and expansions;
- ii. Changes in the share capital structure and other capital formation, maintenance, and alteration operations (for private sector organizations);
- iii. Changes in the location of suppliers, the structure of the supply chain, or relationships with suppliers, including selection and termination.

Disclosure 102-11 Precautionary

Principle or approach

The reporting organization shall report the following information:

- a. Whether and how the organization applies the Precautionary Principle or approach.

Disclosure 102-12 External initiatives

The reporting organization shall report the following information:

- a. A list of externally-developed economic, environmental and social charters, principles, or other initiatives to which the organization subscribes, or which it endorses.

Disclosure 102-13 Membership of associations

The reporting organization shall report the following information:

- a. A list of the main memberships of industry or other associations, and national or international advocacy organizations.

2. Strategy

Disclosure 102-14 Statement from senior decision-maker

The reporting organization shall report the following information:

- a. A statement from the most senior decision-maker of the organization (such as CEO, chair, or equivalent senior position) about the relevance of sustainability to the organization and its strategy for addressing sustainability.

3. Ethics and integrity

Disclosure 102-16 Values, principles, standards, and norms of behavior

The reporting organization shall report the following information:

- a. A description of the organization's values, principles, standards, and norms of behavior.

4. Governance

Disclosure 102-18 Governance structure

The reporting organization shall report the following information:

- a. Governance structure of the organization, including committees of the highest governance body.
- b. Committees responsible for decision-making on economic, environmental, and social topics.

5. Stakeholder engagement

Disclosure 102-40 List of stakeholder groups

The reporting organization shall report the following information:

- a. A list of stakeholder groups engaged by the organization.

Disclosure 102-41 Collective bargaining agreements

The reporting organization shall report the following information:

- a. Percentage of total employees covered by collective bargaining agreements.

Disclosure 102-42 Identifying and selecting stakeholders

The reporting organization shall report the following information:

- a. The basis for identifying and selecting stakeholders with whom to engage.

Disclosure 102-43 Approach to stakeholder engagement

The reporting organization shall report the following information:

- a. The organization's approach to stakeholder engagement, including frequency of engagement by type and by stakeholder group, and an indication of whether any of the engagement was undertaken specifically as part of the report preparation process.

Disclosure 102-44 Key topics and concerns raised

The reporting organization shall report the following information:

- a. Key topics and concerns that have been raised through stakeholder engagement, including:
 - i. how the organization has responded to those key topics and concerns, including through its reporting;
 - ii. the stakeholder groups that raised each of the key topics and concerns.

6. Reporting practice

Disclosure 102-45 Entities included in the consolidated financial statements

The reporting organization shall report the following information:

- a. A list of all entities included in the organization's consolidated financial statements or equivalent documents.
- b. Whether any entity included in the organization's consolidated financial statements or equivalent documents is not covered by the report.

Disclosure 102-46 Defining report content and topic Boundaries

The reporting organization shall report the following information:

- a. An explanation of the process for defining the report content and the topic Boundaries.
- b. An explanation of how the organization has implemented the Reporting Principles for defining report content.

Disclosure 102-47 List of material topics

The reporting organization shall report the following information:

- a. A list of the material topics identified in the process for defining report content.

Disclosure 102-48 Restatements of information

The reporting organization shall report the following information:

- a. The effect of any restatements of information given in previous reports, and the reasons for such restatements.

Disclosure 102-49 Changes in reporting

The reporting organization shall report the following information:

- a. Significant changes from previous reporting periods in the list of material topics and topic Boundaries.

Disclosure 102-50 Reporting period

The reporting organization shall report the following information:

- a. Reporting period for the information provided.

Disclosure 102-51 Date of most recent report

The reporting organization shall report the following information:

- a. If applicable, the date of the most recent previous report.

Disclosure 102-52 Reporting cycle

The reporting organization shall report the following information:

- a. Reporting cycle.

Disclosure 102-53 Contact point for questions regarding the report

The reporting organization shall report the following information:

- a. The contact point for questions regarding the report or its contents.

Disclosure 102-54 Claims of reporting in accordance with the GRI Standards

The reporting organization shall report the following information:

- a. The claim made by the organization, if it has prepared a report in accordance with the GRI Standards, either:

- i. 'This report has been prepared in accordance with the GRI Standards: Core option';
- ii. 'This report has been prepared in accordance with the GRI Standards: Comprehensive option'.

Disclosure 102-55 GRI content index

The reporting organization shall report the following information:

- a. The GRI content index, which specifies each of the GRI Standards used and lists all disclosures included in the report.
- b. For each disclosure, the content index shall include:
 - i. the number of the disclosure (for disclosures covered by the GRI Standards);
 - ii. the page number(s) or URL(s) where the information can be found, either within the report or in other published materials;
 - iii. if applicable, and where permitted, the reason(s) for omission when a required disclosure cannot be made.

Disclosure 102-56 External assurance

The reporting organization shall report the following information:

- a. A description of the organization's policy and current practice with regard to seeking external assurance for the report.
- b. If the report has been externally assured:
 - i. A reference to the external assurance report, statements, or opinions. If not included in the assurance report accompanying the sustainability report, a description of what has and what has not been assured and on what basis, including the assurance standards used, the level of assurance obtained, and any limitations of the assurance process;
 - ii. The relationship between the organization and the assurance provider;
 - iii. Whether and how the highest governance body or senior executives are involved in seeking external assurance for the organization's sustainability report.

GRI 201: Economic Performance

Disclosure 201-1 Direct economic value generated and distributed

The reporting organization shall report the following information:

- a. Direct economic value generated and distributed (EVG&D) on

an accruals basis, including the basic components for the organization's global operations as listed below. If data are presented on a cash basis, report the justification for this decision in addition to reporting the following basic components:

- i. Direct economic value generated: revenues;
 - ii. Economic value distributed: operating costs, employee wages and benefits, payments to providers of capital, payments to government by country, and community investments;
 - iii. Economic value retained: 'direct economic value generated' less 'economic value distributed'.
- b. Where significant, report EVG&D separately at country, regional, or market levels, and the criteria used for defining significance.

Disclosure 201-2 Financial implications and other risks and opportunities due to climate change

The reporting organization shall report the following information:

a. Risks and opportunities posed by climate change that have the potential to generate substantive changes in operations, revenue, or expenditure, including:

- i. a description of the risk or opportunity and its classification as either physical, regulatory, or other;
- ii. a description of the impact associated with the risk or opportunity;
- iii. The financial implications of the risk or opportunity before action is taken;
- iv. the methods used to manage the risk or opportunity;
- v. the costs of actions taken to manage the risk or opportunity.

GRI 204: Procurement Practices

Disclosure 204-1 Proportion of spending on local suppliers

The reporting organization shall report the following information:

- a. Percentage of the procurement budget used for significant locations of operation that is spent on suppliers local to that operation (such as percentage of products and services purchased locally).
- b. The organization's geographical definition of 'local'.
- c. The definition used for 'significant locations of operation'.

GRI 301: Materials

Disclosure 301-1 Materials used by weight or volume

The reporting organization shall report the following information:

a. Total weight or volume of materials that are used to produce and package the organization's primary products and services during the reporting period, by:

- i. non-renewable materials used;
- ii. renewable materials used.

Disclosure 301-2 Recycled input materials used

The reporting organization shall report the following information:

a. Percentage of recycled input materials used to manufacture the organization's primary products and services.

Disclosure 301-3 Reclaimed products and their packaging materials

The reporting organization shall report the following information:

- a. Percentage of reclaimed products and their packaging materials for each product category.
- b. How the data for this disclosure have been collected.

GRI 302: Energy

Disclosure 302-1 Energy consumption within the organization

The reporting organization shall report the following information:

- a. Total fuel consumption within the organization from non-renewable sources, in joules or multiples, and including fuel types used.
- b. Total fuel consumption within the organization from renewable sources, in joules or multiples, and including fuel types used.
- c. In joules, watt-hours or multiples, the total:

- i. electricity consumption
- ii. heating consumption
- iii. cooling consumption
- iv. steam consumption
- d. In joules, watt-hours or multiples, the total:
- i. electricity sold
- ii. heating sold
- iii. cooling sold
- iv. steam sold

- e. Total energy consumption within the organization, in joules or multiples.
- f. Standards, methodologies, assumptions, and/or calculation tools used.
- g. Source of the conversion factors used.

Disclosure 302-2 Energy consumption outside of the organization

The reporting organization shall report the following information:

- a. Energy consumption outside of the organization, in joules or multiples.
- b. Standards, methodologies, assumptions, and/or calculation tools used.
- c. Source of the conversion factors used.

Disclosure 302-3 Energy intensity

The reporting organization shall report the following information:

- a. Energy intensity ratio for the organization.
- b. Organization-specific metric (the denominator) chosen to calculate the ratio.
- c. Types of energy included in the intensity ratio; whether fuel, electricity, heating, cooling, steam, or all.
- d. Whether the ratio uses energy consumption within the organization, outside of it, or both.

Disclosure 302-4 Reduction of energy consumption

The reporting organization shall report the following information:

- a. Amount of reductions in energy consumption achieved as a direct result of conservation and efficiency initiatives, in joules or multiples.
- b. Types of energy included in the reductions; whether fuel, electricity, heating, cooling, steam, or all.
- c. Basis for calculating reductions in energy consumption, such as base year or baseline, including the rationale for choosing it.
- d. Standards, methodologies, assumptions, and/or calculation tools used.

GRI 304: Biodiversity

Disclosure 304-2 Significant impacts of activities, products, and services on biodiversity

The reporting organization shall report the following information:

a. Nature of significant direct and indirect impacts on biodiversity with reference to one or more of the following:

- i. Construction or use of manufacturing plants, mines, and transport infrastructure;
- ii. Pollution (introduction of substances that do not naturally occur in the habitat from point and non-point sources);
- iii. Introduction of invasive species, pests, and pathogens;
- iv. Reduction of species;
- v. Habitat conversion;
- vi. Changes in ecological processes outside the natural range of variation (such as salinity or changes in groundwater level).

- b. Significant direct and indirect positive and negative impacts with reference to the following:

- i. Species affected;
- ii. Extent of areas impacted;
- iii. Duration of impacts;
- iv. Reversibility or irreversibility of the impacts.

Disclosure 304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations

The reporting organization shall report the following information:

- a. Total number of IUCN Red List species and national conservation list species with habitats in areas affected by the operations of the organization, by level of extinction risk:
 - i. Critically endangered
 - ii. Endangered
 - iii. Vulnerable
 - iv. Near threatened
 - v. Least concern

GRI 305: Emissions

Disclosure 305-1 Direct (Scope 1)

GHG emissions

The reporting organization shall report the following information:

- a. Gross direct (Scope 1) GHG emissions in metric tons of CO₂ equivalent.
- b. Gases included in the calculation; whether CO₂, CH₄, N₂O, HFCs, PFCs, SF₆, NF₃, or all.
- c. Biogenic CO₂ emissions in metric tons of CO₂ equivalent.
- d. Base year for the calculation, if applicable, including:
 - i. the rationale for choosing it;
 - ii. emissions in the base year;
 - iii. the context for any significant changes in emissions that triggered recalculations of base year emissions.
- e. Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source.
- f. Consolidation approach for emissions; whether equity share, financial control, or operational control.
- g. Standards, methodologies, assumptions, and/or calculation tools used.

Disclosure 305-2 Energy indirect (Scope 2) GHG emissions

The reporting organization shall report the following information:

- a. Gross location-based energy indirect (Scope 2) GHG emissions in metric tons of CO₂ equivalent.
- b. If applicable, gross market-based energy indirect (Scope 2) GHG emissions in metric tons of CO₂ equivalent.
- c. If available, the gases included in the calculation; whether CO₂, CH₄, N₂O, HFCs, PFCs, SF₆, NF₃, or all.
- d. Base year for the calculation, if applicable, including:
 - i. the rationale for choosing it;
 - ii. emissions in the base year;
 - iii. the context for any significant changes in emissions that triggered recalculations of base year emissions.
- e. Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source.
- f. Consolidation approach for emissions; whether equity share, financial control, or operational control.
- g. Standards, methodologies, assumptions, and/or calculation tools used.

Disclosure 305-4 GHG emissions intensity

The reporting organization shall report the following information:

- a. GHG emissions intensity ratio for the organization.
- b. Organization-specific metric (the denominator) chosen to calculate the ratio.
- c. Types of GHG emissions included in the intensity ratio; whether direct (Scope 1), energy indirect (Scope 2), and/or other indirect (Scope 3).
- d. Gases included in the calculation; whether CO₂, CH₄, N₂O, HFCs, PFCs, SF₆, NF₃, or all.

GRI 306: Effluents and Waste Disclosure 306-2 Waste by type and disposal method

The reporting organization shall report the following information:

- a. Total weight of hazardous waste, with a breakdown by the following disposal methods where applicable:
 - i. Reuse
 - ii. Recycling
 - iii. Composting
 - iv. Recovery, including energy recovery
 - v. Incineration (mass burn)
 - vi. Deep well injection
 - vii. Landfill
 - viii. On-site storage
 - ix. Other (to be specified by the organization)
- b. Total weight of non-hazardous waste, with a breakdown by the following disposal methods where applicable:
 - i. Reuse
 - ii. Recycling
 - iii. Composting
 - iv. Recovery, including energy recovery
 - v. Incineration (mass burn)
 - vi. Deep well injection
 - vii. Landfill
 - viii. On-site storage
 - ix. Other (to be specified by the organization)
- c. How the waste disposal method has been determined:
 - i. Disposed of directly by the organization, or otherwise directly confirmed
 - ii. Information provided by the waste disposal contractor
 - iii. Organizational defaults of the waste disposal contractor

Disclosure 306-3 Significant spills

The reporting organization shall report the following information:

- a. Total number and total volume of recorded significant spills.
- b. The following additional information for each spill that was reported in the organization's financial statements:
 - i. Location of spill;
 - ii. Volume of spill;
 - iii. Material of spill, categorized by: oil spills (soil or water surfaces), fuel spills (soil or water surfaces), spills of wastes (soil or water surfaces), spills of chemicals (mostly soil or water surfaces), and other (to be specified by the organization).
- c. Impacts of significant spills.

GRI 307: Environmental Compliance

Disclosure 307-1 Non-compliance with environmental laws and regulations

The reporting organization shall report the following information:

- a. Significant fines and non-monetary sanctions for non-compliance with environmental laws and/or regulations in terms of:
 - i. total monetary value of significant fines;
 - ii. total number of non-monetary sanctions;
 - iii. Cases brought through dispute resolution mechanisms.
- b. If the organization has not identified any non-compliance with environmental laws and/or regulations, a brief statement of this fact is sufficient.

GRI 403: Occupational Health and Safety

1. Management approach disclosures

Disclosure 403-1 Occupational health and safety management system

The reporting organization shall report the following information for employees and for workers who are not employees but whose work and/or workplace is controlled by the organization:

- a. A statement of whether an occupational health and safety man-

agement system has been implemented, including whether:

- i. the system has been implemented because of legal requirements and, if so, a list of the requirements;
 - ii. the system has been implemented based on recognized risk management and/or management system standards/guidelines and, if so, a list of the standards/guidelines.
- b. A description of the scope of workers, activities, and workplaces covered by the occupational health and safety management system, and an explanation of whether and, if so, why any workers, activities, or workplaces are not covered.

Disclosure 403-2 Hazard identification, risk assessment, and incident investigation

The reporting organization shall report the following information for employees and for workers who are not employees but whose work and/or workplace is controlled by the organization:

- a. A description of the processes used to identify work-related hazards and assess risks on a routine and non-routine basis, and to apply the hierarchy of controls in order to eliminate hazards and minimize risks, including:
 - i. how the organization ensures the quality of these processes, including the competency of persons who carry them out;
 - ii. how the results of these processes are used to evaluate and continually improve the occupational health and safety management system.
- b. A description of the processes for workers to report work-related hazards and hazardous situations, and an explanation of how workers are protected against reprisals.
- c. A description of the policies and processes for workers to remove themselves from work situations that they believe could cause injury or ill health, and an explanation of how workers are protected against reprisals.
- d. A description of the processes used to investigate work-related incidents, including the processes to identify hazards and assess risks relating to the incidents, to determine corrective actions using the hierarchy of controls, and to determine improvements needed in the occupational health and safety management system.

Disclosure 403-3 Occupational health services

The reporting organization shall report the following information for employees and for workers who are not employees but whose work and/or workplace is controlled by the organization:

- a. A description of the occupational health services' functions that contribute to the identification and elimination of hazards and minimization of risks, and an explanation of how the organization ensures the quality of these services and facilitates workers' access to them.

GRI 405: Diversity and Equal Opportunity

Disclosure 405-1 Diversity of governance bodies and employees

The reporting organization shall report the following information:

- a. Percentage of individuals within the organization's governance bodies in each of the following diversity categories:
 - i. Gender;
 - ii. Age group: under 30 years old, 30-50 years old, over 50 years old;
 - iii. Other indicators of diversity where relevant (such as minority or vulnerable groups).
- b. Percentage of employees per employee category in each of the following diversity categories:
 - i. Gender;
 - ii. Age group: under 30 years old, 30-50 years old, over 50 years old;
 - iii. Other indicators of diversity where relevant (such as minority or vulnerable groups).

GRI 413: Local Communities

Disclosure 413-1 Operations with local community engagement, impact assessments, and development programs

The reporting organization shall report the following information:

- a. Percentage of operations with implemented local community engagement, impact assessments, and/or development programs, including the use of:
 - i. social impact assessments, including gender impact assessments, based on participatory processes;
 - ii. environmental impact assessments and ongoing monitoring;
 - iii. public disclosure of results of environmental and social impact assessments;
 - iv. local community development programs based on local communities' needs;
 - v. stakeholder engagement plans based on stakeholder mapping;
 - vi. broad based local community consultation committees and processes that include vulnerable groups;
 - vii. works councils, occupational health and safety committees and other worker representation bodies to deal with impacts;
 - viii. formal local community grievance processes.

GRI 419: Socioeconomic Compliance

Disclosure 419-1 Non-compliance with laws and regulations in the social and economic area

The reporting organization shall report the following information:

- a. Significant fines and non-monetary sanctions for non-compliance with laws and/or regulations in the social and economic area in terms of:
 - i. total monetary value of significant fines;
 - ii. total number of non-monetary sanctions;
 - iii. cases brought through dispute resolution mechanisms.
- b. If the organization has not identified any non-compliance with laws and/or regulations, a brief statement of this fact is sufficient.
- c. The context against which significant fines and non-monetary sanctions were incurred.

