

ATLANTIC  
SAPPHIRE.

**SUSTAINABILITY REPORT**

**2024**

# ADVANCING AMERICA'S BLUE ECONOMY

In an era of heightened global challenges, the need for sustainable solutions in food production has never been more critical. With the world's population projected to reach nearly 10 billion by 2050, the demand for protein sources continues to grow. At the same time, our oceans face unprecedented pressures from over-fishing, pollution, and climate change. These intertwined crises underscore the necessity of advancing America's blue economy, where sustainable aquaculture emerges as a cornerstone for feeding the future while safeguarding natural ecosystems. Atlantic Sapphire is proud to lead this transformative effort, bringing sustainable seafood production to the forefront of the American landscape.





The United States imports more than 85% of its seafood, contributing to a trade deficit and diminishing our ability to ensure sustainable practices. Domestic aquaculture offers a unique opportunity to bolster food security, reduce the environmental impacts of transportation, and support economic growth in coastal and inland communities alike. By producing healthy, low-carbon protein within the U.S., Atlantic Sapphire is redefining what it means to be a steward of the environment and a champion of responsible innovation.

Our pioneering Bluehouse technology exemplifies this commitment. Designed to mitigate many of the environmental challenges associated with traditional aquaculture, our land-based salmon farming system operates with near-zero discharge into surrounding ecosystems, dramatically reducing pollution and safeguarding wild fish populations.

**By controlling every aspect of the salmon's lifecycle, we minimize waste, optimize resource use, and ensure unparalleled product quality. This model aligns with the principles of the UN Sustainable Development Goals (SDGs), particularly those focused on responsible consumption and production, climate action, and life below water.**

Sustainable aquaculture is more than an industry; it is a vital component of a resilient food system. As global consumption of fish continues to rise—the Food and Agriculture Organization (FAO) predicts per capita fish consumption will exceed 21.3 kg by 2027—aquaculture must meet this demand responsibly. Atlantic Sapphire's innovative practices support this growth while protecting marine ecosystems, ensuring that future generations can benefit from both abundant seafood and healthy oceans.

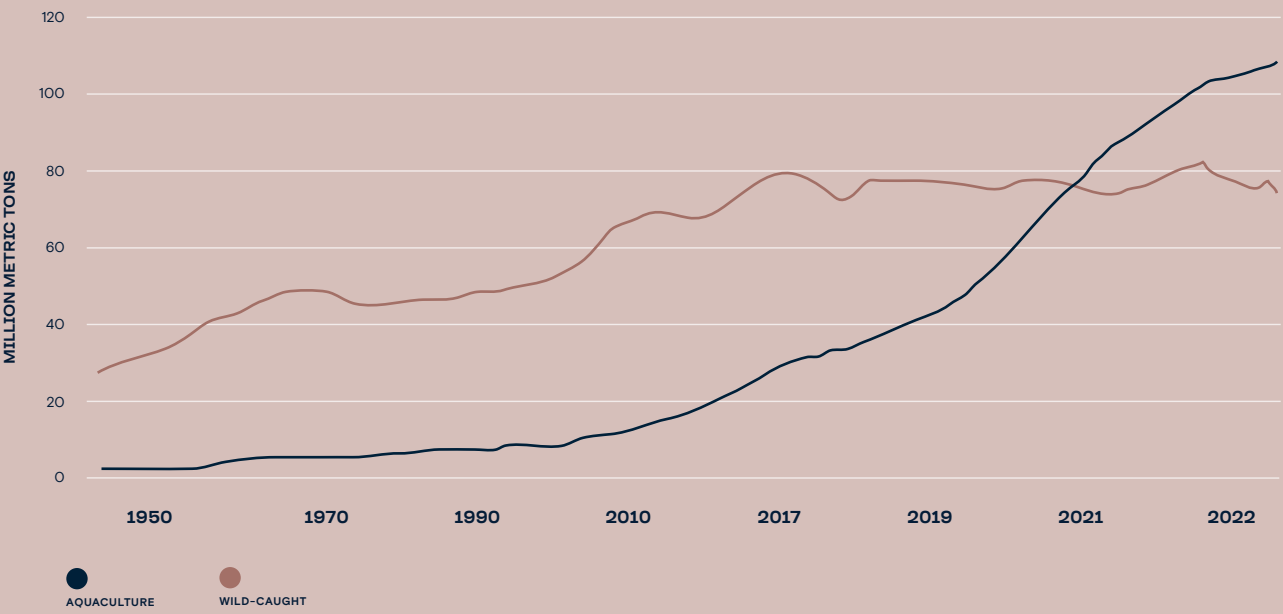
Beyond environmental stewardship, Atlantic Sapphire contributes to the economic vitality of America's blue economy. Our operations create jobs, stimulate South Florida's economy, and establish the U.S. as a leader in sustainable seafood production. We are committed to fostering partnerships with researchers, policymakers, and industry stakeholders to drive innovation and set new standards for sustainability across the sector.



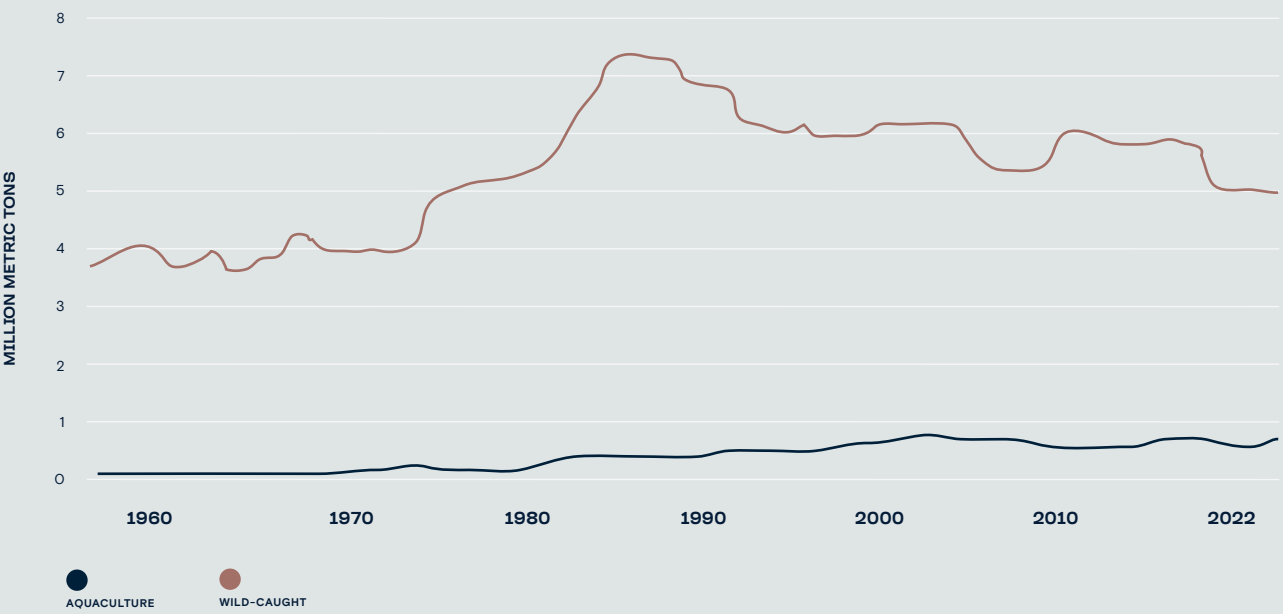
The challenges facing seafood production demand bold action and collaborative solutions. Atlantic Sapphire is honored to play a pivotal role in advancing sustainable aquaculture in the United States. By aligning cutting-edge technology with a deep commitment to environmental and social responsibility, we are not only meeting the immediate demands of today but also building a resilient foundation for the future of global food systems.

Together, we can ensure that America's blue economy thrives, delivering sustainable, nutritious seafood while preserving the planet for generations to come.

Global



North America







6. Developing a Sustainable Option	45. Social Responsibility
8. Consumer and Product Responsibility	60. About this report
18. Economic Responsibility	
24. Environmental Responsibility	

# The Problem

**TODAY**, the global food system generates up to one quarter of the world's greenhouse gases. When human eating habits over-index beef, lamb, pork, and poultry, too many forests are cleared for farmland, too much methane is released into the atmosphere, and too many fossil fuels are burned to produce fertilizers, run farm equipment, and ship food around the globe.

Meanwhile, seafood protein consumption is rising. Most wild fish populations are overfished and can't absorb new demand.



The United Nations Food and Agriculture Organization reports that **90 percent of assessed wild fish populations** cannot handle the pressure of additional fishing.

Ocean-based fish farming offers some answers but faces many challenges and can still pressure the world's oceans. The conventional aquaculture industry today generates a global supply of healthy Atlantic salmon of an estimated 2.7 million metric tons, almost all produced in ocean-based net pens or cages, primarily off the coasts of Norway and Chile due to suitable conditions. However, these industrial oceanbased fish farming areas are remote from the largest endmarkets, and require significant airfreight transportation, and logistics costs, leading to high carbon emissions and a reduced shelf life of the final product.

When **80% of seafood** consumed in the **US<sup>1</sup>** — the **world's largest salmon market** — is imported, the **carbon footprint** remains a **heavy tread**.

In addition, the industry faces numerous other challenges such as ocean-based farmed fish in net pens, host diseases and parasites, including sea lice, requiring continuous use of pesticides and other prevention methods. Farmed salmon also escape into the surrounding waters, spreading non-native fish varieties that may intervene with the local ocean ecosystem and wild salmon. Fish waste dissipates untreated into the coastal areas causing nutrient pollution and harmful algal blooms.

Atlantic Sapphire's Bluehouse technology eliminates conventional industry environmental and health risks.

Conventional ocean net pen farming experiences a series of concerns



<sup>1</sup> NOAA Fisheries [www.fisheries.noaa.gov/national/aquaculture/us-aquaculture](http://www.fisheries.noaa.gov/national/aquaculture/us-aquaculture)



## The Solution

Atlantic Sapphire Raises salmon **on land** in the **U.S.** far from wild waters.

The Group has developed its vision **of a Bluehouse** – essentially a greenhouse where fish can be raised **in optimal conditions** for animal health and **welfare** with a goal of feeding the world with **locally raised seafood** that is **truly sustainable**.



By keeping the whole farming process on land within biosecure Bluehouses, **the Group eliminates the threats to wild fish stock** as well as protecting its own fish from sea lice, parasites, and other diseases being transferred, **avoids untreated fish waste being emitted into coastal areas**, and ensures that **no microplastics** and other contaminants are ingested by the fish raised in the Bluehouse.



The Group's water source is naturally purified through limestone rock in an ancient artesian aquifer. The water is more than 20,000 years old and has never been exposed to man-made contamination such as microplastics or mercury. **More than 99% of the water used is recycled.** Of all the water used, under only 5% is freshwater and over 95% is saline water which is not otherwise suitable for irrigation or human consumption.



Atlantic Sapphire **raises their salmon locally in the U.S.** which means there is **no airfreight** needed. Consumers can receive salmon faster, fresher, and at a fraction of the carbon footprint of imported ocean-farmed salmon. **Salmon raised in a Bluehouse is better for fish, for people, and for the planet.**



We **love** our oceans,  
which is **why** we let them **be**.



# CONSUMER AND PRODUCT RESPONSIBILITY

**Salmon has become a sought-after product as consumers increasingly demand more healthy, delicious, and sustainable protein options.**

**ATLANTIC SAPPHIRE'S MAIN MARKETS** are the US and Canada. Most of today's seafood in North America is imported, and the US has a high obesity rate and a low per capita consumption of seafood. Salmon is an excellent choice as a nutritious part of a healthy diet for all ages. The health benefits of Atlantic salmon are widely documented and include richness in Omega-3s, proteins, and essential vitamins (A, D, and B-12). Thanks to its high level of Omega-3s, Bluehouse Salmon has received the American Heart Association's "Heart Check" certification and the Miami Bluehouse location in Florida paves a path to a locally produced and healthier diet for American consumers.

Another meaningful product attribute to consumers across all segments is the fact that Bluehouse Salmon is raised completely in closed water containment which means less contaminants such as micro plastics and no need for the use antibiotics or pesticides at any point during its life. The Group's reasoning towards an even cleaner and healthier product is simple: Bluehouse Salmon is not exposed to viruses, diseases, or parasites that exist in the wild because its water source comes straight from artesian aquifers which have not been exposed to any man-made contamination.

Although the USDA has been planning to develop an organic certification standard for seafood, such a standard has yet to be formalized in the United States. Nonetheless, the Group believes that its fish is one of the cleanest seafood options available thanks to its onshore closed containment technology and it will be working with the authorities as an organic framework for seafood is being put in place in the years to come. Atlantic Sapphire partners with organizations such as Seafood Nutrition Partnership (SNP) to support and expand educational efforts around the many benefits of Bluehouse-raised salmon.

While Atlantic Sapphire's current business model and technology provide a great solution, The Group will endeavor to continuously seek ways to increase sustainability in the production of its salmon. Bluehouse Salmon not only offers the taste and health benefits valued by consumers, but is also raised in ideal conditions from a fish welfare and environmental perspective.







# Bluehouse Value Chain

**ATLANTIC SAPPHIRE'S PRODUCTION CYCLE** starts with the introduction of salmon ova into the hatchery. As eggs hatch and develop, the fish are moved between increasingly sized freshwater tank systems until they reach the smolt stage in the production cycle.

Smolt typically grow until approximately 50 to 100 grams in freshwater before they are moved to saltwater tanks where the salmon are fed and raised to the target average harvest size of approximately 4 kilograms. Once harvested, the salmon are processed into consumer-ready products and loaded onto trucks for transportation to retailers, restaurants, and other customers. The complete production cycle takes between 18 and 22 months.

Atlantic Sapphire thrives to mimic what it believes is ideal conditions for salmon to thrive from hatch to harvest, and its Bluehouses are tailored to replicate this natural life cycle to the largest extent possible. Salmon is an anadromous fish that begins its natural life cycle in the wild in freshwater rivers and migrates out to sea after it smoltifies. The smoltified salmon then spends its life at sea to grow large and will then reproduce in the river it originated from.

Complete salmon production under one roof shortens the value chain of salmon production significantly, eliminates risk of parasites, reduces risk of diseases, simplifies logistics, and increases traceability of the end-product.

# Fish Welfare

**THE HEALTHIER THE FISH**, the better the Group performs. Atlantic Sapphire's Bluehouse technology brings unprecedented measurements and control of critical production factors. To ensure optimal fish welfare, Atlantic Sapphire constantly monitors all relevant water quality parameters. Over time, the Group has continued to increase data collection to support ongoing improvements in water quality, the general health of the fish and their growth performance. The most powerful "sensor" is the fish itself. A healthy fish that has good environmental conditions will have high appetite and grow fast. In that way, you can say that fish welfare and profitability of the company are aligned and "a happy fish is a happy farmer".

An onsite control room allows for close monitoring, quick detection of variations, and immediate adjustments to maintain optimal Bluehouse conditions. Furthermore, Atlantic Sapphire works with leading information and biotechnology companies to analyze fish welfare and corroborate internal measurements.

In 2024, Atlantic Sapphire's mortality rate was 6.4%. For comparison, the conventional net-pen ocean aquaculture industry in Norway reported a mortality rate of 15.4% in 2024 (Source: The Norwegian Veterinary Institute).



2024  
MORTALITY RATE

6.4%

CONVENTIONAL INDUSTRY  
MORTALITY RATE

15.4%

Bluehouse farming is designed to produce high-quality biomass in a high intensity environment. With high intensity comes added complexity, and successful operations require more from the equipment used and the operators of this equipment. Over the last few years, Atlantic Sapphire has made significant changes to minimize operational risks, in particular as it relates to extraordinary mortality events:

## Risk of hydrogen sulfide (H2S) intoxication

- H2S is a gas that can be created in all water systems with organic material. It can affect fish growth and performance in low concentrations, whereas it can kill fish in minutes in high concentrations. In addition to being highly toxic in small volumes, the gas is very volatile which makes it unpredictable and hard to measure. The toxicity of H2S can be mitigated by adjusting certain water quality parameters and procedures that have successfully been implemented in the Bluehouses. Although Atlantic Sapphire continues to focus on H2S to ensure a low-risk environment, the Group is confident that the risk of large mortality events has been severely reduced, though not eliminated. As a result, the farms are designed with multiple independent systems.

## Organizational restructuring

- Operational changes support better flow of communication and allow for tighter monitoring of all RAS system parameters. The ongoing systems are treated as independent farms.
- Each system has 24/7 staff coverage and Atlantic Sapphire operates with a minimum of nine staff in the Bluehouse at night and during weekends, significantly reducing the risk of incidents with impact on fish or property happening outside of normal business hours.

## Genetics

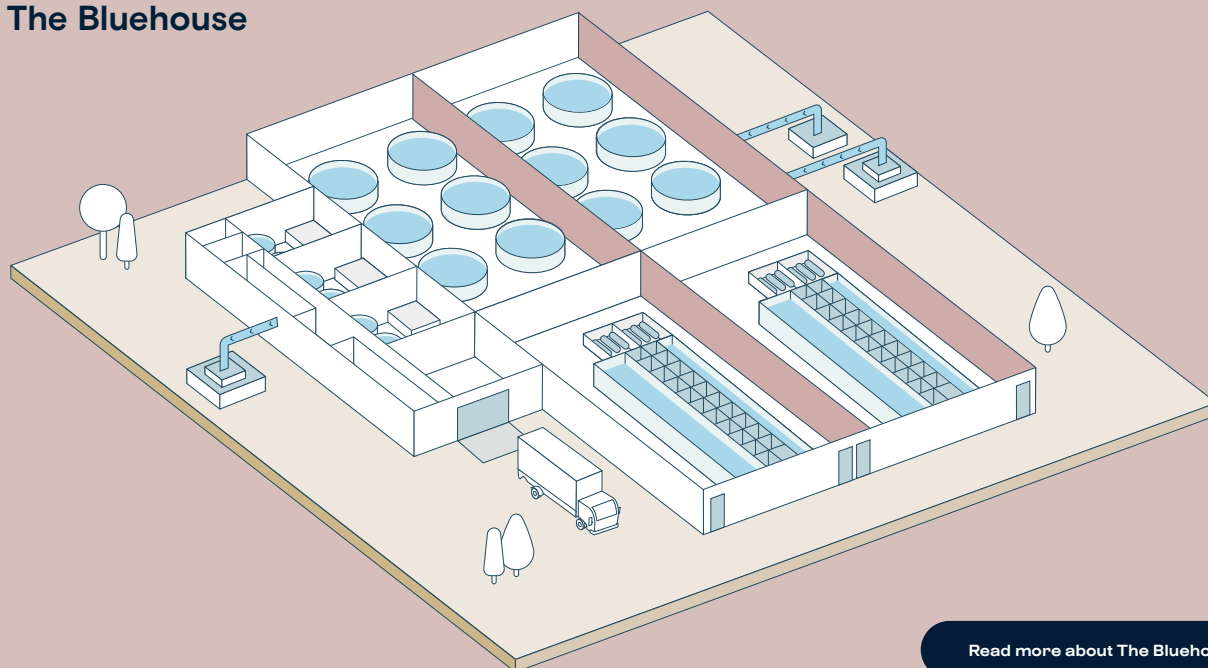
**ATLANTIC SAPPHIRE IMPORTS** ova from leading industry suppliers in Iceland and Norway to its Miami facilities. All ova supplied to Atlantic Sapphire meet the criteria of “no genetic engineering involved” under the terms of the EU regulations. Furthermore, Atlantic Sapphire is committed to never using genetically modified ova in its production.

Genetic development in salmon aquaculture consists of the improvement and strengthening of salmon breeds using selection and mating techniques to ensure a higher survival rate and resistance to the conditions to which salmon are exposed throughout the production cycle.

Atlantic Sapphire's salmon are raised in an environment which allows the genetic work to be focused on growth and trait more specific to Bluehouse conditions rather than attributes such as resistance to parasites, bacteria, pathogens, or other sea-specific conditions.

Atlantic Sapphire is working with leading aquaculture genetics companies to advance performance in its Bluehouses and will work in the future to establish integrated onsite genetics operations.

## The Bluehouse



[Read more about The Bluehouse](#)



## Leading Technological Development

**ATLANTIC SAPPHIRE BLUEHOUSES** deliver maximum biological control due to innovative technology that is revolutionizing the industry. The Group's proprietary capabilities build on collaboration and integration with a diverse range of technology partner solutions. All relevant parameters are constantly monitored with an increasing number of sensors, automation, tools, and equipment that measure water quality indicators such as alkalinity, carbon dioxide, oxygen, and temperature. The systems also measure potential risks for the fish, such as elevated levels of toxic gases. Early detection and mitigation of toxic hydrogen sulfide formation is critical to minimize the risk of a mortality event and continues to be a key area of technical innovation towards risk reduction and exposure for the Group. Continuous improvements in technology also allow Atlantic Sapphire to grow fish faster with less feed and with reduced consumption of oxygen and energy to ensure optimum fish welfare.

### Atlantic Sapphire has patented technology pulling water from one layer of an aquifer, using the water to farm fish and discharging treated wastewater sustainably into a different layer of the aquifer:

The brackish and salty groundwater is sourced from the Floridan Aquifer, a density stratified artesian aquifer, and is located at approximately 1,200 feet below the Miami Bluehouse. The salinity of groundwater in the aquifer increases with the increase in depth as saline water is denser than freshwater. Wells constructed in the Floridan Aquifer are completed in two different zones: the upper Floridan Aquifer and the middle Floridan Aquifer. These hydrogeologic units produce groundwater with salinities of 2.7 parts per thousand ("ppt") and 35 ppt, respectively. Over 95% of the groundwater consumption for farm operations will consist of saltwater from the Floridan aquifer. The exchange of groundwater entering and exiting the Miami Bluehouse is about 10% per day. Inside the Bluehouse, the recirculation degree of filtered water in the tanks is above 99%. Less than 1% of the total water that is sent through the filtration system is discharged as non-toxic wastewater through the injection well and into the Boulder Zone of the lower Floridan Aquifer, located at a depth of nearly 3,000 feet underground. The Boulder Zone then acts as a storage zone and natural filter with a natural current that slowly filters the water over thousands of years, thus eliminating any wastewater impact on the ecosystem.

The unique groundwater resources of South Florida are well suited for Bluehouse farming at scale. A stable supply of fresh, brackish, and saline groundwater, along with a proven and environmentally desirable method for wastewater disposal, are critical elements. In 2018, Atlantic Sapphire was granted a United States patent for its systems and methods of intensive recirculating aquaculture, incorporating the use of wells constructed for groundwater supply and wastewater disposal.

Atlantic Sapphire is continuously working on advancing the aquaculture industry by being leaders in using new and advanced technologies in Bluehouse farming.

Furthermore, the Group is taking advantage of the enormous amount of data of all water quality parameters, thanks to an AI system that recognizes how changes in different water quality parameters impacts water quality and fish appetite. With each day, the AI system becomes better at optimizing water conditions for the fish, which increases biomass gain and economic performance, and results in an even more healthy and delicious product for the end-consumers. Lastly, the Group's focus is on improved and gentle fish movement, energy consumption, and the design and concept for a more modular, highly scalable tank module as part of the Group's Grand Master Plan to reach 220,000t HOG of annual harvest volumes a decade from now.

## Sustaining Trust in Our Product

**GROWING A BRAND** on a promise of a healthier product and sustainability does not happen by accident. In bringing Atlantic Sapphire product to market, the Group has engaged with a range of carefully selected clients and business partners, built, fostered, and maintained trust through transparent communication, and only associated with organizations who share the Group's commitment to sustainable aquaculture and product safety. Domestically raised salmon will contribute to food safety in the value chain, and further consumer trust. Ensuring product safety from 'egg to plate' is paramount.

### Atlantic Sapphire follow strict protocols for testing and lab analysis, which support the Group's goals to ensure that Bluehouse Salmon remains the safest protein for consumers to enjoy.

# Product Certifications

Since inception, Atlantic Sapphire has reviewed a range of potentially relevant certifications and quality standards and continues to do so on a yearly basis, as part of a broad strategy of awareness and consumer education. Atlantic Sapphire engages with several organizations ranging from consumer focus on environmental issues to health-related topics. A few of the Group's partners include Friend of the Sea, American Heart Association, Parent Tested Parent Approved, Monterey Bay Aquarium Seafood Watch, Oceanwise and FDACS's Fresh from Florida.



**BLUEHOUSE SALMON IS** Friend of the Sea certified. Friend of the Sea is a project of the World Sustainability Organization (WSO), an international NGO whose mission is to promote environmental conservation. WSO activities fully align with Agenda 2030 and its 17 sustainable development goals (SDGs). Friend of the Sea strict certification criteria and yearly audit ensure companies are focused on minimizing any negative effect of aquaculture operations, hence gaining the trust of the consumer and industry alike. Friend of the Sea has become a leading certification standard for products and services which respect and protect the marine environment.



**THE AMERICAN HEART ASSOCIATION'S HEART CHECK** certification is a program designed to help consumers make informed choices about the foods they purchase. It makes it easy to spot heart-healthy foods in the grocery store regardless of labeling. This program is the nation's oldest, and it is science based, with a transparent and strict criterion for nutritional requirements. Atlantic Sapphire brand Bluehouse Salmon's recognition with Heart Check speaks to the direct impact in reduced risk of coronary heart disease by increased amounts of beneficial Omega-3 fatty acids. According to a Healthy Living Rewards Concept Test Report (2016), 75% of consumers reported that they were familiar with the Heart-Check symbol, a program that guides shoppers to healthier choices, and that they are more likely to purchase foods that feature the Heart-Check mark, regardless of age or number of kids in their household.



**PARENT TESTED PARENT APPROVED (PTPA)** is a free, parent based, community that offers families the opportunity to try and test products in exchange for their honest thoughts and opinions. This invaluable feedback is analyzed by PTPA, and in favorable cases, results in the granting of its Seal of Approval. Bluehouse Salmon has received the PTPA's Seal of Approval after being declared a 2022 Winner. The trust generated by this type of certification has been quantified in increased loyalty (approximately at 73%) and increased product trial (approximately at 63%).



**ATLANTIC SALMON GROWN** in indoor recirculating tanks worldwide, such as Bluehouses, are rated Green – Best Choice by Monterey Bay Aquarium Seafood Watch. The Monterey Bay Aquarium's Seafood Watch program rates seafood based on scientific criteria of environmental sustainability and has been active for more than twenty five years. A green rating or Best Choice, indicates that a species is abundant and caught or raised in an environmentally friendly way. The public in general can use their recommendations and consumers guides to find seafood that is sustainably produced.



**ADDITIONALLY**, Bluehouse Salmon is Ocean Wise recommended. Ocean Wise is a non-profit conservation organization that helps consumers identify sustainable seafood. It's part of the Vancouver Aquarium's ocean conservation program and was established in 1951. Ocean Wise offers a certification program for businesses that meet its criteria. This program is based on scientific research and third-part, peer reviewed studies, including those from the Marine Stewardship Council (MSC).

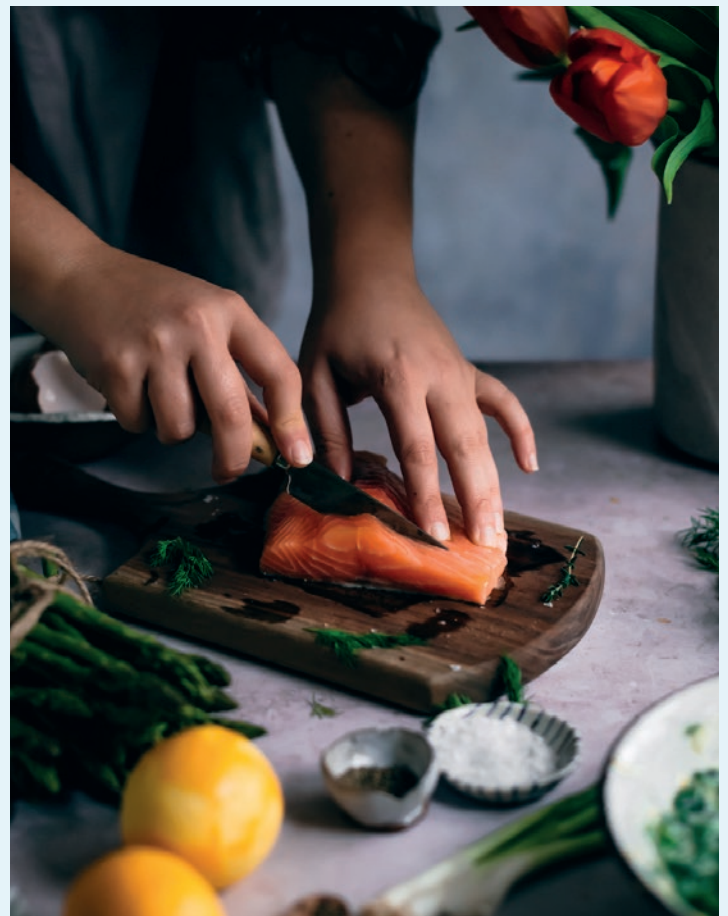
Such third-party certifications affirm the quality and high standards of the Group's Atlantic salmon.



**THE FLORIDA DEPARTMENT** of Agriculture and Consumer Services (FDACS) conducts several programs encompassing local production, food safety and state forests among others. One of their emblematic initiatives is the Fresh from Florida program, which promotes Florida agricultural products through consumer marketing campaigns, partnerships with 100+ domestic and international retailers, and an established presence at prominent industry tradeshows. Bluehouse Salmon is proud to be one of the products featured by Fresh from Florida, and leverages its network of members as well as its newsletter, social media efforts and publications to reach millions of potential consumers who favor and trust locally grown or raised products.



**ATLANTIC SAPPHIRE IS THE FIRST** and only land-based salmon farm in the US. to achieve ASC certification. ASC is a nonprofit impact organization running the world's leading certification and labeling program for responsibly farmed seafood, which includes hundreds of requirements certified farms must meet in order to demonstrate environmentally sustainable and socially responsible practices. ASC developed a new RAS (Recirculating Aquaculture Systems) Module that focuses on key areas of impact around water use, water quality and water and waste disposal as well as energy consumption and emissions. By achieving ASC certification, the Group strengthens its belief that innovative and sustainable aquaculture practices play a critical role in safeguarding the environment while supporting the growing global population.



Note that the Group's fresh product does not have labels as it is sold behind the glass counter without packaging, however, the company produces sign toppers that showcase the product certifications (such as Heart-) and are displayed at point of sale when allowed, enhancing the communication of the product benefits and potentially building trust with the consumer base.



# Food Safety

**TO DATE**, Atlantic Sapphire products are carried by a broad range of retailers and food service operators in North America, from small to large scale. The growing demand for healthy and sustainably produced proteins means that retailers of every category are looking to promote safe, healthy, sustainable, and healthy food products. To address the importance of food safety Atlantic Sapphire was audited and renewed its SQF certification on June 30, 2024.

There have been no incidents of non-compliance concerning the health and safety impacts of products or services for the company.



# Traceability

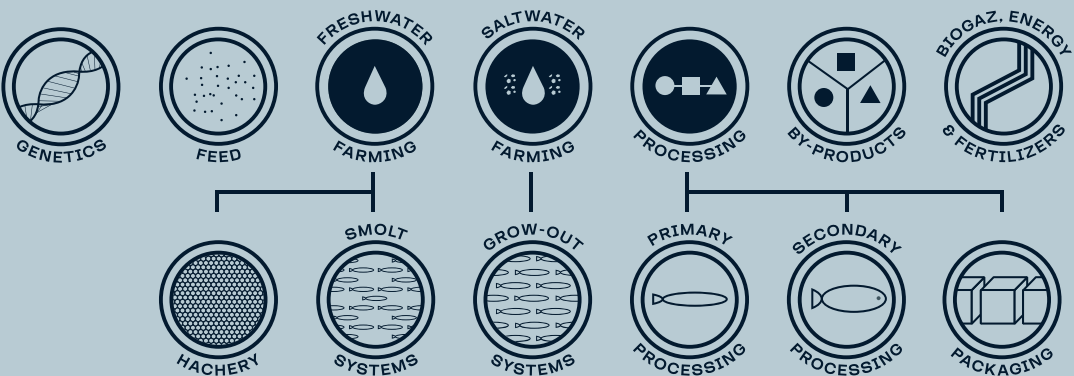
**ATLANTIC SAPPHERE'S** full production cycle is carried out in its Bluehouse, ensuring traceability from egg to final product.

The Group's internal farming, processing, labelling and inventory systems allow full traceability of every box. This through process ensures that information is kept available at all times in the Groups's Bluehouse operations, whereas typical traceability challenges in the conventional industry happen during harvest, at the dock, processing, and for imports. The very short value chain is also a beneficial factor as Atlantic Sapphire sells directly to our customers or with very few intermediaries, "from egg to plate".

**The Group's traceability practices facilitate:**

- Safety: Fraud, mislabeling and environmental damage are mitigated, and information is available if there is need for a recall
- Legal compliance: General food law and fish marketing
- Supply chain: Elimination of illegal and unregulated activities within the supply chain, such as corruption and overfishing
- Customer confidence: Shoppers and food service operators have confidence that what they are buying is legal, safe, and fairly traded.

## Our integrated value chain



## Marketing & Labeling

**ATLANTIC SAPPHIRE IS FULLY COMMITTED** to responsible marketing, and consumer trust in Atlantic Sapphire's product is vital to the Group's business and position as a leader in the marketplace. For that reason, the company is always mindful to ensure the accuracy of every product and sustainability-related claim it makes on labelling and in marketing materials and communications, to avoid any potential misleading instances.

The Group's current product portfolio includes fresh salmon, whole or fillets, smoke roasted salmon, smoked salmon flakes, and frozen and fresh steaks.

As already mentioned, our fresh products do not have packaging and are sold at the seafood counter without product labelling in accordance with the industry practices. Atlantic Sapphire provides product sign toppers to its customer base that indicate the product certifications whenever allowed and desired by the retailer. These certifications include American Heart Association's Heart Check and Fresh from Florida logos, but also product attributes such as Antibiotic Free, USA Raised, Omega-3's powered by micro-algae, and others.

For the smoked salmon varieties and salmon steaks, our products are sold in individual and wholesale packages, for retail and for food service, respectively. Packaging complies with the USDA (U.S. Department of Agriculture) guidelines to Federal Food Labeling requirements for seafood and include Country of Origin declaration and Method of Production designation. Additionally, all FDA Food Product Labeling and Packaging requirements are satisfied including product name, trademark, complete list of ingredients, allergen information, net contents, name and address of manufacturer, distributor, lot identification, expiration date, and detailed nutritional label highlighting calories, fat breakdown, cholesterol, sodium, carbohydrates breakdown and proteins.

There have been no incidents of non-compliance concerning product and service information and labeling, nor any incidents of non-compliance concerning marketing communications.



## Customer Privacy

**ATLANTIC SAPPHIRE UNDERSTANDS** that maintaining customers' trust in its products requires that it protect privacy, and the Group is very sensitive to the needs of customers who use Atlantic Sapphire websites, social media and networking services and emails (collectively, the Group's Sites). Customers are understood as individual consumers or users as well as organizations, such as a retailer.

We may collect information about customers in a variety of ways:

- Directly provided information to us
- Customer chose to allow a social networking service to share information
- Gathered information when a customer visits the Group's Sites or clicks on online ads

The Group employs reasonable security measures designed to protect the security of information submitted through the Sites. Some of these include matters such as the protection of data; the use of information or data for its original intended purpose only, unless specifically agreed otherwise; the obligation to observe confidentiality; and the protection of information or data from misuse or theft. At the same time, customers always have the right to review and update any information previously provided to the Sites. The Group's Sites have clearly marked sections or contact information destined to provide a resource for customers to request further transparency about data processing practices, or access to, or deletion of, the personal information the company has collected.

There have been no complaints concerning breaches of customer privacy, and losses of customer data, derived from non-compliance with existing laws, regulations and/or voluntary standards regarding the protection of customer privacy, as covered in key instruments of the Organization for Economic Cooperation and Development.

Consumer  
Health & Safety

**CONTINUED** 100% compliance with all food safety standards **ACHIEVED**

**OBTAIN** SQF certification **ACHIEVED**

**MAINTAIN** American Heart Association Certification (US) **ACHIEVED**

Production  
Responsibility

**ZERO WASTE** of off-cuts and byproducts from filleting facility (US **ACHIEVED**)

**LOWER** non-edible byproducts by increasing filleting yield of edible meat to minimum 65% for Trim D fillets (changed)

**MISSED:** Results in 2024 were 62%

Packaging

**MAINTAIN** packaging for 80% of our fish in biodegradable or recycled/recyclable packaging for the transportation of harvested salmon to lower use of Styrofoam

**ACHIEVED:** actual rate of 80% for use of recycled/recyclable packaging

Fish  
Welfare

**BETTER** survival rate than the average rate for the Norwegian net pen industry

**ACHIEVED:** 6.4% mortality rate





Consumer  
Health & Safety

**CONTINUED 100%** compliance with all food safety standard

**MAINTAIN** SQF certification

**MAINTAIN** American Heart Association Certification (US)

Packaging

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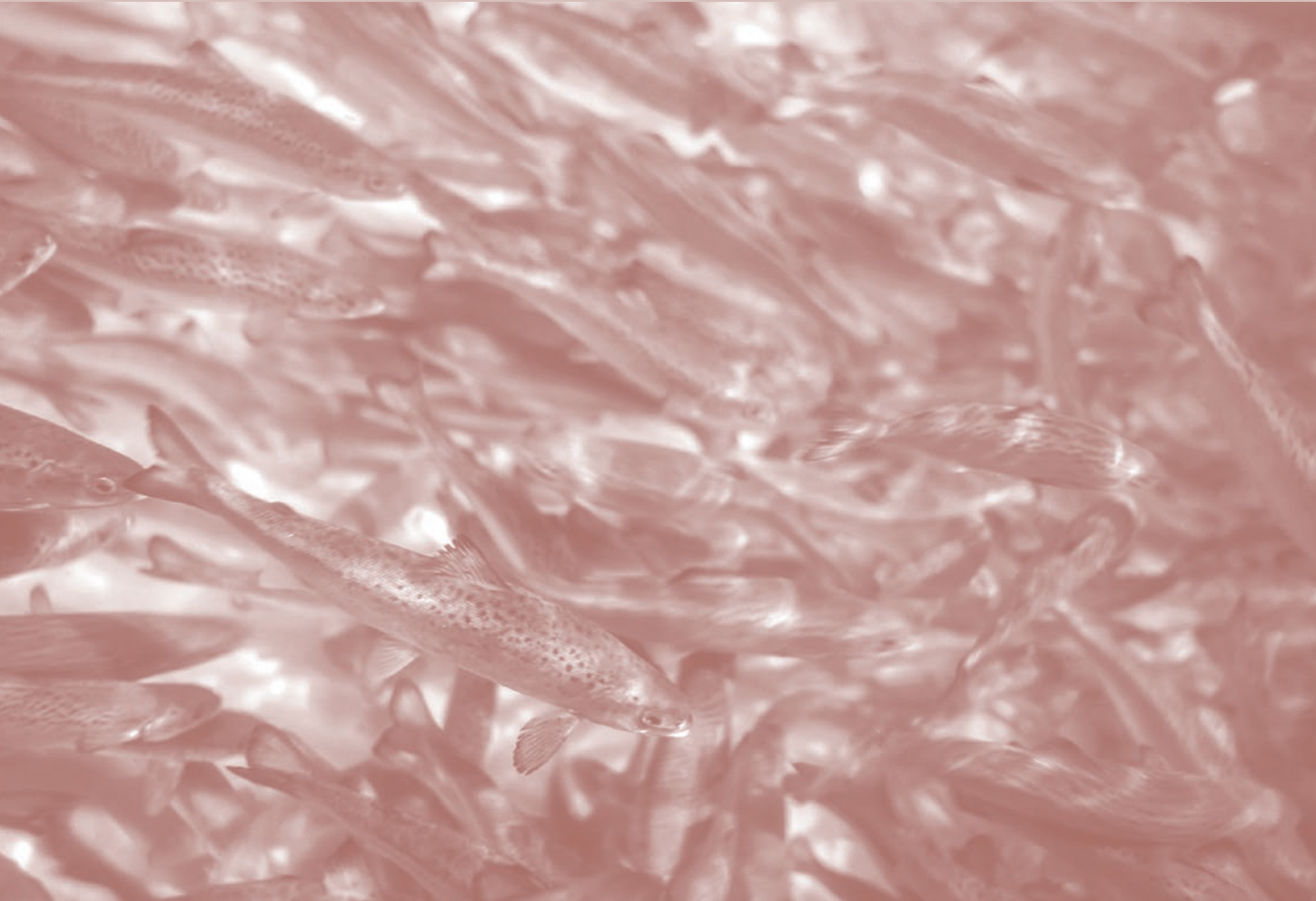
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Fish  
Welfare

**BETTER** survival rate than the average rate for the Norwegian net pen industry





The background of the page is a teal-colored photograph of ocean waves. A white rectangular box is positioned in the upper left corner, containing the title and the first paragraph. The rest of the page is covered by the ocean wave image.

## ECONOMIC RESPONSABILITY

Atlantic Sapphire is fully committed to fostering economic value for all its stakeholders through facilitating job creation, fairly compensating employees, sourcing from local suppliers and distributors, and working closely in collaboration with local officials as well as financial institutions.

**ATLANTIC SAPPHIRE PRIORITIZES** sourcing talent locally effectively contributing to the State of Florida. The Group also support hundreds of small local businesses across Florida. Additionally, it sponsored approximately 4.6% of its workforce through work permits in 2024. Its economic engagement involves responsibility, prompt and full payments to employees, suppliers, financial institutions, and other qualified expenses. Integrity is a foundational virtue of Atlantic Sapphire's ethos.

Its employees play a crucial role in increasing value for by working in the best interests of the Group. The protection of shareholder value is prioritized through ethical conduct and confidentiality regarding resources and proprietary information.



# Generating Economic Value

THE GROUP'S primary investment strategy is focused on the Phase 1 operation of the Miami Bluehouse facility in Homestead, Florida, along with the Phase 2 expansion which began in Q2 2021, but was paused in 2022. Atlantic Sapphire has invested a total capital expenditure (CAPEX) of approximately USD 360m related to these projects through the end of year 2024. The expansion project in Phase 2 is set to increase the annual harvest volume capacity to 25,000t HOG with indirect economic benefits including contributing to hundreds of local businesses, infrastructure improvements including roads and power lines, as well as other indirect impacts.

Furthermore, the construction has benefited local suppliers and business partners who the Group has engaged and supported throughout the construction period. The Group is committed to using local suppliers and business partners to support the local economy where possible.

According to an independent assessment conducted by The Washington Economics Group, Inc., Atlantic Sapphire will have a significant and growing impact throughout the entire State of Florida in the years ahead. By the end of 2025, Atlantic Sapphire will support an average of 3,620 jobs and create \$423 million in Total Economic Impact each year throughout Florida. From 2026 to 2028, Atlantic Sapphire's economic impacts will grow significantly with 9,937 jobs supported and close to \$1.1 billion in Total Economic Impact each year throughout Florida. From 2029 to 2033, just over 34,200 jobs are supported and close to \$3.4 billion in Total Economic Impact is generated each year throughout Florida.

# Economic Performance

ATLANTIC SAPPHIRE was listed on the fully regulated main list of the Oslo Stock Exchange in May 2020 and was also quoted in the US on the OTCQX market under the ticker AASZF as of January of 2021.

## Indirect Economic Impacts

### INFRASTRUCTURE AND SERVICES

Atlantic Sapphire has invested in significant infrastructure towards its Phase 1 and Phase 2 Bluehouse facilities located in Miami, Florida through commercial engagements. Atlantic Sapphire engages in active dialogue and collaboration with local vendors to employ goods, services, and labor in its daily operations. Such efforts allow both Atlantic Sapphire and its partners to mutually benefit from such partnerships and ultimately support the local community. In 2024, approximately 91% of capital expenditures were from US vendors whereas approximately 9% were from foreign vendors.. In 2023, approximately 94% of capital expenditures were from US vendors whereas approximately 6% were from foreign vendors.

2024 SELECTED FINANCIAL MEASURES	USD
Revenues	22.8m
Total operating expenses (excluding USD 73.0m impairment)	113.0m
Total salary and personnel costs	22.6m
Total assets	273.7m





# Managing Financial Risk from Climate Change

## Market Presence

### MINIMUM WAGE

Atlantic Sapphire's primary operations are in South Florida. The Group strives to enhance its human capital through fair wages and benefits. While the hourly minimum wage in the State of Florida for 2024 was \$13.00 and does not require benefits offered, the Group offered local employees an entry level minimum wage per hour for 2024 of \$16.83 plus benefits. Wages offered to the Group's employees is based on the scope and complexity of respective job descriptions and commensurate on employee performance.

### SENIOR MANAGEMENT

The Group's senior management comprises five individuals of which two are US citizens. Therefore, 40% of senior management is considered hired from the local community. All members of senior management reside locally and are actively present in the Group's primary Bluehouse operations in Miami, Florida. Atlantic Sapphire believes this demonstrates the organization's positive market presence. Senior management's active involvement and proximity to day-to-day operations provides them the ability to enhance human capital and to understand the local community and its needs.

## Green Finance

**ATLANTIC SAPPHIRES** Green Finance Framework, which was implemented in October 2020, continues to steer the financing of the business and promote low-carbon, climate resilient, and resource-efficient development in the seafood sector, reducing negative impact on biodiversity. CICERO provided a Second Party Opinion on its Framework, giving Atlantic Sapphire an overall strong CICERO Medium Green shading and a governance score of Excellent. Even before this was in place, the Group obtained a Green Loan from DNB, the first of its kind by DNB to a seafood company, in 2019. All Atlantic Sapphire's debt in the future will be 'green'.

**ATLANTIC SAPPHIRE** welcomes and closely follows the expanding efforts to redirect capital flows towards sustainable economic activities and investments, for example through the EU Taxonomy. Although aquaculture has yet to have technical screening criteria for the environmental objectives finalized, the Group is monitoring the criteria for comparable activities to understand its potential alignment. The Group is also following market consultations around future disclosure requirements such as capital and operating expenditures related to taxonomy-aligned activities. This includes the pending Social Taxonomy with its focus on enhancing the positive social impacts of goods and services. As business and infrastructure investments center around sustainable food production, the Group welcomes these requirements along with the comparability such information will provide investors and other stakeholders.

In part to its commitment towards a sustainable future, Atlantic Sapphire transitioned to paperless invoicing for both customers and suppliers, streamlining invoicing. Atlantic Sapphire is also partnering with financial institutions that are incorporating sustainable banking and finance initiatives within their respective organizations.

Atlantic Sapphire remains strongly committed to providing transparent and decision-useful information to the investment community about the contribution of its activities to climate change mitigation and adaptation.

## Shades of green

Based on our review, we rate the Atlantic Sapphire's green finance framework CICERO Medium Green.

Included in the overall shading is an assessment of the governance structure of the green finance framework. CICERO Shades of Green finds the governance procedures in Atlantic Sapphire's framework to be Excellent.



## Ensuring Responsible Business Conduct

**ATLANTIC SAPPHIRE'S** success depends on maintaining the highest standards of trust and integrity at all levels of the organization, as well as the reputation for honesty and transparency in its business. Atlantic Sapphire released its Code of Conduct in the first half of 2020 to set expectations and provide guidance to its Board of Directors and officers, employees (including part-time, temporary, and seasonal), independent contractors, and consultants. The Group's suppliers and other business partners are expected to share its commitment to integrity by following the principles of the Code.

In 2024, direct vendors and suppliers received the Atlantic Sapphire Code of Conduct as part of its supplier onboarding process and were expected to sign it.

The Code is consistent with the Group's core values, which also serve to guide employee actions. Ethical business is the goal, and employee conduct in performing their respective duties on behalf of the Group must always be honest, transparent, lawful, and in accordance with ethical and professional standards.

The requirement of honest, lawful, and ethical conduct is broad and therefore must be stated in general terms. As such, this Code does not cover every issue that may arise, but instead sets out basic principles to guide all employees. Employees are expected to lead by example and to seek guidance when necessary to clarify any aspect of the Code.

Each employee creates and increases Atlantic Sapphire's value by acting in the Group's best interests by properly using confidential information and protecting intellectual property. All employees are also expected to protect and properly utilize Group assets to ensure their efficient use for legitimate business purposes. Ultimately, the Group is owned by shareholders and all at Atlantic Sapphire have a responsibility to act with integrity and to protect shareholder value.

## Supplier assessment, environmental and social

**THE COMPANY REALIZES** the importance of supplier assessment and monitoring starting with scope 3 GHG emissions and throughout the value chain for social and other environmental issues. This is why this topic is part of our materiality matrix. In 2024, the Group enforced that all suppliers sign the code of conduct (active as well as inactive vendors). It also worked more actively with 2 major suppliers (FPL for electricity and Skretting for feed) on GHG emissions and freshwater use.

## Improper Payments and Anti-Money Laundering

**ATLANTIC SAPPHIRE CONDUCTS** its business in compliance with all laws that prohibit money laundering or financing for illegal or illegitimate purposes and holds a zero-tolerance policy against corruption. Corrupt activities not only represent a Code violation, but also represent a serious violation of criminal and civil anti-bribery and anti-corruption laws in the countries in which Atlantic

Sapphire conducts business. Atlantic Sapphire adheres to applicable anti-corruption laws, including the US Foreign Corrupt Practices Act, which generally prohibit companies and their intermediaries from making improper payments and require companies to keep accurate books and records, as well as appropriate internal controls. Employees review and sign the Company's

Employee Handbook which specifies anti-corruption rules and regulations. In 2024, there has not been any reported cases of corruption.



## Fair Competition

**ATLANTIC SAPPHIRE COMPETES** fairly in full compliance with all applicable antitrust and competition laws. Commercial policy and pricing will be set independently and will never be agreed upon or coordinated with competitors. Concerns related to possible violations of the Code of Conduct and any violations of applicable laws or company policies are included as part of Atlantic Sapphire's open communication policy. The Group provides different channels for reporting and encourages any affected party to report any violations or other concerns as early as possible. The Group is not aware of any breach related to anti-competitive or corrupt conduct in our operations.

Economic  
Performance

EBITDA results  
**MISSED** – [see consolidated financial statements](#)

Code  
of Conduct

100% of employees trained and tested  
**ACHIEVED**

**REQUIRE** 100% of new vendors and suppliers  
to sign and adhere to Atlantic Sapphire's  
Code of Conduct  
**ACHIEVED**





Economic  
Performance

GET US Phase 1 production (US) to steady state

Code  
of Conduct

MAINTAIN 100% of employees trained and tested

REQUIRE 100% of new vendors and suppliers to sign and adhere to Atlantic Sapphire's Code of Conduct





# ENVIRONMENTAL RESPONSIBILITY

Pursuing the most sustainable salmon farming technologies while protecting the environment where it operates is fundamental to Atlantic Sapphire. Its priorities are focused on energy and water use efficiency, minimizing waste and emissions, and avoiding impacting the surrounding marine and land ecosystems. The Group has always taken precautionary measures through systematic risk assessment and risk management where activities may impact vulnerable ecosystems or resources.

**ATLANTIC SAPPHERE'S** Environmental and Social Management System ("ESMS") requires all personnel, including Atlantic Sapphire employees and subcontractors, to act responsibly and maintain regard for impacts on the environment and climate. Through the ESMS, the Group ensures that employees receive guidance, support, and training to maintain the high standards set for environmental performance.





# Minimizing the Group's Carbon Footprint

**CLIMATE CHANGE IS** one of the world's most pressing challenges. Food production plays a major part of the climate challenges and contributes to a significant amount of global greenhouse gas emissions. Emissions from food production and impacts of climate change on agriculture and the food system will deeply affect the way the world produces food in the future.

**Failure to manage environmental and climate-related risks could harm the environment, the local community, and the Group's business and reputation.**

Atlantic Sapphire is committed to setting science-based targets to reduce its carbon footprint as part of its effort to combat climate change. Science-based targets provide a roadmap for reducing greenhouse gas emissions and aligning with the Paris Agreement's goal of limiting global temperature rise to well below 2 degrees Celsius.



## Adherence to GHG protocol framework

**ATLANTIC SAPPHIRE** has taken significant steps in enhancing its sustainability reporting by adopting the Greenhouse Gas (GHG) Protocol framework, which marks a pivotal step in committing to environmental transparency and responsibility. This initiative aligns with the Task Force on Climate-Related Financial Disclosures (TCFD) recommendations, emphasizing the importance of climate-related risk management and opportunity identification within the aquaculture industry. Setting 2023 as the baseline year for Scope 1 and Scope 2 emissions, Atlantic Sapphire has embarked on a journey to meticulously track and report direct and indirect greenhouse gas emissions. This approach underscores Atlantic Sapphire's dedication to sustainable practices, including the management of emissions from its operations and purchased electricity. Furthermore, the strategic involvement of Atlantic Sapphire's board and management in sustainability governance and its efforts to adapt to climate-related risks exemplify its leadership in addressing global environmental challenges. This adoption of the GHG Protocol not only enhances the accuracy and comparability of Atlantic Sapphire's emissions reporting but also reinforces its role as a steward of environmental sustainability in the face of climate change.



Atlantic Sapphire is committed to aligning with the Task Force on Climate-Related Financial Disclosure (TCFD) recommendations, recognizing the imperative of sustainability governance in addressing climate-related risks and opportunities.

Core Elements of Recommended Climate-Related Financial Disclosures



- GOVERNANCE**  
The organization's governance around climate-related risks and opportunities.
- STRATEGY**  
The actual and potential impacts of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning.
- RISK MANAGEMENT**  
The processes used by the organization to identify, assess and manage climate-related risks.
- METRICS AND TARGETS**  
The metric and targets used to assess and manage relevant climate-related risks and opportunities.

Board Involvement

The board guides the strategic direction for sustainability and oversight of all climate-related risks and opportunities. Because ESG is ingrained in The Group's work and mission, board discussions on climate-related issues take place at select board meetings.

All climate-related factors, risk management, and goal-setting, demonstrated throughout this Integrated Annual Report, are reviewed by the board prior to publication.

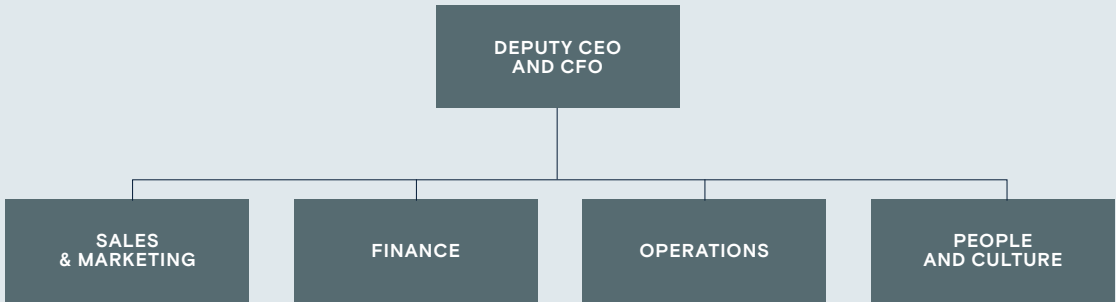
Role of Management

Atlantic Sapphire's Sustainability committee is made up of ten members representing diverse departments within the organization (as seen in the chart below). All mechanisms for monitoring progress towards climate-related goals throughout this report are established by The Group's Sustainability Committee and require the board's comprehensive oversight.

Strategy & Risk Management

Compliance with regulatory requirements is ensured through The Group's ongoing evaluation of climate-related risks and adaptation of risk management strategies. Atlantic Sapphire identifies climate-related risks and opportunities across both short and long-term targets found at the end of each 'ESG Priorities' section of this report: Consumer & Product Responsibility, Economic Responsibility, Environmental Responsibility, and Social Responsibility.

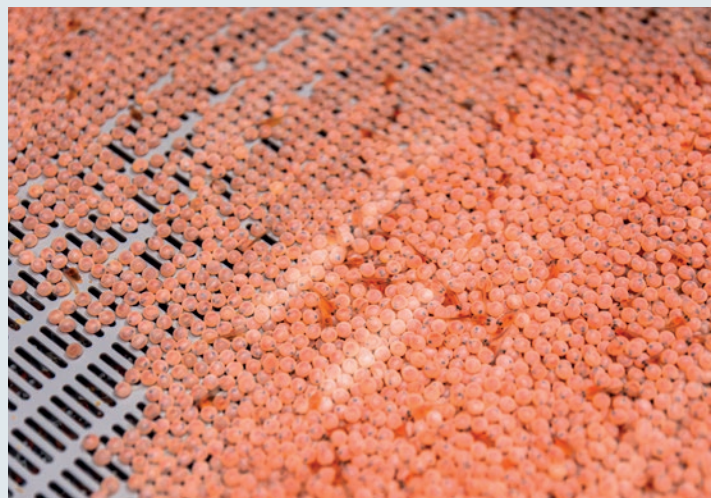
The management group work on climate emissions



**ATLANTIC SAPPHIRE'S** production facilities are located close to coastal areas. As such, the Group has assessed and prepared for the risks of wind and water-related natural disasters such as floods, tropical storms, or hurricanes. In 2023, no major 'named' storms affected the area where the Bluehouse is situated.

Atlantic Sapphire's business can also be impacted by climate change through the sourcing of fish feed. The Group depends on fish feed from third parties, and this is the single largest cost of production item. Although feed represents a large, global commodity, supplier prices are ultimately based on raw marine and non-marine materials. A future increase in such costs to the supplier would most likely result in a direct impact on the Group's cost of production. Such factors could potentially include climate change, increase in global demand, and low supply increase. The Group considers this risk to be high and is therefore exploring alternative raw materials to reduce dependence on marine ingredients.

Another important input to Atlantic Sapphire's business is electricity. Any increase in pricing in the local electricity market will result in higher costs for the Group. However, Atlantic Sapphire considers the risk of significantly higher energy prices in Florida as lower than many other geographical areas since Florida's electricity market is controlled by the Florida Public Service Commission. This commission regulates publicly owned municipal or cooperative electric utilities and has jurisdiction regarding rate structure, territorial boundaries, bulk power supply operations, and planning. Atlantic Sapphire is currently invested in renewable power production through Florida Power & Light's ("FPL") community solar program. Atlantic Sapphire plans to transition over to renewable sources of power as they are not based on scarce resources and could reduce the risk of significant price increases for electricity.



At the same time, Atlantic Sapphire is well-positioned to expand its supply to the market if climate change places limitations on sea-based salmon production. Farming in the ocean is being increasingly impacted by many factors including:

- Ocean temperature warming
- Mortality
- Sea lice management • Disease management
- Oxygen and CO2 fluctuations
- Ocean acidification
- More frequent algae blooms
- More frequent extreme climate events (freezes, storms)

The Group's facilities in South Florida are not dependent on seawater, and its risk exposure is limited by using the unique groundwater resources in Florida.

**Similarly, Atlantic Sapphire expects to be less affected than others in the US market if climate risk were to impact the cost of air transportation (through a carbon tax for instance) because it supplies that market from local production and uses ground transportation.**

In conclusion, management believes the risk associated with climate change is relatively small for the Group compared to the conventional aquaculture industry.

# Adoption of GHG Protocol

## Scope 1: Direct Emissions

In 2023, Atlantic Sapphire Committed to accurately tracking and reporting Scope 1 emissions by aligning with the GHG Protocol for the first time and setting this year as a baseline. The Group continued this work in 2024.

Scope 1 encompasses direct greenhouse gas emissions associated with activities from sources owned or controlled by Atlantic Sapphire. Atlantic Sapphire's Scope 1 reporting includes direct emissions from stationary sources which include emergency generators, mobile sources such as its fleet of vehicles, and fugitive emissions from refrigerants, which were all precisely measured to provide a comprehensive overview of Atlantic Sapphire's operational footprint.

In measuring mobile emissions from Atlantic Sapphire's fleet of cars and trucks, fuel consumption data from supplier, Sun Biodiesel LLC., has been corroborated with Atlantic Sapphire financial records. The approach used to manage fugitive emissions from air-conditioning and refrigeration units adheres to standards issued by the American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE).

These efforts encompass blend compositions, installation figures, and refrigerant charges to meticulously determine assembly losses and leak rates.

Moreover, process heaters have been carefully monitored to ensure emissions are classified correctly under Scope 1, based on the varied fuel sources. For fuel usage from rental equipment used at the Homestead facility, diesel and ethanol consumption totaled 265,084.5 gallons, delineated as 255,964.30 gallons of diesel and 9,120.20 gallons of ethanol.

Based on the figures above, emissions factors provided by the United States Environmental Protection Agency (EPA) were used to convert data from gallons of diesel and ethanol into metric tons of CO2, CH4, and NO2. The Group also consulted the IPCC's GHG to global warming potential chart (see Figure 1 below) to CO2e.

Disclosures adhere to the principles of transparency and responsibility in presenting their operational impact. This report not only encapsulates this year's data but also signals Atlantic Sapphire's ongoing commitment to sustainable practices. Atlantic Sapphire leads by example, demonstrating an unwavering commitment to environmental responsibility and addressing carbon emissions within the aquaculture industry.

GHG	GWP
CO2	1
wCH4	21
N2O	310
HFCs	140-11,700
PFCs	6,500-9,200
SF6	23,900

## Scope 2: Purchased Electricity

In an ongoing commitment to transparency and environmental responsibility, Atlantic Sapphire is pleased to update Scope 2 emissions for 2024.

The Group relies on CO2 data provided by electric utility Florida Power & Light (FPL) for market-based estimates, which reflects the specific fuel mix utilized at the Homestead site, ensuring the most accurate estimates possible. Additionally, the Group has incorporated the Purchased Electricity Tool from the GHG Protocol to estimate location-based emissions, further enhancing the accuracy and completeness of this emissions report. These estimates are based on the most recent report of all fuels in the state of Florida grid by the Environmental Protection Agency. In this context, Global Warming Potential (GWP) is a critical metric, quantifying the heat trapped by greenhouse gases in the atmosphere, expressed as a multiple of the heat trapped by the same amount of carbon dioxide. GWP enables the Group to compare the impacts of emitting different gases. Please reference Figure 1 below for the GWP values used in the calculations, which are essential for evaluating the broader climatic effects of the operations.





EPA GHG Emissions Calculator  
Scope 1 Emissions

EMISSION SOURCE	TYPE	SOURCE DESCRIPTION	CONSUMPTION	CO2 (TONNES)	CH4 (KG)	N2O (KG)	TONNES CO2E
Mobile Sources	Diesel	"Agricultural equipment, offroad trucks, construction equipment and industrial/commercial equipment 9 vehicles - 12 total (7 rentals & 5 HQ Fleet)"	255,964.30	2,605.72	-	153.58	2,653.33
Mobile Sources	Gasoline	"Agricultural equipment and construction equipment 3 vehicles - 12 total (7 rentals & 5 HQ Fleet)"	9,120.20	81.05	4.56	91.20	109.42
Stationary Source Fuel Combustion	Diesel	East and West Power Center, only run 2% of the year for exercise	1000 gal of fuel	74.00	-	93.98	103.13
Fire Suppression Equipment	Fire extinguishers	200 basic ABDC fire extinguishers	0 used	N/A	N/A	N/A	
HFC-134a (C2H2F4)	Refrigerant	Fugitive emissions emitted by refrigerants used to operate refrigeration equipment	15.16 kg	21.68	-	-	21.68
R-507 (5% HFC-125 , 5% HFC143a )	Refrigerant	Fugitive emissions emitted by refrigerants used to operate refrigeration equipment	143.45 kg	571.65	-	-	571.65
R-404A (44% HFC-125 , 4% HFC-134a, 52% HFC 143a)	Refrigerant	Fugitive emissions emitted by refrigerants used to operate refrigeration equipment	100.15 kg	392.79	-	-	392.79
Total				3,747	4.56	338.76	3,851.99

EPA GHG Emissions Calculator  
Scope 2 Emissions

EMISSION SOURCE	TYPE	SOURCE DESCRIPTION	CONSUMPTION	TONNES CO2	TONNES CH4	TONNES N2O	TONNES CO2E
Market-Based Electricity	Purchased Electricity	Florida Power and Light - 13 accounts	93.3 GWH	TBD	TBD	TBD	TBD
Location-Based Electricity	Purchased Electricity	Florida Power and Light - 13 accounts	93.3 GWH	TBD	TBD	TBD	TBD

Note: As of the date of this report, the annotated data above was not yet readily available. Accordingly, it will be provided by FPL and updated within our Sustainability page on our website at a later date.

## Looking Forward: A Focus on Scope 3 Emissions

**AS THE GROUP REFLECTS** on current sustainability efforts, it recognizes the imperative to delve deeper into Scope 3 emissions involving the company's supply chain. Atlantic Sapphire is committed to enhancing its understanding of the environmental impact associated with these emissions, specifically feed supplier Skretting's fish food production as well as all inbound and outbound transportation. In the future, the Group plans to conduct a thorough assessment of the supplier's value chain emissions, collaborating closely with them to gather data and identify opportunities for improvement.

**Later integrated reports will provide a detailed account of the progress in Scope 3 emissions, underscoring Atlantic Sapphire's dedication to transparency and performance. A cornerstone of its commitment lies in the pledge to avoid air transportation of all fish products, a significant step in reducing carbon footprint and upholding corporate sustainability.**

By reporting on Scope 3 emissions, the Group aims to offer a comprehensive view of its carbon footprint, including indirect emissions across the value chain, thereby setting new benchmarks for accountability and environmental stewardship in the aquaculture industry. This full analysis of Atlantic Sapphire's value chain and its suppliers, starting with FPL (electricity), will also include the Group's feed supply chain (Skretting) as well as many other aspects of the business such as: Oxygen, aquaculture supplies, agents, compounds, external labor and contractors, industrial supplies, construction materials, electrical parts and outbound logistics and distribution of Bluehouse Salmon.



## Energy

**EVEN THOUGH** salmon farming emits less carbon as compared to other livestock, Atlantic Sapphire recognizes that the full value chain does leave a carbon footprint and seeks to minimize it. As part of a plan to strengthen its position as a producer of land-based farmed salmon globally, the Group is committed to improving efficiency in the consumption of energy, as well as exploring increasing the use of renewable energy through direct investment in renewable energy.

Excluding transportation, Atlantic Sapphire's Bluehouse production environment requires a higher use of energy than the production of salmon at sea, as exhibited in 2024 Scope 1 and Scope 2 reporting. Therefore, one of the Group's main priorities to explore, develop, and implement solutions to reduce the energy consumption of its operations.

In 2024, Atlantic Sapphire consumed approximately 108.5 GWh of electricity (2023: approximately 93.6 GWh of electricity). The electricity is supplied from the Florida state grid, which is a mix of nuclear, solar, and natural gas generated energy.

As a part of FPL's (Florida Power and Light's) SolarTogether Program, the Group can attribute 28% of its energy consumption from renewable solar energy. In 2024 Atlantic Sapphire retired 30,211 RECs (renewable energy certificates). A REC represents one megawatt hour (1MWh) of electricity from a renewable power plant such as the FPL SolarTogether solar centers. Atlantic Sapphire plans on increasing the amount of energy subscribed to SolarTogether once eligible.

**Atlantic Sapphire aims to utilize the sludge it also produces as either an energy source, biogas, or fertilizer and is determined to support growth in seafood consumption as part of lowering the global carbon footprint of the food sector. By producing and selling fresh product 'in-market' and close to the end-consumer, Atlantic Sapphire avoids the cost and carbon footprint incurred of using airfreight transportation to reach the end-consumer.**

In a study on the greenhouse gas emissions of Norwegian salmon products, published by SINTEF, it was found that salmon shipped to the US are commonly transported by truck to a major airport, for example in London, and thereafter airfreighted by passenger aircrafts to the US. Based on data from the Norwegian seafood council and industry representatives, and on calculations made from environmental calculation tool, NTM (Network for Transport Measures), this report estimates the GHG emissions of Norwegian salmon products to be 6651kg of CO<sub>2</sub> per flight.

Airfreighted products to Asia or USA have a carbon footprint in the range from 16-28 kg CO<sub>2</sub>e per kg of edible product delivered to wholesaler, and airfreight accounts for 68-82% of the carbon footprint.



2024 TOTAL ELECTRICITY  
CONSUMPTION

# 108.5 GWH

2024 SOLAR ENERGY  
CONSUMPTION

# 30.2 GWH

28% OF TOTAL ELECTRICITY CONSUMPTION

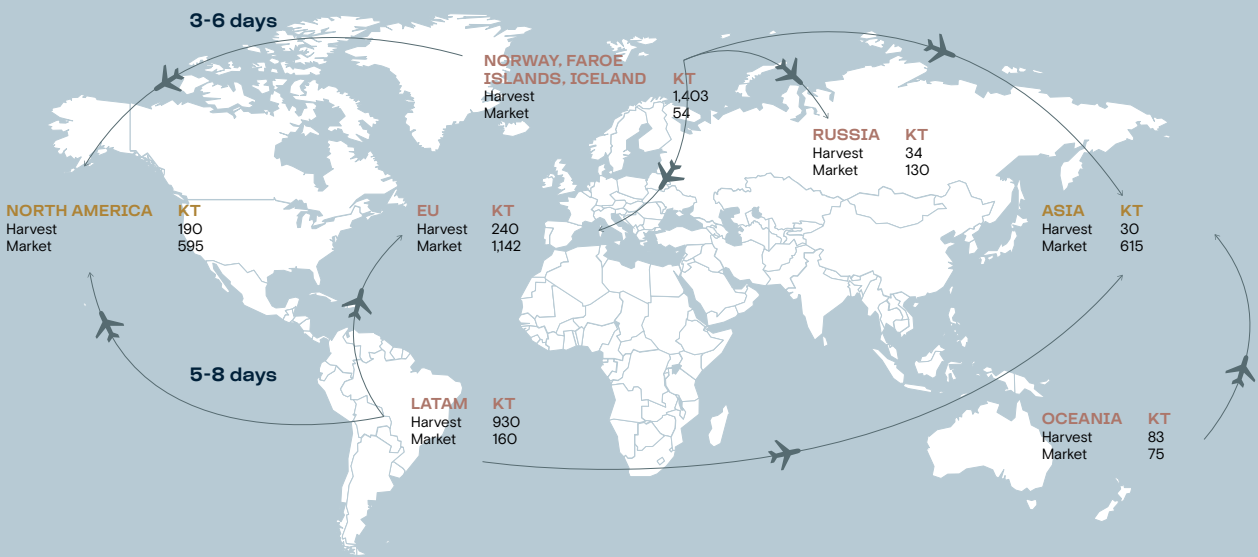


Global Salmon Trade Patterns<sup>1</sup>



TRADE PATTERNS FOR SALMON ARE CHARACTERIZED BY HIGH FREIGHT COSTS AND A LARGE CARBON FOOTPRINT

HIGH FREIGHT COST,  
LARGE CARBON FOOTPRINT,  
REDUCED PRODUCT SHELF LIFE

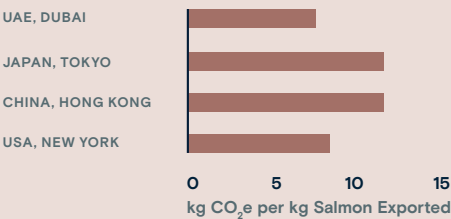


1. Source: Kontali (Salmon world 2019, wfe, all salmonids).

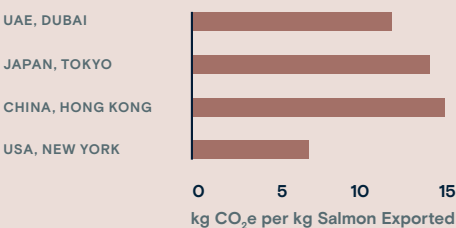
Atlantic Sapphire is proud to say that no commercial shipment of Bluehouse Salmon has ever been made via airfreight.

This is in line with our commitment to reduce our carbon footprint from transportation by supplying the US market from Miami, Florida.

Emission from Norwegian Air Freight



Emission from Chilean Air Freight



Source : SINTEF and Nordea estimates, 2019

## Reducing Energy Consumption

**IN 2022** Florida Power & Light (“FPL”) committed to building a future substation on Atlantic Sapphire’s property serving as a primary source of distribution for the Bluehouses. This will directly reduce energy costs and create a direct pipeline to distribution. This substation will have capacity large enough to power all phases of Atlantic Sapphire’s expansion and the nearby communities. It will also serve as another contingency should current power lines temporarily shut down, for example in the case of a storm of hurricane.

**Additionally, Atlantic Sapphire remains a participant in FPL’s SolarTogether community solar program, allowing the Group to directly participate in the environmental and financial benefits of Florida-based large-scale solar energy, while directly supporting the expansion of solar in Florida.**

Businesses that sign up for the program pay a fixed monthly subscription charge and in exchange receive monthly bill credits that increase every year for their share of the solar energy generated. Solar panels are not directly installed on the rooftop or property, but rather at SolarTogether solar energy centers. The power generated by these sites are delivered directly to the energy grid, where it is combined with power generated from conventional energy sources in FPL’s system.

Next Era Energy, the parent company of FPL announced plans to cut carbon emissions by 70% in 2025 and to “Real Zero” in 2045 without the use of carbon offsets through continued investments and innovation in wind, solar, battery storage, green hydrogen and other renewable energy development. Atlantic Sapphire is committed to directly working with Next Era Energy and FPL to reduce and then fully eliminate carbon emissions from its operations.

### Chillers

Being at the forefront of sustainable aquaculture, Atlantic Sapphire must continue to develop technologies and implement process enhancements to increase the performance and sustainability of its operations. Atlantic Sapphire adopted an innovative technological approach to optimize the cooling and ventilation systems in its facilities and to minimize energy loss in piping of water. Recirculating units and heat exchangers (chillers) enable the Group to maintain steady temperatures in the aquaculture systems for biological performance. The Group has continued to operate its chiller bank fully with electrical power without the use or reliance on diesel or generators.



## Handling Water Consumption and Wastewater

**USING RECIRCULATING AQUACULTURE** systems (“RAS”) technology, Atlantic Sapphire’s water is filtered before it re-enters into a tank system. Over 99% of the water entering tanks is recirculated and filtered, which significantly limits water consumption. There is no risk of water scarcity in Homestead, Florida where Atlantic Sapphire operates. Of all the water used, approximately 5% is freshwater and 95% is saline water which is not suitable for irrigation or human consumption. For farming operations, freshwater consumption in 2024 was 115.45 million gallons, and saltwater consumption was 1,606.01 million gallons. This is equivalent to 235 Liters of fresh water per KG of harvested fish for 2024 (calculating 5,259 metric tons of harvest) in farming operations.

## Water Intake

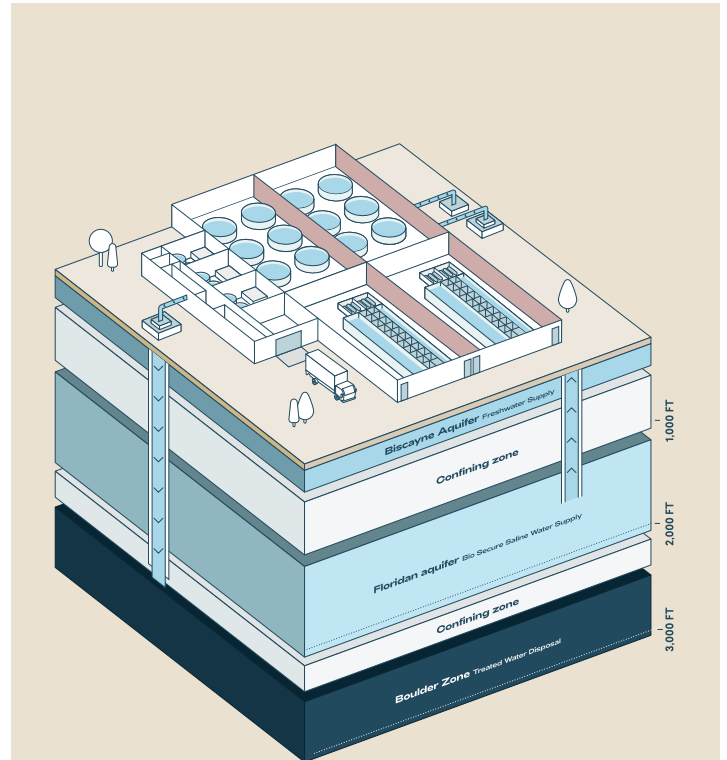
**ALL THE WATER USED** for farming operations comes from highly productive aquifers with stable brackish and fresh groundwater. The groundwater resources for the farm have been allocated for use by the South Florida Water Management District ("SFWMD") under a 20-year water use permit. The permit provides an allocation of groundwater from two subsurface sources:

- The Biscayne Aquifer, which contains fresh groundwater of very low salinity of 0.36 ppt
- The Floridan Aquifer, which contains brackish to saline groundwater that varies in salinity from approximately 2.7 to 35.0 ppt.

**The Bluehouse sources freshwater from the Biscayne Aquifer only a few feet below ground surface and accounts for about 5% of total groundwater consumption based on the current permitted allocations.**

The brackish and salty groundwater is sourced from the Floridan Aquifer, a density stratified artesian aquifer, and is located at approximately 1,200 feet below the Miami Bluehouse. The salinity of groundwater in the aquifer generally increases with the increase in depth as saline water is denser than freshwater. Wells constructed in the Floridan Aquifer are completed in two different zones: the upper Floridan Aquifer and the middle Floridan Aquifer. These hydrogeologic units produce groundwater with salinities of 2.7 parts per thousand ("ppt") and 35 ppt, respectively. Over 95% of the groundwater consumption for farm operations will consist of saltwater from the Floridan aquifer. The exchange of groundwater entering and exiting the Miami Bluehouse is about 10% per day. Inside the Bluehouse, the recirculation degree of filtered water in the tanks is above 99%. Less than 1% of the total water that is sent through the filtration system is discharged as non-toxic wastewater through the injection well and into the Boulder Zone of the lower Floridan Aquifer, located at a depth of nearly 3,000 feet underground.

The Boulder Zone then acts as a storage zone and natural filter with a natural current that slowly filters the water over thousands of years until it eventually returns to the ocean as clean water, thus eliminating any wastewater impact on the ecosystem.



# 99%

**RECIRCULATION DEGREE OF  
FILTERED WATER IN THE TANKS**

The unique groundwater resources of South Florida are well suited for Bluehouse farming at scale. A stable supply of fresh, brackish, and saline groundwater, along with a proven and environmentally desirable method for wastewater disposal, are critical elements. In 2018, Atlantic Sapphire was granted a United States patent for its systems and methods of intensive recirculating aquaculture, incorporating the use of wells constructed for groundwater supply and wastewater disposal. Further, water consumption is comparatively much lower than other proteins, with the Group stating a goal of 200 liters per kilogram of edible meat.



# Is Farmed Salmon More Sustainable Than Meat?

IT IS CLEAR THAT SALMON PRODUCTION, while a well-managed industry relative to livestock production, faces a number of environmental risks that constrain production. However, does salmon have a lower environmental footprint than meat?

Salmon is commonly thought to be significantly more environmentally friendly than chicken and pork, but academic literature suggests this depends on the particular environmental factor considered. In terms of water use, salmon offers some advantages over land-based proteins.

When looking at feed consumption, the picture is less clear. Salmon has a lower kilo-for-kilo feed conversion ratio.

But once the higher calorific content of the feed for salmon is considered (approximately 30% fishmeal and fish oil), the calorie and protein retention looks less impressive (28% and 25% respectively for salmon, versus 37% and 27% for chicken). As salmon only retains 25% of the proteins it requires in its feed, it does not produce protein more efficiently than chicken.

The GHG emissions accounting of individual seafood species varies considerably, yet the science is less developed than for livestock proteins. However, the latest research suggests that GHG emissions for farmed salmon are somewhere in between chicken and pork. A SINTEF report pointed to emissions from farmed salmon at 7.9kg CO2eq as edible meat versus 6.1 kg for chicken, 12.2 kg for pork and 39 kg for beef. A Swedish study also found that farmed salmon’s climate impacts were greater than chicken yet less than pork.

The incremental demand for farmed salmon has also come from further afield, including the Far East and America.

Given that farm production could not be moved from Norway or Chile and given the customer’s strong preference for a fresh product, servicing these markets involves air transport. Salmon travels either in the bellies of passenger planes or in specialist cargo planes. A flight from Oslo is 7,500 km to Miami and 7,000 km to Beijing. On a calculated GHG per km air travel, this would add an extra 10 kg CO2-eq per kg (including approximately an extra 2.5% for conversion into edible meat). This means that a salmon product in Beijing would have emissions of 18 kg CO2-eq per kg versus just 8 kg CO2-eq for the same product served in Oslo. This matters because China is the fastest-growing market for Atlantic salmon, with demand increasing by 9.7% between 2018-2019.



PROTEIN	SALMON	POULTRY (CHICKEN)	PORK	BEEF
GHG emission, kg CO2 per kg edible meat	7.9	6.2	12.2	39
Freshwater consumption, litre per kg edible meat	2,000	4,300	6,000	15,400
Feed conversion ratio, edible meat per 100kg feed	56	39	19	7
Calorie retention	28%	37%	21%	13%
Protein retention	25%	27%	16%	7%



## Water Recirculation and Filtration

**WATER RECIRCULATION IS CONTINUOUSLY** performed throughout the different farming areas and in independent systems to ensure optimal levels of water containment in line with Atlantic Sapphire's de-risking strategy. Filtration is performed through both mechanical and biological filters.

First, water is treated in mechanical filters ("drum filters") that capture the solids generated in the tanks, mainly feces and uneaten feed pellets. Water continues to circulate to biological filters ("biofilters") for the nitrification of the water, a process by which the ammonia generated by fish is converted into nitrite and nitrate in a two-step process.

As a second step, an FDA-approved organic polymer is added in mixers to flocculate the solids. The sludge collected is pumped to a sludge treatment system. Treated sludge is collected and transported to a local waste management facility.

## Water Discharge

**NON-HAZARDOUS AQUACULTURE** derived wastewater is stored underground through an injection well; domestic wastewater will be disposed of on-site to two permitted septic systems under construction. The treatment of the water consists of the separation of sludge and solids generated during aquaculture operations, and effluent water.

Wastewater is stored deep underground by way of an injection well. Regulatory monitoring and reporting associated with injection well system includes both groundwater and wastewater analytical analyses for samples collected at a permit specified frequency. Physical data including groundwater elevation from a Floridan Aquifer monitor well and the operating flows and pressures at the injection well are continuously recorded. All physical and analytical laboratory data are submitted to the Florida Department of Environmental Protection monthly.

## Reducing Effluents and Waste

**IN FLORIDA**, belt presses and a centrifuge will dewater the sludge to 30% dry matter, which is accepted as a solid waste for offsite composting or disposal by commercial of municipal solid waste facilities. The Group is actively looking into alternative options for handling sludge in the future. For example, further treatment to 90% dry matter will make it available for disposal at a local commercially run wastewater to energy facility. Other options for use as energy or soil amendments are also being evaluated.

By using a closed system, the Group maintains a high degree of control over fish waste. Atlantic Sapphire's US operations do not discharge any waste into the ocean which provides positive aspects. For example, there is no risk of: water pollution coming from antibiotics or pesticides from operations, wild species becoming dependent on eating salmon feed spilled from operations, or solid waste, mainly feces and uneaten feed, settling and solidifying on the seabed, altering natural ecosystems.

**Likewise, Atlantic Sapphire's operations have not had any impact on other fauna such as seabirds or predators, and there is no risk of detachment of farming equipment (nets, plastics, or other artifacts) that can be transported by the current contaminating the water, becoming ghost gear, and potentially harming marine fauna.**

Atlantic Sapphire is committed to ensuring the proper handling, management, and disposal of hazardous and non-hazardous waste. This means that the Group complies with local, state, and federal regulations for the storage, identification, record keeping, prevention, reduction, reuse, recovery, recycling, removal, and disposal requirements, as well as the requirements of international standards, such as the IFC Performance Standards and EHS Guidelines.

The Group operates sludge handling systems and mixers which allow it to keep sludge-containing water mixed in buffer tanks. By doing so, the water that passes through the filtration and water purifying plant does not clog up or need frequent adjustments and cleaning of filtration equipment.

In the future, it is the Group's intention to invest in technology to convert all sludge generated in Bluehouses into a resource such as agriculture fertilizer, soil amendment, or biogas energy.



# Reducing Food Waste

Because the Bluehouse creates a controlled environment for the fish, Atlantic Sapphire is able to tackle food waste in three ways:

## 1. Increasing Production Efficiency

Recirculating aquaculture systems, such as a Bluehouse, increase production efficiency by allowing fish to be grown in a controlled environment, which reduces the risk of disease and other factors that can reduce yields. Furthermore, Bluehouse Salmon are never exposed to parasites or diseases such as sea lice.

## 2. Minimizing Shrinkage

Local production with a shorter value chain added to a longer shelf life allows retailers and food service operators to minimize the amount of fish that needs to be disposed of. In the seafood industry, shrink is defined by fish that needs to be thrown away as it couldn't be sold before the best before date. The industry average is around 20% and the longer shelf life of Bluehouse Salmon minimizes that amount.

## 3. Reducing Seafood Waste

Bluehouses help prevent seafood waste by reducing the amount of fish that is lost or discarded during the production process. This is because the controlled environment allows for better monitoring and management of fish health and growth, which can help reduce the risk of disease and other factors that can lead to fish mortality.

Atlantic Sapphire does not generate food loss in its filleting operations. Currently the Group is selling all byproducts from filleting, including culling in early stages, to pet food processors and aquariums. Our fish trimmings and byproducts can be also processed into further value-added ingredients such as Omega 3 and fish oil pills, protein or calcium powders or even other advanced pharmaceutical uses.

Atlantic Sapphire is working towards a zero-waste future, where all natural fish waste continuously filtered from Bluehouse waters can be processed for reuse as an energy source, biogas, or fertilizer. The Group is excited to form relationships with traditional agriculture partners who can benefit from its upcycled fish waste through more vertical integrations.



# Feed Sourcing

**ATLANTIC SAPPHIRE'S GOAL** is to continue net marine protein production of healthy, happy, and sustainably land-raised American salmon, while significantly reducing the level of contaminants coming from marine-sourced feed ingredients. Reducing marine ingredients from wild capture takes us one step further in our mission to achieve zero impact on the oceans.

The vision is to be out of the ocean by reducing marine ingredients from fish feed. Atlantic Sapphire will soon be able to produce seafood with a minimal impact and negligible amount of the contaminants coming from the ocean such as metals, PCBs, or dioxins.

To achieve this, the partnership between Atlantic Sapphire and feed supplier Skretting is focused on developing innovative fish diets for the health of people and planet. Skretting's balanced fish feed consists of a range of sustainably sourced, food safe ingredients, nutritionally formulated to provide a diet in the form of protein, fat, carbohydrates, vitamins, minerals, and antioxidant carotenoids.

**Atlantic Sapphire has lowered the use of marine ingredients consistently over time, resulting in a 0.3 feed fish inclusion factor ("FFIF"), and a 0.46 Fish In Fish Out ratio ("FIFO") for 2024, making Atlantic Sapphire a net positive marine protein producer.**

Atlantic Sapphire's commitment to sustainability starts with feed. Raw material availability, origin, harvesting methods, and regulations throughout the supply chain in feed selection represent key factors in the social, environmental, and economic impact of the production of the final product. There are science and data-based comprehensive standards regulating the supply chain of feed ingredients in aquaculture. In fisheries for example, scientific bodies assess wild stocks in different fishing grounds and establish catch restrictions based on biomass volumes, average size, and the natural seasonality of the species. Atlantic Sapphire carefully selects its feed and ingredient suppliers to ensure that the strictest regulations and full traceability are in place throughout the value chain from primary raw material production through feed ingredient manufacturing and feed production.

## Skretting

Skretting's feed ingredients are highly screened for sustainability, food safety and nutrient content to ensure the highest level of food safety and quality. Skretting meets or exceeds all regulatory requirements for the USA and Canada. 100% of Skretting North America's marine ingredients are certified. Skretting maintains records on the species and origin of each batch of fishmeal and fish oil and assures traceability of all ingredients that make up more than 1% of the feed. Vegetable-based ingredients are purchased as non-GMO and supplier certifications are documented. Skretting and Atlantic Sapphire are committed to sustainability, investment in innovative research and continuous improvement.

In pursuit of supporting Atlantic Sapphire's goal of achieving reduced marine impact, Skretting utilizes alternative sustainable proteins and oils, such as:

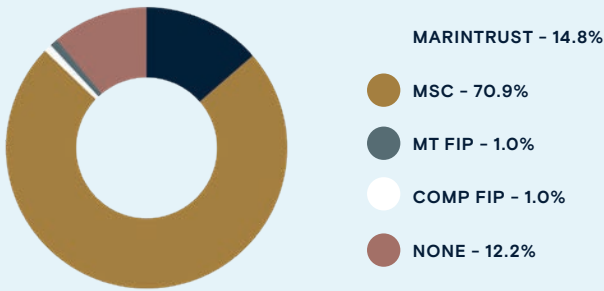
- Vegetable proteins and oils, primarily from North American sources
- Sustainable protein from human food processing by-product, allowing transition to circular economy ingredients
- Novel Algal oil, highly concentrated in Omega 3's (EPA/DHA), produced in the USA through fermentation using renewable resources.

## Marine Ingredients

Skretting has a Marine Ingredients Sourcing Policy for Atlantic Sapphire's global operations aiming at ensuring that by 2025 it sources marine ingredients that are 100% certified by MSC, MarinTrust, or coming from a fishery improvement project, as well as ensuring that all the fishmeal and fish oil used to produce feed originate from fisheries that are managed according to the FAO Code of Conduct for Responsible Fisheries.

Atlantic Sapphire chose to work with feed suppliers that source their marine ingredients from producers which fulfill the requirements of the MarinTrust, the international program for marine ingredient certification, formerly known as the Global Standard for Responsible Supply ("IFFO RS"), in line with the FAO Code of Conduct for Responsible Fisheries. By engaging only with suppliers that operate under third-party recognized standards, the Group ensures that all the fish used in our feed comes from responsibly managed fisheries with well-regulated biomass stocks and with zero-tolerance policies against Illegal, Unreported, and Unregulated ("IUU") fishing and full traceability systems in place.

Sourcing of marine ingredients in Skretting Canada during 2024 details as follows:





### Soy

Another major area of focus in aquaculture feed production is the use of sustainably sourced soy. Atlantic Sapphire believes it is a joint responsibility for both feed suppliers and salmon farmers to uphold strict requirements in the selection of soy with a strong focus on minimizing the risk of deforestation and zero tolerance against forced labor. All soy and/or soy-derived ingredient suppliers for Skretting North America have signed and meet the Nutreco Code of Conduct for Business Partners. As North American soybean meal is not Round Table on Responsible Soy “RTRS” or Proterra certified, Skretting is buying RTRS credits to uphold sustainability standards. This ensures that suppliers meet their criteria for non-deforestation areas. By the end of 2025, Skretting’s ambition is to source soy ingredients that are free from both legal and illegal deforestation.

### Alternative Ingredients

Skretting North America continues to stay connected with both internal global specialists as well as industry networks to receive news on the latest technology/innovation and, whenever applicable, capitalizing on such novel ingredients to address needs of customers. Challenges in a large-scale implementation/embracing of most novel ingredients are still largely due to cost-prohibitive price points to incorporate into formulations, among other reasons.

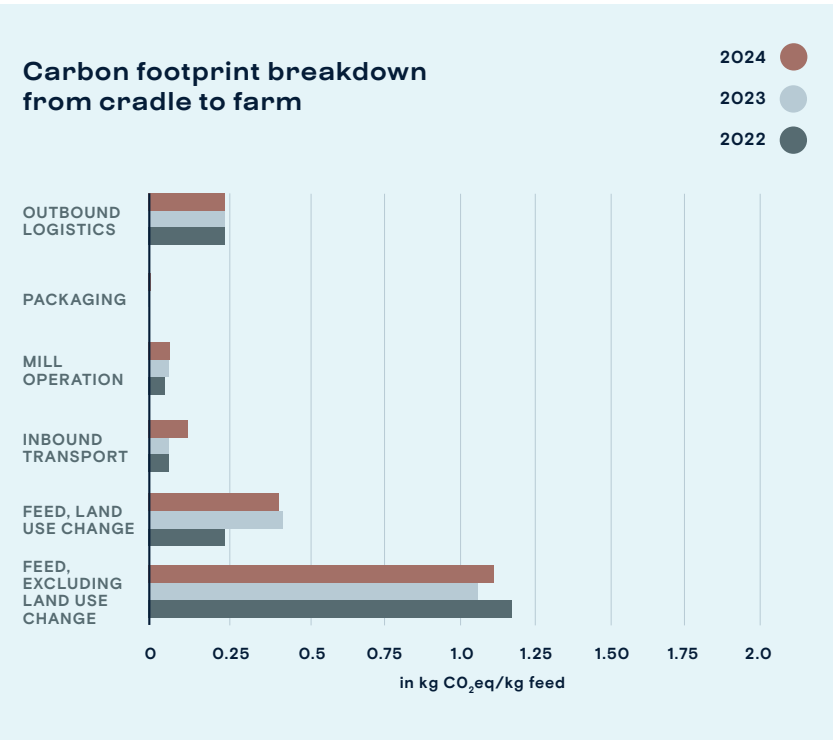
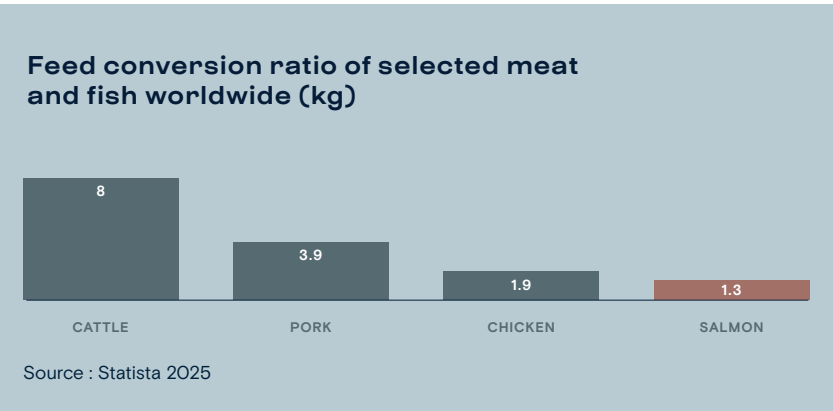
For example, Skretting continues to consult insect meal producers across North America and in recent months has been narrowing the selection criteria and subsequently the candidates of insect meal suppliers that qualify such criteria to hopefully begin a partnership to start receiving steady amounts per month.



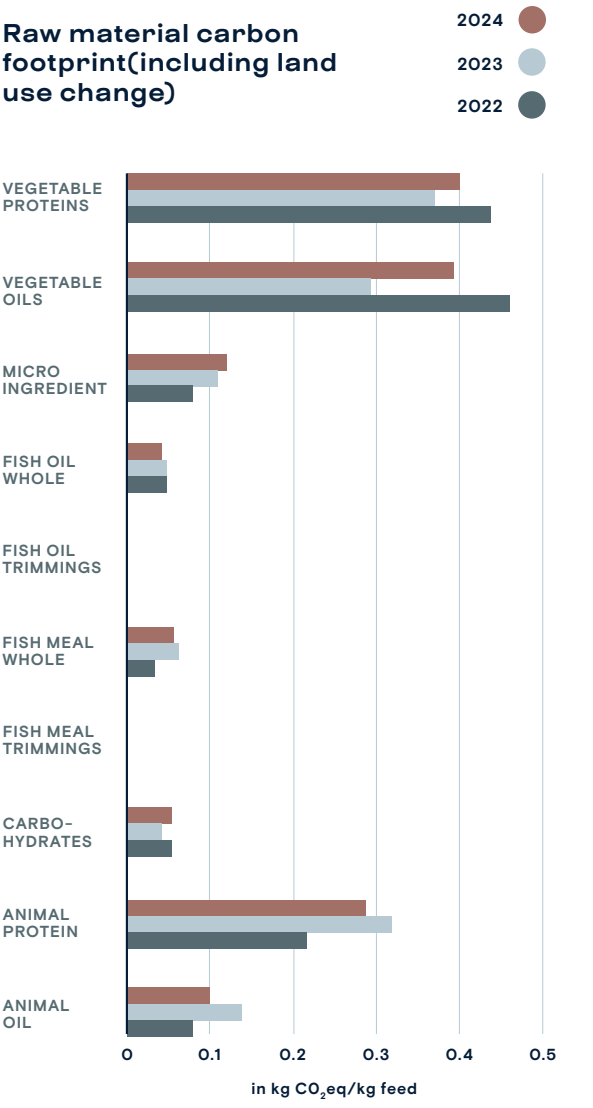
# Feed Conversion

**FARMED SALMON** has a low carbon and water footprint compared to many other sources of protein such as beef and pork. The feed conversion ratio of Bluehouse Salmon (FCR) is a measure of the efficiency of a fish in converting feed into fish biomass. In 2023, the Group's biological feed conversion ratio was 1.37, and economic feed conversion ratio was approximately 1.54. This means it took 1.54 kilograms of feed to produce one kilogram of fish biomass.

As seen in the table below, producing a kilogram of salmon requires far less feed than producing a kilogram of beef or pork, which reduces both environmental impact and the cost of production. Beef cattle hold the highest feed conversion rate, with an average ratio of eight, while in contrast an industry average salmon needs only about 1.3 kilograms of feed to increase its bodyweight by one kilogram, making it a highly favorable conversion ratio.



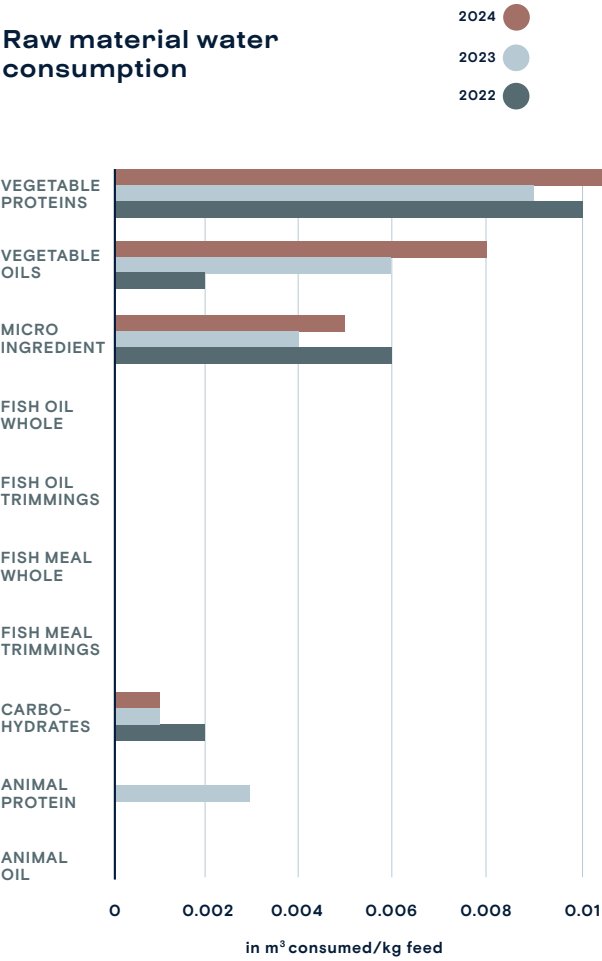
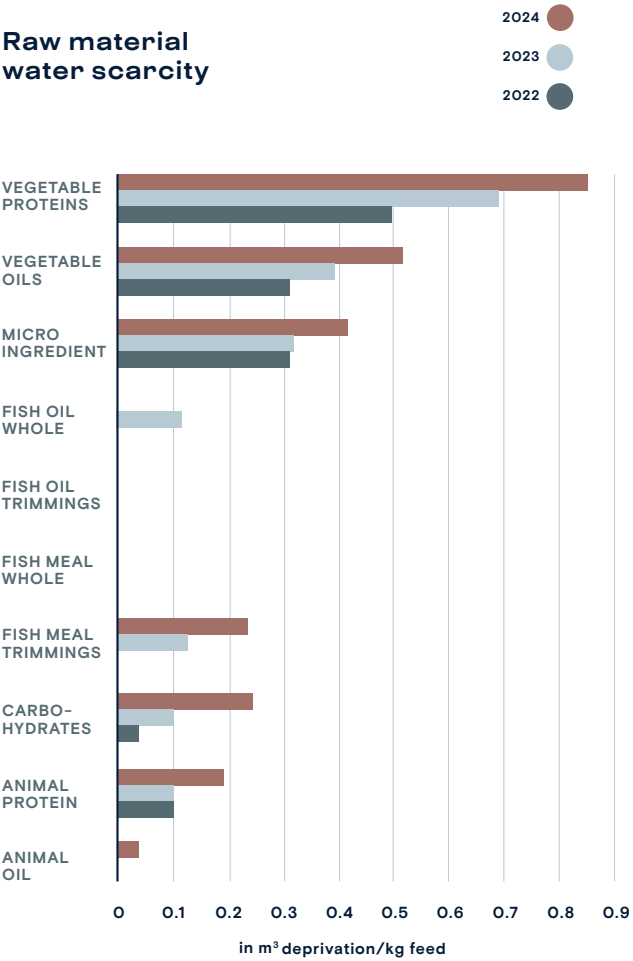
Atlantic Sapphire simultaneously works with feed supplier Skretting on reducing the carbon and water footprint of its feed. The main contributor of the carbon footprint this past year was raw materials production (62%), followed by the associated land use change (16%). The remaining 20% was mainly due to outbound transport (12%), mill operations (3-4%) and inbound transport of raw materials (3%). The main contributing raw materials to the overall carbon footprint were vegetable proteins (28%) and vegetable oils (27%) due to the land use change impact associated with these raw materials.





Water (scarcity or consumption) footprint was mainly determined by water consumption for synthetic amino acids, but also by crop irrigation (in water scarce areas). Skretting used the water scarcity indicator AWARE as recommended by the European Commission in their Environmental Footprint 3.0 selected methods to determine the water footprint of the feed. Skretting did not aggregate the water consumption of each raw material, because water consumed in a water rich area does not have the same environmental impact as in a water scarce area.

Atlantic Sapphire and Skretting are committed to working together to reduce the footprint of our feed while at the same time considering the impact of ingredients on fish performance and welfare. In 2021, Skretting signed an agreement with us with the intent of building a feed plant locally in South Florida.



Having local feed production means that we will lower the transportation of sourcing feed while simultaneously working in an even closer collaboration to develop new feed ingredients that are better for our systems, for our fish, and for the planet.

## Processing and Packaging Solutions

**ATLANTIC SAPPHIRE DOES** primary processing onsite in Homestead. This includes slaughter, eviscerating and packing whole salmon in a state of the art facility. The Group also commissioned in 2024 a filleting line where it does pin bone out fillets on site to guarantee optimal yields, freshness and workmanship.

Atlantic Sapphire's main packaging material for HOG salmon and salmon fillets is made of fully recyclable or biodegradable material for domestic transportation. Together with a sustainability-minded suppliers, the Group is sourcing fully recyclable packaging for whole fish and fillets and using cardboard biodegradable totes or reusable plastic bins for all byproducts from filleting operations (including heads, frames and bits and pieces).

Thanks to this onsite processing in-market, fish arrives faster and fresher to stores and consumers. This means longer shelf life, less shrink and lower food waste on the market side as well.



## Protecting Biodiversity and Coastal Areas

**ATLANTIC SAPPHIRE** has a limited impact on the local biodiversity in the locations where it operates due to its closed production method and efficient land occupation. For example, it can farm up to 1,000 metric tons annually of salmon on one acre of land, which is the highest yield per acre of animal protein in the world.

The Group plans to raise 220,000 annual metric tons of salmon on land that once grew only 10,000 annual metric tons of tomatoes.

Homestead, Florida, the home to the Florida Bluehouse, is a city within Miami-Dade County located between Biscayne National Park to the east and Everglades National Park to the west. Biscayne National Park encompasses coral reefs, islands and shoreline mangrove forest in the northern Florida Keys. America's Everglades is the largest subtropical wilderness in the United States. Everglades National Park protects an unparalleled landscape that provides important habitat for numerous rare and endangered species like the manatee, American crocodile, and the elusive Florida panther.

In 2015, prior to Phase 1 construction of the first Bluehouse, Miami-Dade County conducted an environmental assessment of the Group's property through reviewing photographic aerials, U.S.D.A. soil maps, Miami-Dade County Comprehensive Development Master Plan (CDMP) Departmental records, and a site inspection. The purpose of the assessment was to determine if a Miami-Dade County Class IV Permit for work in wetlands would be required. This environmental assessment revealed that the properties do not contain wetlands as defined by Chapter 24-5 of the Code of Miami-Dade County; therefore, a Miami-Dade County Class IV Permit was not required.

In 2022, this environmental assessment was completed again prior to Phase 2 construction and yielded the same results. Atlantic Sapphire has a goal of no impact on the oceans, and this promise extends to all areas of high biodiversity including outside protected areas. These assessments show that Atlantic Sapphire's activities, products, and services, do not have any significant impact on surrounding biodiversity and wetlands.

**Fresh water is the lifeblood of the Everglades and the South Florida economy. The Bluehouse uses less fresh water per kg of food produced than the vegetable farm it replaced.**

Over the past decades, aquaculture has greatly contributed to the protection of depleting wild stocks and is expected to continue to be a significant contributor in feeding the world's increasing population. However, there is much more to be done in protecting these ecosystems and, in particular, the ocean.

Atlantic Sapphire's farming operation has zero harmful impact on coastal areas and its biodiversity by producing salmon on land, away from wild waters, using its unique groundwater resources in Florida. For more on the goal to minimize impact on the ocean, please refer to feed sourcing.



GHG Emissions  
& Climate Change

- ZERO** kilos of salmon flown on airplanes  
**ACHIEVED**
- ENGAGE** with local electricity company and develop a concrete plan to transition to 100% renewable sources of electricity  
**ACHIEVED**
- REPORT** scope 1 2, and 3 emissions  
**DELAYED** Currently reporting only Scope 1 & 2 emissions
- INTRODUCE** at least 25% sourcing from solar energy during the second half of the year.  
**ACHIEVED** (28%)

Feed

- REMAIN** a net marine protein producer ("FIFO" < 1)  
**ACHIEVED** (0.46)
- INCREASE** the inclusion of alternative ingredients (i.e. algae oil) in our salmon feed  
**MISSED**

Water

- REDUCE** freshwater usage from production and processing to below 200 liters per kilo of edible meat.  
**MISSED** (235 liters per kg of harvested fish (not including feed))



GHG Emissions  
& Climate Change

- ZERO** kilos of salmon flown on airplanes
- ENGAGE** with local electricity company and develop a concrete plan to transition to 100% renewable sources of electricity
- REPORT** Scope 1 and 2 emissions
- INCREASE** sourcing from solar energy **BY 10%**.

Water

- REDUCE** freshwater usage from production, processing, and feed to below 200 liters per kilo of edible meat

Feed

- REMAIN** a net marine protein producer ("FIFO" < 1)





# SOCIAL RESPONSIBILITY

**Atlantic Sapphire is dedicated to fostering a corporate culture that goes beyond regulatory compliance and engages and empowers all employees around realizing its purpose and living its values.**

**THE GROUP IS DETERMINED** to be among the industry leaders in tackling environmental as well as social responsibility issues, consistent with the Group's core values. In recent years, its core values have been extended with new subvalues to encourage and ensure employees embrace the Group's core values every day in dedicated efforts to help customers realize their ambitions. In 2024, Atlantic Sapphire looked at additional ways that its core values could be incorporated into daily employee activities. The "Going Further" Employee Recognition Program was launched to reinforce core value related to Performance. Atlantic Sapphire's primary focus shifted to its US Operations in Homestead, Florida. The South Florida Bluehouse is strategically positioned to help support the future growth of the company and its mission.



# Atlantic Sapphire Values

ATLANTIC SAPPHIRE PROMOTES a safe, healthy, and fair working environment. The Group depends deeply on all our employees’ capabilities and contributions, and it is therefore committed to providing an inclusive, motivating, and safe working environment, as described in its Human Resource Policy and its Environmental, Health, Safety, and Security (“EHSS”) Policy. Achieving its goals while living its values can only be done if employees collaborate and treat each other with respect. Atlantic Sapphire aims to be an open, positive, and supportive working environment.

## 1 Passion

Purpose, dedication, and courage

- WE ARE ALL Fish Farmers.
- WE ARE POSITIVE THINKERS and look for solutions.
- WE SHARE OUR KNOWLEDGE and energy with each other.
- WE ARE ALWAYS eager to learn

## 2 Performance

Initiative, collaboration, and results

- ALONE WE GO FAST – together we go further.
- WE MAKE each other better.
- OUR JOB IS NOT DONE until the customer is happy.
- GOOD BIOLOGICAL CONDITIONS drive financial performance.

## 3 Innovation

Continuous improvement, solutions, and learning

- WHAT WE DO TODAY, we do better than yesterday.
- WE FOCUS ON THE SOLUTION, not the problem.
- WE LISTEN DEEPLY to understand each other.
- WE SHARE IDEAS with our coworkers

## 4 Innovation

Accountability, open communication, and care

- WE TALK to each other, not about each other.
- WE DELIVER what we promise.
- WE STAY HUMBLE and ask for help when need it.
- WE SPEAK UP to solve problems because we care.

## 5 Balance

Healthy fish, wellness, and sustainable planet

- HEALTHY FISH are at the heart of everything we do.
- WE LOVE LIFE, bringing our best self to life and work.
- WE CARE for People, Fish, and the Planet.
- WE DO THE RIGHT THINGS in the right way.

## Employee Growth

2020	2021
104	166
2022	2023
177	158
2024	
237	

# Engaged Employees

In 2024, the Group restructured a number of departments to streamline operations, create greater efficiencies and strengthen competencies across all areas of the organization. The company's headcount increased because had a goal to eliminate temporary labor. As of 31 December 2024, Atlantic Sapphire had 237 full time employees. In the Phase 1 post construction period, the Group prioritized skills and experience in staffing teams to ensure that its operations are safe and secure. The group enlisted a contingent workforce as needed to help support Operations in 2023. Over time, the Group endeavors to increasingly hire full-time employees from the communities in which it operates with a goal of eliminating contingent workers entirely. Atlantic Sapphire has been working through extensive community engagement within universities, colleges, YMCA, and other promotional activities to drive a strong employer branding.

In 2024, Atlantic Sapphire made a concerted effort to cultivate relationships with local universities such as The University of Miami, Florida International University and Florida Agricultural & Mechanical University In addition to hosting onsite tours and visits, the Group networked with professors and career resource centers to help facilitate learning opportunities for students and establish relationships so students can explore future career opportunities. The hope is that the internship program established in 2022 will continue to grow as the Group partners to provide firsthand exposure to tomorrow's future workforce while also building brand ambassadors who are engaged and excited about the mission.

As part of the continuous feedback process In 2025, the Employee Satisfaction Survey, Atlantic Sapphire's Overall Workplace Experience score increased to 4 point to reach 67% employee and employee engagement remained steady at 60% as the group closed out 2024. The largest majority of employees (73%) reported feeling closely aligned with the company's values and respected and supported. The company saw the highest increase in feeling empowered to execute which moved up 7 points to reach 65%.

In 2024 there was an increased effort to engage employees and their families. Some of these initiatives included a company BBQs, a Corporate Run and also participating in "Take your Child to Work 2024".

## Workplace Experience Score



### WORKPLACE EXPERIENCE THEMES

We have categorizes the core survey items into the themes below

SCORE	THEME	TREND DEC 2024	# OF ITEMS VS. BENCHMARK		
			BELOW	CLOSE	ABOVE
60%	ENGAGED 3 Statements	0	=	—	—
73%	CLOSELY ALIGNED 3 Statements	-2	—	≡	—
65%	EMPOWERED TO EXECUTE 5 Statements	+7	—	≡	—
73%	RESPECTED & SUPPORTED 5 Statements	+6	=	=	—
69%	ENABLED TO GROW 3 Statements	+6	—	≡	—
60%	FAIRLY VALUED 4 Statements	+5	=	=	—

Atlantic Sapphire is focused on driving innovation by bringing experience from various industries such as conventional sea based aquaculture, wastewater, engineering, construction, maintenance, and fluid dynamics.

Atlantic Sapphire believes that a diverse and inclusive workforce is essential to success. The Group recruits globally for the talent and experience that may be difficult to find locally, all while emphasizing gender equality and equal employment opportunities. Atlantic Sapphire is proud to count over 20 different nationalities in our workforce.



Atlantic Sapphire onboards people who bring professional experience and fit the corporate culture, and in whom potential for growth is seen. The goal is to build a diverse workforce as Atlantic Sapphire grows – with both ethnic diversity and gender diversity. Atlantic Sapphire has set representation goals to increase diversity across the Group and will focus on three key targeted areas: targeted recruitment, development, and retention and promotion paths.

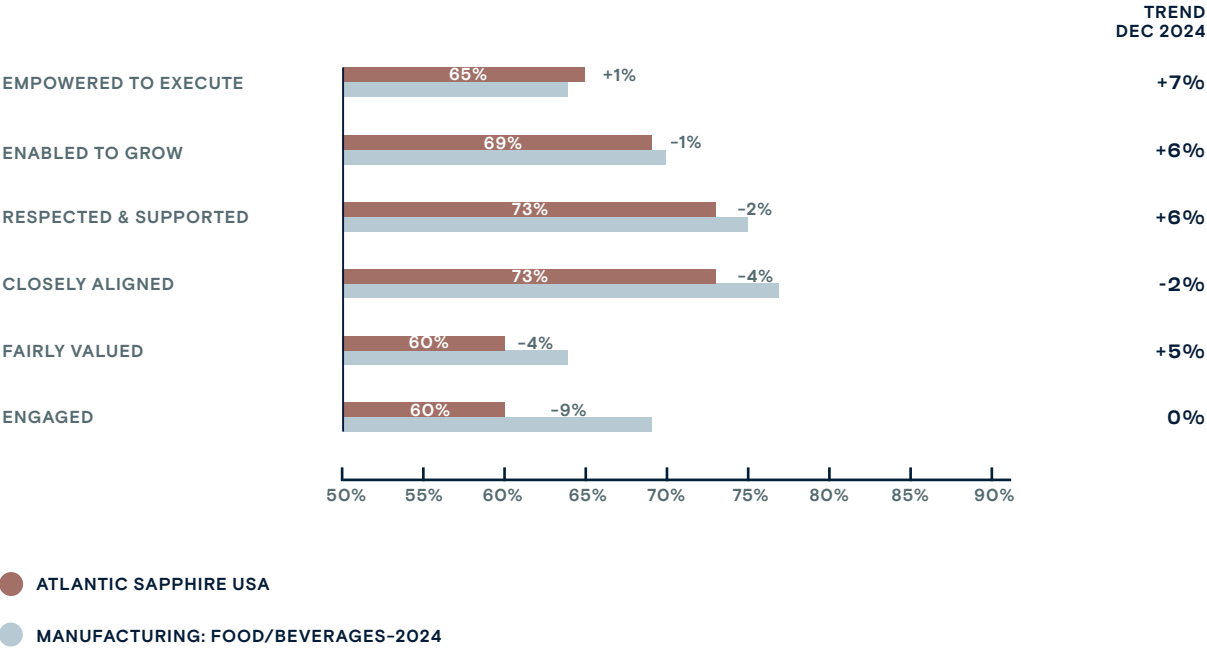
Although Atlantic Sapphire complies with applicable international and national laws, regulations and standards, there could be risks within the Group’s activities that may potentially have a negative impact on its people and communities and therefore, by extension, on its business. These relate primarily to occupational health and safety, training and education, and diversity and inclusion.

Pioneering in an industry also involves building up inexistent competences in the field. Driving performance while retaining talent throughout the organization in such an operationally geared industry is essential.



WORKPLACE EXPERIENCE THEMES

Percent favorable by theme at the organizational level



## Our Code of Conduct

**UNDERPINNING THE** Governance and ESMS framework is the central principle that the success of Atlantic Sapphire depends on maintaining the highest standards of trust and integrity at all levels of the organization, as well as the Group's reputation for honesty and transparency in its business.

Therefore, the Code of Conduct (the "Code") sets expectations and provides guidance for the Group's Board of Directors, officers, employees, independent contractors, and consultants. It is their responsibility to understand the Code as well as exercise good judgement and follow the Code.

All employees must sign the Code. Additionally, suppliers and vendor partners are also required to acknowledge and adhere to our AS Standard Vendor Terms and Conditions before engaging. These documents outline the commitment to integrity by following the principles of the Code. The Code also encourages reporting of any violations to management.

The Code is consistent with the Group's core values and is aligned with Atlantic Sapphire's commitment to the UN Global Compact principals and SDGs.

## Our Human Rights Policy

**ATLANTIC SAPPHIRE** believes that it is fundamental to its business to respect and protect human rights. The Human Rights policy therefore elaborates on the Code of Conduct to provide greater detail on how Atlantic Sapphire believes that it can positively impact human rights as a business. In accordance with principles 1 and 2 of the UN Global Compact, Atlantic Sapphire supports and respects the protection of internationally proclaimed human rights as established in the Universal Declaration on Human Rights and the International Labor Organization's Core Conventions. Human Rights is an area of importance to our employees, contractors, shareholders and investors, customers, end-consumers, civil society groups, and the local communities in which Atlantic Sapphire operates.

## The Human Rights Policy informs employees, business partners, and customers of Atlantic Sapphire's commitment to respecting and promoting human rights and in making a meaningful contribution to uphold human rights across our operations and our supply chain.

Atlantic Sapphire's Human Rights Policy applies to all Atlantic Sapphire employees, anyone doing business for or with Atlantic Sapphire (including suppliers), and others acting on Atlantic Sapphire's behalf to ensure that the Group is not complicit in human rights abuses directly or indirectly. We focus on the following:

### Diversity

Atlantic Sapphire is committed to equal employment opportunities and does not tolerate discrimination and harassment in the workplace. This means:

1. Selecting employees and contractors based on qualification, experience, and past performance.
2. Providing equal opportunity to all employees and applicants for employment without regard to race, creed, color, national origin, religion, ancestry, gender, sexual orientation, gender identity, marital status, familial status, or any other basis protected by federal, state, local law, and international conventions.
3. Respecting the personal rights and dignity of all employees and accordingly, will not tolerate sexual harassment or any other forms of harassment.

### Wages and Benefits

Atlantic Sapphire compensates employees competitively and equitably relative to the industry and the local labor markets. It operates in full compliance with applicable wage, overtime, and benefits laws. Currently Atlantic Sapphires' starting base wage is 29.4% higher than the state required minimum wage of \$13 plus the Group offers comprehensive benefits.

## Child Labor

Atlantic Sapphire is committed to the abolition of child labor, in line with the ILO conventions on Minimum Age and Worst Forms of Child Labor. The Group prohibits the hiring of individuals under the legal age of employment in the relevant jurisdiction and under the age of 18 for positions in which hazardous work is expected.

## Forced Labor and Human Trafficking

Atlantic Sapphire prohibits the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, slave labor, and any form of human trafficking in line with applicable UN and ILO conventions as well as any applicable Federal or State Anti-Trafficking regulation.

## Safe and Secure Working Conditions

Atlantic Sapphire is committed to providing a safe and healthy workplace in accordance with applicable safety and health laws, regulations, and internal requirements. In addition, Atlantic Sapphire complies with the International Finance Corporation's ("IFC") Performance Standard 2 regarding labor and working conditions.

## Freedom of Association

Atlantic Sapphire respects our employees' right to join or form unions without fear of reprisal, intimidation, or harassment.

## Open Communication & Grievance Mechanism

Atlantic Sapphire provides processes for employees and community to use to openly discuss any issues of concern, and will respond to any such grievances in a fair and transparent manner while simultaneously respecting the need for confidentiality, if possible.

## Development and Growth

Atlantic Sapphire encourages continuous learning, conducts new hire and annual performance reviews, and provides appropriate education, training, and guidance to support a drive towards continuous improvement.

## Compliance

Employees and suppliers are expected to never infringe on human rights and are alerted to report any situation in which human rights infringement is suspected. Violation of this policy or the refusal to cooperate will result in disciplinary action, up to and including termination and referral to the appropriate authorities.

## Privacy

The European Union ("EU") introduced data privacy regulation called General Data Protection Regulation ("GDPR") regarding human rights related to privacy. The GDPR is in scope as Atlantic Sapphire has offices in the EU and collects and transfers data from the EU to the US. Accordingly, Atlantic Sapphire engaged a third-party consultant to perform a GDPR Gap Assessment as the recommendations will directly impact Atlantic Sapphire's GDPR compliance posture and assist in improving the Group's overall data privacy and information security maturity. Our GDPR compliance will positively impact our stakeholders by ensuring that their confidential information is safe and secure.

## Responsible Sourcing

Atlantic Sapphire has a large and diverse extended supply chain. Suppliers must be transparent about their human rights and labor practices and work to remedy any shortfalls, and their commitment to complying with the Code of Conduct is contractually secured through their signature of the Terms and Conditions. The Group is exploring ways of monitoring performance and expects to have a more formalized responsible sourcing program in place in the future.





# New employee hires & employee turnover

- 24.3 % turnover in 2024
- 8.81% Decrease from 2023

PERIOD	OVERALL TURNOVER	VOLUNTARY TURNOVER
2022	28.24%	12.42%
2023	33.08%	12.97%
2024	24.27%	12.39%

# Benefits provided to full time employees that are not provided to temporary or part-time

ATLANTIC SAPPHIRE appreciates its team's commitment to its success. The Group is equally committed to providing competitive, affordable health and wellness benefits to help take care of its associates and their families. Full-time employees working a minimum of 30 hours per week are eligible for the below benefits:

- Medical with HRA
- Dental
- Vision
- Company Paid STD & LTD
- Company Paid Life and AD&D
- Voluntary Employee and Dependent Life and AD&D
- Dependent Care FSA
- Pet Insurance
- Aflac Supplemental Benefits
- Wellness Program
- 401k with Company Match



# Parental leave

**2 WEEKS OF** parental leave was added as an official Atlantic Sapphire benefit in the 8th revision of our Employee Handbook.

# Fostering Diversity

## Diversity of governance bodies and employees

HEADCOUNT (%of total organisation)	FEMALE	MALE	NOT SPECIFIED
CEO and Direct Reports	8.33%	91.67%	0%
Leader of Leaders	0%	100%	0%
Front Line Managers	29.63%	70.37%	0%
Individual Contributor	14.14%	83.77%	2.09%

### Ratio of basic salary and remuneration of women to men

In 2024, women earned \$0.96 to every dollar earned by men in non-executive positions. In the executive tier, women earned \$0.65 for every dollar earned by men in executive roles (Directors & C-Suite positions).

**In 2024, the percentage of female employees in the workforce decreased to 17%. The percentage of women serving as frontline managers increased to 29.63 %.**

As part of the overall commitment to human rights, Atlantic Sapphire is committed to providing equal opportunity to all employees and applicants for employment without regard to gender, sexual orientation, race, creed, color, national origin, religion, ancestry, gender identity, marital status, familial status, or any other basis protected by law of US, Denmark, or Norway, as applicable. Through a multifaceted approach which includes strong support from leadership and culture and by establishing policies, talent attraction programs, awareness, and training programs, and rewarding employees through Performance Over Time incentive, Atlantic Sapphire is committed to fostering a work environment that is free from harassment of any kind as well as offensive or disrespectful conduct. Other examples include providing, when possible, an equal number of female and male candidates for job interviews to reduce possible bias, and the Group has started tracking recruitment diversity metrics on gender, race, disability, and veteran status.



	MALE	FEMALE
June 2019	87%	13%
December 2019	78%	22%
December 2020	76%	24%
December 2021	76%	24%
December 2022	80%	20%
December 2023	80%	20%
December 2024	83%	17%

# Nondiscrimination

**ATLANTIC SAPPHIRE** has starting pay bands that are consistent regardless of gender. It clearly posts required state and federal notices related to compliance including Title VII, The Genetic Information Nondiscrimination Act and ADA. Atlantic Sapphire complies with the Americans with Disabilities Act and provided reasonable accommodations to 2 employees and always strives to create an inclusive workspace in 2024.

# Freedom of Association and collective bargaining

**AS A COMPANY**, Atlantic Sapphire has not restricted employees from communicating or working to form a collective bargaining arrangement.

# Child Labor

**ATLANTIC SAPPHIRE** abides by the guidelines established by the Fair Labor Standards Act (FLSA). Additionally, child labor guidelines and requirement by the Florida Department of Business & Professional Regulation are posted in both English and Spanish in all common employee break areas within the facilities.

# Forced or Compulsory Labor

**ATLANTIC SAPPHIRE** works to provide a safe working environment for employees, contractors, and its contingent work force. All employees and vendors are paid fairly based on the nature of the work and services provided.

# Human Resource Information System

**ATLANTIC SAPPHIRE** uses a centralized Human Resource Information System (“HRIS”) and lifecycle experience process. Through this process, every new hire that is onboarded into Atlantic Sapphire has the same employee experience that is designed to set them up for success through alignment with its values, vision, and Code of Conduct as well as its environmental and social management systems. Atlantic Sapphire enhanced security through single sign using Active Directory for many of the company’s systems including its HRIS.

In 2024, the Group chose not to roll out the performance review self assessment because of the leadership changes and restructuring that took place. Emphasis was placed on training team members, cross training and goal setting.

Employees are updated on a weekly basis with respect to the Group’s status and the biological performance of the salmon. Other regular communications informing employees on vacancies, healthcare, safety, production, and maintenance are shared centrally through the internal communication tool. The Group launched an internal intranet portal appropriately named “The Current”.

In addition to The Current, the Group also holds quarterly Town Halls to update employees on the state of the business and provide a forum for direct communication between Team Members and the Senior Leadership Team. As part of driving further recommendations from improvement and growth, grievance mechanisms and suggestion boxes have been actively promoted and solutions have been communicated and updated to all employees through a centralized channel. In 2024, Atlantic Sapphire continued its “Going Further” Employee Recognition program which is tied to the company’s core value of Performance. Through this program, employees are encouraged to nominate a team member for an action or behavior that was above and beyond that positively impacted another employee or helped achieve a shared goal. Atlantic Sapphire understands that the core of its success is the ability from team members and partners to perform.

In 2024, Atlantic Sapphire enhanced its training offerings to further support development and growth of employees from a technical, managerial and leadership, and a common perspective to all employee competence programs. Additionally, the Farm Operations team worked diligently to establish a Career Path for employees’ growth.



# Ensuring Occupational Health & Safety

**ATLANTIC SAPPHIRE** works to ensure a safe and healthy environment for all employees, contractors, and visitors. The Group proactively reinforces the mindset “Think Safe, Act Safe, Be Safe” at every opportunity throughout the organization. For the year ended 31 December 2024, approximately 297,537 total work hours were recorded throughout the organization and 32,696 hours were attributed to sick or personal time off.

The Environmental and Social Management System (“ESMS”) helps ensure that the Group takes extensive precautionary measures to reduce the risks. These include training of employees and a relentless focus on personal protective equipment and safe handling of hazardous materials together with systematic controls of its working processes.

Employees are encouraged to always speak up and raise a concern and refuse to perform work if:

- asked to do a task you consider unsafe,
- asked to do a job you think you are not properly trained to perform and that may harm you or others,
- they see someone performing a task that you think is unsafe or that the person is not properly trained to do,
- they suspect that a piece of equipment is not operating properly and may be unsafe, or
- they observe or are made aware of an unsafe condition or a potential danger to yourself or others.

Atlantic Sapphire actively manages and mitigates health and safety risks in its production facilities including accidents, injuries and occupational diseases, and exposure to chemical hazards.

## The Group designs and operates its production facilities with an emphasis on effective process safety programs to maintain a safe work environment and prevent accidents.

The Group maintains general oversight of the health and safety of its employees predominantly through ongoing auditing, monitoring, and evaluation of activities to ensure compliance, and it actively promotes a strong safety culture with its suppliers, vendors, and contractors.

The Group established the KPI Lost Time Incident (“LTI”), which is also part of the Performance Over Time Incentive program. The formula is as follows: (number of lost time injuries in the reporting period) multiplied by 200,000/total hours worked. In 2024, the total recordable incident rate was 2.54.

Atlantic Sapphire offers comprehensive medical insurance plans along with a host of additional health and welfare benefits for its employees and their families. Employees in the US are covered under the Group Medical Plan including in-patient and out-patient services covering medical, dental, vision, and company-paid benefits such as life insurance and short and long-term disability insurance. All employees are entitled to include members of their families in their insurance coverage.

### Health, Safety, and Environment Policy

**AT ATLANTIC SAPPHIRE** is committed to:

- Zero Harm
- Caring for the Community & the Environment

Atlantic Sapphire believes that all work-related injuries, illnesses, and environmental incidents are preventable, and wants to be a valued member of the community in which it operates.

In particular, Atlantic Sapphire will:

#### HEALTH & SAFETY

- Provide a healthy and safe work environment for employees, contractors, and visitors, and promote safe behaviors.
- Think Safe, Act Safe, Be Safe. Establish and maintain health and safety management standards and systems in compliance with relevant industry standards and regulatory requirements.
- Identify and assess hazards to safety and health and control them as part of a total risk management process.
- Require every employee and contractor to comply with relevant legislation and the health and safety management standards and systems. The Group will provide them with the necessary training to enable them to have the knowledge and skills to undertake that work in a safe and healthy manner.

#### ENVIRONMENT & COMMUNITY

- Conduct operations in compliance with all relevant environmental licenses and regulations.
- Promote the efficient use of resources and energy.
- Strive to minimize impact on the environment.
- Strive to be a valued corporate citizen in the community
- Respect neighbors, their values and cultural heritage and be considerate to them in carrying out operations.

**ON EACH OF THESE AREAS** Atlantic Sapphire will:

- Strive to continually improve.
- Report the progress made on health, safety, and environmental performance.
- Encourage everyone to carry out its commitment to health, safety, and the environment to their homes and to the community.

Atlantic Sapphire makes this commitment to its employees, contractors, customers, shareholders, and the community as it works towards Zero Harm for Everyone Everywhere and Caring for the Community & Environment.

# Investing in Life-Long Competence Development

**ATLANTIC SAPPHIRE** believes in the value of lifelong learning. The Atlantic Sapphire People & Culture team works to ensure that it can develop talent in a systematic and continuous way to support scaling up.

**The Group knows that the best learning comes from direct experience, and its programs are developed with a 70% hands-on, 20% shadowing, and 10% online or classroom approach.**

Atlantic Sapphire uses both the best internal and external sources to train and develop its employees, with collaboration at the core of its approach. Through the training platform, employees are continuously tracking their personal development which positions them to grow meaningful careers.

In 2024, all employees documented a total of 684 safety training hours 2,640 hours of training which included safety, technical and managerial competencies, and skills for personal development. Safety trainings were prioritized because there was a significant effort to drive safety culture and ensure that all team members were adequately trained to work safely. The Group also expanded their HRIS offering to incorporate a Learning Management system that is integrated and tracked by employee to support the multifaceted development needs of employees.

Harassment and Discrimination Prevention training was provided for all employees. This training focused on cultural sensitivity and reinforced the Group's zero tolerance policy on harassment and discrimination. In 2024, four claims of discrimination or harassment were reported and investigated.

Employees receive Occupational Health and Safety ("OHS") induction training upon hire, which teaches about the minimum safety, environmental, and security precautions required before gaining access to the facilities. Additionally, all employees are informed throughout the year of onsite hazards and controls, the location of firefighting and first aid equipment, and emergency response and evacuation procedures.

As Atlantic Sapphire prepares for projected growth and expansion, it realizes that the Group needs to train and develop high-potential employees who will lead future teams. In 2024, the Group focused on equipping employees with the tools to help them develop professionally and to support the anticipated needs of the growing organization. The Group created a Management Development Program with targeted training for current mid-level managers and prospective future leaders in which 24% of full-time employees, representing 85% of our mid-level managers, participated in this initiative.



## Engaging Local Communities

**BY PIONEERING FULL-CYCLE** salmon farming on land, Atlantic Sapphire is spearheading the development of an entire new industry. Building and maintaining its social license to operate is a critical success factor. Stakeholder engagement is based on open communication with neighbors and other stakeholders to promote the sustainable production of salmon, to create quality jobs, and to educate communities on the importance and possibilities of aquaculture.

**The Group organizes visits to the farm by schools, university students, researchers, local neighbors, government, and authorities wanting to learn about Atlantic Sapphire's operations.**

Group employees have also collaborated with universities and presented in classes in different academic fields related to the business. In Miami, an area of the Bluehouse is specially designed to receive visitors and provide tours through the facilities without interrupting operations or compromising safety. This facility design provides unparalleled transparency into the operations for the community and includes a reception room for presentations, and walkways with windows overlooking various stages of the salmon growth cycle.

In 2024 Atlantic Sapphire has not made any donations to political campaigns, political organizations, lobbyists or lobbying organizations.

Atlantic Sapphire paid dues and memberships to the following trade associations and other tax-exempt groups:

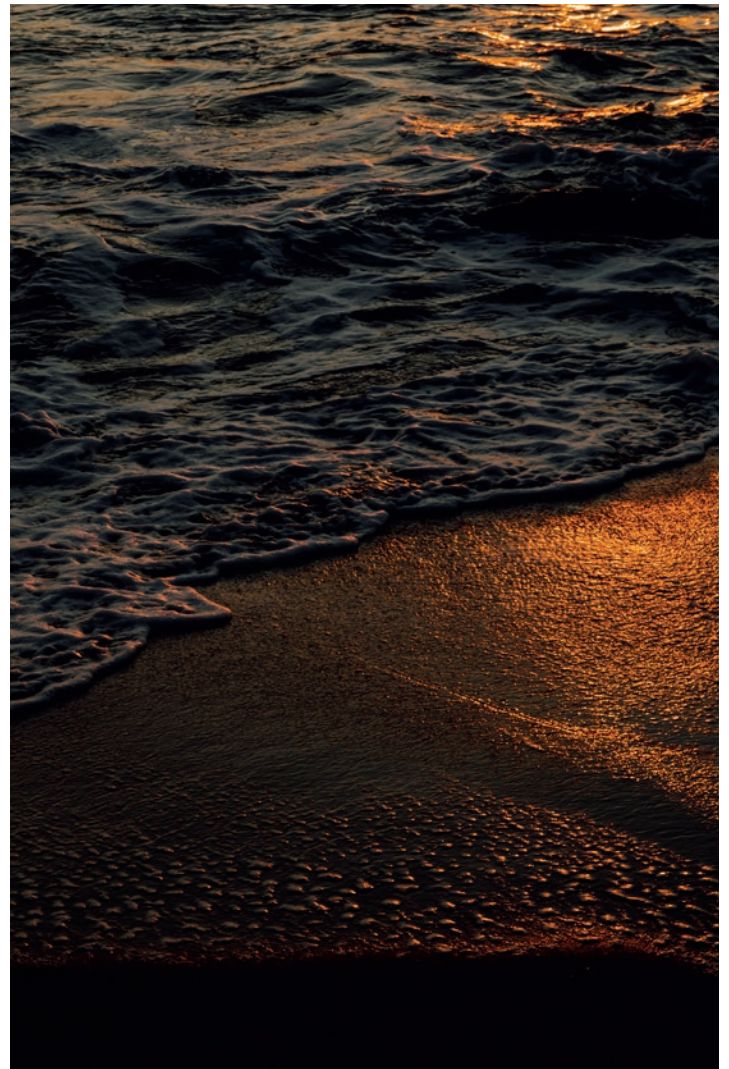
- Organic Trade Association
- Oceanwise
- Friend of the Sea
- Seafood Nutrition Partnership
- American Heart Association
- Miami Waterkeeper

In 2024, the Group engaged with the South Dade Chamber of Commerce, Miami Waterkeeper, and the University of Miami—where we collaborated with an MBA class on a carbon accounting project as a part of their curriculum.

The Group has always participated in local events in support of the community and local economic development. Atlantic Sapphire employees have found it immensely rewarding to help others in need and to remind ourselves of the positive outcomes achieved when coming together to support each other in a crisis.

During 2024, Atlantic Sapphire supported several causes that are close to its mission and also spoke of its commitment to improve the lives of consumers and its surrounding communities. For instance, the Group donated healthy salmon to the Homestead Soup Kitchen and to Camillus House, making an impact upon those in need. Atlantic Sapphire also supported learning initiatives in local Miami Dade schools and participated in a Habitat for Humanity Home build in 2024. Atlantic Sapphire has also contributed to the conservation efforts of Miami Waterkeeper.

Atlantic Sapphire continues to extend its stakeholder engagement plan that includes educational activities for students from schools and universities, researchers, NGOs, and the public. It also includes participation in local events whose principles and objectives align with the Group's values, such as initiatives focused on the oceans.





Diversity

**INCREASE** the representation of underrepresented groups in the organization's workforce by 10%  
**ACHIEVED:** The number of women hired in 2024 increased by 29%

Occupational Health & Safety

**DEVELOP** and implement a safety training program for all employees to ensure they have the necessary knowledge, skills and materials to work safely.  
**ACHIEVED**

**REDUCE** the number of Lost Time Incidents by 10%.  
**MISSED:** This number remained the same

**CONDUCT** regular safety audits to identify potential hazards and implement corrective actions to reduce the risk of accidents.  
**ACHIEVED**

Training and Education

**MINIMUM** 30 hours of training and development for new employees  
**ACHIEVED**

**MINIMUM** 20 hours of training and development per employee per year  
**PARTIALLY ACHIEVED:** 81% of departments met this requirement

**25%** of employees to participate in management development training  
**MISSED**

**DEVELOP** and implement a career development program for employees that provides opportunities for growth and advancement within the organization.  
**ACHIEVED:** Defined set career paths within the Operations department and had a number of employees internally promoted based on the identified parameters

Employee Engagement

**INCREASE** employee satisfaction scores by 10% within the next year through regular surveys and feedback.  
**MISSED**

**INCREASED** participation in wellness program and initiatives by 15% in the upcoming year.  
**ACHIEVED**

Production Responsibility

**SUPPORT** local community development, increasing the number of involvements with community organizations  
**ACHIEVED:** The Group supported several community initiatives and had employee involvement and representation. It is looking to expand outreach efforts in future years.

**INTRODUCE** a company-wide Atlantic Sapphire Impact Day where employees engage in non-profit, volunteer work  
**DELAYED:** The Group is working on implementing this in 2025



Diversity

**INCREASE** the representation of underrepresented groups in the organization's workforce by 10%

Occupational Health & Safety

**DEVELOP** and implement a safety training program for all employees to ensure they have the necessary knowledge, skills and materials to work safely.

**REDUCE** the number of Lost Time Incidents by 10%.

**CONDUCT** regular safety audits to identify potential hazards and implement corrective actions to reduce the risk of accidents.

Training and Education

**MINIMUM** 30 hours of training and development for new employees

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Employee Engagement

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Production Responsibility

**SUPPORT** local community development, increasing the number of involvements with community organizations

**INTRODUCE** a company-wide Atlantic Sapphire Impact Day where employees engage in non-profit, volunteer work



Atlantic Sapphire is committed to continuous improvement in its operations and the pursuit of its sustainability goals. The Group aims for transparency and ongoing engagement with its stakeholders, including customers, seafood industry colleagues, as well as the local and global communities it serves. Selected stakeholder affiliations, endorsements, and voluntary initiatives are listed above.



**TOP 25**  
Seafood  
Sustainability  
and Conversion



**PARTNER**  
NASDAQ  
ESG  
Transparency



**RECOMMENDED**  
Ocean Wise  
Recommended



**STAR OF INNOVATION**  
European Small  
and Mid-Cap Awards



**USA RAISED**  
Grown and Harvested  
Fresh from Florida



**HEART  
HEALTHY**  
American Heart  
Association  
Hearth-Check Certified



**PARTICIPANT**  
UN Global Compact



**PARTNER**  
Seafood Nutrition  
Partnership



**BEST CHOICE**  
Monterey Bay Aquarium  
Seafood Watch Green/  
Best Choice



**CERTIFIED**  
Friend of the Sea



**RECOMMENDED**  
Parent tested  
parent approved



**PARTNER**  
Miami  
Waterkeepers



**AWARD**  
International  
Taste Institute



**PARTNER**  
South Dade Chamber  
of Commerce



**PARTNER**  
Miami Dade Beacon  
Council



**CERTIFIED**  
Aquaculture  
Stewardship Council  
Certification



**THIS SUSTAINABILITY REPORT** covers the relevant and significant ethical, social, and environmental issues for the financial year 1 January to 31 December 2024 of Atlantic Sapphire ASA. This represents Atlantic Sapphire's fourth report, which we intend to publish annually.

**The Sustainability Report provides stakeholders with an overview of this years' performance, complementing the Group Results, which primarily covers financial and economic performance.**

It complies with the statutory reporting requirements of the Norwegian Supervisory Authority ("Finanstilsynet") and those for companies listed on the Oslo Stock Exchange regarding corporate social responsibility, as well as in accordance with the Norwegian Accounting Act ("Regnskapsloven") and the Norwegian Corporate Governance Code. The Sustainability Report also shows Atlantic Sapphire's Communication on Progress to the UN Global Compact and represents the Group's commitment to the principles of the UN Global Compact and its endeavor to impact the Sustainable Development Goals. The analysis in 2024 of material ESG topics and stakeholder expectations has informed the content of this report. It has been prepared on the basis of the GRI reporting principles and guidance on topic boundaries, considering for each topic where the impact occurs and Atlantic Sapphire's involvement with the impacts (for example, if the Group caused or contributed to an impact, or is it directly linked through its business relationships). The GRI Content Index at the end of this report provides references to sections in this report where GRI disclosures are presented. Atlantic Sapphire continues to work on improving data quality and related processes to enhance reporting and comprehensive disclosure going forward. Unless otherwise stated, data and statements in this report cover Atlantic Sapphire's activities in Norway, Denmark, and the US. The Group welcomes feedback and recommendations on its sustainability efforts as it ensure that the Group fully understands, maintains, and communicates key issues accordingly. Feedback or questions on this Report should be sent to [investorrelations@atlanticsapphire.com](mailto:investorrelations@atlanticsapphire.com).

