

OUR VISION

At NIRSA we depend on healthy oceans to have a healthy business - these are both inseparable. As part of its leadership role in the fishing industry of the Pacific, NIRSA is fully committed not only to doing its part, as well as demonstrating progress and improvement on environmental issues in an effort to bring the capture of tuna and other Pacific Ocean species onto a long-term sustainable basis. In partnership with our customers, suppliers, employees, and key stakeholders, we expect to continue to develop policies and practices that go beyond compliance with existing legislative and fishery management frameworks. Our goal is simple - to implement responsible business practices at the heart of all our commercial activities. Our plan is to become a true and recognized actor in sustainable development in our ships, factories, headquarters in Ecuador and in the many countries with which we trade around the world.

OUR IMPACT

As fishermen and processors of quality seafood, our business inevitably has some environmental repercussions. A major issue is the impact of our operations on marine sustainability, and the fish stocks from which we catch or source our fish. As we embark on an increasingly ambitious approach to sustainability, our goal irreversibly must be to ensure responsible fishing practices. We recognize that the exploitation of tuna stocks, in particular, has raised a number of questions. Many of these can only be resolved through collective action; by Regional Bodies, governments, marine management authorities, NGOs and the many companies involved in Pacific fisheries. For this reason, we have developed an ambitious sustainability program which will allow us to adapt ourselves to a new era where responsibility is no longer something optional, but rather essential. We acknowledge that carrying out the improvements required by our environmental management systems is a long and difficult process. However, we are fully committed to meeting the challenge and are transparent and open with all stakeholders about our progress.

REGULATORY FRAMEWORK

1. Our industrial-fishing activity is regulated by the Inter-American Tropical Tuna Commission (IATTC), which is a Regional Fisheries Management Organization (RFMO) for the East Pacific Ocean, where our fishing fleet carries out its activity. It is an organization that, following parameters similar to those of the UN and the FAO, issues control and preservation normative regulations which are of mandatory compliance for all their members, as well as maintaining a Record of duly registered vessels authorized to fish within the Commission's area. Ecuador, as an adherent party to the Antigua Treaty that governs the activities of the IATTC, implements within its territory the conservation and control measures through decrees, ministerial agreements, and resolutions, which are adopted by all member countries, thus creating the appropriate legal framework within the national and international territory, with adequate control and sanctioning power.

2. For many years, until the end of 2023, NIRSA participated as a member of the ISSF (International Seafood Sustainability Foundation) which is a global association between scientists, the tuna industry, and the well-known Global Conservation Organization WWF (World Wildlife Fund) a Foundation whose mission is to adopt and implement science-based initiatives for the long-term conservation and sustainable use of tuna stocks. NIRSA continues to be committed to working with RFMOs (particularly those in the Pacific Ocean) to achieve conservation objectives of tuna stocks and their ecosystems, eradicate all IUU (illegal, unreported, and unauthorized) catches, minimize bycatch and discards, and collect information to promote a better scientific understanding of tuna stocks. It should be noted that one of the most significant achievements of the ISSF has been the successful creation of the PVR (Proactive Vessel Register) of tuna vessels, where not only is the complete information of the vessels registered, including those of NIRSA, but also their compliance with the conservation measures imposed by the foundation and audited annually by independent auditors, to ensure the development of the most appropriate sustainable fishing practices.
3. FIP TUNACONS - Likewise, since 2015, NIRSA led the formation of the FIP (Fish Improvement Plan) currently called FUNDACION TUNACONS, with a group of important companies in the tuna production and commercialization chain, to join efforts to promote a fishery improvement program for the capture of tuna with purse seine nets. This effort seeks to develop applied actions, which establish a clear strategy in order to achieve a fishing productive activity that is sustainable, that combines science and technology for the sustainable conservation of tropical tuna populations and their ecosystems. Everything presented above is done with the valuable sponsorship and scientific advice of the WWF, the Inter-American Tropical Tuna Commission IATTC, and the Ecuadorian fisheries authorities, through the implementation of its action plan on purse seine tuna fishing in the EPO with the aim of achieving the highest MSC (Marine Stewardship Council) certification, having already obtained two certifications for Yellow Fin Tuna, Big Eye, and currently pursuing a similar objective for Skipjack Tuna through a FIP.

Some of the main actions implemented to achieve the aforementioned certification and comply with its principles include: supporting conservation initiatives for marine ecosystems that are part of the tuna environment, motivating governments and RFMOs to make appropriate decisions to ensure the conservation of tuna that are subject to fishing extraction, collaborating with research projects that effectively contribute to the development of technological innovation to solve negative environmental impacts on marine ecosystems, and encouraging companies to search for market niches that require MSC certified products.

OUR COMMITMENTS

NIRSA is firmly committed to leading on environmental issues and has therefore developed an ambitious environmental sustainability policy whose main focus in its first stage is the sustainability of tuna stocks. NIRSA has already adopted the following actions towards sustainability:

NIRSA focus on Fish Aggregating Devices (FADs)

NIRSA acknowledges that the use of FADs, as well as other fishing equipment, may have adverse effects on the marine environment. As such, we are proactive in finding solutions to minimize these impacts. Our focus involves various strategies. First, NIRSA completely complies with all the IATTC resolutions which are also required for our vessels by the PVR and national laws, as they require that all the information about the use of FADs is documented and independently verified by observers. NIRSA fully complies with IATTC Resolution C-13-04, which as of January 2015 requires that all the information related to the use of FADs in your fishing fleets is provided. Likewise, NIRSA complies with the Resolutions about the use of non-entangling FADs and is subject to the annual quota of FADs usable for its vessels, which is fixed by the IATTC. Second, NIRSA invests in its own technological expertise to explore innovative solutions and reduce the impact of FADs. Third, NIRSA works together with the TUNACONS Foundation and other experts and agencies on the matter and has continuously worked with scientists at the IATTC and the ISSF to develop research programs and cruises about the use of non-entangling and biodegradable FADs. Finally, NIRSA voluntarily does not authorize its tuna fleet that operates in the Eastern Pacific to deploy FADs within 40 miles of the coast where juvenile tuna tend to congregate.

Commitment to design, build, and apply more sustainable fishing technology in the long term

NIRSA has designed, built, and applied its own juvenile excluder device (the Arrue Excluder) which allows juvenile tuna and other non-target species to escape harvesting and has implemented its use in its vessels. This NIRSA initiative has also been extended to Ecuadorian-flagged tuna vessels with a carrying capacity >363 metric tons.

Arrue excluder

Recently the IATTC approved a budget destined to carrying out the collection of data related to this device's performance to assess its results and determine its effectiveness in the release of juveniles and non-target species during fishing operations.

NIRSA will continue to explore the possibility of modifying its purse seine nets and fishing methods to increase juvenile escapement and

minimize the catch of non-target species. This work is performed jointly with Ecuadorian scientists and regulators and is being assessed by the IATTC.

Prohibit transshipment of tuna at sea and the use of tender vessels

According to the resolutions adopted by the Inter-American Tropical Tuna Commission (IATTC) which were adopted and voted by Ecuador, NIRSA forbids the transshipment of tuna at sea and the use of supply and tender vessels that fish using FADs both in the East and Central Tropical Pacific.

Prohibit tuna discard practices

NIRSA has always been opposed to tuna discard practices. In this regard, NIRSA requires all its purse seiners to initially keep on board and then offload all the tuna caught. There are two exceptions, the first is when the fish is not fit for human consumption, and the second is for the last set at the end of the trip when there is not enough space in the cold stores to handle all the tuna and other species caught in that set. This regulation has been adopted by the IATTC, the ISSF, and by Ecuadorian laws.

For purposes of this measure, ‘not fit for human consumption’ refers to fish which:

1. Is entangled or crushed in the seine net.
2. Is deteriorated due to the predation of sharks or whales.
3. Has died and decomposed in the net where a machine failure has prevented normal net removal and capture and efforts to release the live fish.
‘Not fit for human consumption’. Does not include fish that:
4. Is considered negligible in terms of size, marketability, or species composition.
5. Is decomposed or contaminated as the result of an action or omission from the crew in the fishing fleet.

Commitment to minimize incidental bycatch levels

NIRSA is committed to minimizing incidental bycatch levels of non-target species and where possible supports the release of marine mammals, sharks, sea turtles, and seabirds caught during fishing operations.

NIRSA has trained the vessel captains to minimize accidental incidental bycatch levels of non-target species and to appropriately treat the release of incidentally caught marine mammals, sharks, sea turtles, and seabirds in order to improve their survival. This training is ongoing and is carried out with the support of scientific members of the IATTC along with experts from other scientific institutions and non-governmental organizations (NGOs). All of the fleet captains at NIRSA vessels must attend these training programs regarding Good Fishing Practices so they can share them with their crew.

NIRSA also provides updated online training at least once a year, based on the ISSF Skippers Training Guidebook, as required for the vessels of our fleet by the PVR. It is also noted that NIRSA only sources for third party vessels that are registered and in compliance with all the PVR conservation measures.

Moratorium on the growth of the tuna fishing fleet

NIRSA maintains a moratorium on the growth of its tuna fleet. In compliance with IATTC regulations, which establish a moratorium on the growth of tuna fishing fleets operating in the eastern Tropical Pacific, NIRSA's fleet has long remained at its current size and storage capacity, abiding by IATTC, and Ecuadorian regulations.

Addressing marine management and conservation issues

Ensuring that the captains and crews of NIRSA vessels are fully aware of what sustainable fisheries are all about, including the vital role they play in achieving sustainable fisheries, is of great importance to NIRSA. In this regard, seminars are held for the captains and crew of NIRSA's tuna vessels on the importance of sustainable fishing practices and ecosystem conservation. NIRSA makes sure every opportunity is taken to address these issues. For example, NIRSA, in addition to publishing it on its website, has produced several posters on sustainable fishing, the need to combat IUU fishing, the prohibition of shark finning, total retention of tuna, and other conservation measures, in order for them to be displayed on board each vessel (own and third party), as well as in appropriate places in NIRSA's offices and the processing plant. The display of these posters is mandatory for all vessels registered in the PVR Proactive Vessel Registry, for owners/operators that do not have a web page, or if it otherwise available to the general public.

Confronting IUU fishing

NIRSA seeks to avoid all IUU fishing:

- Reporting vessels fishing for species covered by the IATTC Convention that are presumed to have carried out fishing activities violating the

management and conservation measures of the United Nations, FAO, IATTC, ISSF, the laws of Ecuador, and international regulations.

- Equipping all its vessels with satellite Vessel Monitoring Systems (VMS). All of the NIRSA tuna vessels are equipped with VMS, which allows for a constant and permanent monitoring to localize the NIRSA fleet.
- A dual real-time surveillance is performed on the position of each vessel by marine and fishery authorities. Not engaging in commercial transactions with vessels included in the list of IUU vessels of the different Regional Fisheries Management Organizations (RFMOs), the UN, ISSF, Ecuadorian laws, among others. Carrying observers on board. Currently, all NIRSA's tuna vessels and those supplied by third parties, with a carrying capacity of >363 m³, are required to carry an observer aboard each fishing trip, in accordance with the AIDCP observer program of the IATTC and Ecuador (PROBECUADOR and TUNACONS), also according to the Resolution adopted by the ISSF and the PVR for vessels with a carrying capacity greater than 335 m³.

Minimizing pollution

NIRSA is committed to minimizing pollution:

- Reducing potential solid waste and liquid effluent discharges into the ocean. Every NIRSA vessel is already equipped with a wastewater treatment plant or a retention tank for solid waste and wastewater. Wastewater is treated by physical-chemical methods before being discharged into the sea. Furthermore, NIRSA vessels have an oily water separator installed to clean bilge water prior to discharge in accordance with regulations issued by the MARPOL Protocol and Ecuadorian laws. All inorganic waste, including any plastic bags and empty salt and oil bags used are kept and registered on board to be offloaded in the port for a better registration, treatment, and disposal in accordance with national and municipal regulations.
- Ensuring strict measures for the loading of fuel according to what is recommended by responsible national authorities. Through its internal procedures for the reception and loading of fuel, NIRSA complies with INEN 2 266:2009 standards, maintaining a safe and suitable environment for the normal execution of work activities in the facilities of its industrial complex in Posorja, during fuel transportation, reception and unloading activities. In accordance with European Union regulations adopted by Ecuador, the use of dual-purpose tanks on tuna vessels is prohibited, and compliance is verified by the Fisheries and Health Authority of our country.
- Implementing efforts to improve the quality of water dumped, as well as to progressively reduce its volume. To do this, the industrial operations of NIRSA in Posorja have a wastewater treatment plant,

which allows for the reduction of pollutants, before discharging it into the effluents, through the use of physical-chemical methods.

- Applying and executing its Environmental Management Plan (EMP) with biennial audits that establish the actions required to prevent, mitigate, control, compensate, and correct possible environmental effects or impacts in compliance with the regulations in force in the country. The objectives pursued by NIRSA through its various production plants are to manage and minimize the environmental impact associated with the production process and to improve efficiency in the use of resources.

Supporting the implementation of management measures in other fisheries

In accordance with domestic fishing regulations, NIRSA has long avoided the use of whole string herring in the production of fishmeal. NIRSA has always supported a total ban on the capture of Pacific Sardine or Pacific thread herring in Ecuador, as well as Pacific anchoveta in the ban areas and during the ban periods established by the law, as well as by National and International treaties to protect their reproduction. NIRSA supports local authorities in all regulatory efforts in any fishery. In addition, it assists in the implementation of regulations to protect non-target species, at risk or threatened levels, and those whose capture for processing for production and/or fishmeal is prohibited or limited by the Fisheries Authority, based on scientific recommendations issued by the fisheries research bodies and institutions.

Food chain traceability

Traceability of seafood products, i.e. from where the fish was caught to the supermarket shelf is essential not only for food safety, but also to ensure that the fish has been caught legally and sustainably. NIRSA is subject to continuous random audits by private companies or national agencies from other countries (DG, SANCO, OLAF, PVR, etc.) as well as from Ecuadorian legal entities. NIRSA can demonstrate full traceability of seafood products originating from its own fleet from the ocean to supermarket shelves and is supplied only from third party vessels that are registered and in compliance with PVR rules and have a registered IMO/TUVI international identification number.

Carbon footprint measuring

NIRSA is aware of the importance of greenhouse gas (GHG) emissions from its operations. NIRSA's CO₂ equivalent emissions are directly linked to fuel use and energy consumption in general. NIRSA conducts an annual

exercise to measure its greenhouse gas emissions and is currently working to identify measures that will enable it to obtain Carbon Neutral certification.

Third-party certification

NIRSA will pursue relevant third-party certification for its fishing practices when it is practical. In this regard, NIRSA will continue to comply with the certification of the Earth Island Institute dolphin safe certification for tuna companies. NIRSA recognizes the Principles and Criteria of the Marine Stewardship Council (MSC) as the global standard leading sustainability in wild capture fisheries, and to this effect, integrates the above mentioned TUNACONS Foundation, whose goal has been achieved, namely, to obtain the MSC certification for two species of tuna, in compliance with its three basic principles:

Principle #1: Sustainable fish populations

Target fish populations must be kept at sustainable levels. Any certified fishing should also operate in a manner which allows the fishing to continue indefinitely without overexploiting resources.

Principle #2: Minimizing environmental impacts

Fishing operations should be managed in a manner that maintains the structure, productivity, function, and diversity of the ecosystem on which the fishery relies, including other species.

Principle #3: Effective management

Fishing has to comply with all local, national, and international laws and they need to have a management SYSTEM that is implemented to answer to changing circumstances in order to maintain sustainability.

Deploying full transparency

NIRSA will regularly review these policies and will establish measurable goals. We will deploy full transparency and will regularly update our progress and challenges. We will support the reporting and recording of all environmental events that could potentially affect our business. If there is any dispute about NIRSA fishing practices, we will seek to respond any question made by third parties in a quick and open manner, whether this is a customer, a fishing management authority, government, NGO, or any other interested party.

All large scale purse seine operated by NIRSA and third party tuna suppliers are registered in the PVR, therefore, has adopted and comply with the following conservation measures, that are annually audited:

ISSF CONSERVATION MEASURE SHARK-FINNING POLICY- CM 3.1.(a)

NIRSA does not do business with firms and/or companies that do not have a Public Policy that prohibits shark finning and requires that sharks, if retained, be released with their fins naturally attached to their bodies. In virtue of this measure, a policy is deemed to be public if it is published on the company website, or if it otherwise available to the general public.

Updated and published on December 31, 2022.

ISSF CONSERVATION MEASURE PROHIBITION OF TRANSACTIONS WITH SHARK-FINNING VESSELS CM 3.1 (b)

NIRSA does not do business with vessels that practice or allow finning in shark and/or who do not offload all the sharks with their fins naturally attached, if they have been retained.

NIRSA will use publicly available research findings conducted by RFMOs or national governments for this purpose. Only after a 2-year period from the date on which the investigation is concluded, NIRSA, processors, traders, transporters, merchants, and others involved in the seafood industry may resume transactions with the non-compliant vessels identified above, provided they have not been involved in additional incidents.

Updated and published on December 31, 2022.

ISSF CONSERVATION MEASURE 3.1 (c) Prohibition of Transactions with Companies without a Public Policy Prohibiting Shark Finning

NIRSA will not carry out transactions with companies that do not have a public policy prohibiting shark finning that demands that sharks are offloaded with their fins attached naturally if they have them. In virtue of this measure, a policy is deemed to be public if it is published on the company website, or if it otherwise available to the general public.

This measure was updated on January 1, 2024.

RESPONSIBLE FISHING AND SOURCING PRACTICES

NIRSA is firmly committed with environmental ecologic responsibility. For this reason, continuing with administrative improvements and the protection of fisheries is at the heart of our sustainability policy.

All NIRSA's tuna vessels are registered with the Proactive Vessels Register (PVR), which in turn requires and audits compliance with conservation measures of the ISSF, an international entity dedicated, like the IATTC, to the long-term conservation and reasonable use of tuna resources, the promotion of a healthy ecosystem and the reduction of bycatch. We use the research, policies, and guidelines from both organizations to set standards for best fishing and sourcing practices.

NIRSA supports and uses the Proactive Vessels Register (PVR) to promote responsible and sustainable tuna fishing, as a transparent, effective, and verifiable source to identify those vessels committed to responsible fishing practices. All of NIRSA's tuna vessels (which provide over 82.75% of our tuna raw materials), as well as third-party suppliers are registered in the ISSF's PVR, and as such are bound to the compliance of its guidelines and regulations.

BEST PRACTICES OF ISSF CM CAPTAINS. 3.4

NIRSA, in its commitment to maintain the good practices of its captains, trains them in different courses and workshops taught by the ISSF and has the following requirements:

- a. Have attended an ISSF Captains Workshop in person and/or online.
- b. Have attended an in-person Captains Workshop led by a trainer who has been accredited by the ISSF to conduct these workshops.
- c. Have watched a video of the ISSF Captains Workshop online.
- d. Have reviewed the Captains Guide online.

All of the above provides information on best practices for the management of purse seine.

FAD MANAGEMENT POLICY FOR ISSF CM 3.7

NIRSA and its Large Purse Seine Vessels adheres and supports the ISSF Conservation Measure 3.7 and is committed to supporting better FAD management, globally, and recognizes that it is an important component to meet the MSC Standard without conditions.

To further support the implementation of existing RFMO conservation measures and recommendations for FAD data collection and reporting and the use of non-entangling FAD designs that do not use any netting in any components, including both the raft and the

tail, and the use of biodegradable FAD designs that are also fully non-entangling, and to promote the development and implementation of FAD recovery policies, strategies to mitigate shark bycatch in purse seine tuna fisheries and the voluntary provision of FAD buoy data to strengthen FAD management, therefore NIRSA commits to adopt and comply with the following measures:

1. Processors, traders, importers, transporters, marketers and others involved in the seafood industry shall conduct transactions only with those purse seine vessels whose owners develop and make public FAD Management Policies that include the activities purse seine and supply vessels are undertaking (if any) on the following elements:
 - (a) Comply with flag state and RFMO reporting requirements for fisheries statistics by set type;
 - (b) Report additional FAD buoy data (FAD daily position data and echosounder acoustic records) for use by RFMO science bodies;
 - (c) Support science-based limits on the overall number of FADs used per vessel and/or FAD sets made;
 - (d) Use only totally non-entangling FADs to reduce ghost fishing;
 - (e) Mitigate other environmental impacts due to FAD loss including through the use of biodegradable FADs and FAD recovery policies;
 - (f) For silky sharks (the main bycatch issue in FAD sets) implement further mitigation efforts.
2. In developing a FAD Management Policy, purse seine vessels and purse seine vessel owning companies should refer to ISSF Technical Report 2023-10, (which updates ISSF Technical Report 2019-11), "Recommended Best Practices for FAD Management in Tropical Tuna Purse Seine Fisheries", (or any subsequent revision) in designing the activities for each element.
3. With respect to the element on mitigating other environmental impacts due to FAD loss (item e above), public FAD Management Policies developed under this measure includes a statement that purse seine vessels and supply vessels covered by the policy are participating in trial(s) of biodegradable FAD designs and/or FAD recovery programs that include the participation of the relevant RFMO science bodies and/or coastal States, national scientists, and/or ISSF scientists to monitor experimental design.
4. With respect to the element on the use of only non-entangling FADs (item d above), since 1 April 2025, public FAD management policies developed under this measure shall include a statement that purse seine vessels and supply vessels covered by the policy will from this date only deploy or redeploy (i.e., will be placed in the water) fully non-entangling FADs, without any netting in any components, including both the raft and the tail. Since 1 April 2025, where practicable, the purse seine vessels and supply vessels should retrieve any encountered pre-existing non-fully NEFAD (whether a set is done or not) which is not in compliance with this measure.
5. With respect to the element on reporting additional FAD buoy daily position data for use by RFMO science bodies (item b above), since January 2023, public FAD Management Policies developed under this measure shall include a statement that purse seine vessels and supply vessels covered by the policy are reporting FAD position data to the relevant RFMO science bodies and/or national scientific institutions and/or its flag State, with a maximum time lag of 90 days. Data submissions must include the vessel name and IMO number (if available). Deployments should be identified in the data submissions when possible. In the

event that purse seine vessels and supply vessels covered by the policy report these data to national scientific institutions and/or its flag State, they shall document that they requested that these data be made available to the relevant RFMO for scientific purposes.

6. With respect to the element on reporting additional FAD buoy echosounder acoustic biomass data for use by RFMO science bodies (item b above), since 1 April 2024, public FAD Management Policies developed under this measure includes a statement that purse seine vessels and supply vessels covered by the policy are reporting FAD echosounder biomass data to the relevant RFMO science bodies and/or national scientific institutions and/or its flag State, with a maximum time lag of 90 days. Data submissions must include the vessel name and IMO number (if available). In the event that purse seine vessels and supply vessels covered by the policy report these data to national scientific institutions and/or its flag State, they shall document that they requested that these data be made available to the relevant RFMO for scientific purposes.
7. For purposes of this measure, a policy is “public” if it is published on the owner or company’s website or is otherwise available to the general public.
8. For purposes of this measure, a large-scale purse seine vessel is defined as those with at least 335 m³ of fish hold volume.
9. This measure applies to vessels in the PVR.

Updated March 1, 2026

TOTAL RETENTION POLICY FOR TUNA ON BOARD

NIRSA has always been opposed to tuna discard practices. In this regard, and in compliance with the conservation measures dictated by the Government of Ecuador, the IATTC and the ISSF, NIRSA mandatorily requires all its purse seine vessels and those of its suppliers to keep on board and then disembark in port all bigeye, skipjack, and yellowfin tuna caught, except fish considered unfit for human consumption for reasons other than their size. The only exception shall be the final set of a fishing trip, when there is insufficient storage space available in the hold to load all the tuna and other species caught in that set.