

## Communication on Progress no. 009

**Participant:** Royal Danish Fish Group A/S

**Published:** 12-07-2021

**Time Period:** 2020-2021

**Format:** Stand-alone document – GC Active COP Template

**Differentiation Level:** This COP qualifies for the Global Compact Active level

### 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 ninth 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.

Our responsibilities are centered on four key areas of interest: **economic, philanthropic, legal, and ethical**. These areas are all integrally linked to our commitment to protect the environment, employees,

customers, and communities affected by our operations whilst maintaining compliance with applicable laws and government regulations.

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.

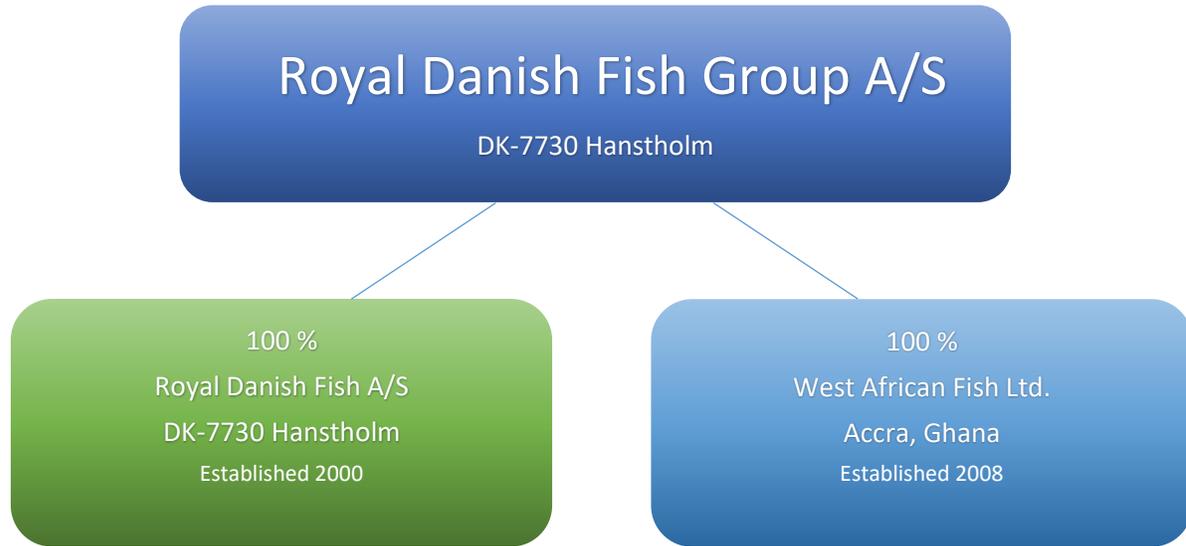
Enjoy reading our 2020-2021 report.

Sincerely yours



Mogens Mathiasen  
Chief Executive Officer  
Royal Danish Fish Group A/S

## The Company



## About the Companies

### Royal Danish Fish A/S (RDF)

- Our Aquaculture is among the world's largest recirculating land-based eel aquaculture plants
- 98% recirculation. Ample water supply and extraction allowance
- Certified ECO-Healthy (pre-organic) production
- (BEK nr 114 of 23/02/2004)
- Certified SES, Sustainable Eel Standard
- 1.000 tpy production
- CSR Strategy – 100 Award 2012

### West African Fish Ltd. (WAF)

- West African Fish Ltd. Breeds and raises Tilapia for the local market
- The Company were in commercial operation by the end of 2008
- Water supply is based on a clear river outlet
- No cold storage
- Distribution "ex works" as local and regional traders pick up themselves
- Demand > Supply in the region
- 4.000 tpy Tilapia production – potential 10.000 tpy
- Ghana Business Code member
- Fish farmer of the year 2011
- Confirmed awardee for the title of "The most innovative fish producing company of the year" by the Ghana Agriculture and Agro-Processing Awards Committee

## 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.



Our employees in Denmark are covered by one of the major national collective labour agreement (Danish Industry) which demand that we as employer follow certain rules. West African Fish 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 Ghana, we provide for documentations from our business partners that they do not use for example child labour. The CSR activities in Ghana are very different from Denmark due to the level difference between the two countries.



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 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.



Anti-corruption – 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.

## Key Activities in Ghana for 2020

---

- Expansion and continued modification and improvement of Secondary Nursery System to enable Heat Treatment of fry to generate an innate response via the production of Heat Shock Protein enzymes to combat ISKN Virus now introduced via illegal strain/stock introductions into the lake. Survival of fingerlings substantially improved as a result of this program.
- Continued use of Solar Panel plant on-site (Redavia Solar Power Company) to offset traditional electricity usage from the national grid and contribute towards a reduced environmental footprint.
- Closure of our on-site hatchery – land based, and lake based components, due to streamlining operations and reducing on site running costs, whilst also further reducing our environmental footprint. Fingerlings are now purchased from two external suppliers based elsewhere on the lake.
- Continued co-operation with chosen local charities and good causes; donation of clothes and educational supplies brought across from Denmark to the “Royal Promise Mission Foundation” in Anum-Asikuma.
- Confirmed awardee for the title of “The most innovative fish producing company of the year” by the Ghana Agriculture and Agro-Processing Awards Committee.



# 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

## Implementation

In Ghana, our company West African Fish 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.

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.

## Philanthropic Responsibility

- **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.

- **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.

- **Accommodation**

West African Fish will where possible house those employees on site who 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.

- **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.



- **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.

- **Investment in Security**

We have an economic responsibility to ourselves and to our employees and the wider community to protect our farm assets and workers from any potential threat.

- **Recruitment of security**

An external company will be deployed at all sites of operation; farm and marketplace to protect employees. A police guard will be employed for daily presence in the market armed to minimize threat from theft and violence providing direct reassurance to customers that we operate in a responsible manner. The company will invest in up to 15 external personnel for security purposes and contribute to housing, food, equipment and training to better safeguard our business and protect the community. To further promote enforcement, bonus schemes will incentivize security measures.

- **Breach of security**

Any theft or unauthorized access is communicated to the local chiefs and broadcast on community radio before police involvement to encourage community support to stop bad practices before lawful intervention is applied.

- **Storeroom policy**

All company items where possible will be under lock and key in a suitable storehouse operated by only two responsible personnel. All items will be signed in/out and logged in a store book. All

feed will be locked in a secure and watertight warehouse on site with a clear logging system for stock management.

- **Tracking stock**

All fish stock will be tracked leaving the farm verified personally by the farm Manager and verified by security at both the farm site and marketplace (both in Asikuma and Tema). This indirectly reassures customers of responsible product transport. Sale of stock will be cross-checked weekly against farm dispatch to ensure all stock is accounted for financially. All purchasing of raw materials will be logged and further verified at end of month file submissions.

### Community Project Development and relations

- **Cultural differences**

Management comprises both local and expat partners to combine expertise from different fields and also maintain a balance in strategies that can promote a sustainable business whilst maintaining respect for local cultures and traditions.



- **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.

- **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.



- **Income development**

Approximately 80% 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.

### 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 2020:

##### **Inclusion**

WAF continues to support a shared incentive bonus scheme to promote income development; 25% of the net sales of any catfish inside our harvest cages is allocated to the employees collectively. The balance of money raised goes towards the end of year staff Christmas packages in recognition of their hard work.

##### **Health & Safety**

All fire safety equipment was serviced and re-filled in August 2020 (Nationwide Fire Safety Limited)

Continue...

### **Activities 2020:**

Annual Renewal in August 2020 of our Workman Compensation Policy with Saham Insurance Ghana Ltd to safeguard employees and their family in the event of a serious accident in the workplace.

#### **Accommodation**

No additional accommodation facilities were constructed in 2020. On-going maintenance of facilities is undertaken, and purchases made where/when necessary. For example, additional investment in canteen cooking facilities (new fridge/freezer).

West African Fish continues to cover the full annual rental costs of our Assistant Sales Manager based at the Tema Outlet, and our two truck drivers based in Asikuma.

#### **Investment in Security**

No additional investment in security personnel other than the fact that we recruited an additional three team members to replace three individuals that either left or were dismissed.

In 2020 we did have a number of fish stock theft incidents which did require our company to formally report and make a theft case report with the Ghana Police Service, who undertook a formal investigation on the matter which did also involve formal interviews of some of our Security Personnel onsite.

#### **Health Promotion**

As per 2019, the Asuogyaman District Health team visited in July 2020 where the company paid 1210 ghc to test all employees including Management for typhoid, check blood pressure and body weight as a measure of general health.

Quarterly medical checks arranged for our divers at Akosombo Hospital; full examination of chest, ears, and back. Blood tests run to check for any water bourne diseases. All expenses and transport covered by WAF. The Divers play an important role in the company and we want to maintain their good Health & Fitness.

All NHIS registration renewed for all permanent workers completed 7<sup>th</sup> August 2020 (total cost 1160 ghc).

COVID-19 sensitization talks were held at regular intervals from March 2020 (continuing into 2021) to explain to staff the importance of general hygiene practises – hand washing, social distancing, improved sanitization measures and mask wearing. The Company made provisions for this – mask allocation to staff, Veronica Buckets for hand washing, socially distanced transport to site etc, in line with government protocols.

#### **Donations**

We continued to organize donations of clothing, educational items and toys from Denmark to Royal Promise Mission Foundation in Anum-Asikuma.



# 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

## 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.

## Legal and economic Responsibility

- **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.

West African Fish also welcomes all employee's to be members of a Union if they choose and wish to do so; currently around 50% of the employees are members of and thus affiliated to the General Agricultural Workers Union (GAWU).

- **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.



- **Creation of Jobs**

For investment to have a direct impact on the community, benefitting the families of each employee through increased disposable income and job security. WAF 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.

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

- **Investment in Training**

For training to not only focus on basic job description but also thorough knowledge and review of health and safety practices in the workplace.

Training also in collaboration with other institutions to ensure collective cooperation and knowledge transfer.

For some aspects of training to provide transferable skills that can be applied in other lifestyle practices e.g. net repair, which can be used in farming practices, safe hygiene practices, stock calculations and money management etc.

- **Child labour**

Strict policy on the use of child labour. No employee is recruited under the age of 18 years 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.

- **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.

- **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/Paternity 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 granted days off throughout pregnancy for routine scans and checkups.

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.

West African Fish has also put in place a paternity policy which will allow fathers a week off (paid leave) to attend to the birth of their child alongside their partner.

### **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 staff 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.

From a socio-economic point of view, WAF currently recruits +/- 76 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 ongoing maintenance and donation contributions.

With a high dependency on our company for both financial security, and provision of a staple & healthy protein source, any detrimental change to our operations would lend local communities vulnerable. Poverty alleviation and food security in often impoverished rural areas are thus key areas in which we believe we are making a positive contribution within the region.

## Activities 2020:

### **Workers Union**

Contract negotiations took place on the 1st of January 2020 extraordinarily. A 10% increase in salary/remuneration was agreed and a Memorandum of Understanding was drawn up and agreed upon between employee's, the worker's union body and company management. Current bonus schemes such as FCR bonus and the allocation of 65 kg's of were finalized (extended) and agreed upon.

### **Compliance with labour law**

At the end of 2019 the company agreed to a 10% pay increase to be valid for the balance of the 6 month current contract period as well as the following 12 month contract period (i.e. effective January 2020-June 2021 inclusive).

Continued non-obligatory help to our employees was maintained, the Union were satisfied with all criteria; no non-compliance issues raised. We further supplied 65kg catfish to each contract worker as part of their increment.

### **Creation of Jobs**

The investment in human capital for 2020 decreased by seven contract employees' due to the decision to close our hatchery facilities. Where possible we tried to re-assign staff in this department to other departments, but this was not possible in all instances. As a result, we chose not to renew the contracts of seven employees when their contracts came to an end in June 2020.

Employees	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020	2020-2021
No. Contract employee's male	49	63	71	85	92	68	63
No. Contract employee's female	12	13	15	12	13	10	8
No. Permanent workers	4	6	0	0	0	0	0
No. Casual workers male	9	6	12	12	3	4	4
No. Casual workers female (largely part time gutters)	5	6	8	10	5	0	1
No. Workers replaced due to disciplinary measures	1	n/a	2	1	0	0	3

Three employees were replaced in the 2020 calendar year. Two staff members chose to submit their resignation and/or left the company at their own choosing with no warning (abandonment of post).

One further member of staff had repeated disciplinary issues and the company chose to summarily dismiss him due to this situation.

Continue...

## Activities 2020:

### **Investment in Training**

In 2020 due to COVID-19 and limited/restricted travel opportunities, there were less activities to report as the farm functioned in a more 'closed manner' than previous years.

Our vaccination and Heat Treatment programs continued as per in 2019, with the notable exception of the introduction of a new vaccine trial in conjunction with Virbac and Aquavet Solutions to see if their vaccine product can improve survival rates in vaccinated fish against the diseases present currently in the Volta Lake.

Two diagnostic fish health reports/analyses were undertaken in collaboration with Virbac and Vet Eau, the latter alongside Raanan Fish Feed W/A Ltd.



## 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

### Implementation

Our **Danish** fish farm, Royal Danish Fish Aquaculture, is a recirculating onshore aquaculture facility where eels are farmed.

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 m<sup>3</sup> 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.



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.

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.

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

- Land Management: Soil erosion & Control
- Wildlife Habitat Management: Impact on native Flora/Fauna
- Waste Disposal Management: Non-biological/Biological waste

- Fish Health & Disease Management
- Water Quality Management
- Energy Consumption Management

### 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 to both the Water Resources Commission (WRC) and Environmental protection Agency (EPA) detailing the main operational activities for the previous year centered on water & waste management.

### Environmental Management

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

- **Supplement traditional electricity consumption through environmentally responsible means**

- The agreement and installation of a Redavia Solar Plant on-site during the first quarter of 2019 allows us to produce 10-15% of our power consumption needs from clean solar energy and thus reduce our environmental footprint; the only fish farm in Ghana to undertake a project of this scale to the best of our knowledge.



- **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 Water Resources Commission (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 2020:

##### **Environmental Management in Ghana**

Our annual environmental reports were submitted in 2020 for the period 2019 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. 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. No permit renewals (WRC/EPA) were undertaken as all are valid and current. The only renewals undertaken were the Fisheries Commission Aquatic Seed and Semi intensive/Intensive On-growing permits, which were duly renewed without any issues raised.

In 2019 we aimed to find a means to optimize energy consumption. We were approached by Redavia Solar Panel Company to make use of solar energy. Installation of Solar Panels were completed on-site in March 2019 to offset traditional electricity usage from the national grid and contribute towards a reduced environmental footprint. This energy saving cost strategy continued throughout 2020.

The decision to close our own hatchery facility in 2020 for the current time has further resulted in significant energy saving costs (25-30% reduction in electricity consumption) which has reduced our environmental footprint in a notable manner.



# Anti-Corruption Principles

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

## Implementation

Royal Danish Fish Group 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.

## Ethical Responsibility

It is our policy to strive where possible to operate in an ethical manner that goes beyond the minimum legal requirements.

- **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.

- **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.
- **Permits & Licensing**

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.
- **Site inspections**

Our company supports all official and regulated site visits required by law including audit reports, labour inspection and environmental regulating bodies. However, as a working farm, our policy requires that all site appointments are made in advance via email and telephone planning and that the CEO is present for all visits to allow daily operations to continue smoothly. Any non-compliance issues raised will be rectified as swiftly as possible.
- **Employee ethics**

To update employees regularly on performance and to be honest & transparent about target achievements where for example bonus payments are applicable.
- **Customer ethics and relations**

To be honest to customers regarding product quality and availability to better allow customers to make informed choices.

We recognize the right for Stakeholder participation. Regular meetings with key customers to provide feedback on our level of service is key to maintaining good relations and responding to popular demand if proposed initiatives can be incorporated in a socially and economically responsible manner.
- **Community requests**

Our policy is for all requests to be presented in writing with a clear outline of their objectives, target beneficiaries and specific requests. Only where projects are deemed appropriate and to the benefit of the community will be considered for any financial sponsorship. Furthermore, our policy is to encourage shared responsibility with a combined effort from community led sponsors and the private sector.
- **Operational ethics**
  - For all departmental activities to be transparent with a clear chain of command to ensure no single person can hide fraud or theft whether at basic level or managerial level.
  - For all hatchery operations to work with minimal chemical intervention and to promote animal welfare at all times on a moral basis.
  - To educate employees to protect their environment at work and at home; waste disposal, use of sanitary facilities, respect for wildlife etc. (all over and above any legal requirements). Respect

for Animal welfare with proper husbandry conditions whether in the workplace or at home is something we are very passionate about.

- Source raw materials from reputable suppliers who share our interest in responsible farming methods.

### Activities 2020:

#### **Permits & Licensing**

- Annual Administrative Stool land fees paid on 11<sup>th</sup> March 2020.
- Annual Business Operating Permit, Conveyance, and property rates paid on 5<sup>th</sup> February 2020.
- Land rent for grounds at new fish outlet in Tema (nr Southern Fried Chicken) paid on 27<sup>th</sup> February 2020 (annual rent).
- Annual permit for water use paid in full for 2019 valid for 3 years (until January 2022) commencing 1<sup>st</sup> January 2019. (dated 26/4/19)
- Business operating Permit for Tema outlet facility renewed 12<sup>th</sup> February 2020 annual permit.
- Environmental Sanitation permit for Tema outlet approved 12<sup>th</sup> February 2019, and again in March (18<sup>th</sup>) 2020 valid until the end of 2020
- Medical screening for employees Tema Outlet 2<sup>nd</sup> February 2019 and again in February 18<sup>th</sup> 2020 – valid until the end of 2020.
- Fire safety equipment servicing completed August 2020 (annual servicing).
- Feed Warehouse Certificate – not renewed in 2020 as no further feed imported at this time and FDA have not been to site to do permit renewal and/or inspection.
- Renewal of Resident & work Permits for expat Management 16<sup>th</sup> October 2018 – 3 year permits in place, expire September 2021.
- EPA permit for 8000 tons production per annum valid from February 2020 to February 2023.
- Fire Safety Certificate paid February 2018 – 2019/20 not renewed as we are awaiting a visit from the Fire Services Department.
- Fisheries Commission Semi intensive/intensive grow-out and Hatchery Permits – valid until July 2021.
- Water Resources Commission Permit – Valid January 2019 – December 2021 inclusive.

#### **Site inspections**

Asuogyaman District Assembly Health Inspection - The outcome of the site health inspection in 2020 was positive after the small improvements we were asked to make in 2019 were affected, and we renewed this permit without any issues/causes for concern/improvement in 2020.

Food & Drugs Board (FDA) - No feed has been imported in 2019-20 so this negates the need for the FDA permit renewal, which elapsed in 2018.

Continue...

Activities 2020:

**Customer relations**

For the period in question (2020) there have been no customer relation issues or complaints. WAF has welcomed visits from regulatory bodies – to include Immigration and the Ghana Police Service. Visits from other departments were lessened/restricted due to COVID-19 and also the fact that no regulatory/permit renewals were done with the notable exception of our Fisheries Commission permit – this is an annual renewal and this was done online/remotely; no physical site visit was made.

**Community Requests**

No additional requests were made other than small scale requests for local chief funerals, farmers day celebrations etc – which we contributed fish to in a selective manner.

