



Communication on Progress no. 005

Participant: Royal Danish Fish Group A/S

Published: 23-06-2017

Time Period: 2016-2017

Format: Stand-alone document – Basic 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 fourth Communication on Progress; we express again our intent to advance those principles within our sphere of influence. We are still committed in making the Global Compact and its principles part of the strategy, culture and day-to-day operations of our company Groups, and to engage in collaborative projects that advance the broader development goals of the United Nations, particularly the Millennium Development Goals. Royal Danish Fish Group A/S wants to make a clear statement of this commitment to our stakeholders and the general public.



Royal Danish Fish
- we make a living difference

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

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

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

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

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

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

Sincerely yours

Royal Danish Fish Group A/S

Mogens Mathiasen

Chief Executive Officer



Key Activities in Ghana for 2016

- Approval from EPA for activities in 2015 relating to best practice procedures on our farm to preserve our natural resource. (no non-compliance issues raised). New EPA Permit has been licensed until 2019.
- FDA (Food & Drugs Board) certified the feed warehouse on our farm 21st June 2016. We now have a registered and recognized feed storage facility for the importation and storage of all feed valid for 1 year.
- Improvement to banking facility for employees through the opening of new accounts with Anum Rural Bank in Asikuma; this streamlined salary payments and reception of cash by employees and provided a facility for loan applications for personal development.
- Completed construction of new building to house management accommodation, and a 4-bedroom guest apartment for guests, drivers and storage. Addition and modification of employee on-site accommodation.
- Complete refurbishment of existing building that was established 2008; new roof and complete re-painting.
- Hosted various government and external visits including the World Bank; assisted projects with the provision of data to look at water resource management.
- Hosted experts in the field of disease Management; paid for the bacteriological analysis of fish samples from our farm to contribute towards the overall study investigating the increasing mortality trend seen across all fish farms in Ghana.
- All employees enrolled onto a Workman's Compensation Insurance Policy; to safeguard employees and the employer against accidental injury in the workplace.



Human Rights Principles

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

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

Assessment, Policy and Goals

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

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

In Africa, we have introduced the following guidelines:

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



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

Implementation

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

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

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

Implementation of the above guidelines is as follows:

- **Non-discrimination**

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

- **Inclusion**

West African Fish believe that all employees should be actively involved in the progress of our operations. Regular meetings, notices and personal incentive schemes in recognition for hard work are all ways by which we work to include workers to be passionate about our vision.



- Harassment

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

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

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

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

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

Employees are recruited on a casual basis with a six-month review period; thereafter workers are made permanent with a view to offering a formal contract. A progress review is held after 3 months to give feedback on any improvements needed and training provided both through the employer and other colleagues in the department. Each employee is monitored for attendance in relation to; absenteeism or ill-health from which a "fitness for duty" rating is determined.



- **Income development**

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

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

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

Health promotion will focus directly on employees working at the site. Health information boards will be posted up in the office concerning basic hygiene, dangers of dehydration, as well as what to do in the event of an accident emergency in the workplace. Annual health visits will be supported for routine typhoid testing in association with the Asuogyaman District Assembly. All employees will be registered with a national health insurance card for use at prescribed clinics in the region.
- **Strategy for HIV/AIDS**

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

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



Measurement of outcomes

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

Activities 2016:

Inclusion:

WAF established a farm sale bonus scheme to both motivate and incentivize employees to be involved in income development. A 30% share of the net sales is allocated to the employees collectively for personal development. Furthermore, any catfish that are in our cages are sold. The money raised goes towards the end of year annual Christmas party and packages.

Security:

No further measures required since 2015. Current set up as per 2015 report still working effectively.

Accommodation:

No major changes made. Two new fridges were purchased; one for the security team and one for the new Assistant Hatchery Manager living on site. As the only female living on site, she received her own private bungalow with new bed, desk, fan, and company laptop & printer. We then refurbished the old guard tower and converted this into an extra bedroom to house the male Hatchery worker who now lives on site permanently.

Health & Safety:

- Following internal training with two employees on basic first aid scenarios we sent them on a formal First Aid in the Workplace course on 17th March 2016 (run through WARA – West African Rescue Association). This was a 1 day course run in Accra. Employees were issued a formal certificate each valid for 3 years. In 2017, we hope to send them on the advanced training course. This becomes more and more important as the number of employees increases to ensure we have the skills in place to best manage any first aid incidents. Whilst the course investment for only 2 employees is over 3500ghc, it is a worthy investment to ensure we are compliant with Safety Management in the workplace.
- All fire safety equipment was serviced and re-filled on 6th March 2016.

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Activities 2016:

- In 2016, WAF also enrolled every employee onto a WORKMANS INSURANCE POLICY. This policy protects all employees and the employer from any accident in the workplace. Any temporary disablement preventing an employee from working provides a means of financial compensation throughout the recovery period. In the event of a death, the immediate family is covered for their loss. Any major medical costs would also warrant financial support but is limited to their total annual earnings. Whilst this measure is in place as a safeguard, it is unlikely to ever come into effect given how closely we strive to protect our employees in the workplace.

Creation of Jobs:

As the company, has expanded, the investment in human capital has increased providing jobs to people principally from the surrounding local villages (Asikuma to Mpakadam), with only 7% recruited from as far afield as Ashaiman and Accra for 2016. New contract employees for 2016 increased by +/- 13%.

Employees	2015-2016	2016-2017
No. Contract employees' male	63	71
No. Contract employees' female	13	15
No. Permanent workers	6	0
No. Casual workers' male	6	12
No. Casual workers' female (largely part time gutters)	6	8
No. Workers replaced due to disciplinary measures	n/a	2

WAF have further taken on the responsibility of recruiting our own private security team following the resignation of contract from G4S, which would have seen 14 guards lose their positions and without any bind to re-post them to other locations. To safeguard their jobs and secure our premises with immediate effect, we have employed all 14 guards effective December 2016, provided new uniforms, and issued a formal contract to every individual. We see this as a long-term investment to promote company loyalty. This increases the male contract work base from 71 as detailed above to 85 males.

Business development:

All employees have been given an account with the newly opened Anum Rural Bank in Asikuma. WAF have provided support to employees by attesting to the bank a letter of reference for loan requests that may allow employees a facility by which to access money for personal business ventures.

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Activities 2016:

Donations:

A large container of clothing items was sent over from Denmark by our CEO; all items were shared to all employees including baby clothes that could be shared to their families in the town. WAF further visited the local Orphanage (Act 2, Collective Orphanage) to donate a toy play set for the children. In discussion, we agreed to organize a container of clothing and school items for the orphanage with a plan to deliver in early 2017. This will help to provide materials for their new school which is currently under construction.

Health Promotion:

- As per 2015, the Asuogyaman District Health team visited in March 2016 where the company paid 1345ghc to test all employees including Management for typhoid. No employee tested positive for typhoid. Results have been consistent now for three years despite the recruitment of additional employees.
- 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 borne 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.
- Health notices on hygiene were posted on the staff notice board following the ebola outbreak in West Africa. This has been expanded to include a notice policy on current advice for HIV/AIDS prevention & protection.
- All NHIS registration renewed for all permanent workers completed 19th June 2016.
- New Aprons and wellington boots purchased accessible for all employees to protect both skin and clothes. (part of on-going maintenance to replace old spoiled items).

HIV/AIDS Strategy:

A health notice has been added to the staff Health notice board to provide an educational summary on prevention & protection.

Compliance with labour law:

As per 2015 report. The Workers Trade Union visited in June 2016 prior to contract renewals for employees. All contract terms and details passed through our Union representatives. With a 15% increase in basic pay and continued non-obligatory help to our workers, the Union were satisfied with all criteria; no non-compliance issues raised.



Labour Principles

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

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

Principle 5: the effective abolition of child labour

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

Assessment, Policy and Goals

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

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

In Ghana, we have introduced the following guidelines:

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

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

Implementation

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



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

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

Implementation of the above guidelines is as follows:

- Gender equality
Gender equality is promoted through the preferential selection for female workers to grade and gut our product at the sorting table. Physical harvest labour is principally for men and limited to those who can safely work on the water. Skilled work in the Hatchery where attention to detail is vital promotes employment for women in this industry where females are preferentially selected.
- Maternity policy
Where females are employed, a clear maternity policy is in place to both support the employee and ensure our farm operations can continue smoothly without the need to lose key personnel. Women are granted 84 days paid maternity leave and also granted days off throughout pregnancy for routine scans and 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.
- 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.
- Workers Union
All workers have the right to join a worker’s trade Union; a union to promote the social and economic rights for employees in their workplace. Upon formal presentation by Union and employee representatives all issues are to be dealt with directly and within a timeframe to ensure matters are resolved swiftly.



Measurement of outcomes

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

Activities 2016:

Workers Union:

Management have cooperated with the Union by facilitating meetings on our premises between Union representatives and their team to discuss any issues raised by employees at their request. Contract negotiations in July 2016 met all criteria with no non-compliance issues raised.

Environmental Principles

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

Principle 8: undertake initiatives to promote greater environmental responsibility

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

Assessment, Policy and Goals

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



aquaculture, we are also able to advise other producers regarding the way of building and running friendly farms. Therefore, in this way our expertise is very useful.

Implementation

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

We are once again in 2016 voluntarily taking big part in the restocking program for the glass eel in Europe. As we still are committed to breeding fish at the highest quality and also 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 most gentle methods are used to catch elvers
- There is a low mortality rate during rearing
- Fish meal / oil in the diet comes from a sustainable resource
- Food is used optimally
- Environmental impact meets statutory requirements
- Handling, transport and slaughter of fish meets fish welfare requirements
- The company actively helps nurturing fish stocks, which could be used by restocking programs

Our breeding facility in Ghana is based on many of the same principles. The farm is built as environmentally friendly as possible, and makes use of modern technology and equipment.

On shore are the hatcheries, where we grow our own fingerlings, that is, fish about the size of a finger. Those are bred from our own broodstock. Currently we only produce fingerlings for our



own use; however, soon we will be able to provide top quality fingerlings for other fish farmers, and for restocking Lake Volta. This will benefit the dwindling Tilapia stock that is causing great problems for local fishing communities. The hatcheries are constructed with state of the art recirculation technologies. This allows us to produce fingerlings with almost no water exchange, which reduce our effect on the environment to a minimum. At the farm, we use the most ecologically friendly floating fish food.

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

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

We have introduced the following guidelines:

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

Measurement of outcomes

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

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

From our environmental Management in Ghana, the annual environmental report was submitted in 2017 for the period 2015-2016 to both the Water Resources Commission and Environmental protection Agency detailing the main operational activities for the previous year centered on water & waste management. Mitigation measures and a clear health & safety policy framework was submitted for review, which met approval and recognition for being well organized with a clear management structure.

Continued water/sludge sampling is carried out every 2-3 months in compliance with guidelines set out by the WRC and sent for routine analysis. To perform in a manner consistent with legal



requirements. All permits and licensing shall be in place for all operations and updated periodically as and when compliance laws or company circumstances change.

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.

Implementation of the guidelines is as follows:

- Recycle where possible as much farm waste as feasibly possible
 - Recycle all water bottles and water sachets
 - Sell feed sacks to the community to avoid landfill.
 - Donate all scrap metal and old equipment to employees for recycling in the town.
 - Regular safe burning of biological/limited non-biological waste in dedicated waste pits located at a suitable distance away from food and flammable sources.
- Comply with environmental monitoring programmer in association with WRC
 - Timely monitoring of samples and prompt analyses
 - Develop response protocol for adverse impacts
 - Annual reports to the EPA and WRC concerning our activities
 - Support Government research groups collecting environmental data
 - Keep logs of production and monitor this in relation to changing environmental conditions.
- Optimize transport, use of raw materials and energy consumption
 - Use of high quality low polluting feed in packaging that can be recycled or put to good use.
 - Coordinate transport efficiently to minimize frequency of movement.
 - Land maintenance on road from Asikuma to farm to prevent soil erosion and economies truck maintenance issues.
- Responsible use of potentially hazardous materials
 - Store hazardous chemicals under lock & key
 - Thorough training and restricted access in the use of hazardous material
 - Safe waste disposal that prevents adverse environmental impacts



Activities 2016:

Environmental Management:

Our annual environmental report was submitted in 2016 for the period 2015 to both the Water Resources Commission and Environmental protection Agency detailing the main operational activities for the previous year centered on water & waste management. Mitigation measures and a clear health & safety policy framework was submitted for review, which met approval and recognition for being well organized with a clear management structure. Continued water/sludge sampling is carried out every 2-3 months in compliance with guidelines set out by the WRC and sent for routine analysis.

Given the increased mortality problem due to the possible streptococcus outbreak in Lake Volta, WAF had to address the issue of waste disposal of dead fish. Three pit diggers were employed to dig deep pits on the farm boundary for suitable waste deposition. Further to this, we invested in a fish grinding machine to destroy the dead fish prior to clearance. This was to avoid local bush people from stealing the dead fish for re-sale in the kobi market. It is a potential health risk but which goes ignored by locals when there is a potential source of "free income". WAF also took the decision to hire a team of 6 guys to work both night and day to routinely move mortality from the cages to keep the water body as clean as possible and not allow fish to "sit" for long periods, which would only negatively impact on the overall water quality. All mortality is recorded and logged for weekly production reports.

Anti-Corruption Principles

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

Assessment, Policy and Goals

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

Implementation

Royal Danish Fish Group A/S has a zero tolerance for any form of corruption and tries to educate all employees in this regard. We have a string policy regarding this matter, which we inform our



partners and customers about before we are doing business. To comply with all regulations in a formal manner with a strict "no bribe" policy. Documentation for all areas of operation will be transparent and available for inspection.

Measurement of outcomes

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

Implementation of the guidelines is as follows:

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

