

cromaris

Sustainability report 2024.

Sufinancira Europska unija

Program ZA RIBARSTVO I AKVAKULTURU

Management Foreword

The business operations in 2024 took place under the strong influence of external factors beyond our direct control, yet with tangible daily impacts. These include geopolitical tensions and disruptions in raw material markets, inflationary pressures and shifting consumer behaviours, as well as climate change, which is increasingly shaping conditions in mariculture.

In such a dynamic environment, business stability does not imply maintaining the status quo but rather requires continuous adaptation and the timely identification of risks. At Cromaris, we are fully aware that long-term sustainability is not the outcome of one-off decisions, but the result of a series of daily technical, operational, and organisational adjustments.

Throughout 2024, we continued to develop and implement measures to mitigate the negative effects of external conditions: we optimised resource consumption, analysed vulnerabilities within our supply chain and assessed business resilience to climate change, maintained operations under standardised quality control systems, and improved mechanisms for collecting market feedback. While the effects of these measures are visible in certain segments of our operations, we remain aware of their limitations and the complexity of the challenges we face.

This report, prepared in accordance with the European Sustainability Reporting Standards (ESRS), provides a transparent overview of our current position, the risks and impacts identified, and the areas in which we are making additional efforts. Our goal is to build a system that learns, adapts, and acts responsibly amid uncertainty.

We express our sincere gratitude to all employees whose daily efforts and expertise ensure business continuity and customer trust. We also thank our partners who share with us the challenges of supply chain disruptions and regulatory changes.

We enter the coming year with caution, yet with clear objectives: to remain flexible, focused on customers and consumers, committed to tangible improvements, and responsible towards the resources and communities we are connected with.

Ivan Leko



Dane Desnica



Ante Šarić



Tin Rukavina



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Who are we?



Vision

To become the leading producer of organic white Mediterranean fish and one of the top three aquaculture companies in the EU, recognised as a leader in premium quality, sustainability, innovation, service excellence and commercial performance.

Mission

To promote and expand a culture of healthy and balanced nutrition through the consumption of fish and seafood products.

A leading company in the farming and processing of premium-quality Mediterranean white fish

Cromaris is a leader in the production and processing of premium-quality Mediterranean white fish and ranks as the seventh-largest producer of sea bass and sea bream globally by production volume. In addition to sea bass and sea bream, Cromaris farms meagre, amberjack and dentex.

Cromaris d.d., headquartered in Zadar, Croatia, was established in 2009 through the merger of Cenmar, Marimirna Rovinj, Marikultura Istra, and Bisage-Nit. The tradition of Mediterranean fish farming at Cromaris spans more than 40 years. Farming begins at the hatchery in Nin and continues across six marine farms in Zadar County and one in Istria County. Fish are sorted, processed, packaged, and transported to customers and consumers from the Gaženica processing and logistics centre in Zadar. Cromaris products are sold through wholesale, major retail chains, and Cromaris-branded fish markets in five cities: Zagreb (Importanne Galleria and Dolac), Rovinj, Zadar, Vir, and Preko on the island of Ugljan.

While our fish are conventionally



farmed, in response to consumer and market demands, we have expanded our product portfolio to include certified organic products: BIO sea bass, BIO sea bream, and BIO meagre.
Cromaris ended 2024 with a total of 614 employees and €107.8 million in revenue. The company generated 85% of its revenue from international markets. In addition to the domestic and strategically important Italian market, in 2024 Cromaris operated in Germany, Austria, France, Poland, Switzerland, Montenegro, Slovenia, Serbia, the Czech Republic, Slovakia, and Spain.
Cromaris is the only company in the world to successfully farm dentex. Fish feed is produced using Cromaris' own proprietary formula. We have an in-house veterinary service that ensures animal welfare, and alongside certified external laboratories that oversee our production and products, we also operate our own laboratory for additional analyses of both fish feed and final products.

Organic product range – BIO sea bass, BIO sea bream, and BIO meagre

As of 31 December 2024, Cromaris employed 614 people and generated €107.8 million in revenue

Cromaris is the only company in the world to have successfully farmed dentex


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Cromaris operates within the Adris Group. Adris d.d. for Management and Investment is Cromaris' sole shareholder. Cromaris d.d. is the founder and sole owner of Cromaris Italia s.r.l., based in Casale sul Sile in the province of Treviso. Cromaris Italia serves as the importer for all Italian clients, ensuring a consistent market presence and daily cooperation with customers and consumers.

Cromaris d.d.

Adris grupa

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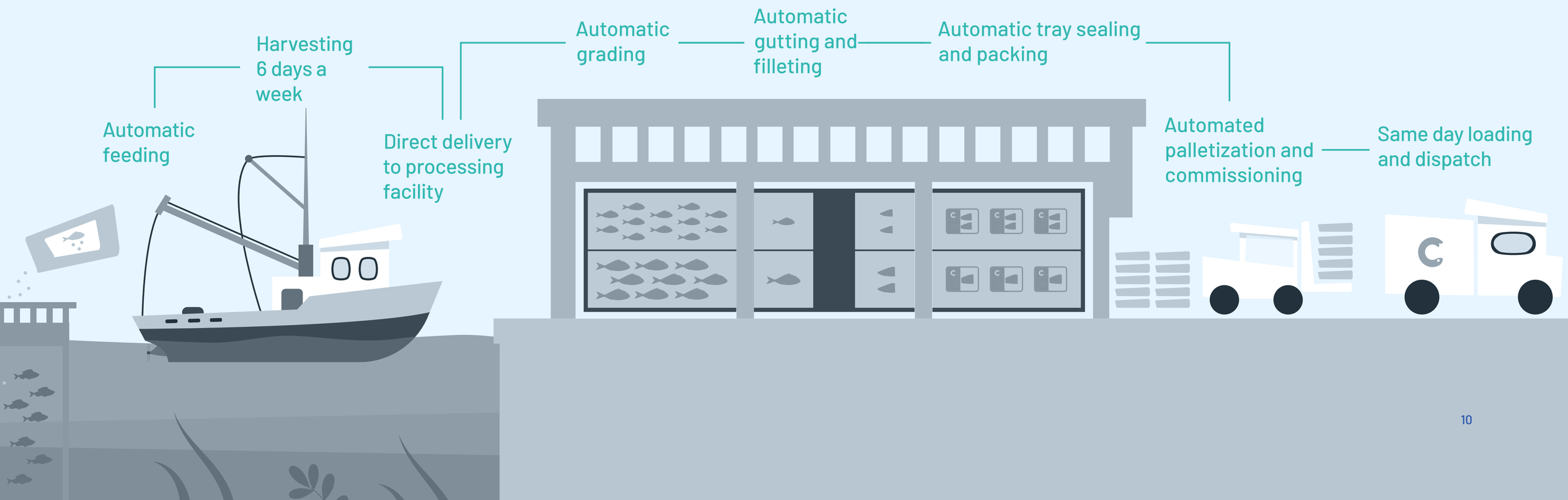
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Timeline

1979

- Cenmar is founded – the first company in the world to farm sea bass in marine cages



1981

- Cenmar opens its first hatchery for sea bass and sea bream in Nin



1984

- Marimirna Rovinj is founded, marking the start of mariculture development in Istria



1995

- Farming of new species begins – common dentex and picarel



2009

- Cromaris d.d. is established as part of the Adris Group
- Innovation in fresh fish packaging: first MAP-packaged fish



2011

- Cromaris introduces a new native species – meagre
- Start of technological process certifications (ISO standards)
- Establishment of R&D and Marketing departments – strategic shift in mariculture



2012

- Launch of the Gaženica production and logistics centre
- Organic fish production certified (EU regulation, Naturland)



2014

- First time selling 5,000 t WFE of fish
- Launch of Cromaris organic product line (sea bass and sea bream)



cromaris BIO

MOJ KOMADIĆ MORA

2015

- New hatchery opened in Nin – one of the most advanced facilities in Europe
- Development and implementation of SAP module for aquaculture management



2016

- Nutrition Centre established; first Cromaris feed formulations developed
- Kudica fish farm becomes operational



2017

- Žman fish farm opened – increased farming capacity



2018

- Launch of the “Future at Cromaris” programme – first cohort of trainees welcomed



2019

- All farms certified according to ASC standards
- New products launched – fresh fillets in recyclable SKIN packaging



2020

- Record year – 10,000 t WFE of fish sold
- Start of greenhouse gas emissions monitoring
- Launch of new MAP line in recyclable PET packaging
- Cromaris certified under the BIO Suisse standard



2021

- New species launched: meagre and dentex
- First in the industry to publish a sustainability report
- Lavdara fish farm opened



2022

- New warehouse and transformer station in Gaženica with sustainable systems
- Photovoltaic power plant installed at the Nin hatchery



2023

- Launch of BIO meagre and SKIN BIO fillets (sea bream, sea bass, meagre)
- New retail stores opened in Zagreb, Pula, and Tkon
- 8.7% of total electricity consumption from in-house solar power plants



2024

- 15th anniversary of Cromaris
- Recognised leader in organic white Mediterranean fish farming

cromaris BIO

MOJ KOMADIĆ MORA



Our Products

Scientific name	Croatian name	English name
Dicentrarchus labrax	Brancin	Sea bass
Sparus aurata	Orada	Sea bream
Argyrosomus regius	Hama	Meagre
Dentex dentex	Zubatac	Dentex
Seriola dumerili	Gof	Amberjack

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Fresh fish from conventional farming

The Cromaris assortment comprises premium-quality whole and gutted fish, fillets, steaks, and ready-to-market products in MAP, skin, and smoked packaging solutions

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Fresh conventionally farmed fish packed in boxes



Cromaris sea bream



Cromaris sea bass



Cromaris meagre



Cromaris dentex



Cromaris amberjack

Our fish is packed in 3 kg, 6 kg and 10 kg EPS boxes. In March 2025 we introduced double-bottom boxes with integrated ice, streamlining handling and keeping transport cleaner.

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Fresh fish in MAP packaging

Fresh gutted fish from conventional farming in MAP packaging



Cromaris sea bream



Cromaris sea bass

Fresh fish in SKIN packaging

Boneless fresh fillets from conventional farming in SKIN packaging



Cromaris sea bass



Cromaris sea bream



Cromaris meagre

Gourmet smoked fillets from conventional farming



Cromaris sea bass



Cromaris sea bream



Cromaris meagre

cromaris

Fresh fish from organic BIO farming

Cromaris' organic BIO assortment includes whole fish, gutted fish, fillets and steaks, as well as MAP, SKIN, and smoked packaged products.

cromaris BIO



Fresh organic BIO fish packed in boxes



Cromaris BIO sea bream



Cromaris BIO sea bass



Cromaris BIO meagre

Our fish is packed in 3 kg, 6 kg and 10 kg EPS boxes. In March 2025 we introduced double-bottom boxes with integrated ice, streamlining handling and keeping transport cleaner.

Fresh organic BIO fillets in SKIN packaging



Cromaris sea bass



Cromaris sea bream



Cromaris meagre

Fresh gutted fish from organic BIO farming in MAP packaging



Cromaris BIO sea bream

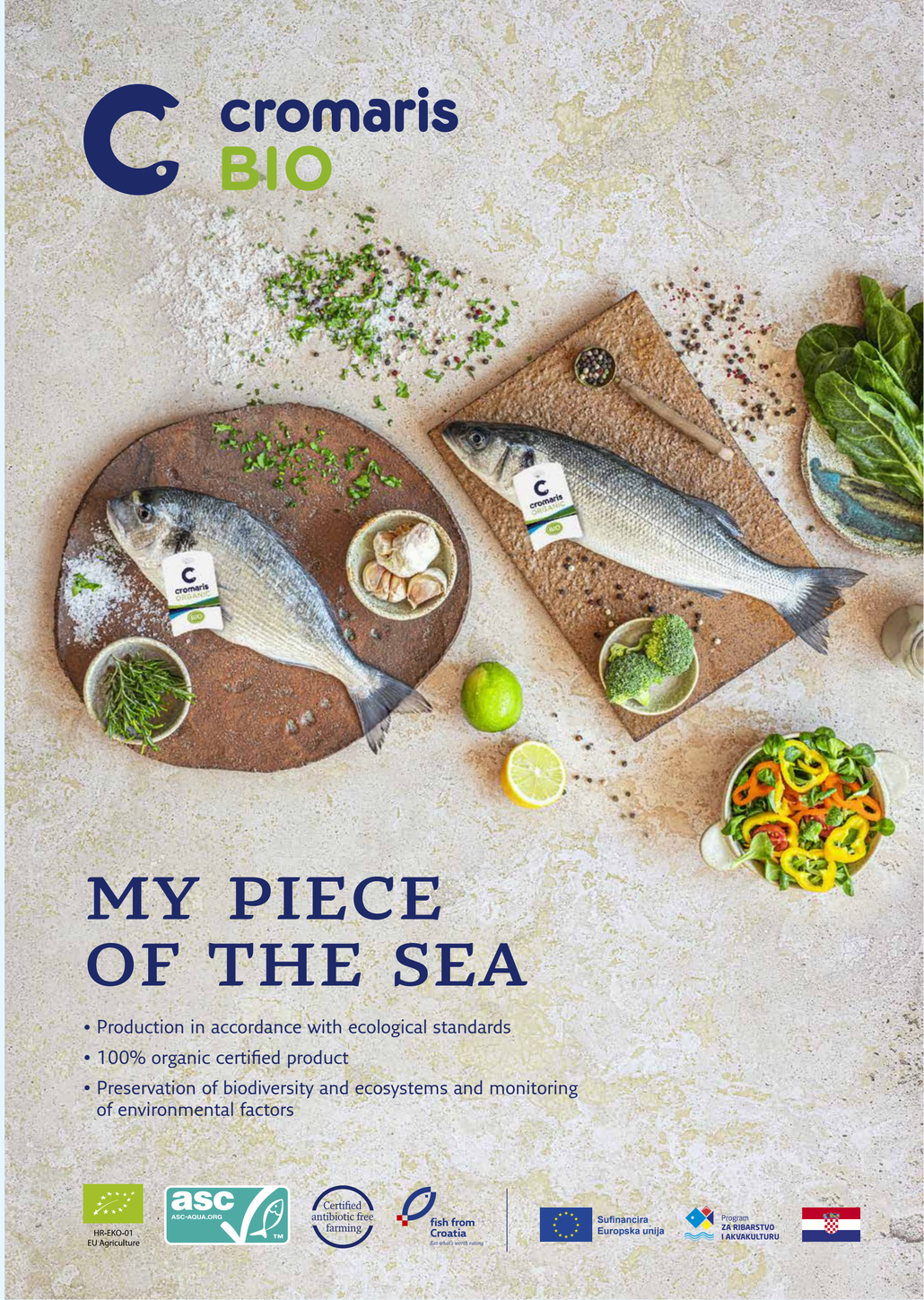


Cromaris BIO sea bass

Cromaris BIO – My piece of the sea

In line with Cromaris' strategic business plan and mission – to promote and expand a culture of healthy, balanced eating and the consumption of fish and seafood – 2024 was marked by intensified promotion of the BIO products in both the Croatian and Italian markets. Promotion of BIO fish at gastronomy and wine events, on social media, TV, local media, B2B publications, and at retail locations led to a 31% increase in brand recognition and sales compared to 2023.

The promotion of Cromaris' organic fish range led to a 31% increase in brand awareness and sales



Renowned Italian chef Giorgio Locatelli, known for his culinary expertise and distinctive approach to cuisine, continued his partnership with Cromaris in 2024, using Cromaris BIO fish to prepare delicious and nutritious meals.



Cromaris' Award-Winning Fish in 2024

Cromaris received the prestigious **Superior Taste Award** for all submitted products, affirming its position as one of Europe's leading fish producers. All submitted Cromaris products were awarded the Superior Taste Award.

Cromaris sea bass has, for the seventh consecutive year, won three golden stars and remains the only fish product to hold the **Diamond Taste Award** – granted to products of exceptional taste, texture, and aroma.

All Cromaris products submitted have been awarded the Superior Taste Award



Cromaris sea bass is the recipient of the Diamond Taste Award

In addition to sea bass, other Cromaris products – including sea bream, meagre, and dentex – were also awarded the Superior Taste Award. Notably, organically farmed fish achieved significant recognition in 2024: for the first time, BIO sea bream, BIO sea bass, and BIO meagre received the Superior Taste Award for quality and authentic flavour. Produced in accordance with organic farming standards, Cromaris BIO products offer not only outstanding taste but also a sustainable choice for consumers who value environmental and social responsibility. Hama, another esteemed fish in the Cromaris range, holds the prestigious Crystal Taste Award. This honour confirms that Cromaris hama offers an exceptional balance of flavour and quality, delighting even the most demanding gourmets. Its distinctive, rich taste and flawless texture make it the perfect choice for every fish lover.



BIO sea bream, BIO sea bass, and BIO meagre received the Superior Taste Award for the first time

Cromaris Certifications

In 2024, Cromaris successfully maintained all certifications for management systems aligned with internationally recognised standards that confirm product traceability, organic aquaculture, antibiotic-free farming, and environmentally and socially responsible business practices.
Suppliers of raw materials, juveniles, and fish feed are also required to hold valid certifications issued by independent certification bodies under schemes such as GlobalG.A.P. and the Aquaculture Stewardship Council (ASC).
Raw materials used in organic production must be certified in accordance with the EU Organic Farming Regulation: Regulation (EU) 2018/848 as well as additional buyer-specific standards, including Naturland and Bio Suisse. As of May 2025, all Cromaris products have been certified in compliance with the HALAL standard.[1]



1 SBM-1, 40 e,f and g, 42 a and c

Standard Name and Scope of Application	Business Process Covered by the Standard	Code
Quality Management System (ISO 9001:2015)	Hatchery, Farms, Gaženica Processing & Logistics Centre	
Environmental Management System (ISO 14001:2015)	Hatchery, Farms, Gaženica Processing & Logistics Centre	
GlobalG.A.P. – Traceability across the production chain from hatchery, juveniles, and feed suppliers to farming, harvesting, and processing of sea bass, sea bream, meagre, and dentex	Hatchery, Farms, Gaženica Processing & Logistics Centre	
GLOBALG.A.P. Risk Assessment on Social Practice (GRASP) – Responsible labour practices	Hatchery, Farms, Gaženica Processing & Logistics Centre	
Antibiotic-Free Supply Chain (DNV STP-80) – Antibiotic-free production throughout the cycle, from juveniles over 8g for sea bass, sea bream, and meagre	Farms	
IFS Food – Global quality and safety standard for private label and brand manufacturers	Gaženica Processing & Logistics Centre	
ASC Farming (Aquaculture Stewardship Council – Farm Standard for Seabass, Seabream and Meagre) – Sustainable farming, processing, and raw material use	Farms	
ASC Chain of Custody – Traceability from certified farming to ASC-labelled product	Gaženica Processing & Logistics Centre, Cromaris Italia	
EU Organic Farming (Regulation 2018/848/EU) – Certification of organic farming	Hatchery, Kudica and Velo Žalo Farms, Gaženica Processing & Logistics Centre, Cromaris Italia	
Bio Suisse – Organic farming certification for the Swiss market	Velo Žalo Farm, Gaženica Processing & Logistics Centre	
Naturland – Organic farming certification for the German market	Velo Žalo Farm, Gaženica Processing & Logistics Centre	
Kosher – Certification of compliance with Jewish dietary laws	Gaženica Processing & Logistics Centre	
HALAL – a certification confirming that production is carried out in accordance with Islamic rules and ethical principles	All Cromaris products	

General Information



Basis for report preparation

General basis for preparation of the sustainability statement BP-1

As part of its 2024 Annual Report, the Adris Group published consolidated business and sustainability report that includes information on Cromaris. Since 2020, Cromaris has also published standalone sustainability reports, available in both **Croatian** and **English** on its official website. Up to and including 2023, Cromaris prepared its reports in accordance with the Global Reporting Initiative (GRI Standards), including the sector-specific standard GRI 13: Agriculture, Aquaculture and Fishing. The 2024 report covers the period from 1 January to 31 December 2024 and is prepared in accordance with the EU Corporate Sustainability Reporting Directive (CSRD), as transposed into the Croatian Accounting Act, and the European Sustainability Reporting Standards (ESRS). Disclosures in this report also reflect information required under the Companies Act and International Financial Reporting Standards (IFRS).

As in previous years, this report covers the operations of Cromaris d.d. and its wholly owned subsidiary Cromaris Italia s.r.l. The information presented is prepared on the same consolidated basis as Cromaris' financial statements, ensuring consistency and completeness of reporting.[2] The report includes all relevant data, without omitting any material information related to intellectual property, know-how, innovations, or forward-looking statements and negotiations.[3]

2 BP-1, 5 a, 5 b-i
3 BP-1, 5 d, e

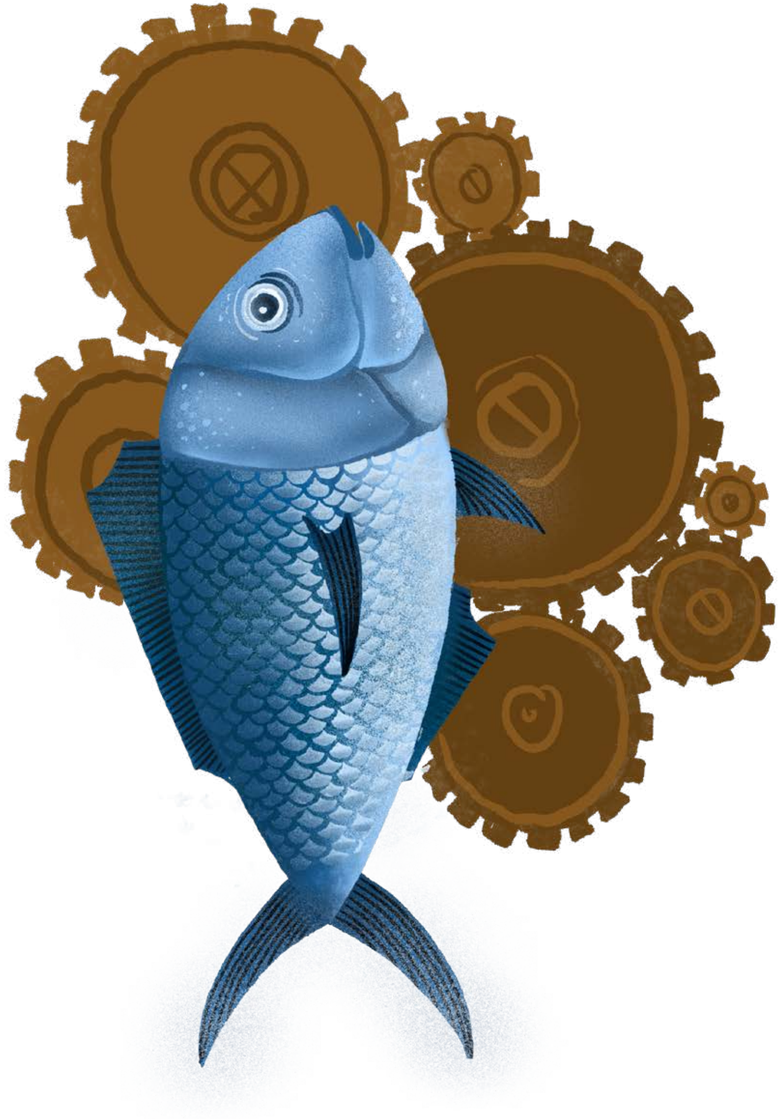
Scope of the sustainability report: Cromaris d.d. and Cromaris Italia s.r.l.

Cromaris has published five sustainability reports

The contents of this report are based on the results of the 2024 double materiality assessment, conducted in accordance with CSRD and ESRS requirements. The assessment evaluated Cromaris' environmental, social, and governance (ESG) impacts, risks, and opportunities, as well as the company's key stakeholders. The chapter **Material impacts, risks and opportunities and their interaction with the strategy and business model SBM-3**, describes the double materiality process and identifies topics considered material. In 2024, no material topics were identified under ESRS E2 – Pollution and ESRS S2 – Workers in the Value Chain.

The report incorporates the interests of Cromaris' own employees through the employee satisfaction survey conducted internally. It also includes the perspectives of customers and consumers, based on satisfaction surveys regarding Cromaris products, as well as

The report content is based on the double materiality assessment



those of fish feed and packaging suppliers, who are regularly audited by Cromaris as part of the company's certification processes for sustainability and product traceability (Cromaris certifications).
In line with the Fish Feed Quality Policy, these suppliers have also provided data on their greenhouse gas emission intensities, which Cromaris has used to calculate its Scope 3 carbon footprint.

Local communities are also considered a key stakeholder group, with whom Cromaris engages in joint initiatives aimed at environmental protection, promoting sports activities, educating children and youth, and raising awareness of white Mediterranean fish as a nutritionally valuable food product.[4]

4 BP-1, 5 c

Cromaris' key stakeholders in 2024 included: Employees, Local communities, Suppliers, Customers and consumers



Disclosures in relation to specific circumstances BP-2

Time horizons

The definitions of the time periods in the report are consistent with those provided in the ESRS. The short-term period refers to the reporting year, the medium-term period covers one to five years, and any period longer than five years is considered long-term.[5]

5 BP-2, 9

Value chain assessment

The value chain analysis covered significant 2024 stakeholders: employees, local communities, suppliers, customers, and consumers. The assessment was based on surveys and direct stakeholder engagement. Sectoral emission factors were used to calculate Scope 2 GHG emissions under the market-based approach for electricity procurement without guaranteed origin, as supplier-specific data was not available.[6]

6 BP-2, 10

Disclosures derived from other regulations or sustainability standards

Disclosures required by other applicable laws or standard.[7]

Regulation / Standard	Requirement under the Regulation / Standard	Page Number in the Report
Taxonomy Regulation (EU) 2020/852 and Implementing Regulations	Assessment of sustainability of activities against six environmental objectives and minimum safeguards Calculation of key performance indicators – Revenue, CapEx, and OpEx	from 76. to 80. and Annex I
ASC Farming Standard	Energy intensity per ton of harvested fish (GJ/t of fish) GHG emissions intensity per ton of harvested fish (t CO_2/t of fish)	107

7 BP-2, 15

Incorporation by Reference

The data referred to sustainability report sourced from the Cromaris 2024 Financial Report.[8]

Referenced Item	Note in the Financial Report
Net revenue used to calculate energy and GHG emissions intensity, sourced from the Cromaris d.d. Financial Report	Page 26, Note 5: • Foreign sales revenue • Domestic sales revenue • Revenue from resale of goods • Other income excluded
Total number of employees, sourced from the Cromaris d.d. Financial Report	Page 27, Note 8

8 BP-2, 16 and E1-5, 43

Application of phased-in provision

In 2024, Cromaris applied the phased-in provision in accordance with Appendix C of ESRS 1 – General Requirements. During the 2024 double materiality assessment, topics, subtopics and sub-subtopics under ESRS E2 – Pollution and ESRS S2 – Workers in the Value Chain were not assessed as material.[9]

9 BP-2, 17

Indicators subject to phased-in application by Cromaris in 2024

ESRS	Indicator
E1 – Climate Change	E1-9 Expected financial effects from material physical and transition risks and potential climate-related opportunities
E3 – Water and Marine Resources	E3-5 Expected financial effects of impacts, risks and opportunities related to water and marine resources
E4 – Biodiversity and Ecosystems	E4-6 Expected financial effects of impacts, risks and opportunities related to biodiversity and ecosystems
E5 – Resource Use and Circular Economy	E5-6 Expected financial effects of impacts, risks and opportunities related to resource use and circular economy
S1 – Own Workforce	S1-7 Characteristics of non-employee workers in the undertaking's workforce

Governance

Role of the Administrative, Management and Supervisory Bodies GOV-1

The administrative, management, and supervisory bodies are involved in the governance, control, monitoring, and oversight of material sustainability matters. Cromaris applies a two-tier corporate governance structure consisting of a Supervisory Board and a Management Board. Members of the Supervisory Board are appointed by the General Assembly, and the Supervisory Board appoints the members of the Management Board. The operations of the General Assembly, the Supervisory Board, and the Management Board are governed by the Articles of Association and the Companies Act. Governance responsibilities and powers are defined by Croatian legislation, the Articles of Association, and internal rules.

Members of the Supervisory and Management Boards are appointed based on education, professional background, and practical experience that support the implementation of strategic objectives and ensure effective oversight, without discrimination based on gender, age, race, or ethnicity. The Code of Ethics defines standards of professional and ethical conduct, including policies on conflicts of interest, anti-corruption, and whistleblower protection. Employee representation in governance bodies is ensured by having an employee representative on the Supervisory Board.

Supervisory Board as of 31 December 2024

In 2024, the Supervisory Board of Cromaris consisted of five members, two of whom were women[10]. The share of independent members was 20%.[11]

- Hrvoje Patajac, MSc, Chair of the Supervisory Board
- Vitomir Palinec, Deputy Chair
- Dr Marica Šorak-Pokrajac, Member
- Gordana Berović Baketić, Member (employee representative)
- Vjekoslav Prenner, Member

10 GOV-1, 20 a and 21 d
11 GOV-1, 21 e

Works Council

The member of the Works Council, whose role is to participate in decisions concerning employee rights and interests, is also a member of the Supervisory Board.[12]

Role of the Supervisory Bord

The Supervisory Board oversees the management of material sustainability matters through its role in reviewing and adopting strategic plans. Cromaris adopts its strategic business plan for a three-year period, updated annually.[11]

12 GOV-1, 21 b

Management Board as of 31 December 2024

The Management Board in 2024 consisted of two executive members, with no female representation.

- Ivan Leko, President of the Management Board
- Dane Desnica, Member

Significant changes from 1 April 2025

After the end of the reporting period and before publication of the report, two additional members were appointed to the Management Board on 1 April 2025. The Board now has four executive members, with no women.[10]

- Ivan Leko, President of the Management Board
- Dane Desnica, Member
- Ante Šarić, Member
- Tin Rukavina, Member



IVAN LEKO



ANTE ŠARIĆ



DANE DESNICA



TIN RUKAVINA

Role of the Management Bord

The Management Board is the highest governance body responsible for sustainability and responsible business conduct. Together with the extended leadership team, the Board sets sustainability objectives and integrates ESG criteria into business operations. The President of the Management Board is responsible for the implementation of the Quality, Food Safety, Environmental and Social Responsibility Policy, the Biodiversity Policy, the Occupational Safety Master Policy, the Code of Ethics, and the Collective Agreement. The Head of R&D is responsible for implementing the Fish Feed Quality Policy.

The Management Board reviews ESG performance quarterly and confirms ESG objectives for the new reporting year in the first quarter. Each ESG objective has a designated responsible person who coordinates a team of employees with relevant expertise. Based on the quarterly performance review, implementation continues or corrective measures are proposed in case of deviations from the targets.

Responsible persons and ESG teams

In addition to implementing measures and monitoring performance indicators, responsible persons and team members also prepare weekly reports that include a summary of past activities, plans for the upcoming week, and progress on sustainability topics. These reports are compiled by directors and unit managers and submitted to the Management Board. There were no significant deviations from the ESG goals in 2024.

The Cromaris ESG system is part of the broader ESG framework of the Adris Group

The ESG function at Cromaris collaborates with corresponding units within the Adris Group responsible for corporate sustainability. Cromaris actively contributes to the development of the Adris Group ESG Framework.

Sustainability competence and expertise

The Management Board, directors, and senior managers at Cromaris possess sustainability-related knowledge obtained through targeted training sessions organised by bodies such as FEAP (Federation of European Aquaculture Producers), EFRAG (European Financial Reporting Advisory Group), the European Commission, the Croatian Chamber of Commerce, and others. This knowledge is shared during internal quarterly meetings and through collaboration with external experts and consultants. The Management Board also receives input from internal and external audits, which Cromaris conducts as part of its certifications in sustainability, product traceability, organic farming, and antibiotic-free production.[13]

13 GOV-1, 20 c, 23 a and b



Disclosures on the governance of material sustainability matters GOV-2

The Management Board was directly and actively involved in the 2024 double materiality assessment, working alongside Cromaris employees engaged in the quarterly ESG performance evaluation process. Other employees were included as needed.

At the initial workshop, the ESG department, with support from external experts, presented to the Management Board the ESRS-aligned double materiality assessment methodology, material sustainability matters, the plan for involving business units, and site visits across operations. The Management Board participated in assessing impacts, risks, and opportunities related to governance practices and followed progress through weekly ESG team reports. Results of thedouble materiality assessment were presented to the Management Board, directors, department heads, and participating employees. Following this, the Board formally approved the material topics for 2024. Given that Cromaris has published sustainability reports since 2020, the company's experience and knowledge gained in prior years supported its alignment with ESRS requirements in 2024. The outcomes of the assessment were also presented to the Adris Group Management Board and the Cromaris Supervisory Board.[14]

14 GOV-2, 26 a

Sustainability objectives integrated into Strategic Business Planning

At the end of each calendar year, Cromaris adopts a new three-year strategic business plan. Accordingly, the 2024–2026 plan was adopted in December 2023, and the 2025–2027 plan in December 2024.

The basis for defining and tracking sustainability objectives (ESG targets) is the double materiality assessment, conducted for the first time in 2024 in accordance with European Sustainability Reporting Standards (ESRS) and to be repeated annually. This assessment considers Cromaris' impacts on the environment, society, human rights, and the economy, as well as the risks and opportunities arising from significant stakeholders in the value chain.[15]

Details on 2024 ESG targets and performance are described in the section **Sustainability Objectives in 2024** and in the individual chapters on material sustainability matters.

15 GOV-2, 26 b

Integration of sustainability-related performance in incentive schemes GOV-3

In 2023, the Adris Group incorporated sustainability performance results into its incentive schemes. The incentive programme rewards the management boards of operating companies and the Adris Group management. The model is designed to balance short-term performance with long-term value creation and includes short- and long-term objectives.

Short-term objectives are approved by the Supervisory Board, while long-term goals are reviewed and defined every three years. For 2024, Cromaris' sustainability-related objective was the creation and development of infrastructure for effective sustainability reporting.[16]

16 GOV-3, 29 a,b,c,d,e



Statement on due diligence GOV-4

Cromaris has embedded due diligence processes into its own operations and value chain activities through questionnaires and direct engagement with employees, customers, suppliers, local communities, competent authorities, and public sources of information.[17]



17 GOV-4, 30

Key Elements of the Due Diligence Process	Section in the Sustainability Report
a) Integration of due diligence into governance, strategy, and business model	GOV-2 Information provided to the administrative, management and supervisory bodies and material matters addressed by those bodies GOV-3 Inclusion of sustainability performance in incentive schemes SBM-3 Material impacts, risks and opportunities and their interaction with strategy and the business model
b) Stakeholder engagement in all key steps of the due diligence process	GOV-2 Information provided to the administrative, management and supervisory bodies and material matters addressed by those bodies SBM-2 Stakeholder interests and views IRO-1 Description of the processes for identifying and assessing material impacts, risks and opportunities
c) Identification and assessment of adverse impacts	IRO-1 Description of the processes for identifying and assessing material impacts, risks and opportunities SBM-3 Material impacts, risks and opportunities and their interaction with strategy and the business model
d) Actions taken to prevent or mitigate negative impacts	Data on actions described in thematic standards
e) Monitoring the effectiveness of efforts and communicating results	Target-related data described in thematic standards

Risk management and Internal Controls over Sustainability Reporting GOV-5

The basis for preparing Cromaris' 2024 Sustainability Report is the double materiality assessment, conducted in full compliance with ESRS requirements. The process involved the Management Board, directors, senior managers, and team leaders, as well as employees responsible for setting ESG targets, performance indicators, and implementation of related measures. Based on the results of the assessment, the Management Board approved the material topics for 2024.

The ESG department, operating under the Finance division, coordinated the preparation of the sustainability report in collaboration with the R&D and Commercial Excellence departments. The Management Board was kept informed through weekly reports on all activities related to the preparation of the report.

In 2024, Cromaris engaged external experts to support the process. Data was collected from employees responsible for specific sustainability areas. As Cromaris' report forms part of the consolidated Adris Group sustainability report, disclosure requirements under ESRS were discussed and harmonised during coordination meetings of ESG leads across the Group and individual business segments.

Each report chapter was submitted for review to the Cromaris Management Board, directors, managers, and employees who contributed to the report. Based on their feedback, both quantitative and qualitative data were revised before final publication to ensure accuracy and alignment with reporting expectations.[18]



18 GOV-5, 36 a,b,c,d and e

Strategy

Strategy, Business Model, and Value Chain SBM-1

Cromaris operates on the basis of three-year strategic business plans, revised annually. The Strategic Plan 2024–2026 remained in force during the reporting year, while the Strategic Plan 2025–2027 was in force at the time of publication.

Strategic pillars of Cromaris' Business Plan

- Research and development focused on species and product innovation, fish welfare, standardisation and certification of products and processes, and the selection of broodstock for hatchery operations
- Premium-quality products distinguished by superior taste, appearance, and nutritional value
- Market-driven marketing based on consumer insights and the targeted promotion of products aligned with evolving preferences
- Operational excellence grounded in the highest standards of traceability, sustainability, quality assurance, and responsible aquaculture practices

Strategic directions

- Differentiation and innovation – sustainable organic fish farming, new species, and value-added products
- Consumer insights – value-added products aligned with market trends and consumer expectations
- Digital transformation – advanced business process management systems

Cromaris' product offering reflects the company's strategic plan

The chapter **Our Products** describes the product portfolio in 2024, including promotion of organically farmed BIO fish and award-winning products. Fish farming practices and product offerings are aligned with Cromaris' vision, mission, and strategic objectives.[19] [20]

19 SBM-1, 40 a i
20 SBM-1, 40 a ii



Employees are Cromaris' Strength

As of 31 December 2024, Cromaris employed a total of 614 people, with over 98% based in Croatia, and the remainder in EU countries – Italy, Poland, and Germany.[21]

21 SBM-1, 40 a iii

Employees by Geographic Region

Country	Number of Employees	Share (%)
Croatia	605	98.53
Italy	7	1.15
Germany	1	0.16
Poland	1	0.16
Total	**614**	**100**

Cromaris is not engaged in the fossil fuel sector, chemical production, controversial weapons, or tobacco farming and production.[22]

Cromaris' Value Chain

Cromaris' production depends on suppliers of raw materials, goods, and services — primarily fish feed, packaging, and providers of transportation, machine maintenance, and equipment servicing. All suppliers and service providers are based in EU countries. Partnerships are governed by Cromaris' General Terms of Procurement, which include environmental protection, anti-corruption, and child labour prevention clauses. These terms are publicly available on Cromaris' website and embedded in the Adris Group's Ensolva e-procurement platform. The strategic business plan considers the cost of raw materials for feed, energy and fuel prices, and value chain disruption risks due to weather events, health crises, and geopolitical or economic instability. Cromaris products are the result of a business model based on traceability, quality control, sustainable production, and responsible farming. The product offering is shaped by market trends, consumer behaviour, and customer satisfaction surveys. Further details are available in **Consumers and End-users ESRS S4**.[23]

22 SBM-1, 40 d i, ii, ii, iv

23 SBM-1, 42 b and c

Sustainability Objectives in 2024

Sustainability objectives for 2024 were based on the performance evaluation of 2023 ESG goals and aligned with global, EU, and national sustainability frameworks relevant to aquaculture and the blue economy. These targets support the UN Sustainable Development Goals (SDGs), the EU Green Deal, Strategic Guidelines for Sustainable and Competitive Aquaculture in the EU (2021–2030), Croatia's National Aquaculture Development Plan 2027, the Circular Economy Action Plan 2030, the Climate Change Adaptation Strategy until 2040, outlook to 2070, and the Integrated National Energy and Climate Plan (NECP) 2021–2030.

Additional considerations included inflation, purchasing power in key markets (Croatia and Italy), customer expectations, insights from stakeholder engagement, media monitoring, raw material and energy prices, labour availability, access to secondary raw material packaging suitable for food contact, and the resilience of supply chains in the face of geopolitical and climatic uncertainties.
No material deviations from the sustainability objectives were identified in 2024. Performance against these objectives is presented in detail in the respective Environmental (E), Social (S), and Governance (G) sections.[24]

24 SBM-1, 40 e , f and g, 42 a and c

The 2024 sustainability goals are grounded in global, EU, and national sustainability targets, aligned with aquaculture-specific standards, and shaped by prevailing economic, geopolitical, and climatic conditions

Sustainability Objectives in 2024

ESRS / Sustainability Factor	Objective	Achievement in 2024
ESRS E1 – Climate Change, Climate Change Mitigation	Reduce CO_2(e) emissions intensity per tonne of harvested fish in Scopes 1 and 2 by 25% by 2025 and by 40 to 50% by 2030 compared to 2020.	Objective achieved. Emissions intensity reduced by 33%.
ESRS E5 – Resource Use and Circular Economy, Resource Outflows	Recover at least 50 tonnes of animal by-products.	Objective achieved. The total quantity of animal by-products was recovered.
ESRS E5 – Resource Use and Circular Economy, Resource Outflows	Improve the mixed municipal waste separation system.	Objective partially achieved. Activities will continue in 2025.
ESRS E5 – Resource Use and Circular Economy, Resource Outflows	Improve the packaging management system in line with the market availability of packaging that comes into direct contact with food and secondary packaging based on recyclability and recycled content criteria.	Objective not achieved, as 100% recyclable packaging or packaging with more than 10% recycled content suitable for food contact is still not available on the market.
ESRS S1 – Own Workforce, Employee Health and Safety	Maintain the number of serious injuries at 0 and reduce the number of minor injuries and sick leave hours by 22% in 2024 compared to 2023.	The objective to reduce sick leave hours was achieved, with a 33% reduction compared to 2023. Total number of workplace injuries in 2024 was reduced by 27% compared to 2022 and 2023.

ESRS / Sustainability Factor	Objective	Achievement in 2024
ESRS S1 – Own Workforce	Regularly conduct employee satisfaction surveys and align action plans for implementing improvement measures.	Objective achieved. Employee satisfaction was assessed and action plans were updated accordingly.
ESRS S1 – Own Workforce	Encourage team cohesion among employees – at least two activities during 2024.	Objective achieved.
ESRS S3 – Affected Communities	Promote voluntary employee participation in socially responsible activities – at least two voluntary initiatives (environmental protection, humanitarian actions, improving relations with the local community).	Objective achieved. In 2024, Cromaris employees voluntarily participated in a cleanup action in PP Telašćica and the seabed of the port in Sukošan, the Wings for Life humanitarian run, and held several educational sessions for children and youth on the importance of environmental and biodiversity conservation.
ESRS S3 – Affected Communities	Cooperate with educational institutions – more than 50 visits by pupils/students.	Objective achieved. In 2024, Cromaris hosted 360 pupils and students.
ESRS S3 – Affected Communities	Donate at least €45,000 to the local community (in cash and/or fish).	Objective achieved. A total of €78,000 was donated in 2024.
ESRS G1 – Business Conduct	Maintain ASC Farming certification for all Cromaris farms.	Objective achieved. All farms maintained ASC Farming certification in 2024.

Interests and Views of Stakeholders SBM-2

Cromaris' key internal stakeholders include employees, the company's shareholder, and representatives of the Trade Union of Workers in Agriculture, Food, Tobacco and Water Management of Croatia (PPDIV), specifically the "CROMARIS" trade union branch. External stakeholders comprise customers and consumers of Cromaris products, suppliers of raw materials, goods and services, local communities, the scientific and academic community, industry associations, regulatory authorities, the shareholder, certification bodies and standard owners, as well as the media.[25]

25 SBM-2, 45 a and b



Stakeholder	Objective of Engaging Stakeholder Interests and Views	Method of Engagement
Employees and employee representatives	• Ensure a healthy, safe, and supportive workplace • Motivate employees to meet strategic objectives • Foster a sense of belonging and purpose • Provide opportunities for professional growth and fair compensation	• Employee satisfaction surveys regarding work at Cromaris • Regular informing of employees about business operations, ways to provide comments and suggestions for business improvement, benefits, and protection of dignity – internal news, email, human resources open-door days, informational materials on bulletin boards and delivered with payslips • Evaluation of employees, managers, and directors (efficiency, communication, teamwork) • Negotiations with trade union representatives on the terms of the collective agreement
Owner	• Present and approve the strategic business plan • Create added value for the owner • Contribute to the owner's reputation	• Board of Directors and Supervisory Board sessions • Regular meetings, coordination and consultations between Cromaris and Adris Group
Customers and consumers	• Adapt product portfolio to market trends and consumer habits • Build trust and loyalty through fair marketing and two-way communication • Ensure product availability	• Customer and consumer satisfaction surveys regarding Cromaris products • Possibility of fulfilling the requirements from Cromaris' General Terms of Sale and Delivery • Survey on the recognizability of the Cromaris brand • Communication with customers and publications for customers and consumers on social media (LinkedIn, Instagram, FB) • Communication with customers and consumers via email • Exchange of information with customers at fairs, events, meetings • Publicly available data on customer operations

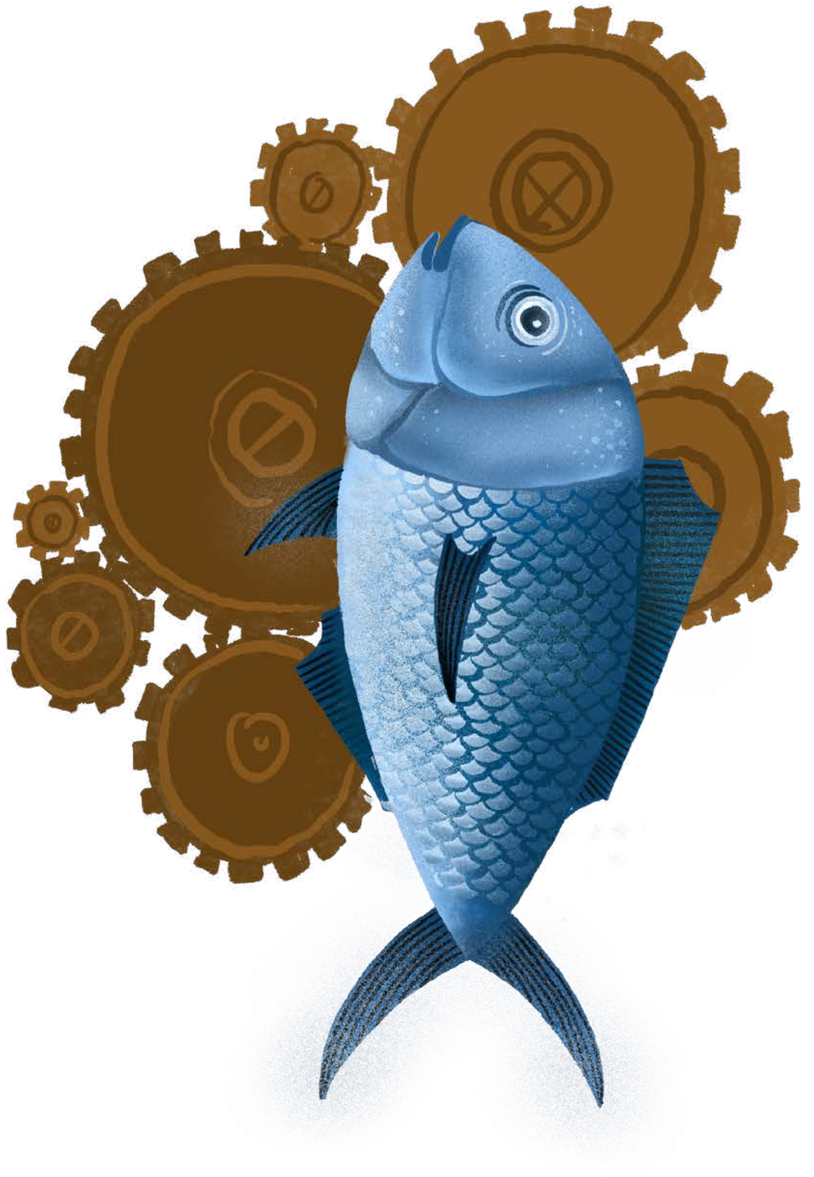
Stakeholder	Objective of Engaging Stakeholder Interests and Views	Method of Engagement
Suppliers	• Secure supply chain reliability • Positively influence suppliers with requirements on environmental protection, social responsibility, anti-corruption, and child/forced labour prevention	• Evaluation of new and existing suppliers • Procurement procedures and compliance with Cromaris' General Terms of Procurement of Goods and Services • Supplier audits and compliance with standard requirements • Regular meetings to find more sustainable business solutions (packaging) • Publicly available data on business operations
Regulatory authorities	• Monitor timely changes to permits and concessions procedures • Track new or amended legislation • Collaborate with regulatory authorities	• Participation in public consultations and e-consultations • Participation in working groups for legislative changes
Local communities	• Build and maintain good relationships with local communities • Promote positive changes through environmental, sports, educational and humanitarian initiatives • Support and renew local infrastructure	• Clean-up action in Telašćica Nature Park • Clean-up action in the port of Sukošan • Education of children and youth on the importance of environmental protection, biodiversity, and the inclusion of fish in the diet • Support for local sports clubs and events. Sponsorship – KK Zadar, Croatian Long Distance Swimming Federation, RK Zadar, and PK Zadar • Support for smaller sports clubs and events, including the Škraping race on the island of Pašman • Participation in and support for traditional events – Zadar Street Food Festival, Weekend Media Festival, Toč Festival in Nin, Sea and Salt Festival in Sali, Crnilo Cup in Lukoran, and numerous fishermen's nights

Stakeholder	Objective of Engaging Stakeholder Interests and Views	Method of Engagement
Scientific community and educational institutions	• Educate high school and university students in aquaculture as future Cromaris employees • Follow trends and research in aquaculture • Finance and co-finance EU-funded projects	• Field visits of university and secondary school students with the aim of familiarizing them with Cromaris' business processes • Mentorships for the preparation of seminar, final, and graduate theses • Exchange of experiences and knowledge, and cooperation on projects for business improvement and cost reduction
Auditors and standard owners	• Independently verify traceability and product quality, organic and antibiotic-free farming, and responsible business conduct • Improve production and business processes through audit recommendations • Monitor standard changes for business impact	• Cooperation during the preparation and submission of documentation to demonstrate compliance with standard requirements • Exchange of professional knowledge and experience during audits and the final opinion • Participation in working groups for amendments and revisions of standards
Industry and aquaculture associations	• Join forces with other companies to strengthen visibility and advocate for sector and business interests	• Membership in associations for representing the interests of entrepreneurs • Exchange of knowledge and experience with experts in the mariculture sector and the economy
Media	• Enhance Cromaris brand visibility • Ensure business transparency	• Media publications, interviews, reports

Managers and directors of organisational units report to the Cromaris Management Board on all significant business activities, including those related to stakeholder engagement and collaboration. Reports are prepared and submitted on a weekly basis, providing a summary of activities from the previous week and plans for the week ahead.
Directors, managers, and, where applicable, employees involved in stakeholder engagement report to the Management Board during decision-making meetings aimed at ensuring the necessary resources for stakeholder engagement and cooperation.

The Management Board also directly participates in communication with stakeholders, including employees, trade union representatives, suppliers, customers, industry associations, local communities, regulatory authorities, and the media.
The Management Board was actively involved in the double materiality assessment for 2024, and the Supervisory Board was informed of the results of the assessment as well as the strategic business plans, which include stakeholder engagement and cooperation.[26]

26 SBM-2, 45 c



Material Impacts, Risks and Opportunities and their Interaction with Strategy and Business Model SBM-3

The Strategic Business Plan 2024–2026, along with its most recent update for the period 2025–2027, integrates the material impacts, risks, and opportunities identified through the double materiality assessment. These elements serve as the foundation for planning targeted measures and resource allocation aimed at achieving sustainability goals and enhancing the resilience of the business model.

Objectives, actions, and performance indicators related to the implementation of sustainability goals are presented in the chapters addressing the respective material sustainability matters.[27] The following section provides an overview of the material environmental, social, and governance (ESG) impacts, risks, and opportunities arising from Cromaris' own operations as well as from its upstream and downstream value chain, assessed across the short-, medium, and long-term horizons. This is followed by a detailed description of the positive and negative impacts, as well as the associated risks and opportunities, linked to each material sustainability matter and their potential influence on stakeholders.[28]

27 SBM-3, 48 f

28 SBM-3, 48 a



Overview of Cromaris' Material Impacts, Risks and Opportunities – Environment (E)[29]

			Value chain			Time horizon		
Topic – Environment	**Sustainability topics and related IROs**	**I/R/O**	**Upstream chain**	**Own operations**	**Downstream chain**	**Short-term**	**Medium-term**	**Long-term**
E1 Climate Change	**Mitigation of climate change**							
	Greenhouse gas emissions – Scope 1 and 2	Negative impact		•		•		
	Greenhouse gas emissions – Scope 3	Negative impact	•		•	•		
	Energy							
	Energy consumption	Negative impact		•		•		
	Climate change adaptation							
	Extreme weather events – fish escape	Risk		•		•		
	Climate risks – strong winds	Risk		•				•
	Power purchase agreement for renewable energy	Opportunity		•				•
E3 Water and Marine Resources	**Water and marine resources**							
	Seawater withdrawal	Negative impact		•		•		

29 ESRS 2, SBM-3, 48 a), b), c) iii, iv

			Value chain			Time horizon		
Topic – Environment	**Sustainability topics and related IROs**	**I/R/O**	**Upstream chain**	**Own operations**	**Downstream chain**	**Short-term**	**Medium-term**	**Long-term**
E4 Biodiversity and Ecosystems	**Impacts on species status**							
	Fish escape	Negative impact		•		•		
	Direct drivers of biodiversity loss							
	Increased organic load in the sea – fish feed	Negative impact		•		•		
	Feeding control	Opportunity		•		•		
E5 Circular Economy	**Resource outflow related to products and services**							
	Recovery of dead fish (mortality)	Positive impact		•		•		
	Use of fish by-products for pet food production	Positive impact		•		•		
	Waste							
	Plastic packaging – output chain	Negative impact			•	•		
	Waste generation	Negative impact		•		•		
	Opportunity to establish a pre-processing unit	Opportunity		•			•	•
	Surplus fish after harvest	Opportunity		•			•	•

Overview of Cromaris' Material Impacts, Risks, and Opportunities – Social (S)[29]

			Value chain			Time horizon		
Topic – Social	**Sustainability topics and related IROs**	**I/R/O**	**Upstream chain**	**Own operations**	**Downstream chain**	**Short-term**	**Medium-term**	**Long-term**
S1 Own Workforce	**Working conditions**							
	Secure employment	Positive impact		•		•		
	Freedom of association	Positive impact		•		•		
	Employee well-being	Positive impact		•		•		
	Work–life balance	Positive impact		•		•		
	Working hours – overtime	Negative impact		•		•		
	High salt concentrations in the air	Negative impact		•		•		
	Health and safety – injuries	Negative impact		•		•		
	Loss of key personnel	Risk		•		•		
	Workforce turnover	Risk		•		•		
	Equal treatment and opportunities for all							
	Training for employees	Positive impact		•		•		
	Equal treatment	Positive impact		•		•		
	Other rights arising from employment relationship							
	– Adequate accommodation for migrant workers	Positive impact		•		•		

			Value chain			Time horizon		
Topic – Social	**Sustainability topics and related IROs**	**I/R/O**	**Upstream chain**	**Own operations**	**Downstream chain**	**Short-term**	**Medium-term**	**Long-term**
S3 Affected Communities	**Entity-specific**							
	Local community employment	Positive impact		•	•	•		
	Collaboration with academic and research communities	Positive impact		•	•	•		
S4 Consumers and End-Users	**Impacts related to information provided to end consumers and/or end-users**							
	Quality certifications	Positive impact		•		•		
	Access to product information	Positive impact		•	•	•		
	Market pressure – prices	Risk		•	•		•	•
	Personal safety of consumers and/or end users							
	Customer and end-user complaints	Negative impact		•	•	•		
	Antibiotic-free fish farming	Positive impact		•	•	•		
	Social inclusion of consumers and/or end-users							
	Organic fish production	Positive impact		•	•	•		

Overview of Cromaris' Material Impacts, Risks, and Opportunities – Governance (G)[29]

			Value chain			Time horizon		
Topic – Governance	**Sustainability topics and related IROs**	**I/R/O**	**Upstream chain**	**Own operations**	**Downstream chain**	**Short-term**	**Medium-term**	**Long-term**
G1 Business Conduct	**Animal welfare**							
	Post-harvest handling of fish	Negative impact		•		•		
	Animal welfare – post-harvest handling of fish	Opportunity		•			•	•
	Disease transmission between species	Risk		•		•		
	Broodstock disease	Risk		•				•
	Diseases in fish cages	Risk		•		•		
	Supplier management, including payment							
	Raw materials for fish feed production	Risk	•	•		•		
	Supplier of fish bathing treatments	Risk	•	•		•		
	ESG questionnaire for suppliers	Opportunity		•				•
	Entity specific							
	Cybersecurity	Risk		•			•	

Description of Material Impacts – Environment (E)[30]

Topic	Sustainability topics and related IROs	Negative/ Positive impact	Description	Affected stakeholder
	Mitigation of climate change			
E1 Climate Change	Greenhouse gas emissions – Scope 1 and 2	Negative impact	Thermal energy is produced by heat pumps and burners using fossil fuels. Vehicles, vessels, and machinery rely on fossil fuels. Official hybrid vehicles combine fossil fuel and electricity. Refrigeration and air-conditioning use controlled substances with various global warming potentials (GWPs). Electricity produced under a non-guaranteed origin model in 2024 was purchased from a supplier, and the related emissions are included in Scope 2. In 2024, 10 % of electricity needs were covered by generation from the company's own photovoltaic solar power plants.	Nature
	Greenhouse gas emissions – scope 3	Negative impact	In 2024, Scope 3 emissions included those from feed and packaging suppliers (category 1), operational waste (category 5), and employee air travel (category 6).	Nature
	Energy			
	Energy consumption	Negative impact	Consumption of energy and fossil fuels for heat production, operation of vehicles, vessels, and machinery, and purchase of grid electricity without guaranteed origin certificates.	Nature

30 ESRS 2, 48 c i, ii

Topic	Sustainability topics and related IROs	Negative/ Positive impact	Description	Affected stakeholder
E3 Water and Marine Resources	**Water and marine resources**			
	Seawater withdrawal	Negative impact	Seawater withdrawal is a key resource for larval production at the Ninu hatchery. Seawater withdrawal may impact marine species.	Nature
E4 Biodiversity and Ecosystems	**Impacts on species status**			
	Fish escape	Negative impact	Genetic alteration of wild fish populations due to escapes from cages. Escaped farmed fish with different genetic material may interbreed with wild stocks, altering their DNA and potentially affecting the marine ecosystem.	Nature
	Direct drivers of biodiversity loss			
	Increased organic load in the sea – fish feed	Negative impact	Increased organic load from fish feed and metabolic processes in seawater causes imbalances in aquatic ecosystems and raises the risk of eutrophication.	Nature

Topic	Sustainability topics and related IROs	Negative/ Positive impact	Description	Affected stakeholder
	Resource outflows related to products and services			
	Recovery of dead fish (mortality)	Positive impact	Mortality collected from farms is valorized as feedstock for biogas production.	Nature
	Use of fish by-products for pet food production	Positive impact	By-products from sorting and processing are sold as raw material for pet food production. Their nutritional value makes them suitable for the pet food industry.	Nature
E5 Circular Economy	**Waste**			
	Plastic packaging – downstream chain	Negative impact	Delivery of fresh fish in plastic packaging, if not properly managed, can end up as litter and contribute to microplastic pollution.	Nature
	Waste generation	Negative impact	Various wastes arise during production, processing, packaging, and sale of Cromaris products. Mostly non-hazardous (sludge from wastewater treatment, plastics, plastic and cardboard packaging, bulky waste). Hazardous waste mainly consists of waste oils, lubricants, and lead-acid batteries from maintenance of machinery and equipment.	Nature

Description of Material Impacts – Social (S)[30]

Topic	Sustainability topics and related impacts	Negative/ Positive impact	Description	Affected stakeholder
S1 Own Workforce	**Working conditions**			
	Secure employment	Positive impact	All workers are informed of working conditions and social protection rights upon hiring.	Own workforce
	Freedom of association	Positive impact	All Cromaris employees are free to join associations such as the Workers' Council and/or the Union.	Own workforce
	Employee well-being	Positive impact	The collective agreement covers all employees and provides various benefits (e.g., favorable loans, insurance discounts, discounts on Cromaris fish, Christmas and Easter bonuses, child gifts, financial aid + paid leave for birth/death, additional days off for childcare transitions and first grade school entrance).	Own workforce
	Work–life balance	Positive impact	The company offers employees various work–life balance options, including family leave, flexible working hours, and remote work where applicable.	Own workforce
	Working hours – overtime	Negative impact	Production and processing workers often work overtime due to delivery deadlines. Extended overtime can cause fatigue, stress, and reduced employee satisfaction.	Own workforce

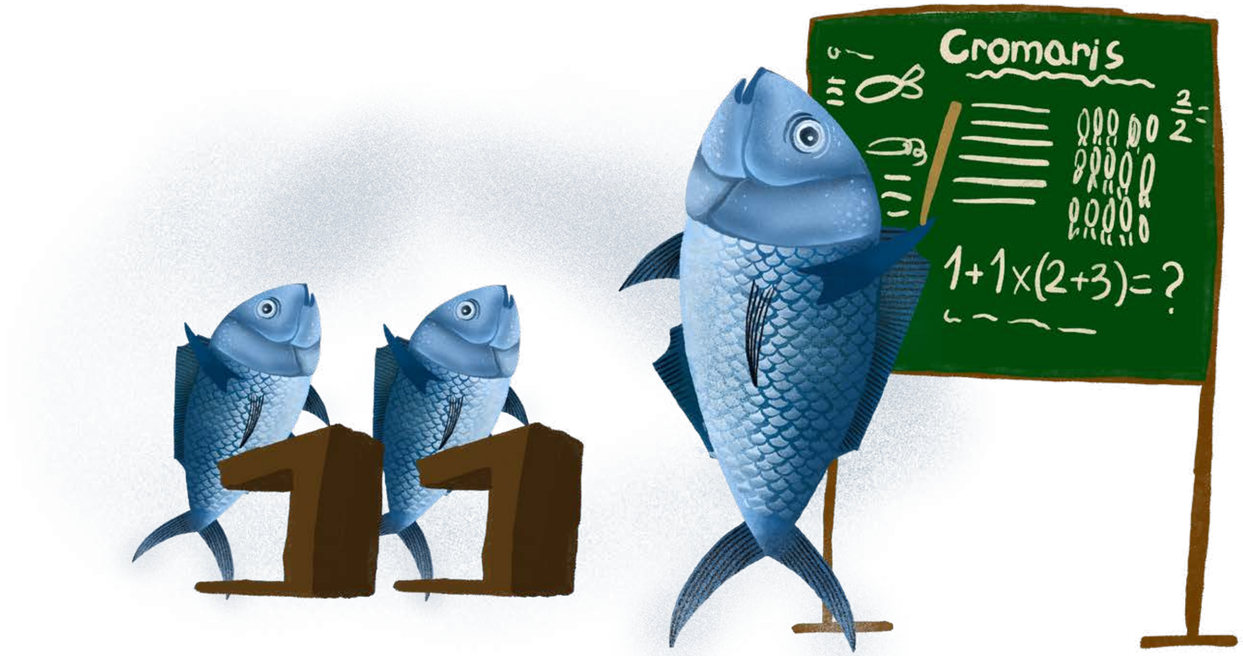
Topic	Sustainability topics and related impacts	Negative/ Positive impact	Description	Affected stakeholder
	High salt concentrations in the air	Negative impact	High salt concentrations in the hatchery air can affect workers and working conditions. Mitigation measures were implemented during 2024.	Own workforce
	Health and safety – injuries	Negative impact	Most Cromaris employees are exposed to altered microclimates and special working conditions that can increase injury risk.	Own workforce
	Equal treatment and opportunities for all			
S1 Own Workforce	Training for employees	Positive impact	Training and professional development enable employees to acquire specialized knowledge and skills, increasing process efficiency and excellence in task performance.	Own workforce
	Equal treatment	Positive impact	Gender equality and equal pay for work of equal value are promoted. Cromaris uses a structured pay grade system to establish competitive salary ranges for different positions.	Own workforce
	Other rights arising from employment relationship			
	Adequate accommodation for workers from third countries	Positive impact	Due to labor shortages and turnover, the company employs workers from third countries and provides them with appropriate housing.	Own workforce

Topic	Sustainability topics and related impacts	Negative/ Positive impact	Description	Affected stakeholder
	Entity specific			
S3 Affected Communities	Local community employment	Positive impact	Half of the workforce at Cromaris farms comprises local island residents skilled in vessel operation under all weather conditions. Employing locals supports island economies.	Affected communities
	Collaboration with academic and research communities	Positive impact	Collaboration with academia and research institutions fosters development of future mariculture professionals, knowledge exchange, and joint projects to improve production processes.	Affected communities
	Impacts related to consumer and end-user information			
S4 Consumers and End-Users	Quality certifications	Positive impact	The implemented and certified standards are an independent confirmation of product traceability, antibiotic-free farming, organic farming, and farming in accordance with the principles of environmental protection and socially responsible business conduct. Certified standards contribute to consumer trust in Cromaris products.	Consumers
	Access to product information	Positive impact	Product quality information is available to customers via the website, social media, reports, and direct communication.	Consumers

Topic	Sustainability topics and related impacts	Negative/ Positive impact	Description	Affected stakeholder
S4 Consumers and End-Users	**Personal safety of customers and end-users**			
	Complaints from consumers and end users	Negative impact	One common complaint concerns transport services. Handling by multiple carriers can disrupt the cold chain, directly affecting product quality.	Consumers
	Antibiotic-free fish farming	Positive impact	Antibiotic-free production helps prevent antibiotic resistance in living organisms.	Consumers
	Social inclusion of consumers and/or end-users			
	Organic fish production	Positive impact	Organic farming contributes to marine environmental protection, animal welfare, and aligns with market trends and consumer demands.	Consumers

Description of Material Impacts – Governance (G)[30]

Topic	Sustainability topics and related impacts	Negative/ Positive impact	Description	Affected stakeholder
G1 Business Conduct	**Animal welfare**			
	Post-harvest handling	Negative impact	Water and ice baths are applied after catch in fishing and mariculture. In the interest of animal welfare, methods that shorten the time to death of fish post-catch are preferred.	Nature



Description of Material Risks and Opportunities – Environment (E)[31]

Topic	Sustainability topics and related IROs	Risk/ Opportunity	Description
E1 Climate Change	**Climate change adaptation**		
	Extreme weather events – fish escape	Risk	Extreme weather events (storms and strong winds) can damage farming infrastructure, cause fish escapes, potentially affect the DNA of wild fish populations, and result in financial losses.
	Power purchase agreement for renewable energy	Opportunity	A new business development segment for Adris Group is underway: a joint-venture project to build renewable energy sources that will satisfy 85 % of total electricity consumption. Electricity production for Cromaris began in 2025 under a seven-year contract and will reduce dependency on energy suppliers, stabilize energy prices, and decrease Scope 2 greenhouse gas emissions.
E4 Biodiversity and Ecosystems	**Direct drivers of biodiversity loss**		
	Feeding control	Opportunity	Installation of cameras at grow-out sites enables more efficient monitoring of fish feeding processes and optimization of feed consumption. This ensures animal welfare, reduces the amount of feed entering the marine environment and the risk of organic pollution and eutrophication, and lowers feed procurement costs.

31 ESRS 2, 48 b

Topic	Sustainability topics and related IROs	Risk/ Opportunity	Description
	Waste		
E5 Circular Economy	Opportunity to establish a pre-processing unit	Opportunity	The introduction of pre-growout phases in the hatchery would enable the transport of larger and more resilient fish to the farming sites. Due to the increased fish size, the use of nets with smaller mesh sizes — which are more prone to biofouling, require more frequent cleaning, wear out faster, and generate more waste — would be reduced.
	Surplus fish after harvest	Opportunity	Opening a new fish market within the plant would allow the sale of surplus fresh fish that has not been sold to customers and would otherwise become waste due to its short shelf life.

Description of Material Risks and Opportunities – Social (S)[31]

Topic	Sustainability topics and related IROs	Risk/ Opportunity	Description
S1 Own Workforce	**Working conditions**		
	Loss of key personnel	Risk	The loss of key personnel in strategic positions can slow down business processes and affect the production, processing, and delivery of products to customers.
	Workforce turnover	Risk	High employee turnover can negatively impact business continuity and productivity. The company's specific geographic location also affects its ability to recruit new staff.
S4 Consumers and End-Users	**Impacts related to consumer and end-user information**		
	Market pressure – prices	Risk	Due to changing consumer habits, most end-users no longer buy fish at fish markets but at retail chains. Retailers' policy is to negotiate the lowest market price, which constrains Cromaris' pricing strategy.

Description of Material Risks and Opportunities – Governance (G)[31]

Topic	Sustainability topics and related IROs	Risk/ Opportunity	Description
G1 Business Conduct	**Animal welfare**		
	Animal welfare – fish killing	Opportunity	Stunning fish has a major influence on post-mortem processes, such as the onset and resolution of rigor mortis, which affects muscle texture and microbiological degradation of tissue. Less stressful stunning methods minimize stress responses and thus post-mortem changes. Consumers and end-users, as well as the World Aquaculture Society, recommend electrical stunning as a less invasive killing method.
	Disease transmission between species	Risk	Transmission of disease agents from wild to farmed fish can compromise the health of fish in farms and production volumes, resulting in financial losses.
	Broodstock disease	Risk	Broodstock must be maintained and protected from all potential pathogens and stressors to preserve product quality and ensure uninterrupted business processes.
	Diseases in fish cages	Risk	Various diseases (bacteria, viruses, parasites) can infect cage-reared fish stocks and cause mortality if not treated promptly and adequately.

Topic	Sustainability topics and related IROs	Risk/ Opportunity	Description
G1 Business Conduct	**Supplier management, including payment**		
	Raw materials for fish feed production	Risk	Unstable market conditions and geopolitical factors influencing raw materials for fish feed can affect their availability and drive up prices, potentially leading to shortages and higher final feed costs.
	Suppliers of bathing treatments	Risk	Dependence on the sole EU-registered supplier of antiparasitic treatments for skin, fin, and gill infections in fish impacts both cost and production reliability.
	ESG questionnaire for suppliers	Opportunity	The company is developing an ESG questionnaire for suppliers to assess their ESG maturity and gather specific data (e.g., Scope 3 emissions). Improved insight into supplier ESG performance can inform procurement decisions and help the company meet its ESG targets, such as reducing greenhouse gas emissions.
	Specific to governance		
	Cybersecurity	Risk	The risk of cyber threats and attacks continues to grow, necessitating measures to protect data and assets in order to maintain production continuity and avoid financial losses.

Description of the Process to Identify and Assess Material Impacts, Risks and Opportunities IRO-1

The assessment of impacts, risks and opportunities for 2024 was conducted in accordance with the methodology prescribed by the ESRS, based on on-site visits carried out from 13 to 17 May 2024. The double materiality assessment involved key Cromaris employees: members of the Management Board, directors, managers, and operational staff from the following organisational units: R&D, hatchery, fish farms, processing, grading, logistics, marketing, sales, maintenance, human resources, finance, controlling, accounting, procurement, and ESG.[32]

From 2020 to 2024, sustainability matters were assessed based on GRI Guidelines, and as of 2024, in accordance with the European Sustainability Reporting Standards (ESRS). Since 2020, Cromaris has identified material topics that served as the basis for preparing sustainability reports and setting objectives, measures, activities, and performance indicators. Between 2020 and 2024, material topics were determined in accordance with the methodology defined in the GRI Standards 2021 and the sector standard GRI 13: Agriculture, Aquaculture and Fishing. This approach

32 IRO -1, 53 a, b c i,

From 2020 to 2024, sustainability factors were assessed in accordance with the GRI guidelines, and as of 2024, in accordance with the European Sustainability Reporting Standards (ESRS)

The double materiality assessment included relevant internal and external stakeholders

to defining material topics was the starting point for the ESRS double materiality assessment. The material topics, objectives, measures, and performance indicators (ESG goals) for the period 2020–2024 are published in Cromaris' sustainability reports available on its **corporate website**.

The double materiality assessment included both internal and external stakeholders. The double materiality assessment for 2024 encompassed Cromaris' own operations and key segments of the value chain: suppliers, customers and consumers, local communities, the academic and scientific community, and competent authorities. The involvement of internal and external stakeholders in the value chain in the double materiality assessment and strategic planning is described in the chapter **Stakeholder Interests and Engagement SBM-2**.[33]

The assessment of impacts and financial risks and opportunities resulted in the identification of sustainability matters

Based on the previous years' material topic assessments aligned with GRI Standards 2021, on-site visits and interviews with key employees in May 2025, certification standards applicable to Cromaris' operations, value chain stakeholder analysis, strategic business plan objectives, the current economic and geopolitical context, frequent changes in weather conditions and their effects on production, and market trends, a so-called long list of topics was compiled.[34]

Impacts were assessed based on severity, and financial risks and opportunities based on likelihood and magnitude. Impacts were assessed according to severity, which included magnitude, scale, and irreversibility of negative impacts, and the likelihood of potential impacts. Financial risks and opportunities were assessed using the likelihood and magnitude of potential financial effects on Cromaris' financial position, performance, cash flows, and access to finance. For ESG-related risks and opportunities, the methodology used was consistent with Cromaris' standard business risk assessment practices.

Impacts were assessed based on their severity, while financial risks and opportunities were assessed based on their likelihood and magnitude

33 IRO-1, IRO-1, 53 b i, iii, 53 f and g

34 IRO-1, 53 c iii

The severity of actual and potential impacts was scored on a scale from 1 to 5. For potential impacts, a separate likelihood scale from 1 to 4 was also used. The materiality threshold was set at 3.0 for actual impacts and 3.5 for potential impacts. The application of different thresholds allowed a harmonised approach to materiality determination. The magnitude of financial risks and opportunities was assessed on a 1 to 5 scale, based on the expected significance of financial impact and the potential influence on decisions of primary users of financial statements (e.g. banks, investors). The materiality threshold for financial risks and opportunities in 2024 was set at 3% of annual revenue (score 3).[35] In the chapters addressing each material sustainability matter, the assessed topics and the stakeholders involved in the double materiality assessment are clearly presented. The results of Cromaris' double materiality assessment were consolidated with those of the Adris Group.

The results of the double materiality assessment were reviewed with Cromaris staff who participated in the process and subsequently presented to the Management Board and the Supervisory Board.[36]

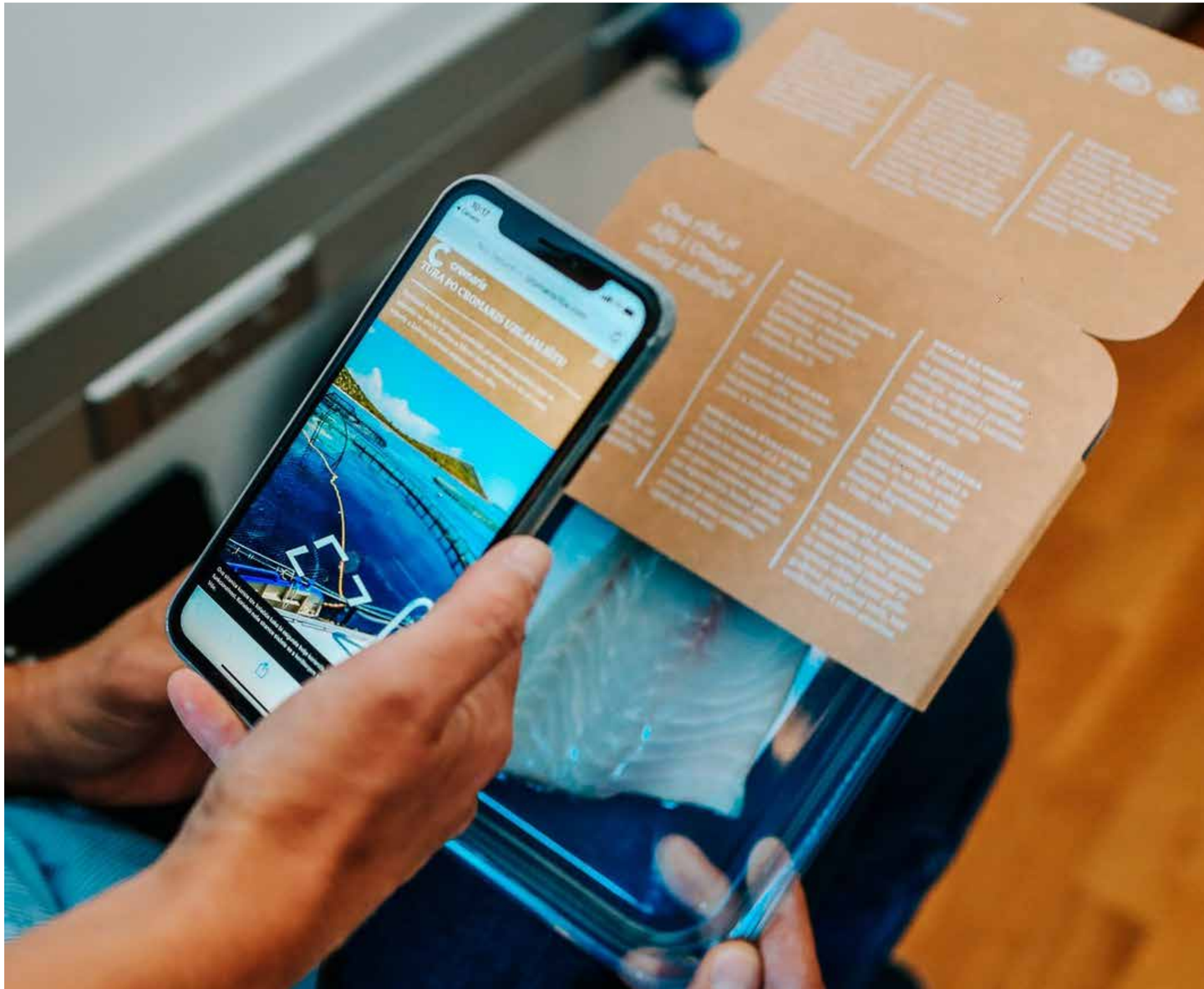
35 IRO-1, 53 c) ii, b) iv, g)
36 IRO-1, 53 b iii, 53 d, e

The results of Cromaris' double materiality assessment have been consolidated with the results of the Adris Group



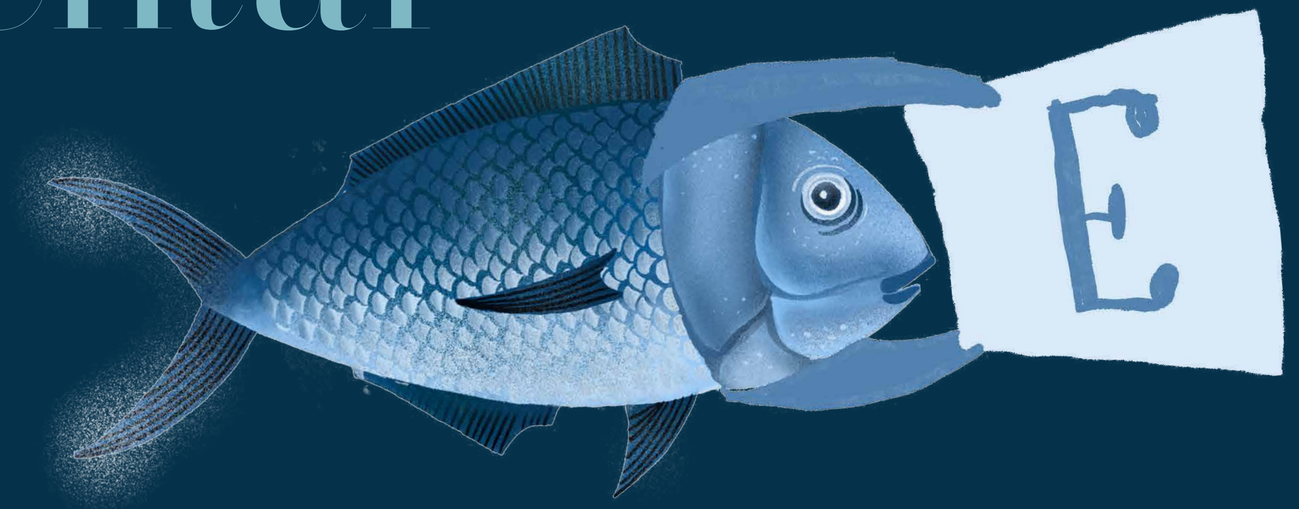
Disclosure Requirements Addressed in the Company Sustainability Statement IRO-2

The full list of ESRS disclosure requirements that Cromaris reports on is provided in **Annex II – Index of Disclosed Requirements in the 2024 Sustainability Report**.[37]



37 IRO-2, 56

Operating in Accordance with Environmental Protection Principles



Sustainability assessment of operations and activities in accordance with the EU Taxonomy

Assessment of the sustainability of operations and activities against environmental-protection criteria

Since 2022, Cromaris has been analysing its activities and operations in accordance with the provisions of the EU Taxonomy Regulation. For the mariculture sector, no technical screening criteria have been established to assess the sustainability of the activity, so Cromaris analysed, evaluated, and categorised applicable activities as non-taxonomy eligible, taxonomy-eligible, and taxonomy-aligned.

Following the assessment of sustainability for the six environmental objectives, compliance with the minimum safeguards was analysed. These safeguards relate to the protection of human rights, labour law, and occupational health and safety. All taxonomy-related activities in 2024 were aligned with the minimum safeguards, as the relevant provisions of the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the International Bill of Human Rights are incorporated into Cromaris' Code of Ethics, Collective Agreement, Safety Policy, internal occupational health and safety rules and instructions, and the Policy on Quality, Food Safety, Environmental Protection and Social Responsibility.

In 2024, Cromaris had a total of ten taxonomy-eligible activities, of which nine were listed in the Delegated Regulation for substantial contribution to climate change mitigation and for ensuring Do No Significant Harm (DNSH) to the other environmental objectives. One activity was listed in the Delegated Regulation for substantial contribution to the circular economy and DNSH to the other environmental objectives.

Out of the nine activities listed under the Delegated Regulation for climate change mitigation, three were aligned with the technical screening criteria and the minimum safeguards. The activity listed for the circular economy objective was aligned with the technical screening criteria for environmental sustainability and the minimum safeguards.

Out of the three taxonomy-aligned activities, two are enabling activities: installation, maintenance and repair of energy efficiency equipment, and installation, maintenance and repair of technologies for renewable energy generation.

Assessment of Activity Sustainability for 2024

Substantial contribution to climate change mitigation and Do No Significant Harm (DNSH) to other environmental objectives

No.	Taxonomy Activity	Relevance to Cromaris	Taxonomy-aligned Activity	Transitional/ Enabling Activity
Water supply, sewerage, waste management and remediation activities				
5.5	Collection and transport of non-hazardous waste in source segregated fractions	Separately collected non-hazardous waste delivered to authorised companies for reuse or recycling	Yes	Not applicable
6. Transport				
6.5	Transport by motorbikes, passenger cars and light commercial vehicles	Road transport by passenger company cars and light commercial vehicles	No	Transitional activity
6.6	Freight transport services by road	Freight vehicles (categories N1, N2 or N3) used for own product distribution	No	Transitional activity
6.10	Sea and coastal freight water transport, vessels for port operations and auxiliary activities	Vessels used for: transport of fish feed, nets and other aquaculture equipment; cage and platform installation and maintenance; medical interventions and sanitary inspections of farmed fish	No	Transitional activity

Substantial contribution to climate change mitigation and Do No Significant Harm (DNSH) to other environmental objectives

No.	Taxonomy Activity	Relevance to Cromaris	Taxonomy-aligned Activity	Transitional/ Enabling Activity
7. Construction and real estate activities				
7.2	Renovation of existing buildings	Renovation of existing buildings	No	Transitional activity
7.3	Installation, maintenance and repair of energy efficiency equipment	Replacement of windows and doors, installation and replacement of light sources, installation, replacement, maintenance and repair of HVAC systems and water heating systems, and installation of kitchen and sanitary appliances	Yes	Enabling activity
7.6	Installation, maintenance and repair of renewable energy technologies	Electricity production via solar PV and heat production via heat pumps	Yes	Enabling activity
7.7	Acquisition and ownership of buildings	Building maintenance	No	Not applicable

Substantial contribution to climate change mitigation and Do No Significant Harm (DNSH) to other environmental objectives

No.	Taxonomy Activity	Relevance to Cromaris	Taxonomy-aligned Activity	Transitional/ Enabling Activity
8. Information and communication				
8.2	Data-driven GHG emission reduction solutions	Fleet management for vehicles and vessels	No	Enabling activity

Substantial contribution to circular economy and Do No Significant Harm (DNSH) to other environmental objectives

No.	Taxonomy Activity	Relevance to Cromaris	Taxonomy-aligned Activity	Transitional/ Enabling Activity
5.4	Sale of second-hand goods	Sale of wooden pallets after use for the same purpose for which they were manufactured	Yes	Not applicable

Key Performance Indicators – Revenue, CapEx, and OpEx

For each activity, key performance indicators were calculated in accordance with the requirements of the EU Taxonomy Delegated Regulation for the calculation of revenue, capital expenditures (CapEx), and operating expenditures (OpEx), and the applied accounting policy is described. A summary of the key performance indicators for the year 2024 is provided below. **Annex I – Key Sustainability Indicators of Activities According to the EU Taxonomy** describes the applied accounting policy, the calculation methodology, and provides a tabular presentation in accordance with the requirements of the EU Taxonomy Delegated Regulation.

Summary of Key Performance Indicators – Revenue, CapEx and OpEx

	Revenue (000 €)	Share in Total Revenue (%)	CapEx (000 €)	Share in Total CapEx (%)	OpEx (000 €)	Share in Total OpEx (%)
A. Taxonomy-eligible activities (A.1.+A.2.)	5	0	1,921	45,79	1,266	28,94
A.1. Taxonomy-aligned activities	5	0	271	6,45	0	0
A.2. Taxonomy-eligible activities	0	0	1,650	39,33	1,266	28,94
B. Taxonomy-non-eligible activities	107,757	100	2,274	54,21	3,109	71,06
TOTAL (A.+B.)	107,757	100	4,195	100	4,375	100

Climate Change ESRS E1

Governance

Inclusion of climate matters in incentive schemes GOV-3

In 2024, climate-related matters were not incorporated into the remuneration policies of the members of the administrative, management, and supervisory bodies.[38]

Strategy

Transition plan for climate change mitigation E1-1

Cromaris has not yet adopted a transition plan for climate change mitigation fully aligned with the requirements of ESRS E1-1. However, in 2022, it developed a Carbon Footprint Management Strategy accompanied by an action plan for reducing greenhouse gas emissions, which is updated annually. The Management Board reviews and approves the updated document based on the presented results.[39] Cromaris will align its strategy and action plan with the requirements of ESRS E1-1 in the medium term.

The monitoring of energy consumption and the calculation of greenhouse gas emissions at Cromaris has been conducted since 2020, in line with the requirements of the Aquaculture Stewardship Council

38 ESRS 2, GOV-3, E-1, 13

39 E1-1, 17

Since 2022, Cromaris has been developing a Carbon Footprint Management Strategy with an accompanying action plan for reducing greenhouse gas emissions, updated annually

Cromaris has been calculating its carbon footprint since 2020 in accordance with the GHG Protocol

(ASC) standard. The 2024 strategy and action plan include data on total and specific energy consumption per tonne of harvested fish, GHG emissions in Scope 1, 2, and 3, emission intensity per tonne of fish harvested and per euro of revenue, base and target years, as well as reduction targets for 2030 and 2050. The carbon footprint is calculated according to the methodology prescribed by the Greenhouse Gas Protocol. Reduction targets for energy consumption and emissions in Scope 1 and 2 are pursued through the implementation of measures based on potential reduction assessments. A list of implemented measures up to 2025 and the implementation plan for additional carbon footprint reduction measures from 2025 onwards is provided in the chapter **Measures and resources related to climate policies E1-3**.

The base year for intensity reduction targets in Scope 1 and 2 is 2020. Target values for 2030 and 2050 are set out in the chapter **Targets related to climate change mitigation E1-4**. The selection of 2030 and 2050 as target years is aligned with the EU Fit-for-55 package and the Revised Integrated National Energy and Climate Plan of the Republic of Croatia for the period 2021–2030 (NECP). These documents are developed in accordance with the provisions of the Paris Agreement at both the EU and national levels.[40]

40 ESRS 2 SBM-3, 18

Material impacts, risks, and opportunities and their interaction with strategy and business model ESRS 2 SBM-3

The 2024 double materiality assessment identified two significant climate-related risks, both classified as physical climate risks:

- Extreme weather and fish escape: assessed as a short-term potential risk that could impact business performance.
- Strong winds and storms: assessed as a long-term potential risk that may affect operational infrastructure and business continuity.

No significant transition risks were identified during the 2024 double materiality assessment.[41]

41 ESRS 2, SBM-3, AR 6

Scope of climate resilience analysis of the strategy and business model

The 2024 climate resilience analysis included all significant physical and transition climate risks based on available knowledge, sector-specific experience in mariculture, and existing resilience assessments. The scope of the analysis is expected to expand over time depending on future developments at local and global levels, strategic and business decisions, and the evolution of climate change.[42]

The resilience analysis of Cromaris' Strategic Plan covers the impacts of climate change on fish farming and transition risks. For the assessment of physical climate risks, Cromaris applied Table II – Classi-

42 ESRS 2 , SBM-3, 19 a

fication of climate-related hazards from Annex A of Commission Delegated Regulation (EU) 2021/2139. Rapid and sudden changes in weather conditions, as well as strong and stormy winds, are considered material due to their potential to cause damage to fish cages and farming infrastructure. Key variables for fish farming also include air temperature fluctuations (e.g., heatwaves), increases in average sea temperature, and changes in salinity and acidity.

The resilience assessment also considered the impacts of climate change on employees, biodiversity, the health of farmed fish, and supply chains. In addition to physical risks, transition risks were analysed. A significant market-related transition risk was identified, referring to the growing demand to reduce the share of wild-caught fish oil and fishmeal in aquafeed, as well as potential supply chain disruptions caused by extreme weather.

A potential market-related transition risk is also represented by changing consumer preferences and increasing demand for organically farmed fish. Cromaris has turned this risk into an opportunity, as BIO sea bream, BIO sea bass, and BIO meagre are an integral part of its product portfolio.

Regarding technological risks, the transition to lower-emission technologies was analysed, particularly the vehicle fleet. Since 2022, Cromaris has been optimizing vehicle and vessel routing through fleet management to reduce fuel consumption and GHG emissions. Additionally, Cromaris is participating in the EU-funded 3EFISHING project, which is assessing the feasibility of replacing fossil fuel-powered engines on vessels under 12 meters with hybrid or electric propulsion systems.[43]

43 ESRS 2, SBM-3, 19 b



Methodology and Timeline of the Resilience Analysis

The resilience analysis was based on the Intergovernmental Panel on Climate Change (IPCC) scenarios for the years 2030 and 2050, and included the following:

- Low-emissions scenario (SSP1-2.6) – limited climate change with effective mitigation measures.
- Intermediate-emissions scenario (SSP2-4.5) – moderate risks with partially implemented adaptation measures.
- High-emissions scenario (SSP5-8.5) – significant changes in ecosystems and high climate stress.

The following sources were used during the development of the analysis: EU Copernicus Programme services, European Commission's Climate-ADAPT portal, State Meteorological and Hydrological Service of Croatia – Climate Reports and National Climate Change Adaptation Portal.[44]

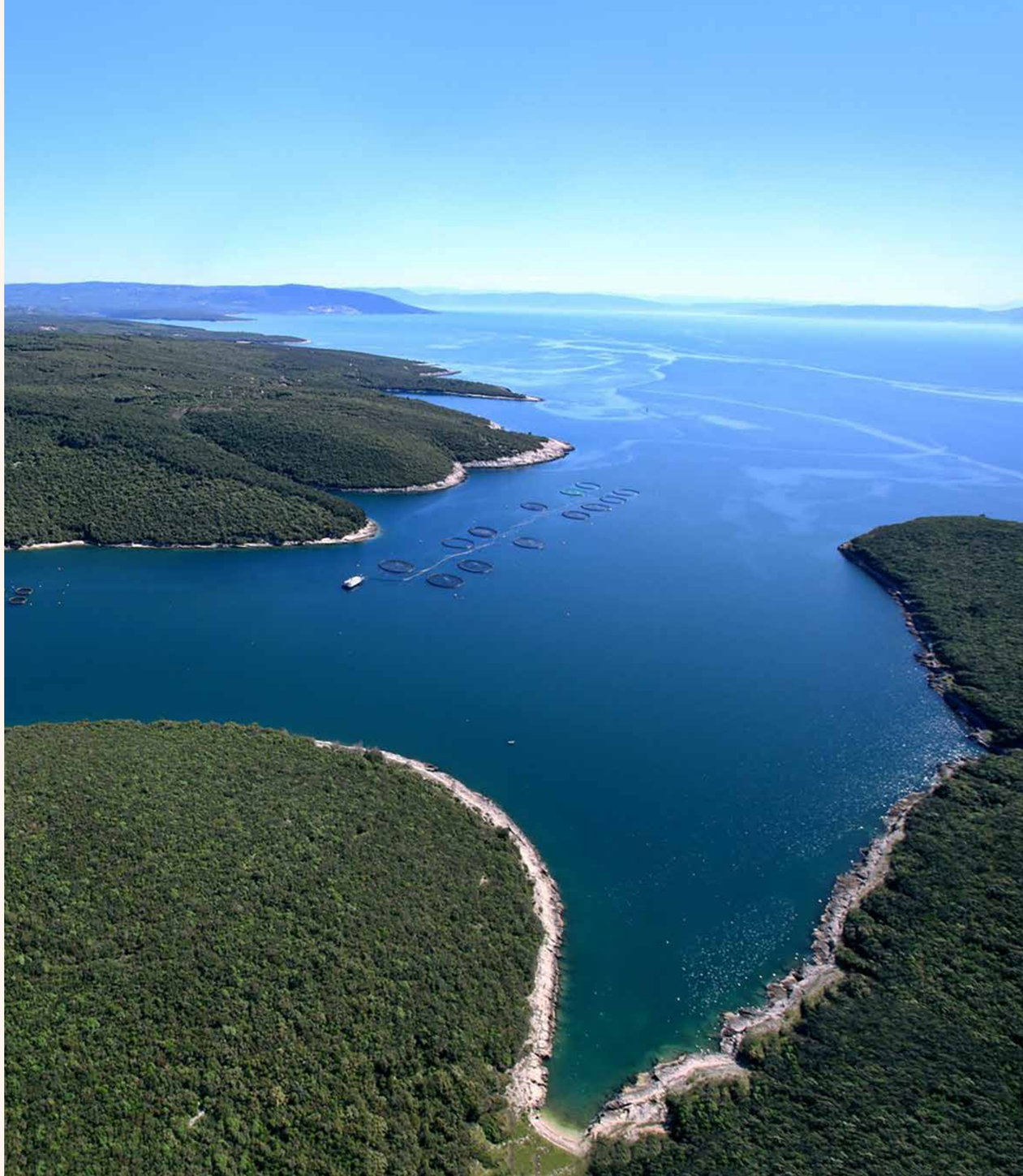
44 ESRS 2, SBM-3, 19 c



Resilience Analysis Results

Under the low-emissions scenario (SSP1-2.6), relatively stable operations are expected, requiring only minor adjustments related to managing heat stress and optimizing fish feeding practices.
Under the intermediate-emissions scenario (SSP2-4.5), more significant adaptations will be necessary. These include the development of more resilient fish species, use of more expensive feed, and changes in feed formulations to include immunostimulants. Technological farming processes will also need to be adjusted. Supply chain disruptions are anticipated, along with impacts on employee health and work capacity. Environmental changes are expected, such as increased marine eutrophication due to rising average sea temperatures and ocean acidification. Sudden and rapid changes in weather conditions may lead to delays in the delivery of Cromaris products to customers and consumers.
Under the high-emissions scenario (SSP5-8.5), additional negative impacts are expected on the fish farming production process compared to the intermediate-emissions scenario. Without strategic adaptation—such as the introduction of new species, farming technologies, feed formulations, and suppliers—significant financial losses could occur.[45]

45 ESRS 2, SBM-3, E1, AR 7 a



Impact of Physical Climate Risks on Fish Farming

Physical Climate Risks	Consequences for Fish Farming	Prilike
Sudden and rapid changes in weather conditions	• Inability to carry out farming operations at fish farms • Inaccessible or difficult access to fish farms • Damage to cages that may lead to fish escape or mortality • Damage to vessels • Difficult or impossible transport of goods to customers and consumers • Employee safety at risk	-
Air temperature changes – heat waves	• Shortage of fish and plant-based raw materials on the market • Higher prices of raw materials and fish feed • Impact on employee health and working capacity	• Modification of in-house fish feed formulations
Rising sea temperatures	• More frequent fish diseases • Reduced fish resilience, potentially leading to increased mortality • Need for expensive immunostimulant-rich feed or medical treatments • Appearance of invasive species (potential predators or new pathogen carriers) • Rapid fish growth affecting product quality and animal welfare • Increased marine eutrophication	• Longer periods of elevated sea temperatures stimulate fish growth
Changes in sea salinity and acidity	• Changes in feeding regimes in cages and adjustments in technological farming processes • Inability of fish to adapt to new conditions	-



Assumptions on the Impact of Transitioning to a Climate-Resilient and Low-Carbon Economy

In 2024, assumptions regarding the impact of transitioning to a climate-resilient and low-carbon economy included macroeconomic trends in the operating environment, energy consumption and sources, and technological developments. The analysis of physical and transition risks is conducted during the development of the three-year Strategic Plan and will be updated annually.

Macroeconomic Trends in the Operating Environment[46]

The European Union is a global leader in the transition to a low-carbon economy, having adopted the European Green Deal, the "Fit for 55" package, and the European Climate Law. As a member of the EU, Croatia aligns its legislation with EU law, which is expected to result in rising fossil fuel prices due to the introduction of the ETS 2 emissions trading system. ETS 2 applies to fossil fuel distributors in road transport and buildings, and to some smaller industries not covered by the existing EU ETS. ETS 2 will be fully operational in 2027, at which time distributors will pass the cost of purchasing allowances into fossil fuel prices, affecting Cromaris's transport costs.



46 ESRS2, SBM-3, E1, AR 7b

A new law is being drafted for implementing Regulation (EU) 2023/956 on the Carbon Border Adjustment Mechanism (CBAM). CBAM, effective from 2026, targets raw materials and products imported into the EU (e.g., cement, iron, steel, aluminium, fertilisers, electricity, and hydrogen). Importers will factor the CBAM certificate costs into product prices, increasing the cost of new construction and maintenance of buildings and facilities.

Financial institutions and investors are increasingly prioritising sustainable investments based on EU Taxonomy-aligned activities, influencing business model adjustments to ensure access to funding.

Demand for organically farmed fish is growing due to changing consumer awareness and habits. However, given the economic environment, purchasing power still determines production volumes.





Energy Consumption and Energy Mix[47]

Cromaris covers approximately 10% of its electricity needs from in-house solar PV systems. Thermal energy is generated from fossil fuels combined with heat pumps, minimizing fossil fuel use. Cromaris purchases 90% of its electricity from the market. By 2026, 85% of its electricity will come from renewable sources based on a joint investment agreement between the Adris Group and ENCRO, reducing dependency on fossil fuel suppliers and prices, and lowering Scope 2 emissions.

As part of efforts to reduce vessel emissions, Cromaris is participating in the 3EFISHING project under the Interreg Italy–Croatia programme. The project aims to test innovative solutions for converting small coastal fishing and aquaculture vessels (up to 12 m) to electric or hybrid power to reduce fuel use, noise, and GHG emissions at sea. Since 2022, Cromaris has also implemented a fleet management project for its vehicles and vessels. Data collected supports more efficient operations, optimising capacity, energy and fuel savings, and lowering Scope 1 emissions.

Digitalisation and automation of feeding systems reduce feed waste and improve environmental conditions around farms while also reducing energy use and operating costs.

47 ESRS2, SBM-3, E1, AR 7 a



Technological Assumptions[48]

The development of low-carbon logistics and distribution systems, including optimised transport routes, may reduce fossil fuel use and the carbon footprint. However, delivery speed and reliability may be impacted if charging infrastructure is insufficient or if electric/hybrid vehicles are not suitable for all weather conditions. Measures must be taken to prevent and manage fire risks during charging. Cost savings from reduced fossil fuel consumption could be offset by losses from delays, leading to unmarketable products and additional waste management costs. The decarbonisation of vessels up to 12 m depends on the 3EFISHING project results. Larger vessels powered by electricity or hybrid engines are not currently considered best available technology for Cromaris, as its emissions contribute less than 0.03% of Croatia's total emissions. Electrified vessels for mariculture remain rare and expensive. 3EFISHING will also assess the resilience of hybrid vessels under varying weather conditions.

48 ESRS-2, SBM-3, E-1, AR 8 a



Areas of Uncertainty in the Resilience Analysis

The resilience analysis involves significant uncertainties related to climate and market changes that may affect the business model.[49]

Physical Climate Risks

- Uncertainty in the rate and intensity of rising average sea temperatures and their effect on fish
- Uncertainty in the frequency and intensity of extreme weather (storms, marine heatwaves, salinity and acidity shifts) that may affect infrastructure and production cycles
- Risk of emerging fish diseases and changes in marine ecosystems, leading to unforeseen adaptation costs

Transition Risks and Regulatory Uncertainties

- Introduction of ETS2 and CBAM and potential new EU laws accelerating decarbonisation, but also uncertainty due to possible implementation delays
- Price volatility of energy and raw materials for fish feed production
- Changing consumer preferences and purchasing power influenced by economic conditions
- Requirements from financial institutions and investors seeking confirmation of sustainable investments under the EU Taxonomy

Technological Uncertainties

- Development of new sustainable farming methods and uncertainty around their commercial viability
- Availability and financial feasibility of electric or hybrid vehicles and vessels, considering cost, market supply, charging infrastructure, fire safety, and operational reliability
- Changes in fish stunning methods post-harvest

49 ESRS-2, SBM-3, E1, AR 8 b

Assets and Business Activities Covered in the Resilience Assessment and Mitigation Measures

When preparing and updating the three-year Strategic Plan, Cromaris assesses the exposure of its assets and business activities, based on which measures are planned and implemented:[50]

- Infrastructure and fish farms – investments to enhance the resilience of marine cages to extreme weather
- Logistics and distribution network – investment and maintenance of infrastructure to optimise vehicle routes, reduce fossil fuel use and GHG emissions, and implement a project to replace diesel engines with hybrid engines in vessels up to 12 m
- Energy availability and costs – installation of rooftop solar PV systems at Cromaris facilities and investment agreement in renewable energy projects by Adris Group and ENCRO to ensure access to renewable electricity
- Financial exposure – aligning investment decisions with financial institutions' requirements for sustainable business activities

Between 2030 and 2050, the transformation of Cromaris's strategic business plan is expected to align with market availability of new technologies, their financial feasibility, economic conditions, and climate developments, aiming to:

- Achieve climate neutrality by 2050
- Establish a circular economy, reduce waste, and valorise animal by-products
- Potentially expand the business model to include new species, farming methods, and innovative products[51]

50 ESRS 2, SBM-3, AR 8 b

51 ESRS 2, 4.2, 62

Managing Impacts, Risks, and Opportunities

Description of the Processes for Identifying and Assessing Material Impacts, Risks and Opportunities Related to Climate ESRS 2 IRO-1

The double materiality assessment process, as required by ESRS 2 – IRO-1 for climate-related matters, resulted in the identification of material sustainability topics for the year 2024. The assessment covered both the company's own operations and its value chain.

The value chain assessment included Cromaris' employees, feed producers, packaging suppliers, and waste generated through business operations. A detailed description of the double materiality assessment process is provided in the section **Description of the Processes for Identifying and Assessing Material Impacts, Risks, and Opportunities IRO-1**.

Cromaris is not active in the sectors of fossil fuel extraction, chemical production, controversial weapons, or tobacco manufacturing. The company is also not subject to compliance under the European Union Emissions Trading System (EU ETS).



Climate-Related Impacts

Topic	Sub-topic	Impact	Impact Description
Climate Change	Climate change mitigation	Actual, negative, short-term impacts of own operations on environment and society	*Greenhouse gas emissions resulting from:* • Combustion of fossil fuels for thermal energy generation (Scope 1) • Combustion of fossil fuels in vehicles, vessels, and machinery (Scope 1) • Leakage of controlled substances in cooling and air conditioning units (Scope 1) • Purchased electricity generation from market suppliers (Scope 2)
Climate Change	Climate change mitigation	Actual, negative, short-term impacts of the value chain on environment and society	*Greenhouse gas emissions arising from:* • Upstream value chain (Scope 3) • Downstream value chain (Scope 3)
Climate Change	Energy	Actual, negative, short-term impacts of own operations on environment and society	*Energy consumption from:* • Generated from fossil fuels in combustion units for the production of thermal energy • Resulting from the combustion of fossil fuels in vehicles, vessels, and machinery • Generated from fossil fuels and purchased from suppliers on the market

Climate-Related Risks and Opportunities

Topic	Sub-topic	Risk/Opportunity	Description
Climate Change	Climate change mitigation	Long-term opportunity for own operations	*Development of Adris Group's renewable energy sector will:* • Provide 85% of Cromaris's electricity demand from renewable sources (10% already covered by Cromaris-owned solar PV) • Reduce dependence on electricity suppliers and market price fluctuations • Reduce greenhouse gas emissions (Scope 2)
Climate Change	Climate change adaptation	Short-term impact of acute physical climate risk – storm winds	*Storm winds can cause:* • Damage to nets and cages • Fish escapes

Climate-Related Policies E1-2

Cromaris's Quality, Food Safety, Environmental Protection and Social Responsibility Policy

Cromaris has committed to the efficient use of energy sources and natural resources and to reducing the amount of all types of waste, thereby contributing to the reduction of its carbon footprint.[52] The Policy applies to the company's own operations and value chain, is publicly available on Cromaris's website, and the President of the Management Board is responsible for its implementation. The Policy applies to Cromaris d.d. and Cromaris Italia s.r.l., as well as to suppliers and customers. Adaptation to climate change is not included in the Policy, but adaptation to climate change is included in the Strategic Business Plan. Cromaris will adopt a climate-change adaptation policy in the next reporting period.[53]

52 MDR-P, 65 a, b, c, f

53 E1-4, 34 f

Measures and Resources Related to Climate Policies E1-3

Climate-change mitigation is achieved by reducing the carbon footprint. The measures focus on lowering energy and fossil-fuel consumption, increasing the share of energy from renewable sources, and improving both energy efficiency and the efficiency of business processes. Cromaris's Carbon Footprint Management Strategy, together with its Greenhouse Gas Emissions Reduction Action Plan, sets out the range of possible measures and their carbon-abatement potential. Implementing these measures not only shrinks the carbon footprint and mitigates the company's climate impact, but also cuts operating costs for energy and fuels. Implementation is financed through the company's own funds and EU funding programmes.[54]

54 E1-4, 34 e

Measures to reduce the carbon footprint and mitigate climate change by 2025

Measure	Location	Funding Source	Contribution to Climate Mitigation
Installation of solar PV plants	Hatchery in Nin; Processing and logistics centre in Gaženica, Zadar	Own funds	• Reduced fossil-based electricity consumption • Covers 9–10% of annual electricity needs • Reduced market electricity dependence
Heat pump installation	Hatchery in Nin	Own funds	• Reduced fossil fuel consumption for thermal energy • Reduced Scope 1 carbon footprint
LED lighting replacement	Hatchery in Nin	Own funds	• Lower market electricity use • Reduced Scope 2 emissions
Fleet route optimisation (Fleet Management)	Hatchery, farms, processing/logistics centre	Own funds	• Reduced fossil fuel consumption in transport • Lower Scope 1 emissions
Hybrid vehicles (electric + petrol)	Processing and logistics centre Gaženica	Own funds	• Reduced petrol consumption in 5 company cars • Lower Scope 1 emissions

Measures to reduce the carbon footprint and mitigate climate change from 2025 onwards[55]

Measure	Location	Funding Source	Contribution to Climate Mitigation
Power Purchase Agreement (PPA) between Adris Group and ENCRO for the purchase of electricity from renewable sources	All Cromaris sites where electricity is consumed	Own funds	• 85% reduction in Scope 2 emissions • 18% reduction in Scope 1 and 2 combined
Replacement of a diesel engine in a 12-meter vessel with a hybrid/electric propulsion system – project 3EFISHING	Fish farms	The Interreg Italy–Croatia 3EFISHING project by Cromaris is co-financed by the European Union (80%) and own funds (20%)	• Reduced fuel use and Scope 1 emissions • Exact reduction to be calculated after implementation

55 E1-4, 34 od a) do d)

Climate Targets E1-4

Climate Change Mitigation

The greenhouse gas (GHG) emission reduction target for sectors outside the EU ETS, including mariculture, is 42% by 2030 compared to the base year, in line with the global Paris Agreement. The revised Croatian Integrated National Energy and Climate Plan (NECP) for 2021–2030 was adopted in March 2025 to support implementation of the EU's "Fit for 55" package. Through the NECP, Croatia contributes proportionally to the EU-wide target of reducing GHG emissions by 55% by 2030 compared to 1990 levels. The national reduction target for Croatia's non-EU ETS sectors is 16.7%. Cromaris's contribution to Croatia's GHG emissions is as follows: Scope 1 and 2 (location-based): 0.024% and Scope 1 and 2 (market-based): 0.039%.[56] The most recent data on Croatia's GHG emissions is from 2022, published in the National Inventory Report (NIR 2024) for the period 1990–2022.

56 E1-4, 34 e



Share of Cromaris' Total Emissions in Croatia's GHG Emissions

Total GHG emissions in Croatia excluding LULUCF[1] – most recent data from 2022	24,552 kt
GHG emissions in Croatia outside the EU ETS	15,200 kt
Cromaris's total GHG emissions Scope 1 and 2 in 2024 – LBA	5.87 kt
Cromaris's total GHG emissions Scope 1 and 2 in 2024 – MBA	9.71 kt
Cromaris's total GHG emissions Scope 1, 2 and 3 in 2024 – LBA	61.06 kt
Cromaris's total GHG emissions Scope 1, 2 and 3 in 2024 – MBA	64.91 kt
Share of Cromaris's Scope 1 and 2 GHG emissions in Croatia's total emissions – LBA	0.024%
Share of Cromaris's Scope 1 and 2 GHG emissions in Croatia's total emissions – MBA	0.039%
Share of Cromaris's Scope 1, 2 and 3 GHG emissions in Croatia's total emissions – LBA	0.247%
Share of Cromaris's Scope 1, 2 and 3 GHG emissions in Croatia's total emissions – MBA	0.264%
Share of Cromaris's Scope 1 and 2 GHG emissions in Croatia's non-EU ETS sectors – LBA	0.038%
Share of Cromaris's Scope 1 and 2 GHG emissions in Croatia's non-EU ETS sectors – MBA	0.064%
Share of Cromaris's Scope 1, 2 and 3 GHG emissions in Croatia's non-EU ETS sectors – LBA	0.402%
Share of Cromaris's Scope 1, 2 and 3 GHG emissions in Croatia's non-EU ETS sectors – MBA	0.427%

LULUCF = Land Use, Land-Use Change and Forestry
LBA= Location-based approach
MBA = Market-based approach
GHG = Greenhouse gases
EU-ETS = European Emission Trading System

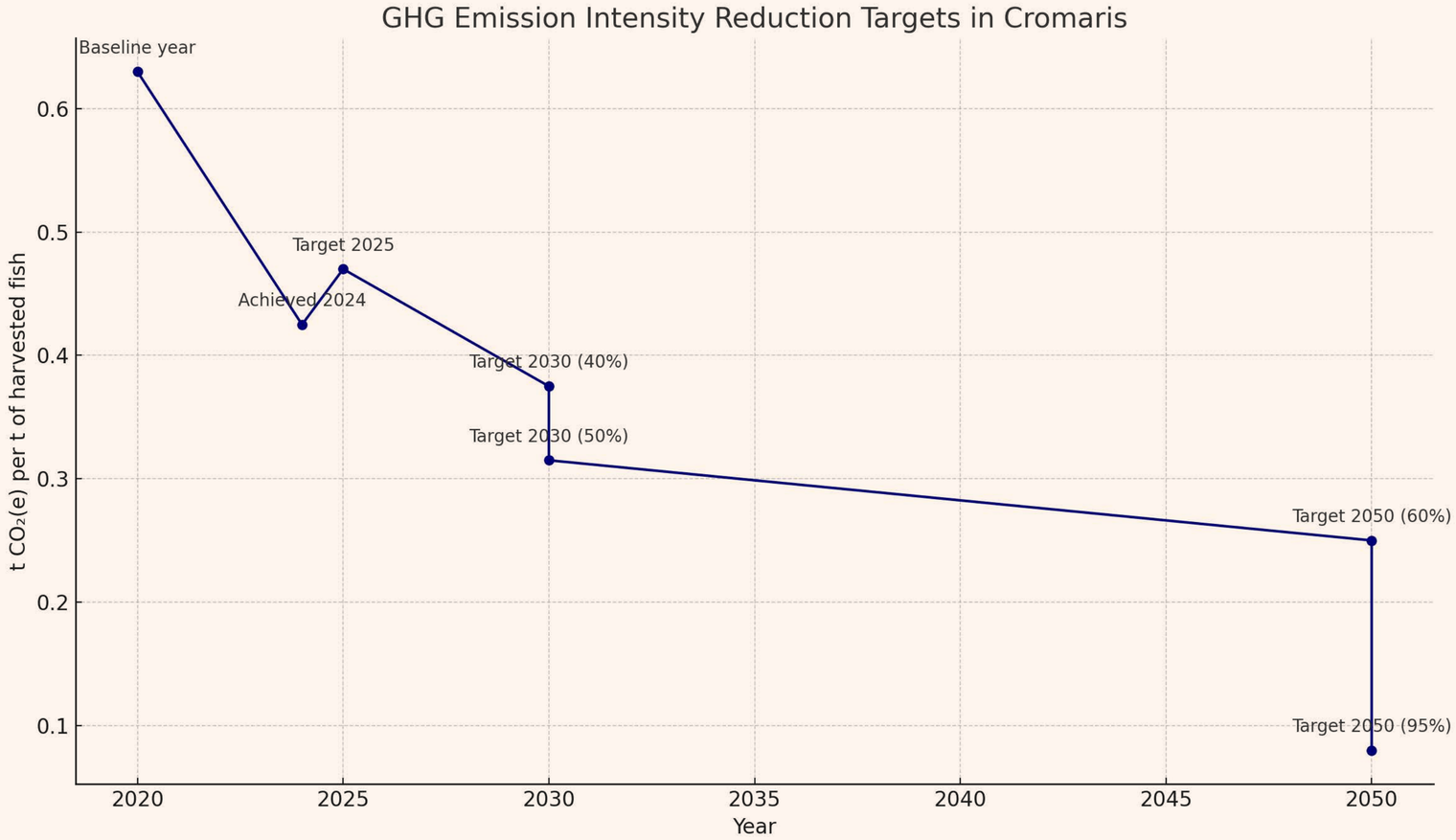
The Carbon Footprint Management Strategy and the Action Plan for Greenhouse Gas Emission Reduction define relative targets for reducing greenhouse gas (GHG) emissions based on the reference year 2020. These relative targets are expressed as GHG emissions intensity (Scope 1 and 2) per tonne of harvested fish: t CO_2(e)/t harvested fish. For 2024, GHG emissions were calculated from sources including: administrative building and the processing-logistics centre in Gaženica (Zadar), hatchery in Nin, Seven fish farms, five fish markets and shops and Cromaris Italia. A description of the methodology behind the calculation of emissions according to the GHG Protocol (Greenhouse Gas Protocol) is found in the chapter **Gross greenhouse-gas emissions from Scopes 1, 2, 3 and total greenhouse-gas emissions E6-1**. Greenhouse-gas emissions from the value chain, i.e. Scope 3, are not included in the calculation of relative emission-reduction targets because of measurement uncertainty caused by the selection of emission factors and the calculation methodology. Cromaris has not set an absolute greenhouse-gas-reduction target because production growth—that is, an increase in catch—was taken into account, as well as the market availability and price of hybrid- and electric-powered fishing vessels.[57]

57 E1-4, 34 b)

Target Values and Indicators for Reduction of GHG Emission Intensity (Scope 1 and 2) in 2024

Indicator	Value
Emission intensity in base year 2020 (t CO_2(e)/t harvested fish)	0.626
GHG intensity reduction target for 2025 (%)	25
Target GHG emission intensity for 2025 (t CO_2(e)/t harvested fish)	0.469
GHG intensity reduction target for 2030 (%)	40 to 50
Target GHG emission intensity for 2030 (t CO_2(e)/t harvested fish)	0.375 to 0.313
GHG intensity reduction target for 2050 (%)	60 to 95
Target GHG emission intensity for 2050 (t CO_2(e)/t harvested fish)	0.250 to 0.079
Emission intensity in 2024 (t CO_2(e)/t harvested fish)	0.421
Reduction in GHG emission intensity 2024 vs. 2020 (%)	33

In 2024, Cromaris achieved a 33% reduction in GHG emissions intensity compared to the 2020 baseline, exceeding the 2025 target by 8 percentage points.



Monitoring the reduction in GHG emissions intensity per tonne of harvested fish is a requirement of the ASC standard

Adaptation to Climate Change

Based on the analysis carried out of the impact of climate change on operations, the double-materiality assessment for 2024, the WEF (World Economic Forum) global-risk analysis, and monitoring of the frequency of extreme weather events and the impact on Cromaris's field infrastructure, the following risks have been identified: extreme weather events and fish escapes from cages, and strong winds and storms that can cause damage to farms. In order to reduce damage to farming infrastructure at the farms and fish escapes, divers and feeders regularly implement measures in accordance with Cromaris's internal Farm Maintenance Plan. The measures include regular inspections of cages and barges, elimination of any damage incurred and the continuation of farming, as well as the prevention of fish escapes. Implementation of the measures will continue in the next reporting periods as well. At the end of 2024, research began on the impact of average sea temperature on fish farming.[56].

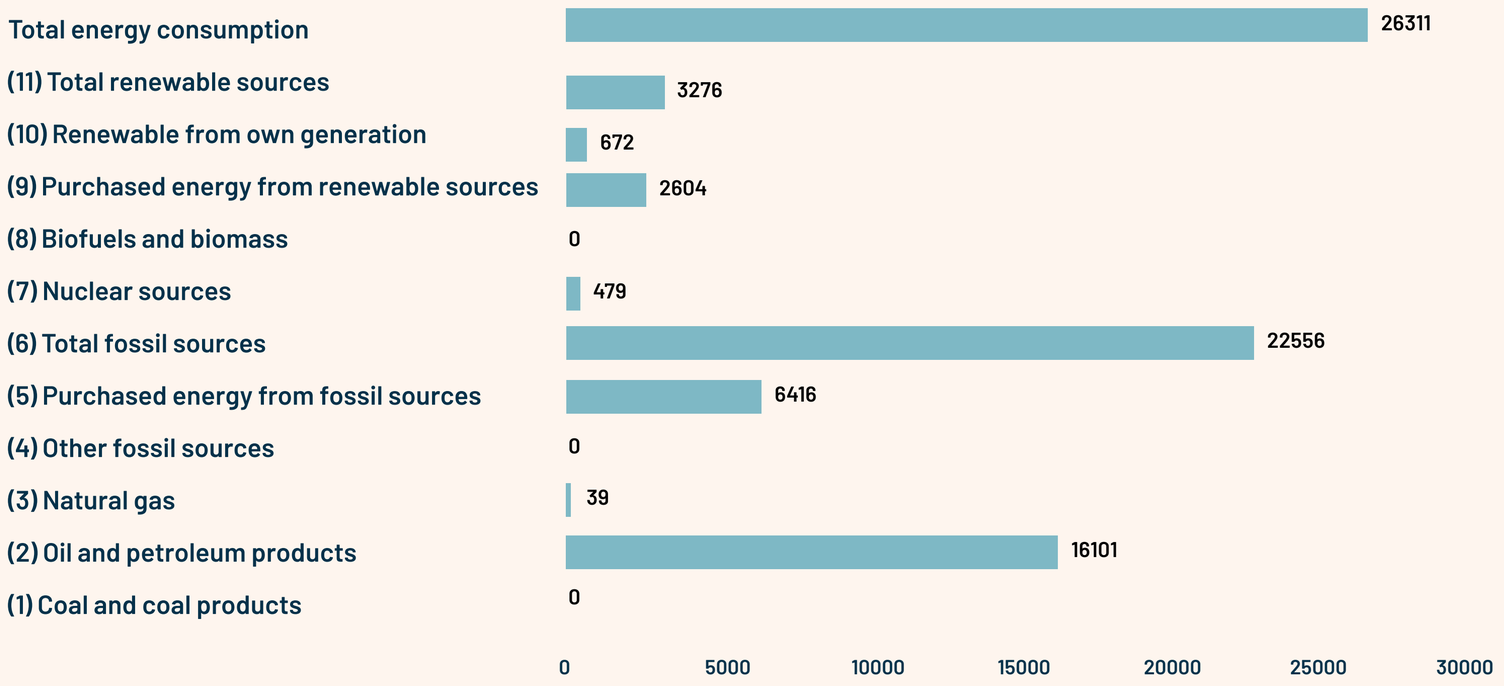


Energy Consumption and Energy Mix E1-5

In 2024, energy and fuels used for electricity and heat production, as well as for powering vehicles, vessels, and equipment, originated from fossil fuels and renewable sources. The share of total energy from fossil sources was 85.73%, while 12.45% came from renewable sources.[58]

58 E1-5, 37, 38 and 39

Energy consumption (MWh)



Energy Intensity Based on Net Revenue

In line with Implementing Regulation (EU) 2022/1288, mariculture falls under climate-intensive sectors (NACE A 3.21). Energy intensity based on net revenue is shown in megawatt-hours per million euros (MWh/mil. €).[59]

59 E1-5, 40 to 43

Total energy consumption in 2024 (MWh)	26,311.0
Total net revenue in 2024 (mil. €)	107.8
Energy intensity based on net revenue (MWh/mil. €)	**244.1**

Energy Intensity Based on Harvested Fish

In accordance with ASC standards, energy intensity is expressed in gigajoules per tonne of harvested fish (GJ/t).

Total energy consumption in 2024 (GJ)	94,719.6
Total fish harvested in 2024 (WFE, tonnes)	13,946
Energy intensity based on fish harvest (GJ/t)	**6.8**

Gross Greenhouse Gas Emissions – Scopes 1, 2, and 3 E6-1

GHG emissions are calculated according to the methodology set out in the GHG Protocol. The carbon footprint for 2024 consists of emissions from Scopes 1, 2, and 3. Included GHGs are carbon dioxide CO_2, methane CH_4, nitrous oxide N_2O, and the controlled refrigerant substance R449a. Conversion of CH_4, N_2O, and R449a into $CO_2(e)$ used Global Warming Potential (GWP) values from the 6th IPCC Report.

Cromaris has calculated its carbon footprint in line with the GHG Protocol since 2020

Sources of direct greenhouse-gas emissions (Scope 1) in 2024 were: a fossil-fuel-fired combustion plant for thermal-energy production; passenger and freight vehicles; fossil-fuel-powered vessels and mobile machinery; and fugitive emissions resulting from the leakage of controlled working substances from refrigeration and air-conditioning equipment.

The indirect emission source (Scope 2) was electricity generated from fossil fuels and purchased from the supplier. In 2024 the electricity was procured under a model without a guarantee of origin, and the carbon footprint was calculated using both the location-based and market-based approaches.

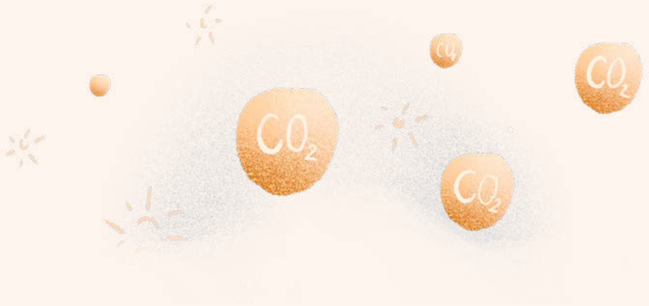
Value-chain emissions were calculated for the first time for 2023, when emissions from fish-feed producers were included. In the Scope 3 (value-chain) carbon-footprint calculation for 2024, the following were covered: emissions from fish-feed and packaging producers

(upstream emissions, Category 1); waste generated in operations (upstream emissions, Category 5); and employee business travel by air (upstream emissions, Category 6).

Emission factors listed in the IPCC *Guidelines for National Greenhouse Gas Inventories* 2006, 2023 version, were used for the calculation of Scope 1.

For the calculation of Scope 2 emissions under the location-based approach for Croatia, the National Emission Factor Database published on the website of the Ministry of Environmental Protection and Green Transition was used, while for Italy the emission factor published on the website of the European Environment Agency (EEA) was applied.

The carbon footprint in 2024 consisted of Scope 1, Scope 2 and Scope 3 emissions



Because electricity suppliers in Croatia and Italy did not provide emission factors, factors for an energy mix that excludes energy covered by the guarantee-of-origin system—published on the AIB *Guaranteeing the Origin of European Energy* website—were used.

Emissions from the production of fish feed and packaging were calculated using the emission intensities supplied to Cromaris by vendors through an online questionnaire required by the Fish Feed Quality Policy.

For the calculation of emissions from disposal of operational waste, factors from the National Database were applied, and for emissions from employee business travel by aeroplane, data from passenger tickets and information from carriers' websites were used.

All sources owned by and under the operational control of Cromaris were included in the calculation: the hatchery, farms, the processing-logistics centre, fish markets and shops, and Cromaris maris Italia.[60]

60 E1-4, 34 b)

The base and target years, together with the greenhouse-gas emission-reduction targets and indicators, are described in **Target Values Related to Climate-Change Mitigation E4-1**[61], and the reduction measures in **Measures and Resources Related to Climate Policies E1-3**.[62]

61 E1-4, 34 f
62 E1-3, 11; 12 a i,ii,iii, 14; MDR-P, 65 a, b, c, d, f

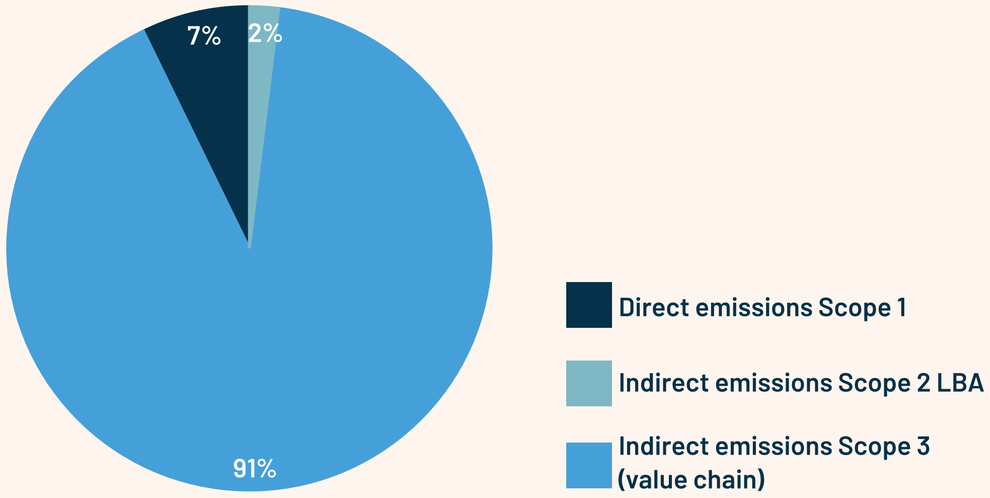
In 2024, compared to the baseline year 2020, Cromaris reduced its GHG emission intensity by 33% and total emissions by 3%, while increasing harvest volume by 26%.

GHG Emission Source	2020 Base year	2024	2024/2020 (%)
Direct emissions – Scope 1 (t)	4,635.2	4,485.6	-3.2
Indirect emissions – Scope 2 (LBA) (t)	1,451.7	1,383.1	-4.7
Indirect emissions – Scope 2 (MBA) (t)	NA	5,227.2	NA
Indirect emissions – Scope 3 (value chain) (t)	NA	55,195.9	NA
Input chain – feed & packaging (Category 1) (t)	NA	55,169.5	NA
Input chain – operational waste (Category 5) (t)	NA	13.7	NA
Input chain – air travel (Category 6) (t)	NA	12.3	NA
Carbon footprint – LBA (t)	6.086,9	61,064.2	NA
Carbon footprint – MBA (t)	NA	64,908.3	NA

NA = Not applicable for 2020
LBA = Location-based approach
MBA = Market-based approach

Share of Scope 1, 2 and 3 emissions in the carbon footprint in 2024

In 2024, Scope 3 value chain emissions accounted for 91% of Cromaris' total carbon footprint.



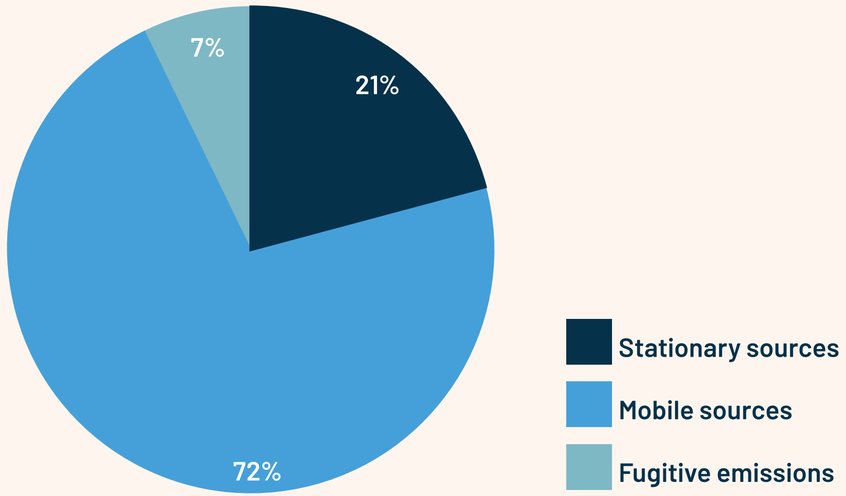


Emission Breakdown – Scope 1

In 2024, the largest share for 60.3% of direct emissions under Cromaris' ownership and operational control (Scope 1) originated from vessels and barges. Stationary sources producing thermal energy accounted for 21% of Scope 1 emissions.

GHG Source	CO_2 (t)	CH_4 (t)	N_2O (t)	CO_2(e) (t)
Stationary sources – total (t)	944.54	0.0381	0.0076	947.75
Thermal energy – Cromaris d.d. (t)	938.35	0.0380	0.0076	941.55
Thermal energy – Cromaris Italia (t)	6.20	0.0001	0.0000	6.21
Mobile sources – total (t)	3,209.57	0.28	0,12	3,245.88
Company cars – Cromaris Italia (t)	127.10	0.0068	0.0083	129.57
Company cars – Cromaris d.d. (t)	13.10	0.0007	0.0007	13.30
Freight vehicles (t)	336.80	0.0177	0.0177	342.17
Vessels and barges (t)	2,678.78	0.2538	0.0725	2,706.14
Work machines – forklifts (t)	53.80	0.0030	0.0208	54.70
Fugitive emissions – total (t)				292.00
Refrigerants (RAC systems) (t)				292.00
Total Scope 1 emissions (t)	**4,154.12**	**0.32**	**0.13**	**4,485.64**

Share of each source in Scope 1 emissions





GHG Intensity Based on Net Revenue[63]

The GHG intensity for 2024 was calculated based on Scope 1, 2, and 3 emissions. For Scope 2, both location-based (LBA) and market-based approaches (MBA) were applied, so the GHG intensity based on net revenue is presented for both approaches.

Carbon footprint (Scope 1 and 2) – LBA (t)	5,868.7
Carbon footprint (Scope 1 and 2) – MBA (t)	9,712.8
Carbon footprint (Scope 1, 2 and 3) – LBA (t)	61,064.2
Carbon footprint (Scope 1, 2 and 3) - MBA(t)	64,908.3
Total net revenue in 2024 (mil. €)	107.8
GHG intensity (Sccope 1 and 2) per net revenue – LBA (t/mil. €)	**54.4**
GHG intensity (Sccope 1 and 2) per net revenue – MBA (t/mil. €)	**90.1**
GHG intensity (Sccope 1 and 2) per net revenue – LBA (t/mil. €)	**566.5**
GHG intensity (Sccope 1, 2 and 3) per net revenue – MBA (t/mil. €)	**602.1**

63 E1-6, 53 to 55

GHG Removals and Mitigation Financed by Carbon Credits E1-7

In 2024, Cromaris did not participate in projects for GHG removals or emission mitigation financed by carbon credits. Instead, Cromaris initiated the EU-funded project 3EFISHING, applying based on the fact that vessels accounted for 60.3% of total Scope 1 direct emissions under Cromaris' ownership and operational control.[64]

64 E1-7, 56

Internal Carbon Pricing E1-8

Based on the carbon-footprint calculation and the share of vessels in the total direct Scope 1 emissions under ownership and operational control, Cromaris applied for the EU 3EFISHING project. The project—co-financed with EU funds was selected specifically because of the cost of the hybrid engine and the estimated internal carbon price for the vessel participating in the project. Using the project results, Cromaris will calculate the actual internal carbon price of vessel decarbonisation, which will cover the cost of the hybrid engine, the EU co-financing share, the number and types of vessels to which the replacement applies, the management of diesel engines replaced by hybrid ones, employee training for vessel operation, maintenance costs and the speed of fault rectification.[65]

65 E1-8, 63

Expected Financial Effects of Significant Climate-Related Physical and Transition Risks and Opportunities E1-9

For 2024, Cromaris applied the transitional provision in accordance with ESRS 1, point 10.4 and Appendix C – List of disclosure requirements introduced progressively.

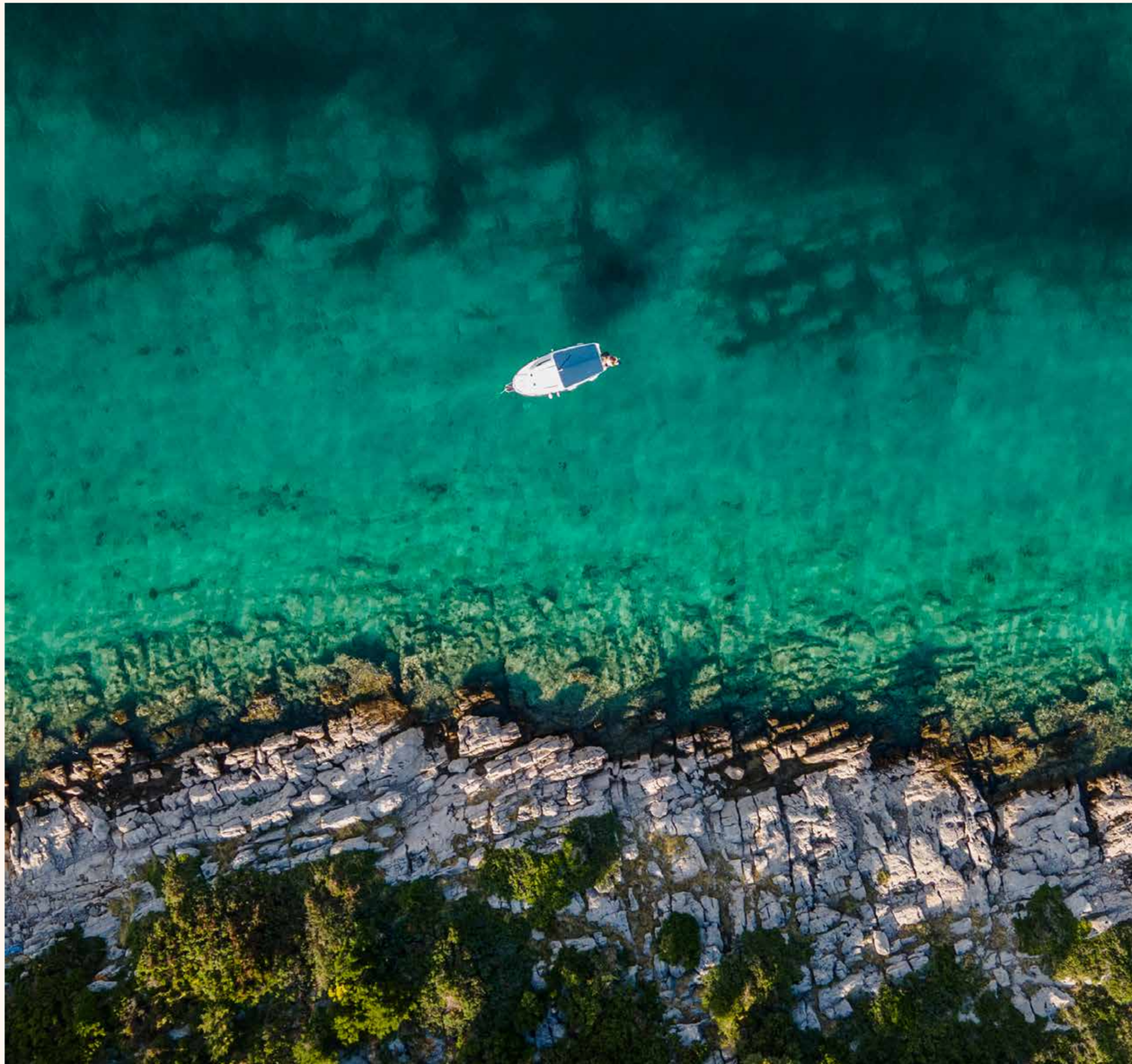
Water and Marine Resources ESRS E3

Management of Impacts, Risks and Opportunities

Description of Double Materiality Assessment Procedures ESRS 2 IRO-1

The double materiality assessment procedure under ESRS 2 – IRO-1 related to water and marine resources resulted in the identification of material sustainability topics for 2024. The assessment covered both own operations and the value chain. Key value chain stakeholders related to water and marine resources include: authorities responsible for concessions, aquaculture and water permits; accredited water and marine laboratories; national inspection services; standard owners and certification bodies; and nature as a silent stakeholder. No material risks or opportunities related to water and marine resources were identified in own operations or the value chain for 2024.[66]

66 ESRS 2 IRO-1, 8 a, b



Impacts – Water and Marine Resources

Topic	Subtopic	Sub-subtopic	Impact Type	Description
Water and Marine Resources	Water	Water withdrawal	Potential, negative, short-term impact	• Seawater for juvenile fish rearing is withdrawn at the hatchery in Nin under concession • Seawater withdrawal may affect biocenoses • Seawater is treated before discharge in accordance with water permit requirements

Policies for Water and Marine Resources E3-1

The Quality, Food Safety, and Social Responsibility Policy governs operations in line with environmental protection and sustainable management practices. The policy includes provisions on the efficient use of natural resources, including water and marine resources. It contains commitments to protect all environmental components, prevent pollution, and monitor legal compliance and certification standards. The policy was published on the corporate website in 2021 and is implemented under the responsibility of the President of the Management Board.[67]

67 E4-1, 13.

The Biodiversity Policy and the Food Quality Policy contain provisions on protecting biodiversity in fish feed production and fish farming, directly linked to efficient water and marine use, pollution prevention, and achieving good water body status. Both policies were published on the Cromaris website in 2023. The Biodiversity Policy is managed by the President of the Management Board, and the Food Quality Policy is overseen by the Head of R&D.[68]

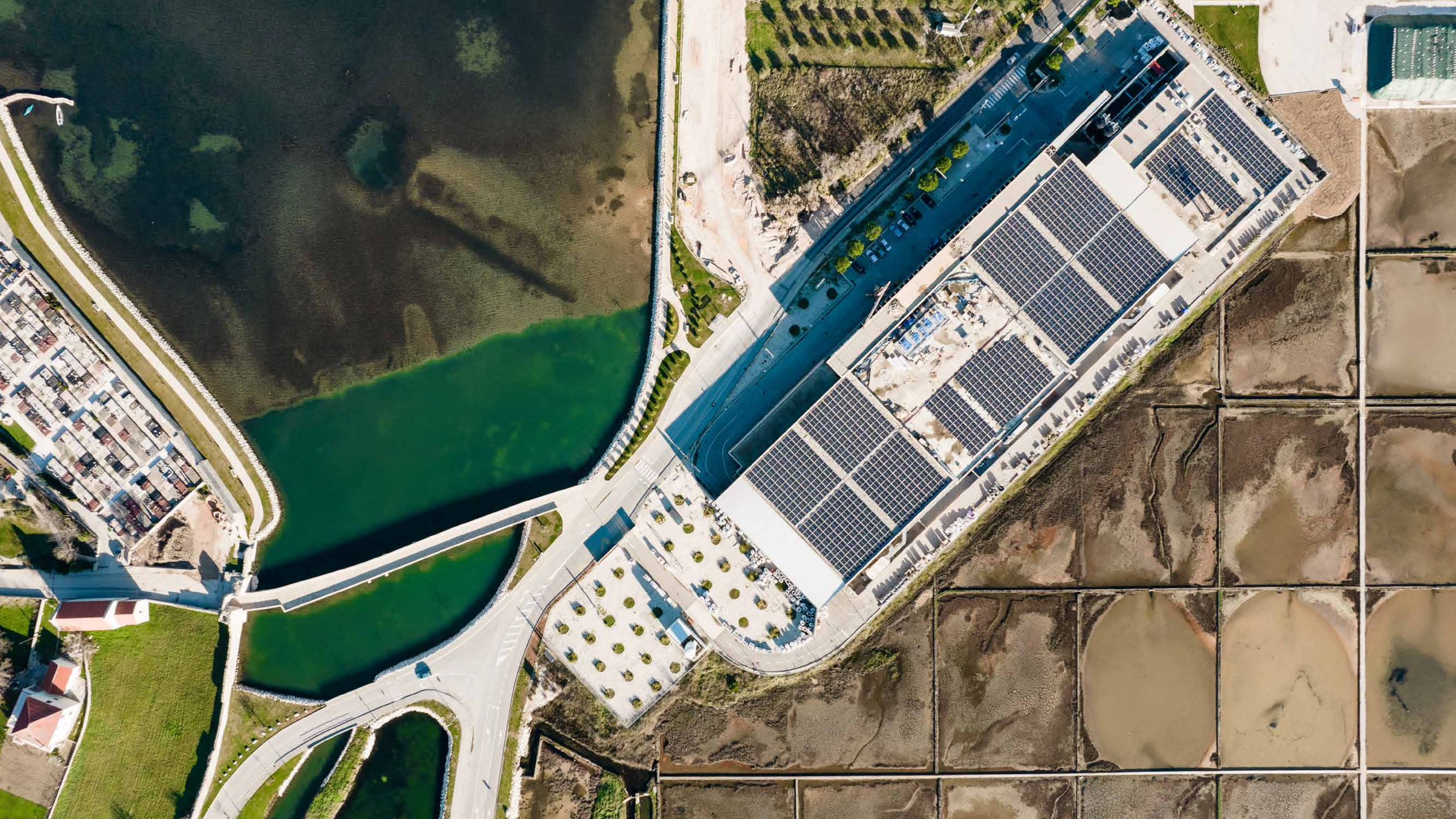
68 E3-1, 11; 12 a i,ii, iii; 14, MDR-P, 65 a

Measures and Resources Related to Water and the Sea E3-2

To manage water and marine resources in line with the Concession Agreement, Aquaculture Permit, and Environmental Impact Approvals, Cromaris regularly maintains and monitors the infrastructure for seawater withdrawal and treatment before and after use at the hatchery in Nin. Seawater circulates through juvenile rearing tanks, which are continuously replenished with about 10% fresh seawater. The used seawater is not recycled or recovered. Prior to use, seawater is filtered with sand filters and sterilised using UV light. Routine maintenance includes inspections of the abstraction system to prevent pipe leakage. Before being discharged into the Miljašić Jaruga surface water body, seawater is treated in line with the water permit, involving filtration (Stages I & II), cooling, phosphorus removal, and sludge dehydration.[69]

Financial resources for the maintenance, monitoring, and water withdrawal and discharge system analysis are planned in the last quarter of the current year for the next financial year.

69 MDR-A i E3-2, 18.



Indicators and Targets

Targets Related to Water and Marine Resources E3-3

At the Nin hatchery, freshwater is supplied from the public water system, while seawater is used for juvenile fish rearing and facility operation. Seawater withdrawal is conducted under a Concession Agreement, Aquaculture Permit, and Environmental Impact Approvals.
In 2024, there were no deviations in the amount of seawater withdrawn compared to previous years. No exceedances were recorded in 2024 for emission limits set in the water permit (temperature, pH, suspended solids, settleable solids, total nitrogen, total phosphorus, total chlorine, and anionic detergents). Analyses are conducted by accredited laboratories and submitted to Croatian Waters.[70]

Water Consumption E3-4

Seawater is used at the hatchery in Nin for juvenile fish farming and facility operations, and is withdrawn at locations 70 MDR-A and 68 a, b, c, d, e, outside the Nin Lagoon, at a depth of 5 to 6 meters. Croatia is not among countries with high water scarcity risk, according to the Water Exploitation Index Plus (WEI+) from the European Environment Agency (EEA). A WEI+ below 20% indicates low exploitation. The water scarcity concept applies to freshwater, not seawater withdrawal.[71]
The volume of seawater discharged from the hatchery nearly matches the abstracted volume, so water consumption in 2024 was 0 m^3. Consequently, seawater consumption intensity in 2024 was 0 m^3/mil. € revenue.[72]

Expected Financial Effects of Water- and Marine-Related Impacts, Risks and Opportunities E3-5

For 2024, Cromaris applied the transitional provision in line with ESRS 1, point 10.4, and Appendix C – List of disclosure requirements phased in over time.

70 MDR-A, 68 a, b, c, d, e

71 E3-4, 28.

72 MDR-A, 68 a, b, c, d, e i E3-4, 28

Biodiversity and Ecosystems ESRS E4

Strategy

Biodiversity and Ecosystems Transition Plan E4-1[73]

In 2024, Cromaris had not adopted a formal Biodiversity and Ecosystems Transition Plan in accordance with ESRS E4-1.
Although no formal Biodiversity and Ecosystems Transition Plan has been issued, impacts, dependencies, risks and opportunities related to biodiversity and ecosystems are embedded in Cromaris' Strategic Business Plan. The Strategic Plan is aligned with EU strategies and biodiversity protection plans, circular economy requirements, Croatian nature protection laws, results of physical-chemical and biological marine and seabed testing, sustainable fish feed sourcing requirements, past events, and third-party sustainability certification standards.

73 E4-1, 13

Fish farming and fish quality depend on the condition of the marine environment

All Cromaris sites operate with valid environmental permits

Farming of native fish species and production traceability contribute to the preservation of biodiversity in the Adriatic Sea

Hatchery and farming operations are conducted under a Concession Agreement, Aquaculture Permit, and Environmental Impact Approvals. The processing and logistics centre also holds an Environmental Impact Approval. Cromaris' fish farms are not located in protected areas or Natura 2000 sites, but are situated nearby.[74]

By rearing juvenile native species in its modern hatchery in Nin, Cromaris ensures full traceability and prevents the introduction of invasive species. All hatchery production units are isolated with individual filtration systems to ensure optimal zoo-sanitary conditions. The production process follows the natural photoperiod of fish to ensure health and welfare. Juvenile fish (3–5 g) are transported in tanks to Cromaris farms for further growth at seven marine locations until harvest.

Measures are implemented at all farms to prevent organic loading of the marine environment and fish escape. The Lamjana site includes separate cages for testing new feed and species. Cromaris' veterinary service continuously monitors fish health at all farms.

Digitalisation and automation of feeding started in 2023 to reduce feed use and organic waste. Harvested fish are sent to the production and logistics centre in Gaženica Port, Zadar, located near the farms and transport routes to enable rapid distribution.

By optimising vessel and vehicle routes (Fleet Management), fossil fuel use and the company's carbon footprint are reduced. As part of the climate risk assessment, both physical and transitional risks were analysed. In late 2024, a project began to study the impact of rising average sea temperatures on fish mortality.[73]

Fish Feed Production According to Cromaris Formulations Reduces Upstream Biodiversity Impact

Cromaris influences the preservation of biodiversity and ecosystems through its value chain as well. Fish feed is produced according to Cromaris' formula and must not contain genetically modified raw materials, antibiotics, hormones or other growth promoters. Fish meal and fish oil for fish-feed production must not originate from illegal, unreported and unregulated (IUU) fishing. Species or fish by-products classified as endangered or critically endangered on the IUCN Red List may not be used in fish-feed production. Producers may not use raw materials derived from fish of the same species for which the feed is intended, i.e. sea bass, sea bream, hama, common dentex and greater amberjack. In feed production, preference is given to fish meal and fish oil certified under the IFFO Responsible Supply (RS) and/or Marine Stewardship Council (MSC) standard. Cromaris requires feed producers to use soy products originating from sources certified under RTRS (Round

74 SBM-3, 16. a

Table on Responsible Soy Association), ProTerra or SSAP (Soybean Sustainability Assurance Protocol), with preference for products from EU countries. All feed producers must be certified under the ASC and Global G.A.P. standards. Fish feed for organic farming must hold an EU Organic Farming certificate in accordance with Regulation 2018/848/EU and, depending on the market, additional organic certificates such as Naturland and Bio Suisse.[74]

Fish-feed formulations are aligned with the requirements for the use of raw materials from sustainable sources

By the controlled use of high-quality by-products from the poultry industry and by-products from cereal processing and vegetable-oil production, as a substitute for fish oil and fish meal obtained from wild-caught fish, Cromaris contributes to the EU circular-economy goals and to waste reduction. In 2024 Cromaris continued work on improving fish-feed formulations in order to meet the nutritional needs of fish, ensure the best production results and the sustainability of production. The improvement of fish-feed formulations is carried out on the basis of the results of fish farming on the experimental platform. The experimental platform provides monitoring and control of feeding and rearing parameters, and the impact of the change in fish-feed composition on the quality of the final product is regularly checked in the internal laboratory.[74]

In line with EU circular economy goals, Cromaris integrates



high-quality by-products from the poultry industry, grain processing, and plant oil production into its feed formulas, reducing reliance on wild-caught fishmeal and fish oil while minimising waste. In 2024, the company continued to enhance feed formulations to meet fish nutritional needs, optimise production performance, and ensure sustainability.

Feed improvements are guided by trials conducted on Cromaris' dedicated research platform, where feeding and rearing parameters are closely monitored. The effects of feed composition changes on the final product's quality are regularly assessed in the company's internal laboratory.

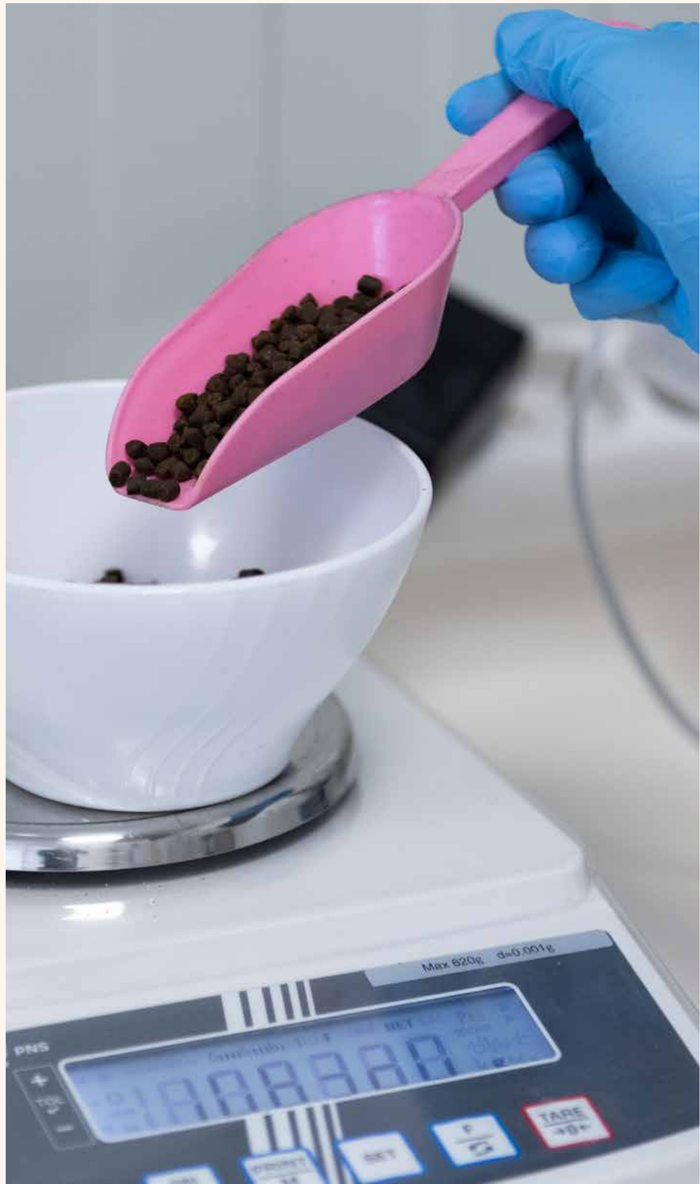
In accordance with circular-economy principles, by-products from the poultry industry were used in 2024

In 2024, poultry-industry by-products (Land Animal Protein, LAP) were introduced into fish-feed production: meal made from fresh whole poultry parts, hydrolysed feather meal and poultry blood meal. Easily digestible processed animal proteins are a suitable raw material for carnivorous fish species because they contain essential amino acids (lysine and methionine), fats and minerals (calcium and phosphorus) required for fish growth. Animal by-products are high-quality and safe, and they have a positive effect on feed-conversion ratio, fish growth and weight, and survival rate.[73]

In 2024, the share of plant-based ingredients suitable for human consumption was reduced by 11%

To increase the proportion of ingredients from sustainable sources, Cromaris has balanced its use of by-products from the grain processing industry, such as wheat bran, and the vegetable oil production sector. The share of such by-products rose from 14% in 2023 to 16% in 2024. Concurrently, the use of plant-based ingredients suitable for direct human consumption – such as corn gluten, wheat gluten, and rapeseed oil – was significantly reduced from 23% in 2023 to 12% in 2024.[68]

While soy is one of the most effective and protein-rich substitutes for fishmeal, its cultivation



is associated with deforestation and land-use change. In response to increasing global and EU-level initiatives to reduce soy dependency, Cromaris decreased the soy content in its feed formulas from 19% in 2023 to 7% in 2024.

Financial resources for the preservation of biodiversity and ecosystems are part of the business plan

Financial resources for the modernisation of production facilities, the assessment of resilience and alignment of operations with environmental conditions, the payment of fees under concession agreements and aquaculture licences, the carrying out of analyses to assess the impact of Cromaris's operations on biodiversity and ecosystems, the improvement of fish-feed formulations in accordance with circular-economy principles, the implementation of measures for the preservation of biodiversity, and audits under standards that demonstrate the sustainability of operations are planned in the last quarter of the current year for the following business year and constitute the basis for the preparation and updating of strategic business plans and the business plan.

To reduce the impact on deforestation, the share of soy in fish feed was reduced by 12 percent in 2024

Significant impacts, risks and opportunities and their connection with strategy and business model SBM-3

All locations where spawning, farming, processing, grading and logistics take place are owned by and under the operational control of Cromaris. They are not situated in nationally protected areas or within the EU NATURA 2000 ecological network, but they are located in their vicinity. None of the Cromaris sites lie in High Conservation Value Areas (HCVAs), and no economically important species whose cultivation supports the local economy have been found at the farms. No protected or endangered species from the IUCN Red List were detected at the farms during 2024. In 2024, Cromaris' operations had no impact on land degradation, desertification, or soil sealing.[75]

75 ESRS 2, SBM-3, 16 b

Proximity of Natura 2000 Sites to Cromaris Farms[76]

Natura 2000 Code	Site Name	Proximity to Cromaris Sites	Conservation Focus
HR3000419	S. Molat – Dugi – Kornat – Murter – Pašman – Ugljan – Rivanj – Sestrunj – Molat	• Košara • Lamjana • Velo Žalo • Kudica • Žman • Lavdara	• Bottlenose dolphin • Submerged/semi-submerged marine caves • Coral reefs
HR3000473	Babuljaši and surrounding reefs	• Košara	• Coral reefs
HR2000522	Budava Bay – mainland	• Budava	• Forests: *Quercus ilex* and *Q. rotundifolia*
HR2001388	Budava	• Budava	• Land snail *Vertigo moulinsiana*

76 ESRS 2, SBM-3, 16 a ii, iii, AR 4

Wastewater from the hatchery is treated before being discharged into Miljašić Jaruga, a body of water currently classified as having poor ecological status due to elevated phosphorus levels (as per the Water Area Management Plan). Cromaris is required by its water permit to monitor total phosphorus levels in discharged wastewater. In 2024, as in previous years, authorised laboratory analyses confirmed phosphorus concentrations remained below the permitted thresholds. As noted in the water permit justification, Cromaris' discharge does not worsen the condition of Miljašić Jaruga. Industrial and sanitary wastewater from the processing-logistics centre in Gaženica is also treated before being discharged into the public sewerage system. Potentially contaminated stormwater from operational surfaces is treated prior to discharge into the coastal waters of the Pašman and Zadar Channels. According to the Water Area Management Plan, the overall ecological status of these water bodies is assessed as "good."[77]

Wastewater is treated before discharge and does not have a negative impact on the status of water bodies

In 2024, there were no significant negative impacts of hatcheries on biodiversity compared to previous years

77 MDR-P, 65 f

The impact of the farms on habitats and species in 2024 did not differ significantly from the results of analyses carried out in previous years. The influence of farming activities is visible solely in a limited area, beneath the cages and up to approximately 25 metres from them, whereas in the rest of the profile the composition of plant and animal communities is characteristic of the part of the Adriatic[78] and of the terrain configuration in the area where Cromaris's farms are located. Typical organisms such as sea snails, bivalves, sea cucumbers, sea urchins and starfish were also observed at other farming locations in the Adriatic Sea and form the usual communities near mariculture. Their presence contributes to faster assimilation of organic matter from farming into the marine environment. The existence of stable populations on the seabed beneath the cages indicates an appropriate oxygen concentration. No legally protected plant or animal species were recorded at the farms during 2024. Meadows of the endemic Mediterranean seagrass (lat. *Posidonia oceanica*) were not recorded at the farms, but smaller areas were recorded and are monitored regularly.[77]

Cromaris' broodstock fish originate from native populations

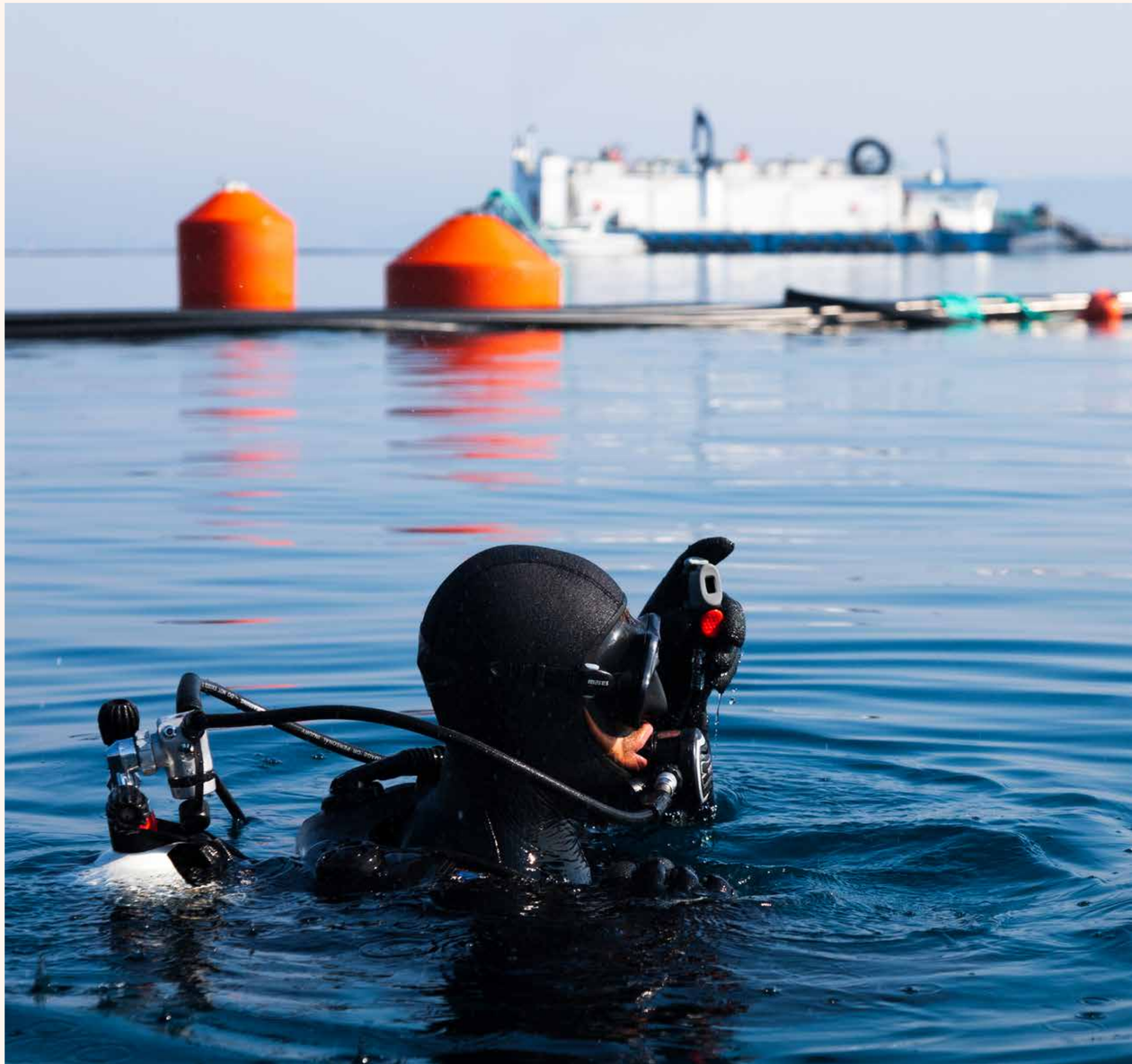
78 77 ESRS 2, SBM-3, 16

Fish escapes may occur due to damage to nets and cages caused by extreme weather events, fish-related tearing, or unforeseen incidents. Although potential genetic differences between ecotypes of European seabass (*Dicentrarchus labrax*) and gilthead seabream (*Sparus aurata*) are recognised, the introduction of farmed offspring into wild populations near farming sites is assessed as low risk.

Given the lack of absolute genetic isolation between farmed and wild native populations and the likelihood of natural interaction in shared habitats, it is assumed that original wild ecotypes remain dominant within their respective territories. Consequently, the risk of undesirable gene flow into native populations from potential escapes is considered low. Cromaris implements strict maintenance protocols to minimise escape risks, in line with its Marine Farm Maintenance Plan.[77]

Organic fish farming

Cromaris's vision is to be the leading producer of organic white Mediterranean fish, therefore organic farming is an integral part of the Strategic Business Plan. Organic production, through lower stocking densities of juveniles and the use of certified fish feed from sustainable raw materials and organic farming, further contributes to the preservation of biodiversity and the protection of ecosystems.



Management of Impacts, Risks, and Opportunities

Double Materiality Assessment Process ESRS 2 IRO-1

In line with ESRS 2 IRO-1, Cromaris conducted a double materiality assessment for biodiversity and ecosystems in 2024. This process encompassed both the company's own operations and its value chain. Key actors in the biodiversity value chain include regulatory authorities responsible for permits and environmental protection, accredited laboratories for marine and water analysis, authorised marine ecological and diving inspection companies, national inspectorates, standard owners and certifiers, fish feed producers, and nature as a silent stakeholder.

Details of the double materiality methodology are presented in the chapter: **Description of the Process to Identify and Assess Material Impacts, Risks and Opportunities IRO-1**.[79]

79 ESRS 2, IRO-1, 17 and 18



Material Impacts – Biodiversity and Ecosystems

Topic	Subtopic	Sub-subtopic	Impact	Impact Description
Biodiversity and ecosystems	Effects on species condition	Fish escapes	Potential, negative, short-term impact on environment and society	Escaped fish may interbreed with wild counterparts, alter genetic diversity (DNA), and impact ecosystem dynamics.
Biodiversity and ecosystems	Direct drivers of biodiversity loss	Increased organic load from fish feed	Potential, negative, short-term impact on environment and society	*Increased eutrophication of the sea and imbalance in marine ecosystems caused by organic loading due to:* • Excess fish feed in the water • Intensified metabolic processes in fish resulting from overfeeding

Risks and Opportunities – Biodiversity and Ecosystems

Topic	Subtopic	Sub-subtopic	Risk/Opportunity	Description
Biodiversity and ecosystems	Direct drivers of biodiversity loss	Feeding control	Short-term opportunity for own operations	*Implementing feeding optimisation based on monitoring technologies can:* • enhance animal welfare, • reduce feed consumption, and yield cost savings.

Biodiversity and Ecosystem Protection Policies E4-2

Cromaris has adopted and published both a Biodiversity Policy and a Fish Feed Quality Policy, which are based on its overarching policy on Quality, Food Safety, and Social Responsibility.

The Biodiversity Policy outlines commitments to safeguarding biodiversity and ecosystems throughout the construction, operation, and decommissioning of facilities, including cage deployment, farming activities, and emergency situations. Measures are aligned with environmental impact assessment approvals, environmental monitoring programmes at the hatchery and farming sites, and the ASC Farm Standard for seabass, seabream, and meagre. The policy emphasises managing potential impacts on birds and IUCN Red List species found near or at farming locations. It also contains provisions for ensuring feed raw material sustainability in alignment with Cromaris' proprietary feed formulations.

Fish feed used in organic aquaculture must be fully traceable and certified for both sustainable sourcing and organic origin. The policy includes a goal to expand organic fish production. The Biodiversity Policy was published on Cromaris' website in 2023, and the CEO is responsible for its implementation.

The Fish Feed Quality Policy, intended for all EU-based feed producers working with Cromaris formulas, promotes sustainable sourcing of ingredients such as fishmeal, fish oil, and soy, which must be proven via valid certifications. The policy mandates traceability, non-GMO sourcing, and verification that feed is free from antibiotics, hormones, and growth promoters, supported by appropriate documentation. Feed must not be made from species farmed by Cromaris or species listed on the IUCN Red List. Cromaris' internal laboratory regularly verifies feed composition according to agreed analysis plans.

All feed producers are also required to annually report GHG emission intensity per tonne of feed produced. Cromaris uses this data to calculate its Scope 3 greenhouse gas emissions. The Fish Feed Quality Policy was published in 2023, and its implementation is overseen by the Head of Research and Development.[80]

80 E4-2, MDR-P, 65 a, b, c, d, f; 23, 24

Measures and Resources for Biodiversity and Ecosystem Protection E4-3

The Environmental Impact Acceptability Decisions do not impose an obligation to implement compensatory measures.
Cromaris employees, and external specialized companies as needed, participate in the implementation of measures aimed at preserving biodiversity and ecosystems.
The implementation of these biodiversity and ecosystem conservation measures ensures the fulfilment of objectives set out in the Biodiversity Policy, the Fish Feed Quality Policy, and the Quality, Food Safety, and Social Responsibility Policy.
The effectiveness of the measures is monitored based on physico-chemical and biological indicators and the achievement of target values.
Measures to prevent water pollution are also linked to the protection of biodiversity and the preservation of ecosystems, as they do not cause deterioration of water bodies as defined in the Water Management Plan of the Republic of Croatia 2021–2027.
By replacing fossil fuels with renewable energy sources, increasing energy efficiency, and automating and digitalising business processes, Cromaris reduces its carbon footprint and climate impact, thereby also reducing its impact on biodiversity and ecosystems.



By producing fish feed using raw materials from sustainable sources, the risks of deforestation, desertification, and negative impacts on biodiversity and ecosystems are reduced.

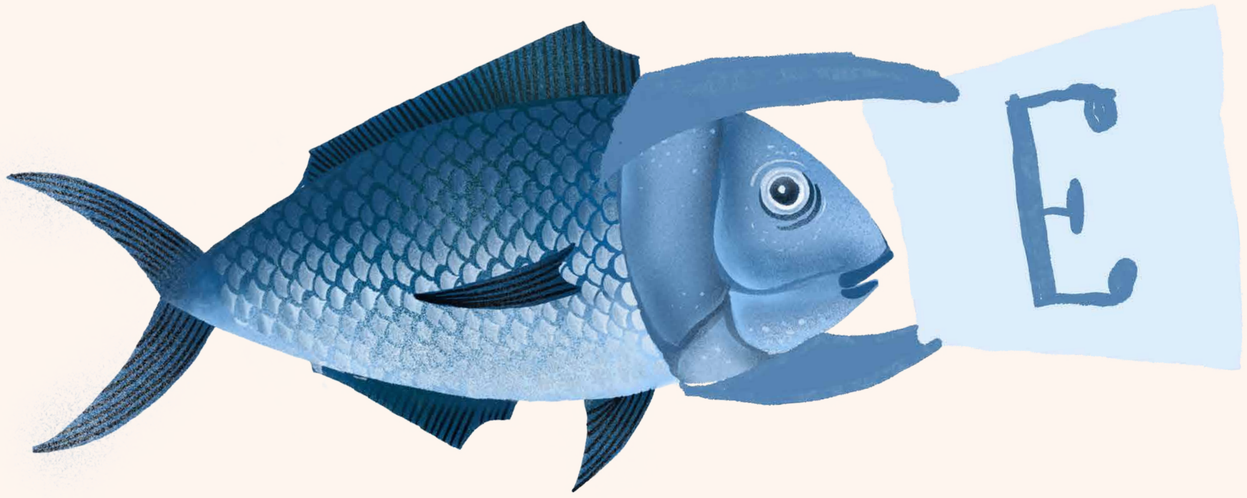
Effective waste management reduces the amount of waste sent to landfill and mitigates impacts on biodiversity and ecosystems near landfill sites.

By reducing the volume of biodegradable waste, Cromaris also contributes to lowering greenhouse gas emissions associated with business-related waste, thereby reducing Scope 3 carbon emissions.[81]

Measures to prevent water pollution are linked to the protection of biodiversity and the preservation of ecosystems because they do not worsen the condition of water bodies identified in the Water-Area Management Plan of the Republic of Croatia 2021–2027. By replacing fossil fuels with renewable energy sources, increasing energy efficiency, and automating and digitalising business processes, the carbon footprint and the impact on the climate are reduced, and thus the impact on biodiversity and ecosystems. Producing fish feed from raw materials sourced sustainably reduces the risk of deforestation, desertification and negative impacts on biodiversity and ecosystems. Effective waste management reduces the amount of waste sent to landfill and the impact on biodiversity and ecosystems near landfills. By reducing the amount of biodegradable waste, Cromaris also helps cut greenhouse-gas emissions from operational waste and its carbon footprint in Scope 3.[80]

81 E4-2, 28

Measures for the protection of waters and the sea, the reduction of the carbon footprint and of disposed waste enable the protection of biodiversity and the preservation of ecosystems



Measures for Biodiversity and Ecosystem Protection[82]

Measure	Effect	Implementation
Juvenile fish and feed production in own hatchery	• Full traceability of production • Prevention of invasive species introduction	• Own operations – Nin hatchery
Conventional production aligned with sustainability principles	• Use of sustainably sourced feed ingredients • Farming of native species • Reduced organic load on marine environment • Lower impact on benthic habitats near cages	• Own operations – Lamjana, Košara, Kudica, Lavdara, Žman, Budava
Organic production	• Less densely stocked juveniles; positive impact on animal welfare • Reduction of organic load on the marine environment • Reduction of impacts on habitats and species on the sea-bed, beneath and around farming sites	• Own operations – Velo Žalo farm
	• Use of certified organic fish feed from sustainable sources (EU Organic, Naturland, and Swiss Organic)	• Value chain – fish feed producers

82 MDR-P, 65 b, c

Measure	Effect	Implementation
Feeding automation and digitalisation	• Reduction of organic load on the marine environment and eutrophication • Reduction of impacts on habitats and species on the seabed, beneath and around farming sites • Feed savings	• Own operations – all farms
Regular removal of mortalities from cages	• Reduced organic marine load and eutrophication • Reduced impact on benthic habitats	• Own operations – all farms
Recovery of mortalities via biogas plants	• Renewable energy production (biogas) • Reduced GHG emissions through fossil fuel substitution	• Value chain – biogas facilities
Net maintenance (zoohygiene) – washing with seawater on land and underwater robotic cleaning	• Prevention of chemical discharge into the marine environment • Reduction of organic load on the marine environment and eutrophication • Reduction of impacts on habitats and species on the seabed, beneath and around farming sites • Extended lifespan of nets • Reduction of risk of fish escape • Reduction of risk of financial losses	• Own operations – all farms

Measure	Effect	Implementation
Regular infrastructure inspections under Farm Maintenance Plan	• Early detection of net and cage damage and prevention of major damage – divers and feeders • Increased infrastructure resilience before and after changes in weather conditions • Reduction of risk of fish escape • Reduction of risk of financial losses	• Own operations – all farms
Regular inspections of nets above cages; release of birds and animals entangled in the nets	• Protection of birds and other animals • Reduction of risk of fish loss • Reduction of risk of financial losses	• Own operations – all farms
Monitoring presence of IUCN Red List species	• Protection of endangered species when detected at farm sites	• Own operations – all farms
Avoidance of acoustic predator deterrents	• Protection of marine species living near aquaculture sites	• Own operations – all farms

Indicators and Targets

Target values for biodiversity and ecosystems E4-4

Target values related to surface waters of importance for Cromaris are defined by the Regulation on Water Quality Standards. The Regulation is aligned with European directives for the protection of surface and groundwater. The target values that need to be achieved according to the Regulation are:

- prevention of deterioration of the status of all surface waters, without permanently jeopardising the status of other waters in the same river basin
- protection, encouragement of restoration, and restoration of all surface waters to achieve good status, without permanently jeopardising the status of other waters in the same river basin.

Target values for preventing the impact of wastewater from the hatchery and processing-logistics centre on the condition of water bodies are described in the chapter **Target values related to water and marine resources E3-3**.[83]

Performance indicators related to changes in biodiversity and ecosystems E4-5

Fish farming depends on the quality of the sea; therefore, in accordance with the requirements of the Decision on the Acceptability of the Environmental Intervention and the ASC Standard, quarterly physico-chemical and biological examinations of the sea and of the degree of eutrophication are carried out; these are at the same time indicators of the effects of farming on the marine ecosystem. At the farms, the effects of farming on marine ecosystems are also monitored on the basis of sediment analysis on the seabed, biological diving surveys, and monitoring of the state of marine habitats of the coastal belt, of the areas below the sea surface, and of the seabed. The examinations are conducted once or twice per year, depending on the farm location. At the Lamjana, Velo Žalo and Žman farms, residues of antibiotics in the tissue of mussels collected from cage fouling are tested, and at the Lavdara farm the influence of fats on the living communities of the mediolittoral is examined.[84]

83 E4-4, 32

84 E4-5, 41

Annual reports on environmental-state monitoring for all Cromaris farms are prepared by the Institute of Public Health of Zadar County, on the basis of the authorisation of the ministry responsible for environmental protection. The locations of sampling stations at the farms, the allowable areas of environmental impact (Allowable Zone of Effect, AZE) and the reference stations are defined by the ASC Standard. The allowable area of impact is located 25 metres from the farm in the direction of the dominant currents. A reference station must be at a distance of at least 500 metres from the farm, opposite to the direction of the dominant currents, and must not be under the direct influence of inputs of nutrients of anthropogenic origin, including mariculture, agricultural run-offs or the discharge of nutrients from coastal settlements. Deviation from the limit values for pollutants at the reference stations is an indicator of inputs from other sources not directly connected with mariculture.

The results of the examinations are evaluated according to the Regulation on Water-Quality Standards. Concentrations of antibiotic residues in mussel tissue are evaluated on the basis of the Veterinary Act and Regulation (EU) 37/2010 on pharmacologically active substances and their classification with regard to the maximum permitted quantities of residues of pharmacologically active substances in food of animal origin. All examination results in 2024 were in accordance with the requirements of Regulation (EU) 37/2010.[83]

Sampling and analysis of biodiversity- and ecosystem-related indicators at farming sites are carried out by an authorised laboratory and companies specialised in diving-based biological inspections

Performance indicators of farm impacts on biodiversity and ecosystems

Sampling location and frequency	Indicator	Location
Water column – quarterly	**Physical-chemical quality indicators**: • General indicators • Thermohaline properties • Oxygen regime • pH value • Nutrients (ammonium ion and ammonia, nitrites, nitrates, inorganic nitrogen, total nitrogen, orthophosphates, total phosphorus, and silicates) • Total Organic Carbon **Biological indicators**: • Phytoplankton biomass – chlorophyll α • TRIX index for describing trophic status	• Lamjana, Košara, Lavdara, Velo Žalo, Žman, Kudica, Budava
Sediment – surface and up to 10 cm depth – annually	• Redox potential • Total Organic Carbon (TOC) • Total nitrogen • Total phosphorus	• Lamjana, Košara, Lavdara, Velo Žalo, Žman

Sampling location and frequency	Indicator	Location
Antibiotic residue testing in mussels (Mytilus galloprovincialis) from cage fouling – annually	Residue concentrations of: • Sulfadiazine • Flumequine • Oxytetracycline • Tetracycline • Doxycycline • Chlortetracycline • Trimethoprim	• Lamjana, Velo Žalo, Žman
Biological diving inspections – at least once a year, depending on the farm location	• Monitoring and mapping of benthic communities using the CARLIT method, from the infralittoral zone (constantly submerged) to below the cages, depending on the farm location	• Lamjana, Košara, Lavdara, Žman, Velo Žalo, Budava
	• Monitoring of marine habitats in the coastal belt using the CARLIT method: mapping of macroalgae communities in the mediolittoral and upper infralittoral, with processing of collected data for accurate spatial definition of water quality in GIS; deviations from natural (reference) state are shown by the EQR (Ecological Quality Ratio)	• Lamjana, Velo Žalo, Košara, Žman
	• Impact of fats on mediolittoral biocenoses	• Lavdara

All environmental monitoring reports for 2024 were submitted by Cromaris to the competent environmental protection authorities in Zadar County and Istria County. Cromaris also, based on the results of environmental monitoring, prepares biodiversity reports and submits them to the Aquaculture Stewardship Council (ASC). According to ASC requirements, to monitor the influence of natural and anthropogenic factors on the status of species on soft sea bottoms, in addition to the above-mentioned indicators, the Marine Abiotic Index (AMB) was selected. The biodiversity reports, together with environmental monitoring data, contain information on the probability of the occurrence of protected and endangered species at the farms at the national level, as well as species that, according to the IUCN Red List criteria, are classified as vulnerable, endangered, or critically endangered.

The biodiversity reports include information on the distances of the farms from protected areas at the national level, NATURA 2000 areas, Areas of High Conservation Value (PVVO), and data on species of significant economic importance. Furthermore, the reports contain an assessment of the farms' impact on biodiversity and ecosystems and data on fish escapes, if any.[75] In 2024 there were no significant negative impacts of the farms on biodiversity compared with previous years.

Expected financial effects of risks and opportunities related to biodiversity and ecosystems E4-6

For 2024, Cromaris applied the transitional provision in accordance with ESRS 1, paragraph 10.4 and Appendix C – List of disclosure requirements subject to phase-in.

Environmental monitoring reports are prepared annually and submitted to competent authorities

Biodiversity reports include data on farm impacts on biodiversity in accordance with ASC requirements

Resource Use and Circular Economy ESRS E5

Management of Impacts, Risks and Opportunities

Description of the procedures for identifying and assessing material impacts, risks and opportunities related to resource use and the circular economy ESRS 2 IRO-1

In the process of the double materiality assessment for 2024, four impacts and two opportunities were assessed as significant **Description of the procedure for determining and assessing significant impacts, risks and opportunities IRO-1**. Three impacts relate to own operations, and one impact to the downstream value chain. Of the impacts concerning own operations, two were assessed as actual, positive and short-term impacts, and two as actual, short-term and negative impacts.

During the analysis, two opportunities were also identified for reducing waste and operating costs. The assessment included own operations and the value chain. Significant parts of the value chains connected with resource use and the circular economy are authorised companies for the management of animal by-products and waste, fish-feed and packaging producers, standard owners and certification bodies, and nature as a silent stakeholder.[85]

85 ESRS 2 IRO-1, 11. a i b



Impacts – Resource Use and Circular Economy

Topic	Subtopic	Sub-subtopic	Impact	Description of the impact
Resource use and circular economy	Waste	Recovery of dead fish (mortality)	Actual, positive, short-term impact on the environment and society of own operations	• Dead fish (mortality) are collected at farms to reduce organic load in the sea and eutrophication • Dead fish are recovered in biogas plants and used to produce a renewable energy source – biogas
Resource use and circular economy	Waste	Management of waste packaging for product packing	Actual, negative impact on the environment and society of the downstream value chain, i.e., consumers and end-users	*Packaging that comes into direct contact with fish and is fully recyclable and made from secondary raw materials (recyclate) is not available on the market* • Waste generated from packaging at consumers and end-users, if not handed over to authorised waste management companies, may pollute the environment
Resource use and circular economy	Waste	Waste management generated in the business process	Actual, negative, short-term impact on the environment and society of own operations	*Waste generated in the business process at the hatchery, farms, processing-logistics centre, and retail and fish markets* • If the waste is not managed in accordance with the waste management hierarchy, it may pollute the environment
Resource use and circular economy	Resource outflows related to products and services	By-products from fish processing as raw material for feed production	Actual, positive, short-term impact on the environment and society of own operations	*Animal by-products are generated during sorting and processing* • By-products are not declared as waste but are used as raw material for pet food production

Risks and Opportunities – Resource Use and Circular Economy

Topic	Subtopic	Sub-subtopic	Risk/opportunity	Description
Resource use and circular economy	Waste	Possibility of opening a pre-growing unit	Opportunity	*Development of additional capacities for pre-growing juvenile fish in the hatchery* • Larger fish are transported to farms, reducing the number of nets with smaller mesh size • Nets with smaller mesh size need more frequent cleaning, wear out faster, and become waste • Larger fish are less likely to escape through the nets • Reduction of business costs
Resource use and circular economy	Waste	Sale of surplus fish after harvesting	Opportunity	*Opening of a fish market at the processing-logistics centre* • Reduction of fish waste • Reduction of business costs

Policies Related to Resource Use and Circular Economy E5-1

To ensure efficient resource management and waste reduction, Cromaris has adopted the Policy on Quality, Food Safety, Environmental Protection and Social Responsibility, and the Fish Feed Quality Policy. Cromaris has also established a series of internal working instructions concerning the management of animal by-products from fish farming and processing, as well as waste management.[86]

86 E5-1, 14, 16

Policy on Quality, Food Safety, Environmental Protection and Social Responsibility

This policy is publicly available to all stakeholders and is published on Cromaris' website.[87] The President of the Management Board of Cromaris is responsible for its implementation.[88] The policy includes commitments to responsible business conduct that contributes to environmental protection and the sustainable use of resources, and the reduction of all types of waste resulting from Cromaris' production processes.[89]

87 MDR-P, 65 f
88 MDR-P, 65 c
89 MDR-P, 65 a

The policy is based on the requirements of international standards that Cromaris has adopted and certified.[90] It is focused on quality and food safety, responsibility toward customers and consumers, and environmental and social sustainability of business operations.

Fish Feed Quality Policy

The Fish Feed Quality Policy applies to all Cromaris fish feed producers and suppliers, as well as to consumers and end-users.[91] The policy is based on the requirements of international standards that Cromaris has adopted and certified.[92] The policy is publicly available, and its implementation is the responsibility of the Head of Research and Development.[93]

90 MDR-P, 65 d
91 MDR-P, 65 b, c

Internal Working Instructions – Management of Animal By-products and Waste

The internal working instructions describe the business processes in which animal by-products and waste are generated, the methods of management, the documentation kept and submitted to authorised companies, and the responsibilities within Cromaris.[92]

92 MDR-P, 65 d
93 MDR-P, 65 c

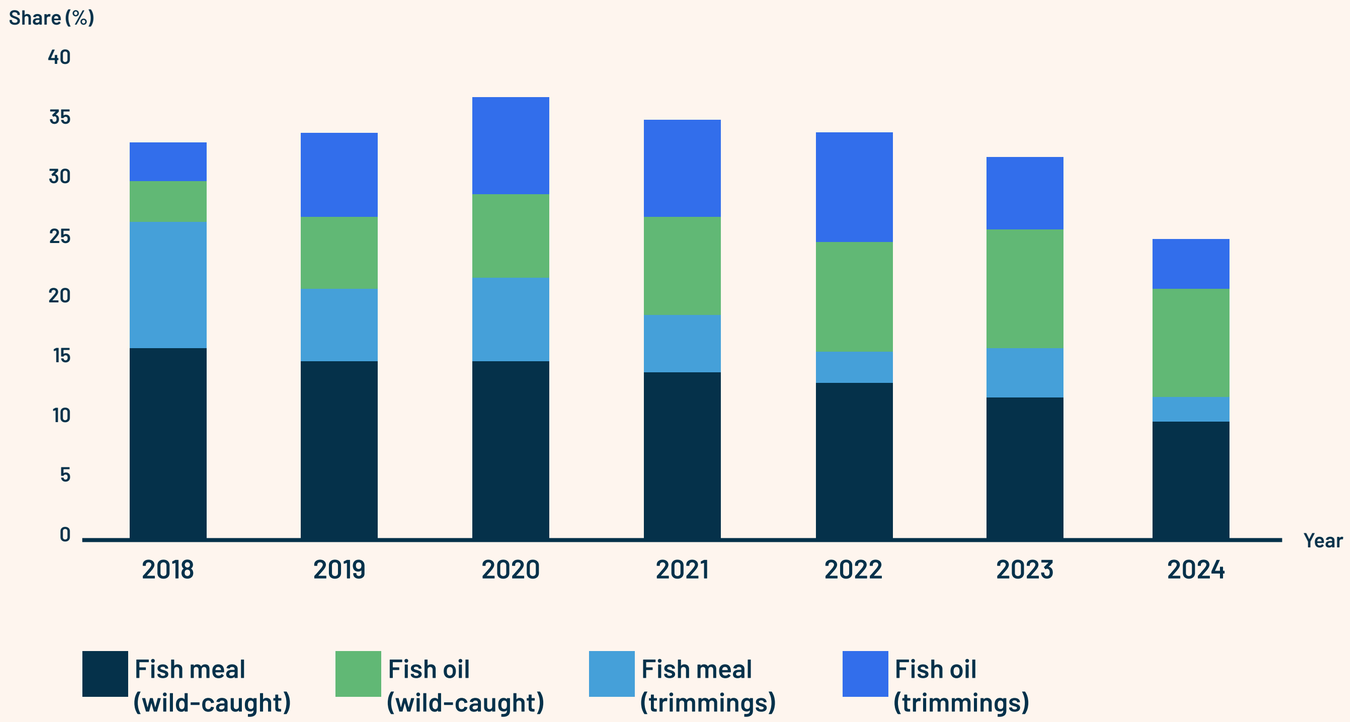
Measures and Resources for Resource Use and Circular Economy E5-2

Resource inflow – fish-feed production

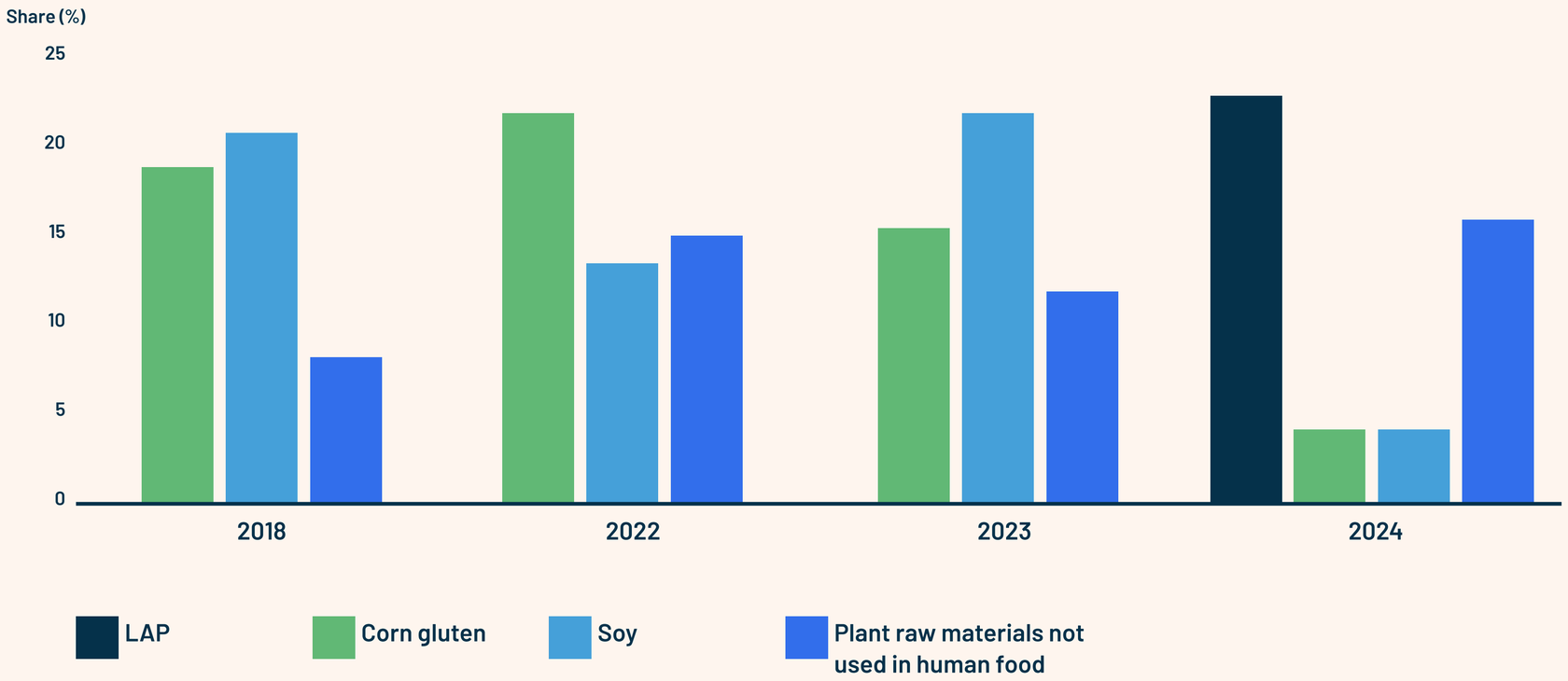
In the process of farming white Mediterranean fish, significant resources are those for the production of fish feed and for packaging fresh fish, fish fillets and smoked products. With the aim of sustainable resource use and quality control, Cromaris has developed its own formula according to which fish feed is produced. In the chapter **Transition Plan for Biodiversity and Ecosystems E4-1**, the measures for preserving biodiversity and ecosystems are described, and these measures contribute to the preservation of natural resources. The change of the fish-feed formulation resulted in optimisation of energy and protein in the ration and in the method of feeding. All this led to a reduction in the quantity of fish feed needed to produce one kilogram of fish (fish-in / fish-out ratio).



Share of sustainable marine raw materials in fish feed



Share of sustainable non-marine raw materials in fish feed



Resource Inflows – Packaging

Cromaris explores and identifies solutions to reduce packaging waste and to increase the recyclability and recycled content in the packaging used for its products, in accordance with the packaging available on the market. According to the technical screening criteria of the EU Taxonomy for assessing the sustainability of packaging production, packaging that comes into direct contact with food shall be considered sustainable if it contains up to 10% recycled content by 2028, and 50% recycled content from 2028 onwards.

Since 2020, Cromaris' MAP trays (Modified Atmosphere Packaging) are no longer made from styrofoam (EPS), but from PET plastic, which is fully recyclable. Fresh cleaned and uncleaned fish as well as fillets in quantities of 3, 6, and 10 kilograms are packed in styrofoam boxes due to food safety requirements and the need for fast distribution of fresh fish to customers and consumers.

Since March 2025, double-bottom boxes with ice have been used to make product delivery to customers and consumers more practical and hygienic. To reduce the volume of PET trays, Cromaris' cleaned fish fillets and steaks are packed in SKIN packaging. SKIN packaging preserves the freshness, color, and integrity of the product, and the fish is covered with a thin layer of protective film.[94]

94 MDR-A, 68 a, b, c, e

Resource Outflows – Animal By-products

In the process of fish processing and sorting at the processing and distribution center, animal by-products are generated which are not declared as waste, but are handed over to authorised companies for the production of pet food. In 2024, 1,046.2 tonnes of by-products were used for pet food production.[95]

Waste – Dead Fish from Farms (Mortality)

Dead fish (mortality) are regularly removed from fish farming cages and are recovered in biogas plants. In 2024, 292.7 tonnes were recovered, from which biogas was produced.[87]

95 MDR-A, 68 a, b, c, e

Waste – Scales and Bones from Processing

A total of 81.2 tonnes of scales generated in 2024 during fish processing were handed over to an authorised company. In order to find a solution for the management of fish scales and bones from processing, Cromaris began implementing the EU Horizon project "Earth-to-marine-to-earth virtuous cycle: Harnessing residual biomass of animal origin for terrestrial-marine integrated circular economy." The goal of the project is to find, in cooperation with scientific institutions, practical applications for fish bones and scales in industries such as pharmaceuticals, cosmetics, and fertiliser production.[96]

96 MDR-A, 68 a, b, c, e

Waste – Municipal and Other Operational Waste

Municipal and other operational waste is sorted at the place of origin according to type and characteristics and is managed according to the waste management hierarchy, with the aim of preventing generation and reducing the amount of waste landfilled. Waste at Cromaris is managed in accordance with the Waste Management Act and related by-laws. Waste is collected at the point of generation in appropriate containers and temporarily stored until collected by authorised waste management companies.Accompanying Waste Documentation (PL-O forms) is handed over with the waste to authorised companies, except in the case of mixed municipal waste and biodegradable waste, which are collected as part of public services and for which waste producers are not obliged to submit PL-O forms. Data on the quantities of hazardous and non-hazardous waste produced are entered into the Electronic Environmental Pollution Register (ROO) maintained by the Ministry of Environmental Protection and Green Transition, if 500 kg or more of hazardous waste or 20 tonnes or more of non-hazardous waste is generated annually.[97]

97 ESRS 2, IRO-1, E5 11 a

Target Values Related to Resource Use and Circular Economy E5-3

For 2024, Cromaris has not set quantitative target values related to resource use and the circular economy, but it monitors the effectiveness of measures implemented to reduce waste and operate in accordance with circular economy principles.

Resource Outflow E5-5

Waste generated at Cromaris in 2024 is presented according to the mass diverted from disposal, the mass disposed of by type of treatment, and the total quantity of non-recycled waste.[98]

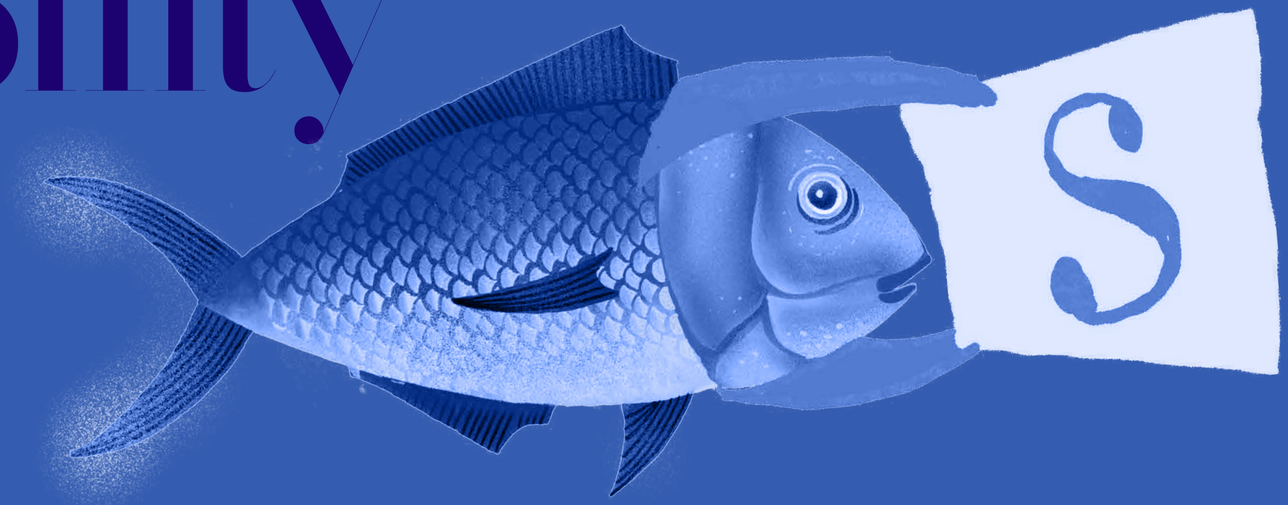
Waste generated at Cromaris in 2024	
Total waste generated	1 202,24 t
Total waste diverted from disposal (by mass)	
Hazardous waste	17,36 t
Non-hazardous waste	1 184,88 t
Waste by recovery operation – Hazardous waste (total 17,36 t)	
Preparation for reuse	0,00 t
Recycling	0,01 t
Other recovery operations	17,35 t
Waste by recovery operation – Non-hazardous waste (total 984,88 t)	
Preparation for reuse	0,00 t
Recycling	316,47 t
Other recovery operations	668,41 t
Waste by treatment operation – Hazardous waste (total 17,35 t)	
Incineration	0,00 t
Landfilling	0,00 t
Other disposal operations	17,35 t

98 E5-5, 37

Waste generated at Cromaris in 2024

Waste by treatment operation – Non-hazardous waste (total 200,00 t)	
Incineration	0,00 t
Landfilling	200,00 t
Other disposal operations	0,00 t
Waste disposed of (by mass)	
Hazardous waste	0,00 t
Non-recycled waste	
Total quantity of non-recycled waste	885,76 t
Share of total non-recycled waste	73,68 %

Operating in accordance with the principles of social responsibility



Own Workforce ESRS S1

Strategy

Stakeholders' Interests and Views ESRS 2 SBM-2

The success of Cromaris' business operations depends on its employees. Employees are not only consumers of Cromaris' products but also residents of the local communities on islands, in villages, and in towns where production facilities are located. In addition to employees from Croatia, Italy, Poland, and Germany, Cromaris employs workers from Bosnia and Herzegovina, Serbia, Kosovo, the Philippines, and Nepal.

Employee satisfaction with working at Cromaris is assessed annually

To involve employees in decision-making and to foster an encouraging work environment, annual employee satisfaction surveys are conducted. These surveys include questions related to working conditions, employee benefits, management structures, and the company's strategic business plan. The results are analysed and used to prepare action plans for improvement. The success of the implemented measures is monitored through so-called pulse-check surveys.

Cromaris regularly informs its employees about business-relevant topics

Employee communications on topics relevant to business operations are shared through internal newsletters delivered by email and via leaflets attached to payslips and displayed on notice boards. The HR department organises open-door days where employees have the opportunity to speak directly with department representatives.

Cromaris has established mechanisms to protect employee rights

Cromaris has put mechanisms in place to protect employee rights. Complaints can be submitted to persons appointed to ensure dignity in the workplace, who are authorised to handle complaints. An ethics procedure is initiated based on a report submitted to the employer, the immediate manager, or the ethics committee via the dedicated email address eticko.povjerenstvo@cromaris.hr or through anonymous submission boxes placed at each business location.

Designated confidential persons carry out internal whistleblowing procedures in accordance with the internal Whistleblowing Rulebook and the procedure for appointing a confidential person and their deputy, adopted in line with the Whistleblower Protection Act. These designated persons are available for consultation and to report any form of misconduct, including discrimination, harassment, or any other irregularity observed in the workplace.[99]

99 S1-1 20 a, b, c, 21

The Works Council and trade union represent employee interests

Cooperation with the Works Council and trade unions allows for representation of employees' interests and reaching agreements on important matters related to working conditions, work organisation, and organisational changes.[100]

Through its strategy and business model, Cromaris recognises actual and potential material impacts on its own workforce and uses this awareness as a tool to mitigate negative impacts and enhance the working environment. Impacts, risks, and opportunities related to own workers are described in the "**Description of the process to identify and assess material impacts, risks, and opportunities – IRO-1.**"[101]

100 ESRS 2 SBM - 2;12
101 ESRS 2 SBM-2, S1 AR 4



Policies related to Own Workforce S1-1

Issues concerning Cromaris' own employees are regulated through a number of documents that apply to all Cromaris staff.[102] [103]

The Collective Agreement regulates working conditions, freedom of association, employee wellbeing, work-life balance, worker training, equal treatment and opportunities for all, impact on health and safety at work, and working hours. The standard workweek is five days, with the possibility of working six days for specific roles. Overtime is limited to 250 hours annually, with entitlement to increased pay. The agreement outlines both financial and non-financial employee benefits: holiday pay, anniversary rewards, severance pay, and assistance in difficult circumstances. Union involvement in collective bargaining enables fairer and more transparent working conditions, improves workplace atmosphere and efficiency, enhances the employer's reputation, reduces employee turnover and the loss of key staff, and helps attract new talent.[104]
The Collective Agreement applies to all Cromaris employees. The agreement's signatories are responsible for its implementation. All employees, the Union of Workers in Agriculture, Food, Tobacco Industry and Water Management of Croatia (PPDIV), the employer, and the competent Ministry of Labour, Pension System, Family, and Social Policy have access to the agreement. The contracting parties review the effectiveness of the agreement's implementation at least twice a year. A dedicated six-member body monitors implementation and provides legal interpretations: three members are appointed by the union and three by the employer.[105]

The Quality, Food Safety, Environmental Protection, and Social Responsibility Policy provides the foundation for a business approach that respects the interests and views of employees, local communities, customers, consumers, and all relevant stakeholders. This policy ensures operations are aligned with the UN Declaration of Human Rights, ILO Conventions, international human rights standards, and national labour, occupational health and safety, and human rights legislation.[106]

102 S1-1 AR 11
103 S1-1, 19

104 MDR-P, 65 a

105 MDR-P, 65 b, c, d, e, f

106 S1-1, 21

The Code of Ethics sets out principles and standards for business and employment relations. It covers safe working conditions, employee awareness of job requirements, business operations, future plans, and employee training. It also regulates equal treatment in recruitment, remuneration, and promotion, health and safety at work, working time, and rest periods. The Code prohibits child labour, supports the right to collective bargaining, and bans discrimination and harassment. Cromaris hires, pays, and promotes employees based on knowledge, skills, and job performance—not race, gender, skin colour, religion, age, ethnicity, sexual orientation, or other inherent characteristics.[107] [108]

Cromaris complies with all applicable legal provisions related to occupational health and safety. The company clearly states in its Code of Ethics that it will not tolerate any form of forced, mandatory, debt-related, or child labour, or any unethical employment practices, such as unpaid wages, denial of sick or leave days, misuse of alternative forms of employment, or failure to pay health contributions.[109]

The Code applies to all employees. The Supervisory Board oversees its implementation and monitors its effectiveness through reports from the Management Board, which receives inputs from the Ethics Committee, the HR department, and other designated legal representatives.[110] The Code is accessible to all employees on notice boards and Cromaris' website.[111]

Through the Code of Ethics, Cromaris requires suppliers to operate in accordance with the principles of socially responsible business, respecting human and labour rights, protecting the environment, and combating corruption.[112]

In 2024, Cromaris identified a group within its own workforce particularly exposed to vulnerability risks, and consequently introduced a mandatory mentorship programme for foreign workers to support their integration.[113]

107 S1-1, 24 a, b
108 S1-1, 24 d
109 MDR-P, 65 a
110 MDR-P, 65 b, c, d
111 MDR-P, 65 f
112 S1-1 AR 13
113 S1-1, 24 c

Stakeholder engagement procedures with own workforce and workers' representatives S1-2

Communication is carried out through direct contact with employees and representatives of the Union of Workers in Agriculture, Food, Tobacco Industry and Water Management of Croatia (PPDIV), the Trade Union Branch "CROMARIS d.d.", and the Works Council to ensure that employees' interests and viewpoints are considered in decision-making processes that affect the working environment. Meetings are held at least twice a year, discussing matters such as working conditions, safety, health, and workers' rights.[114] By appointing an employee representative to the Supervisory Board, employees participate in decisions important to the company's operations. The results of employee satisfaction surveys are presented to the head of the relevant organizational unit and their key collaborators.[115]
Financial resources for conducting employee satisfaction surveys (including external service providers – application solutions), organizing regular meetings, and drafting reports to ensure transparent communication and effective implementation of agreed measures are planned within the annual business plan.[116]
Cromaris has not identified groups within its own workforce that may be particularly vulnerable to impacts and/or marginalization.[117]

114 S1-2, 27 a; AR 24 a

115 S1-2, 27 c
116 S1-2, AR 24 d
117 S1-2, 28

Remediation procedures and communication with employees S1-3

Internal whistle-blowing procedure

Employees may raise their concern to the Management Board, their immediate manager, the Human Resources and Legal Affairs Department, the Confidential Person, the Confidential Person's deputy, or the Ethics Committee. When reporting an irregularity, the whistle-blower is ensured identity protection and confidentiality of the procedure, judicial protection, compensation for damage, primary free legal aid in accordance with the provisions of the act governing the right to free legal aid, emotional support, and other rights laid down in the Whistle-blower Protection Act. On the basis of the reports received and the facts established, the Confidential Person assesses the merit of the report, draws up a written report, and submits it to the Management Board. If the report concerns a member of the Management Board, the report is also submitted to the Supervisory Board. After receiving information from the Management Board, the Confidential Person prepares and without delay delivers to the whistle-blower a notice of the outcome of the procedure—by e-mail, by post, or in person, as requested by the whistle-blower. The Confidential Person must also inform the Ombudsperson of the report and the outcome of the procedure

within 30 days of the decision. If the report remains unresolved, the Confidential Person is obliged to forward it to the competent authorities for further action.[118]

Ethics procedure

Under the Ethics Code, employees are informed about their rights and procedures for reporting unethical conduct. The procedure is initiated by a report to the Ethics Committee. After review, the Committee makes a determination or dismisses unsubstantiated complaints. Written decisions are shared with both the whistleblower and the subject. In cases of breach of ethical rules, the Committee prepares recommendations for department heads who are authorized to take appropriate actions.[119]

Dignity at work procedure

The employer must protect workers' dignity from inappropriate behavior by superiors, colleagues, or other individuals they interact with at work, especially if such behavior

118 S1-3, 32 a, b, c, d

119 S1-3, 32 a, b, c, d



is unwanted and against the Labour Act or special laws. This procedure protects employees from harassment and discrimination. Formal channels are provided for complaints, and the process includes investigation and appropriate corrective measures. Whistleblowers have the right to confidentiality and protection from retaliation. Cromaris offers legal protection and advisory services. Reports are assessed by the confidential person or responsible body and forwarded to the Management Board. If Management Board members are involved, the report is also submitted to the Supervisory Board. Whistleblowers and authorities are informed about the outcomes, including measures taken to address the issues.[119]

These remediation procedures are accessible via suggestion boxes placed at all Cromaris operational sites, with employees notified through internal news, pay slip flyers, and notice boards. In 2024, employees voiced suggestions via the Union and Works Council, leading to collective agreement amendments in March 2024.[120]

Cromaris monitors the effectiveness of procedures through the confidential person, who logs reports and drafts improvement recommendations. The effectiveness of the channel is ensured through stakeholder engagement, transparent communication, and feedback, which enable the assessment and optimisation of the channel's performance.[121]

The effectiveness of the channel is ensured through stakeholder engagement, transparent communication, and feedback, which enable the assessment and optimisation of the channel's performance.

Cromaris enhances employee awareness and trust through training on reporting rules and procedures, and by providing information on their rights. A designated confidential person ensures feedback, while the whistleblower protection policy against retaliation further strengthens trust in the system. These measures, together with transparent and impartial procedures, contribute to employee confidence in the channels for raising concerns.[122]

120 S1-3, 32 c

121 S1-3, 32 e

122 S1-3, 33

Measures to manage impacts, risks and opportunities related to own workforce S1-4

In the double-materiality assessment process Cromaris identified significant negative and positive impacts, as well as risks related to its own workforce. With the aim of ensuring employee well-being, a Collective Agreement was adopted whose rights are guaranteed for all Cromaris employees. To reduce staff turnover and increase earnings and employee satisfaction, Cromaris introduced quarterly incentive payments based on employee evaluations carried out by the immediate manager. For employees who operate the fleet of vessels with a registration number, a maritime allowance was introduced, and to attract employees to the maintenance department, a call was issued for scholarships for pupils of the Vocational School in Zadar and subsequently the Technical School Zadar. Potential employees with professional knowledge and skills in mariculture also include pupils and students who come on professional visits.[123] To mitigate the risk of experts leaving key positions, a succession system for key positions was established. Each year, successors are defined with department managers and are trained and educated to take over the position.[124]

The benefits guaranteed by the Collective Agreement mitigate risks related to employee satisfaction with working conditions, which in the long term contributes to reducing staff turnover.[125] Decisions on retaining or improving existing benefits and on introducing new benefits are made on the basis of an analysis of the benefits-satisfaction questionnaire.[126]

The Code of Ethics promotes human rights and workers' rights in all aspects of the employment relationship, including equality in recruitment criteria. The processes of hiring, rewarding and advancement are the same for everyone. Cromaris has clearly defined the complexity of individual jobs, and pay ranges within a pay grade depend on that complexity.[127] For foreign employees, who accounted for more than 5 percent at Cromaris in 2024, decent accommodation is provided.[128] Growth, devel-

123 S1-4, 37, 38 a, c, 40 a, b, 43

124 S1-4, 40 a, b
125 S1-4, 37, 38 c
126 S1-4, 38 c, d

127 S1-4, 37, 38 a, c
128 S1-4, 38 a

opment and the improvement of employee competences are ensured through regular targeted internal and external training.[129] All the measures mentioned apply to Cromaris d.d. and Cromaris Italia s.r.l.[130] [131]

Key measures for ensuring legal remedy are defined through the application of the Code of Ethics for dispute resolution and the assurance of fairness, and through transparent procedures for lodging complaints and resolving them.[132]

Managing significant impacts entails ensuring the necessary resources, which include financial resources, human resources and training. Within the framework of the annual planning of employee costs, funds are secured to cover all relevant operating costs connected with managing these impacts.[133]

129 S1-4, 36, 37, MDR-A 68 a
130 S1-4, MDR-A 68 b
131 S1-4, MDR-A, 68 c

132 S1-4, MDR-A, 68 d
133 S1-4, 43



Targets related to own workforce S1-5

The objectives related to the management of material negative impacts, risks and opportunities for 2024 are described in the chapter **Sustainability Targets for 2024**.[134] To focus on outcomes and monitor progress in reducing all identified material negative impacts, as well as in enhancing positive impacts on the own workforce and managing material workforce-related risks, Cromaris measures the effectiveness of its actions through employee satisfaction surveys. These surveys assess the annual increase in employee job satisfaction.

The baseline satisfaction score was 6.14, as calculated in 2022, and the company aims to reach a score of 7.30 by the end of 2026. In 2024, the target value of 6.78 was achieved.[135]

134 S1-5, 38 d), 39; MDR-T 81 b) i. Ii.

135 MDR-T 81 b) ii

Characteristics of the workforce S1-6

Employee data are collected through the internal Human Resources Information System. The employee turnover rate was calculated using the formula: the number of employees who left Cromaris divided by the average number of employees during 2024.[136]

136 S1-16, AR 60; S1-6, 50 d) i; MDR-M 77 a)

Employees in 2024[137]

	Number of employees
Men	418
Women	196
Total employees	614

137 S1-6, 50 a

Employees in 2024 by country[138]

Country	Number of employees
Croatia	605
Germany	1
Italy	7
Poland	1

138 S1-6, 50 b

Employees in 2024 by type of contract[139]

Type of contract	Men	Women	Total
Number of employees (number)	418	196	614
Number of permanent employees (number)	323	163	486
Number of temporary employees (number)	95	33	128
Number of full-time employees (number)	418	196	614
Number of part-time employees (number)	0	0	0

139 S1-6, b i, ii, iii

Employees who left Cromaris in 2024 and turnover rate[140]

Total number of employees who left Cromaris	111
Turnover rate of employees in the reporting period	18.1 %

140 S1-6, 50 c

Coverage of collective bargaining agreements and social dialogue S1-8

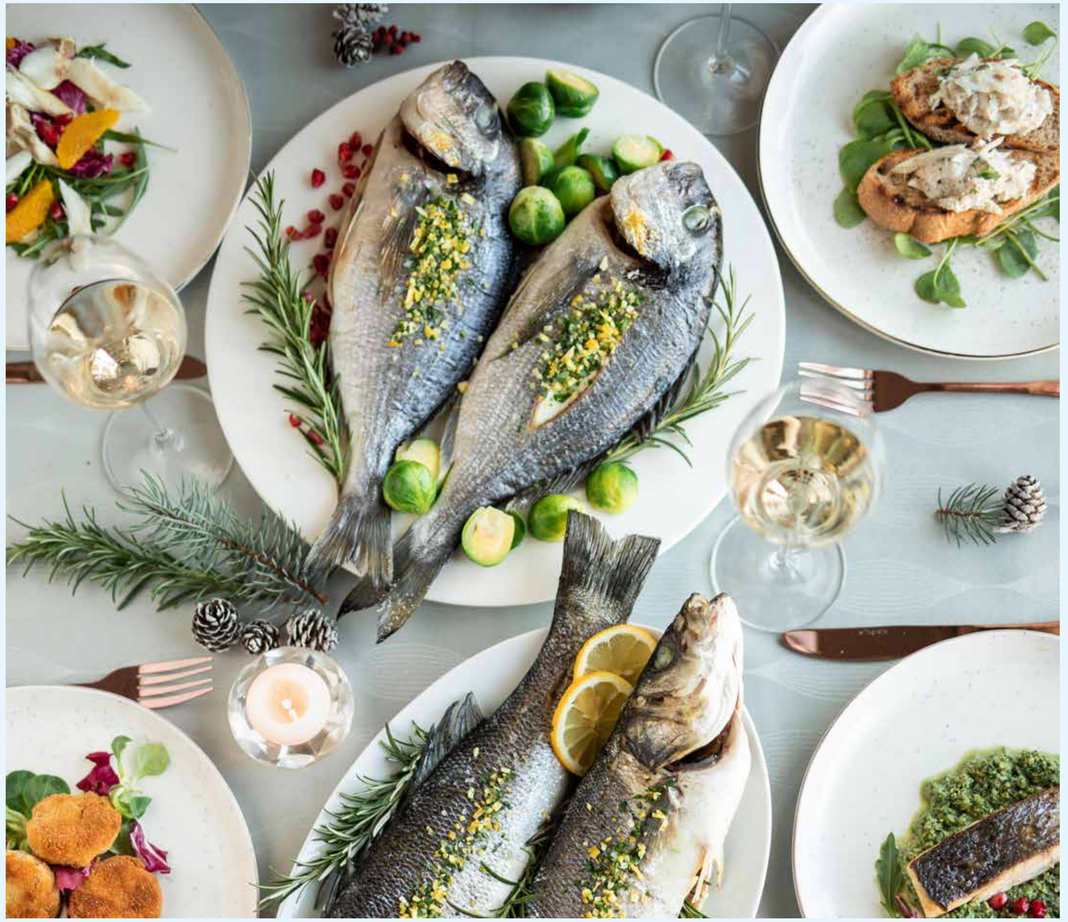
All Cromaris employees are covered by a collective bargaining agreement, representing 100% of the total workforce.[141] Cromaris has one collective agreement in place, originally signed on 1 April 2022. Subsequent amendments and supplements to the agreement were signed and entered into force on 1 March 2023, 1 March 2024, and 1 January 2025.[142]

141 S1-8, 60 a, c
142 S1-8, 60 b

Diversity indicators S1-9

At Cromaris, the definition of senior management includes members of the Management Board and the Supervisory Board.[143]

143 S1-9, AR 71



Employees at the highest management level in 2024

	Number	Share %
Men	5	71
Women	2	29

Employees by age in 2024

Age group	Number	Share %
Under 30 years	94	15
Between 30 and 50 years	367	60
Over 50 years	153	25

Social protection S1-11

All Cromaris employees in Croatia, Italy, Poland, and Germany are covered by social protection schemes that safeguard income in the event of major life events, including illness, unemployment, occupational injury, parental leave, and retirement.[144]

144 S1-11, 72

Training and skills development S1-13

In 2024, the average number of training hours per employee was 20.6 hours. The average number of training hours was 35.3 for female employees and 13.7 for male employees.[145] All Cromaris employees participate in regular performance and professional development reviews.[146]

145 S1-13, 83 b
146 S1-13, 83 a

Health and safety indicators S1-14

The Occupational Health and Safety Department plays a key role in ensuring the health, safety, and well-being of all employees, agency workers, external contractors, individuals on site, and visitors. The department operates in line with applicable legislation, standards, and internal procedures aimed at preventing injuries, accidents, and occupational diseases, while ensuring a safe working environment.

The department systematically monitors legal compliance in the area of occupational health and safety, and continuously updates internal procedures. At Cromaris, workplace risk assessments are conducted regularly, taking into account organisational changes, the introduction of new equipment and technologies, and the history of accidents and injuries. Based on the assessments, appropriate protective equipment is provided to employees.

The department also organises and coordinates employee training programmes, covering both basic and specialised topics, including handling hazardous substances, first aid, and emergency evacuation procedures. All training is tailored to specific job tasks and also includes agency workers, who are subject to the same safety standards as Cromaris employees.

Furthermore, the department monitors the working environment, carries out internal inspections, and proposes measures to improve working conditions. Regular inspections and certifications ensure the proper functioning of all work equipment.

In the event of workplace accidents or injuries, the department performs detailed root cause analyses and prepares recommendations to prevent recurrence. It works closely with insurance companies and relevant authorities, and supports the employer in making safety-related decisions.

The department includes the Occupational Health and Safety Committee, which brings together representatives of employees, the employer, the occupational safety department, occupational health professionals, and the labour inspection authority. The committee regularly reviews proposals and initiatives from all parties and suggests improvements to safety measures, thereby contributing to transparency and improved internal communication.

All processes carried out by the Occupational Health and Safety Department are focused on risk prevention, improving safety, and raising awareness about the importance of occupational safety, thereby directly contributing to a healthier and safer working environment for all employees. All Cromaris employees are covered by the occupational health and safety system.[147]

147 S1-14, 88 a

Health and Safety Indicators for Cromaris d.d. in 2024 (own workforce)[148]

Number of fatalities resulting from work injuries and work-related illness	0
Number of occupational injuries	13
Occupational injury rate (per million hours worked)	9.9
Number of cases of work-related illness	0
Number of lost days	242



148 S1-14, 88 b, c, d, e

Remuneration indicators – gender pay gap and total remuneration ratio S1-16

One of the key indicators of equality is the comparison of average salaries between male and female employees. Based on collected data, it was determined that the average salary of male employees is 8.16% higher than that of female employees. Specifically, the average salary of female employees represents 91.84% of the average salary of male employees.[149]

This gap highlights the need for further analysis and potential corrective measures to ensure greater pay equity. The gender pay gap was calculated in accordance with the methodology described in ESRS S1-16, paragraph 97 a. Data used for this calculation included annual B1 remuneration and hours worked during the reporting period.[150]

Another equality-related indicator is the ratio between the total annual remuneration of the highest-paid individual and the median of the total annual remuneration of all employees. A ratio of 7.68 indicates that the total annual remuneration of the highest-paid individual is 7.68 times greater than the median annual remuneration for all other employees.[151] This figure was calculated using the formula provided in ESRS S1-16, paragraph 97 b. Cromaris applies the same calculation method and formula consistently across all its business units, both in Croatia and abroad.[152]

149 S1-16, 97. a

150 S1-16, 97. c

151 S1-16, 97. b

152 S1-16, 99, AR 102

Human rights-related cases, complaints, and material impacts S1-17

In 2024, one case of alleged violation of dignity was reported. Following a thorough internal review, the claim was found to be unsubstantiated, and no further disciplinary actions, sanctions, or corrective measures were taken.
Cromaris actively encourages employees to use available grievance mechanisms to express their concerns. In 2024, no complaints were filed with the OECD National Contact Points concerning issues related to the company's own workforce.[153] In the reporting period, not a single serious case of human-rights violations related to the workforce was recorded.[154]

153 S1-17, 103
154 S1-17, 104 a, b



Affected Communities ESRS S3

Strategy

Stakeholder Interests and Perspectives ESRS SBM-2

Employment for the Local Population

Cromaris is one of the largest employers in Zadar County, employing approximately 600 people on average, with numbers increasing during the peak season. Although the company operates in a region with a long-standing tradition of maritime occupations, contemporary trends and business growth require the continuous development of employee knowledge and skills, particularly in the field of marine sciences.

Cromaris actively employs members of local island communities, thereby supporting the development of small and often remote areas and contributing to population retention on the islands. In 2024, employees from island communities accounted for 24% of Cromaris' total workforce, consistent with the level recorded in 2023. On fish farms, the proportion of employees originating from local island communities was 55% in 2024.

To attract new employees, the company's website features a "Work at Cromaris" application form. Job postings with detailed descriptions of requirements, responsibilities, and benefits are published regularly. In addition to external advertising, Cromaris implements an internal "Referral Programme," enabling employees to recommend acquaintances, friends, and family members.

In 2024, more than 443 applications were processed, resulting in the recruitment of 64 new employees in Croatia and 1 in Italy. Additionally, 46 employees received internal promotions.[155]

155 ESRS 2, SBM-2, 7

Collaboration with the Academic and Scientific Community

During 2024, a total of 360 students and pupils took part in field classes, internships and study visits at Cromaris. In 2024, 61 students participated in field classes, namely from the University of Zadar (Department of Ecology, Agronomy and Aquaculture), the Undergraduate Professional Study of Information Technology of the University of Zagreb, the Faculty of Agriculture, and the University of Pula. A total of 7 students took part in internships, and besides students from the Univer-

sity of Zadar there were students of the Italian Università degli Studi di Napoli Federico II and the Hungarian University of Agriculture and Life Sciences. Two pupils from the vocational Agricultural, Food and Veterinary School Stanko Ožanić of Zadar took part in vocational pupil practice. A total of 273 students and pupils of vocational schools from Croatia, Belgium, Austria and Germany took part in professional visits to the hatchery, farms and processing facility.

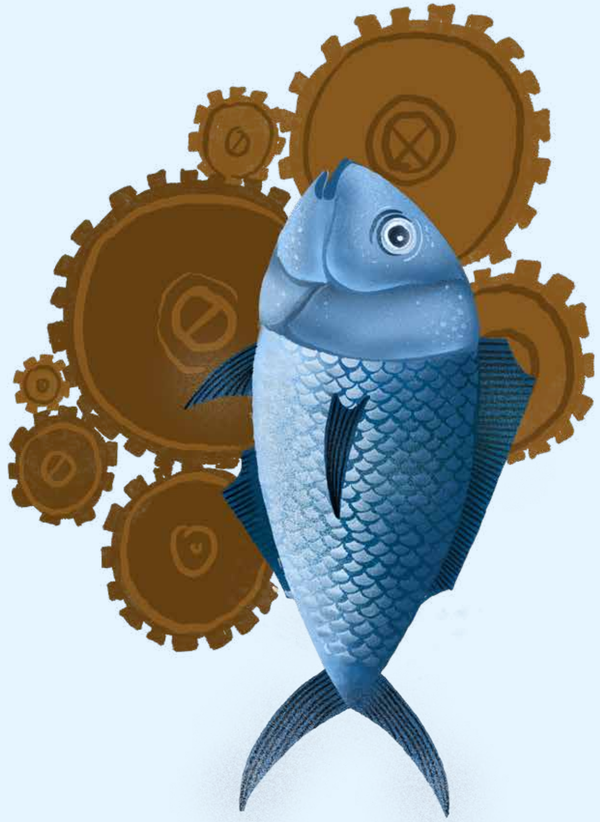
Cromaris experts contributed their knowledge and experience to the students' research and activities within their final and graduate theses. Cromaris employees held training on the importance of biodiversity conservation, the protected species of the Adriatic and marine protection for pupils of Šimun Kožičić Benje Primary School in Zadar. In 2024 Cromaris continued its cooperation with the University of Bologna on two projects financed and co-financed with EU funds. The project One Earth is financed under the HORIZON programme, and the project 3EFISHING is co-financed under the Interreg programme.[156]

156 ESRS 2, SBM-3

Material Impacts, Risks and Opportunities and their Link to Strategy and Business Model ESRS 2 SBM-3

As part of the 2024 double materiality assessment, two positive impacts were identified, both stemming from Cromaris' own operations. The most relevant segments of the value chain related to affected communities include local communities, the academic and scientific community, primary and secondary schools, and the local population.[157]

157 ESRS 2 SBM-3



Impacts – Affected Communities

Topic	Sub-topic	Impact	Description of the impact
Affected Communities	Cromaris-specific – Job creation for local communities	Actual, positive, short-term impact of own operations on the downstream value chain	*Job creation near fish farms and employment of local island populations* • Improvement of socio-economic opportunities on islands • Local islanders possess the skills required for fish farm work
Affected Communities	Cromaris-specific – Cooperation with academic and research institutions	Actual, positive, short-term impact of own operations on the downstream value chain	*Collaboration with academic institutions and research institutes* • Exchange of knowledge and experience to improve production practices

Job creation for local communities

With the aim of attracting and retaining qualified workforce from local communities, programmes for the employment of local residents have been developed: the "Cromaris Referral Programme" and youth talent attraction programmes "Future at Cromaris" and "Careers Inspired by the Sea", in accordance with business requirements.[158]

158 ESRS 2, SBM-3, 8 a ii, 9 c

Cooperation with the academic and scientific community

Cooperation with the academic and scientific community enables the exchange of knowledge and skills and the improvement of production practices. Students and secondary school pupils are given the opportunity to acquire practical knowledge in the field of mariculture, and may one day become Cromaris employees.[159] Educational activities, such as lectures on biodiversity and marine protection, raise awareness among young people about the importance of protecting the marine environment.[160]

159 ESRS 2 , SBM-3 8a i
160 159 ESRS 2, SBM-3, 8a ii; 9 c



Managing impacts, risks and opportunities

Policies for affected communities S3-1

The Quality, Food Safety, Environmental Protection and Corporate Social Responsibility Policy defines a business approach based on the respect for local communities and social responsibility in line with the principles of the UN Declaration of Human Rights, ILO conventions, international human rights standards, and national labour legislation. The policy is published on the company website, and its implementation is the responsibility of the President of the Management Board.[161]

161 S3-1, 16

Processes for engagement with affected communities regarding impacts S3-2

In addition to employing local island populations, Cromaris cooperates with representatives of local and tourism boards, schools, and sports clubs. The aim of this cooperation is to maintain good neighbourly relations, preserve the environment, raise awareness of the importance of including fish in the diet of children and youth, encourage children and youth to participate in sports, preserve cultural heritage, and invest in shared public infrastructure.[162]

162 S3-2, 21



Processes for remediation of negative impacts and communication with affected communities S3-3

As part of the double materiality assessment for 2024, no significant negative impacts or risks related to affected communities were identified.[163]

Measures to mitigate impacts, risks, and opportunities related to affected communities S3-4

Cooperation with local communities

In 2024, as in previous years, Cromaris participated in a number of events and activities as organiser, co-organiser, or participant. In 2024, Cromaris employees participated in a volunteer action to clean up Telašćica Nature Park. The interactive exhibition *Treasure of the Adriatic Seabed* was visited by more than 7,500 children from 8 primary schools and children from 4 kindergartens. The aim of the exhibition was to raise awareness of the importance of protecting the marine environment and to encourage children and youth to include fish and seafood in their diet.



163 S3-3, 27

Cromaris also actively supports local sports clubs such as KK Zadar, Swimming Club Zadar, the Long-Distance Swimming Association, Handball Club Zadar 1954, the Youth Association Preko, Sailing Club Sali, and local sports events such as *Škraping* on the island of Pašman and the international youth football tournament *Dalmatinko Cup*.

In 2024, Cromaris also organised a series of events in cooperation with local and tourism boards, with the aim of promoting local cultural heritage and customs, as well as traditional Mediterranean recipes: *Tuna, Sushi & Wine Festival Zadar*, *Fish & Jazz Festival Zadar*, *Toč Festival Nin*, *Zadar Street Food Festival*, *Festival of the Sea and Salt Sali*, *Crnilo Cup Lukoran*, *Submania – Pašman Island Spearfishing Cup*, *Croatian Culinary Days*, *Seabream and Squid Days*, as well as numerous fishermen's nights and other gastronomic events.

A direct contribution to the well-being of the community also includes systematic investment in shared (public) infrastructure. Cromaris enabled the decoration of the culinary classroom of the Zagreb Hospitality School. Through this project, Cromaris actively contributes to the promotion and popularisation of aquaculture and educates young people about sustainable fish farming and the importance of marine resources.[164]

164 S3-4, 32



Targets for managing impacts, risks and opportunities related to affected communities S3-5

For 2024, Cromaris set targets for cooperation with local and tourism boards, the academic and scientific community, secondary and primary schools, and sports clubs. All set targets for 2024 were achieved. The number of visits, mentorships, educational activities, events and donations continues to grow each year, which is an indicator of good cooperation with the local community, the academic and scientific community, and educational institutions.

Goal	Activities to Achieve the Goal
Building and maintaining good relations with local communities and encouraging positive change	• Donations and sponsorships of sports activities and clubs – at least 2 • Donations and sponsorships of local events (culture and heritage) – at least 2 • Participation in local community events (culture and heritage) – at least 2 • Humanitarian donations – at least 2 • Investments in shared/public infrastructure in the community – at least 2 • Donations to educational programmes/materials (promoting knowledge, awareness and prevention) – at least 1 • Cooperation with local media – at least 12 • Donations and sponsorships in cash and fish (equivalent value in EUR) – Cromaris donated €78,000 in cash and fish in 2024
Cooperation with the scientific and academic community and educational institutions	• Implementation of informative and educational activities (protection of Adriatic Sea biodiversity and promotion of fish and seafood consumption) through the *Treasure of the Adriatic Seabed* programme – at least 100 visitors • Visits by pupils/students to Cromaris' facility/hatchery/fish farm – at least 5 visits and 50 visitors • Education for primary and secondary school children on biodiversity, environmental protection, balanced diet, and fish as a healthy food; encouraging fish consumption in line with our mission – at least 3 educational sessions and 15 participants

Customers and Consumers ESRS S4

Strategy

Stakeholder Interests and Perspectives ESRS 2 SBM-2

Cromaris provides customers and consumers in Croatia, Italy, and across 20 other European markets with safe and nutritionally valuable sea-farmed products, whose quality is regularly monitored by accredited laboratories.
The company's strategic business planning incorporates insights from consumers and end-users satisfaction surveys, research on market trends, and analysis of economic indicators at both the local and global levels.[165]

165 ESRS 2, SBM-2, AR 3

Incorporation of the interests, views, and human rights of consumers and end-users into the company's strategic business planning[166]

Interaction Channels with Customers and Consumers	Objective
Regular research of market trends and consumer habits, as well as customer and end-users satisfaction with Cromaris products	• Obtain accurate information from customers and end-users regarding expectations related to quality, traceability, and nutritional values of products • Continuously align the strategic business plan with market trends and the requirements of customers and end-users
Certification of operations in accordance with standards on quality, environmental protection, product traceability, organic farming, antibiotic-free farming, and operations in line with environmental protection principles and socially responsible business practices	• Inform customers and end-users about sustainable business practices confirmed by independent external auditors and certifiers
Two-way communication with customers and end-users via social media and email	• Obtain accurate and timely information from customers and end-users • Fast and timely communication that enables quick reactions and responses

166 ESRS 2 SBM- 2 , 8

Material impacts, risks and opportunities and their connection to strategy and the business model ESRS 2 SBM-3

As part of the double materiality assessment, Cromaris identified one actual short-term negative impact, four positive impacts, and one potential medium- to long-term risk.
The double materiality assessment covered the company's own operations and its downstream value chain, including consumers and end-users, providers of product transportation services, and nature as a silent stakeholder. **Description of the process for identifying and assessing material impacts, risks and opportunities – IRO-1.**



Impacts – Consumers and End-Users

Topic	Sub-topic	Sub-sub-topic	Impact	Description of Impact
Consumers and End-Users	Impacts related to information for consumers and/or end-users	Standards, norms and certifications	Actual, positive, short-term impact of own operations on the environment and society	*Certified norms and standards* • Ensure product traceability, confirmation of quality, organic farming, antibiotic-free farming, and compliance with environmental and social responsibility principles • Contribute to consumers and end-users trust • Represent a potential competitive market advantage
Consumers and End-Users	Impacts related to information for end consumers and/or end users	Access to product information	Actual, positive, short-term and long-term impact of own operations and downstream value chain (i.e., consumers) on the environment and society	*Access to product quality information is available to all consumers and end-users* • On product labels • On the website • On social media

Topic	Sub-topic	Sub-sub-topic	Impact	Description of Impact
Consumers and End-Users	Personal safety of consumers and/or end-users	Customer and end-users complaints	Negative, actual short-term impact of own operations and downstream value chain (i.e., end-users) on the environment and society	*Customer complaints refer to product transport services* • Handling of products between transport service providers may affect cold chain stability and directly impact product quality
Consumers and End-Users	Personal safety of consumers and/or end-users	Antibiotic-free fish farming	Actual, short-term positive impact of own operations and downstream value chain (i.e., consumers) on the environment and society	*Antibiotic-free production* • Contributes to reducing antimicrobial resistance • Enables more effective treatment of living beings with antibiotics
Consumers and End-Users	Social inclusion of consumers and/or end-users	Organic farming	Actual, short-term positive impact of own operations and downstream value chain (i.e., consumers) on the environment and society	*Organically farmed fish* • Contributes to animal welfare • Increases availability of organic products on the market • Represents a potential competitive advantage

Risks and Opportunities – Customers and Consumers

Topic	Sub-topic	Sub-sub-topic	Risk/Opportunity	Description
Consumers and End-Users	Impacts related to information for end consumers and/or end-users	Market pressure – pricing	Medium- and long-term risk related to own operations and downstream value chain (i.e., customers)	*Due to changing consumer habits, consumers increasingly buy fish in supermarkets instead of traditional fish markets* • Retail chains purchase fish at the lowest prices, affecting Cromaris' pricing policy and business sustainability • Investment in R&D to balance nutritional value with production cost

All positive impacts on consumers and end-users are directly linked to Cromaris' strategic plan. Two of the four main business directions focus on differentiation and innovation: sustainable production of organic fish and value-added products, as well as understanding consumers and offering them value-added products aligned with market trends and their preferences. In doing so, the interests, views, and rights of consumers and end-users are taken into account.[167]

Cromaris has established a system for receiving and resolving complaints and grievances

To address the negative impact related to the transportation of Cromaris' products to consumers and end-users under a cold chain regime and product handling, a system for receiving and resolving complaints and grievances has been established in accordance with Cromaris' strategic business plan, which is centered around consumers and end-users understanding.[168]
Cromaris aligns its operations with market trends and changes in consumer habits A potential medium- and long-term risk is associated with changes in consumer habits regarding fish purchasing. Consumers and end-users increasingly prefer to buy fish in retail chains instead of at markets and fishmongers. Retailers in these chains tend to negotiate the lowest purchase prices, which affects the sustainability of production and requires continuous research and development of products that maintain quality and nutritional value while remaining price-accessible. Cromaris' three-year strategic plan is revised annually and aligned with changes in customer and consumer behavior, market trends, and economic indicators on both local and global levels.[169]

Cromaris aligns its business operations with market trends and changes in consumer behaviour.

167 ESRS 2, SBM-3 , 10 c

168 ESRS 2, SBM-3, 9

169 ESRS 2 SBM-3, 9 a,b; 48 b, c i ii, 10 d

The double materiality assessment has considered all consumer categories potentially impacted by Cromaris.[170] Each year, Cromaris conducts both qualitative and quantitative research involving key consumers and partners in Italy and Croatia. This research was conducted in 2024 as well, assessing product freshness, quality, nutritional composition, sales representatives, as well as prices and financial terms. Participants included representatives of wholesale, retail, HoReCa (hotels, restaurants and catering), and direct purchase and pickup (cash and carry). The double materiality assessment also included customer and consumer complaints and grievances. In 2024, the number of complaints was one-third lower than in 2023, and the cost of complaints decreased by 57%. The number of grievances also decreased by 35% compared to 2023. Complaints have no financial impact, but are informational in nature and, along with claims, are taken into account when making decisions on measures and actions aimed at reducing the share of justified claims and complaints.

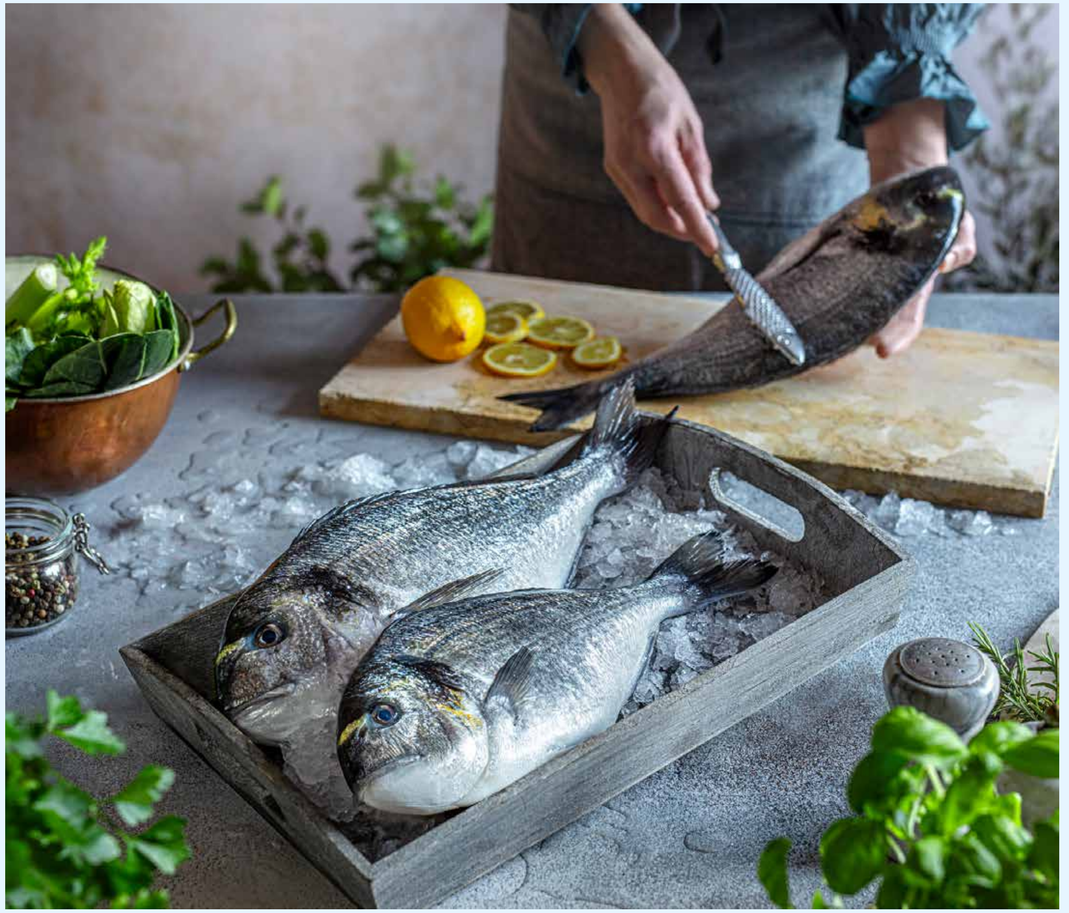
170 ESRS 2 SBM-3, 10a i, ii, ii, iv

Customer and end-user satisfaction surveys are conducted every year

Product declarations on all Cromaris products ensure access to information for all customers and consumers

Cromaris manages potential negative impacts on customer and end-user health and safety by ensuring product traceability, producing food according to its own recipes, using certified raw materials in line with environmental and social sustainability principles, raising fish without antibiotics, monitoring expiry dates based on microbiological and sensory analyses of fish under a cold chain regime, maintaining hygiene of work surfaces, equipment, and products, performing nutritional analyses by external accredited laboratories, and conducting internal checks on omega-3 and omega-6 fatty acid content for each product lot. All Cromaris products are labeled in accordance with Croatian and EU legal requirements, and product declarations include information on the name and description of the product, ingredients, nutritional values, health properties, allergens, type of packaging material, storage and distribution conditions, and instructions for use and shelf life.[171]

171 ESRS 2 SBM-3, 10 b



All Cromaris products are equally accessible to all interested customers and end-users

All Cromaris products are available to a wide range of consumers and end-users and can be found in large retail chains as well as specialized stores and fishmongers in several cities. We actively participate in various events and activities to encourage consumers to choose nutritionally valuable products. However, we face significant market risk due to price pressures. Cromaris collaborates with retail chains that continuously negotiate lower prices, posing a challenge to our pricing policy. Although our products are designed for a broad audience, this market dynamic can affect our ability to maintain the quality and value of the products we offer.[172]

172 ESRS 2, SBM-3, 12



Consumer and End-user Policies S4-1

All policies, standards, general terms and conditions, internal guidelines, governance documents, documented procedures, and work instructions apply to all Cromaris consumers and end-users and do not differentiate between any specific group.[173]

Certified standards demonstrate product traceability, organic farming, antibiotic-free farming, and environmental and social sustainability of operations.

The Policy on Quality, Food Safety, Environmental Protection and Social Responsibility is publicly available to customers and end-users and published on Cromaris' website. The President of Management Board of Cromaris is responsible for its implementation. The policy has been adopted based on the requirements of international standards that Cromaris has implemented and certified, and it applies to all Consumers and End-Users. The policy focuses on food quality and safety, accountability to Consumers and End-Users, and the environmental and social sustainability of operations.[174]

The Fish Feed Quality Policy is publicly available to consumers and end-users and is published on Cromaris' website. The Head of Research and Development at Cromaris is responsible for its implementation, and the policy applies to all Cromaris consumers and end-users. It is based on the requirements of international standards that Cromaris has adopted and certified. The policy ensures the quality, traceability, and sustainability of raw materials used for feed production.[175]

The Code of Ethics sets guidelines for responsible business conduct and transparent relations with customers and consumers. The President of Management Board of Cromaris is responsible for implementing the provisions of the Code, which apply to all Cromaris customers and consumers.[175]

The General Terms and Conditions for the Procurement of Goods and Services are publicly available on Cromaris' website and define principles for cooperation with suppliers and service providers, thereby ensuring accountability to customers and consumers through high standards of quality and safety. The President of Management Board is responsible for their implementation, and they apply to all suppliers of goods and services.[175]

173 S4-1,15

174 MDR-P, 65 a,b,c,d, f

175 MDR-P, 65 a

The General Terms and Conditions of Sale and Product Delivery form an integral part of all contracts that Cromaris concludes with its consumers. These terms are publicly available on Cromaris' website, and both parties to the contract are responsible for their implementation. The general terms define the rules of business with consumers, emphasising safety, quality, and transparency in the supply chain.[175]

The documented procedure Management of Non-Conformities and Initiation of Corrective Actions is an internal document that defines the method for identifying, documenting, and resolving non-conformities in product manufacturing and distribution in order to ensure safety and quality for consumers and end-users. The organisational unit for Quality Control and Product Development is responsible for analyses, handling of non-conformities, and preparing responses to customers and consumers. A product non-conformity refers to any deviation from prescribed standards of quality, food safety, legal requirements, specifications, and internal procedures (microbiological, physical, chemical, organoleptic, cold chain temperature control, labelling and traceability issues, non-compliance with implemented and certified standards or internal documents).[175]
The work instruction Managing Supplier Non-Conformities is an internal document defining the process for identifying, reporting, and resolving non-conformities in the delivery of products and services by suppliers. Its objective is to ensure consistency in supply quality and reliability, to minimise the impact of non-conformities on production processes, and to protect the interests of consumers and end-users.[175]

The work instructions Handling Customer and Consumer Complaints and Grievances define mechanisms for protecting consumer rights, handling grievances, and fulfilling transparency requirements. The organisational unit for Quality Control and Product Development is responsible for analysing, processing, and preparing responses to complaints, while the Marketing Department together with Quality Control and Product Development is responsible for addressing grievances. A complaint is defined as any expression of dissatisfaction by a customer/end-users with the purchased product or provided service that has financial consequences. Grievances about products and services that do not involve financial losses are informative in nature and serve to improve processes. These procedures apply to all complaints and grievances received from customers and end-users.[175]

From sea to fork



Broodstock



Hatchery



Fish feed formulation



Farming



Harvesting



Processing and packaging



Sales and logistics



Fishmongers



Consumer and End-Users

Protection of Consumers and End-Users and the Right to Information and Safe Products

The protection of consumers and end-users, as well as their right to information and health-safe products, is ensured through the following mechanisms:

- Standardisation and certification of sustainable business practices, which verify product traceability from sea to fork, antibiotic-free farming, compliance with the five animal welfare freedoms, organic farming, and operations aligned with environmental protection principles and socially responsible business conduct
- Regular product inspections regarding health safety and nutritional value, including:
  - Shelf-life checks based on microbiological and sensory testing of fish under cold chain temperature conditions
  - Hygiene inspections of work surfaces, equipment, and products
  - Nutritional analyses conducted by external accredited laboratories twice a year
  - Internal controls of omega-3 and omega-6 fatty acid content for each product lot
- A system for receiving and resolving complaints and grievances from costumers and end-users related to product quality, quantity, and pricing
- A product non-conformity management system, which prevents non-compliant products or services from being placed on the market and, where necessary, ensures their withdrawal if they deviate from the prescribed criteria and standards
- A supplier non-conformity resolution system, which enables the resolution of cases where the supplier does not meet the agreed conditions, requirements, or quality standards in their products or services
- Product labelling and declarations of composition in accordance with legal requirements of EU and Croatian legislation
- Transparent marketing practices and educational initiatives, aimed at raising consumer awareness about the benefits of sustainable fisheries and aquaculture, the importance of including fish in the diet, and food waste reduction—without exposing customers and consumers to misleading information.[176]



176 S4-1, 16 a,b,c; 17 a, b,c

Cooperation with Consumers and End-Users Regarding Impacts S4-2

Cromaris defines its cooperation with consumers and end-users through the General Terms and Conditions of Sale and Delivery of Products, the General Terms and Conditions for the Procurement of Goods and Services, Management of Non-conformities and Initiation of Corrective Actions, the Work Instruction for Resolving Complaints and Grievances of Costumers and End-Users, and the Work Instruction for Resolving Supplier Non-conformities.

Furthermore, on Cromaris website there is an e-mail address to which consumers and end-users can submit their complaints, suggestions or comments, together with the contact details of Cromaris sales in Croatia and Italy, export, shops and fishmongers. Cromaris also communicates with its customers and consumers via social networks (LinkedIn, Instagram, Facebook).[177]

177 S4-2, 22, 23, 27



Cromaris takes into account the perspectives of customers and consumers when making business decisions aimed at managing actual and potential impacts on customers and consumers. Two of the four main directions of Cromaris business, established by the strategic plan, concern differentiation and innovations in business that is, the production of organic fish, the farming of new species and value-added products, monitoring market trends, and understanding consumer requirements. Information is gathered through direct contact with consumers when concluding cooperation agreements, during annual surveys of satisfaction with all Cromaris products, on the basis of complaints and reports, from fairs, conferences, gastronomic and enological events, and from digital platforms and social networks.

Cooperation with customers and end-users is direct and continuous. Various organisational units participate in communication with consumers and end-users, depending on the type of cooperation: wholesale, retail, the organisational unit responsible for procurement, then transport and logistics, quality control and product development, marketing, and, as needed, other organisational units. Responsibility for achieving cooperation with customers and end-users and for taking the results of such cooperation into account when making decisions likewise depends on the type of cooperation with customers and consumers. Therefore, the directors of market operations and commercial excellence, logistics, and research and development are involved in cooperation with consumers and end-users. Overall responsibility rests with the President of the Management Board of Cromaris.[178]

Cromaris has not identified consumers who would be particularly vulnerable or marginalised and on whom a negative impact related to maintaining the cold chain could have an additional negative effect.

Cromaris has not identified any consumer groups as particularly vulnerable or marginalised who might experience disproportionate negative effects related to cold chain compliance.[179]

178 S4-2, 20 a,b,c,d

179 S4-2, 21

Remediation of Negative Impacts and Communication with Consumers and End-Users S4-3

The General Terms and Conditions of Sale and Product Delivery, General Terms and Conditions for the Procurement of Goods and Services, Documented Procedure for Non-Conformity Management and Corrective Actions, Work Instructions for Handling Customer and Consumer Complaints and Grievances, and Work Instructions for Managing Supplier Non-Conformities establish the processes for remediation of negative impacts, providing channels through which consumers may express concerns. Consumers and end-users may also submit comments, suggestions, complaints, and reports via email addresses published on Cromaris' website. In 2024, Cromaris' operations and its supply chains did not cause any significant adverse impacts on customers or consumers that would have required the application of legal remedies.[180] The procedure for legal remedies is described in the General Terms and Conditions of Sale and Product Delivery. These terms are publicly available on the company's website and form an integral part of all contracts concluded with consumers. Responsible contracting practices and impartial selection of business partners help ensure product quality for consumers and end-users. Cromaris' Code of Ethics prescribes zero tolerance for corruption and unethical business conduct. Relationships with consumers are built on trust and accountability.[181]

180 S4-3, 25 a

181 S4-3, 25 b

Measures to Mitigate Negative Impacts and Risks Related to Consumers and End-Users S4-4

Objective	Description of Measures
Ensuring cold chain integrity during transport from Cromaris to customers[182]	• Training of supplier staff involved in product transport • Establishment of a system for monitoring and resolving product non-conformities • Complaint and grievance handling system
Ensuring product quality and nutritional value[183]	• Regular health and nutritional quality checks, including microbiological and sensory testing • Complaint and grievance handling system
Production of fish feed according to Cromaris' proprietary formula to ensure traceability, animal welfare, and biodiversity and ecosystem protection[182]	• Fish feed policy defining production requirements • Development and optimisation of feed formulation to achieve best production results and meet fish nutritional needs • Use of sustainably sourced raw materials and reduction of fishmeal and fish oil from wild catch contributes to biodiversity and ecosystem preservation
Fair marketing practices and consumer education[184]	• Consumer education on sustainable practices and benefits of fish consumption via digital platforms and social media • Promotion of the BIO product range • Provision of high-quality product information through clear labels and communication channels • Collaboration with renowned chefs to promote healthy recipes

182 S4-4, 31 a
183 S4-4, 31 b
184 S4-4, 31 c

In 2024, Cromaris implemented a series of measures aimed at preventing, mitigating, or remediating significant negative impacts on consumers. No cases of consumer human rights violations were reported during the year.[185] These measures and actions are ongoing and apply across Cromaris' own operations, as well as to suppliers, consumers, end-users and employees.[186] The effectiveness of these measures is regularly monitored based on market and consumer and end-user satisfaction surveys, analysis of feedback received through digital platforms, and the performance of the complaints and grievance systems. All product information (labels, nutritional values) is provided on the packaging in accordance with the legal requirements of the country where the product is sold.[187] The measures are financed through internal resources and EU funding.[188]

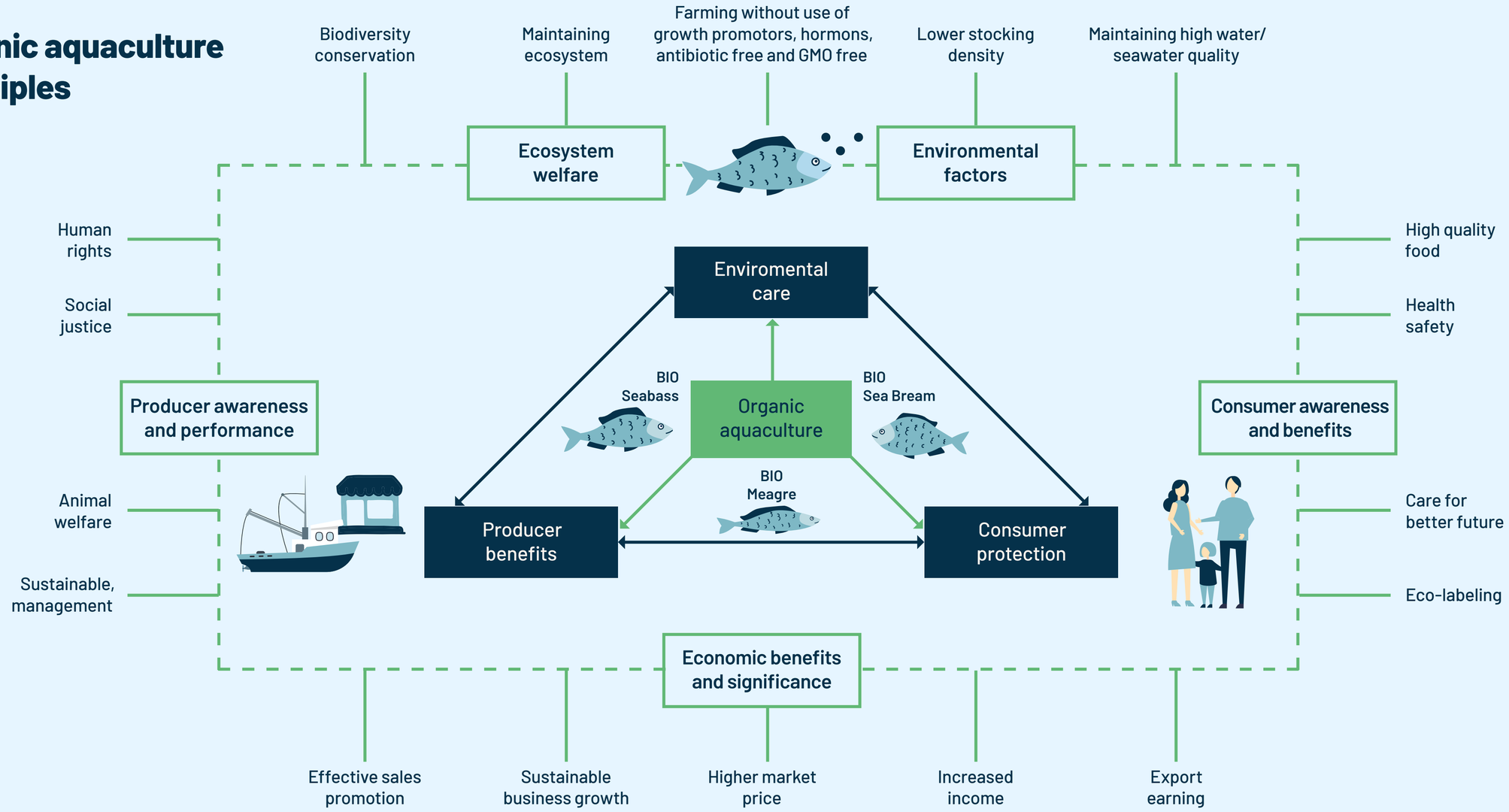
185 S4-4, 35.
186 MDR-A, 68. b, c
187 S4-4, 37.
188 S4-4, MDR-A 69. a

Promotion of Organic Products

In line with its vision, mission, and strategic business plan, which includes raising consumer awareness of the benefits of regular fish consumption, Cromaris launched several communication campaigns in 2024 via digital platforms and social media. Special focus was placed on promoting Cromaris' BIO product range. In cooperation with the agency Bruketa & Žinić, a communication strategy for BIO fish targeting Croatian and Italian markets was developed. Cromaris' BIO fish is the main ingredient in recipes by renowned Italian chef Giorgio Locatelli, with whom Cromaris has a long-standing collaboration.



Organic aquaculture principles



Participation in Gastronomic, Enological, and Media Events

At leading regional enological, gastronomic, and media events such as Weekend Food and Weekend Media Festival, dishes made from Cromaris BIO fish were presented, inspired by Asian culinary traditions. Cromaris also participated as a partner in various gastronomic events in Zadar in 2024, reaffirming its position as a leading producer of premium Mediterranean fish. At the Tuna, Sushi & Wine Festival, Cromaris fish was presented as an excellent choice for sushi, merging local traditions with modern culinary trends. In cooperation with the Zadar Tourist Board, Cromaris co-organised the second Fish & Jazz Festival, where visitors enjoyed jazz performances accompanied exclusively by delicacies made with Cromaris fish. At the *TOČ Festival* in Nin, Cromaris BIO fish was featured in dishes by renowned chefs alongside top-quality wines. Cromaris also showcased its products at events such as the *Zadar Street Food Festival, Festival of the Sea and Salt in Sali, Crnilo Cup in Lukoran, Submania Cup* on Pašman Island (underwater fishing), *Croatian Culinary Days, Days of Sea Bream and Calamari*, and numerous other seafood-themed and gastronomic events.[189]

189 S4-4, 31 c

"Seafood Expo" Barcelona 2024

In 2024, Cromaris again participated in the *30th Seafood Expo* in Barcelona, the world's largest seafood and fisheries fair. As part of the Croatian Chamber of Commerce's *Eat What's Worth It* project, eleven Croatian companies, including Cromaris, showcased their products at this prestigious event. Seafood Expo provides a unique opportunity for Cromaris to strengthen business relationships with over 300 existing partners and to present its products at the largest seafood fair in Europe.

"Fish International" Bremen 2024

For the first time, Cromaris presented its premium product range at *Fish International* in Bremen, a leading trade fair for fish and seafood for Central and Western European markets. Dishes made from Cromaris' dentex received the highest ratings.[190]

190 S4-4, 31 d

Targets for Organic Farming and Fair Marketing Practices S4-5

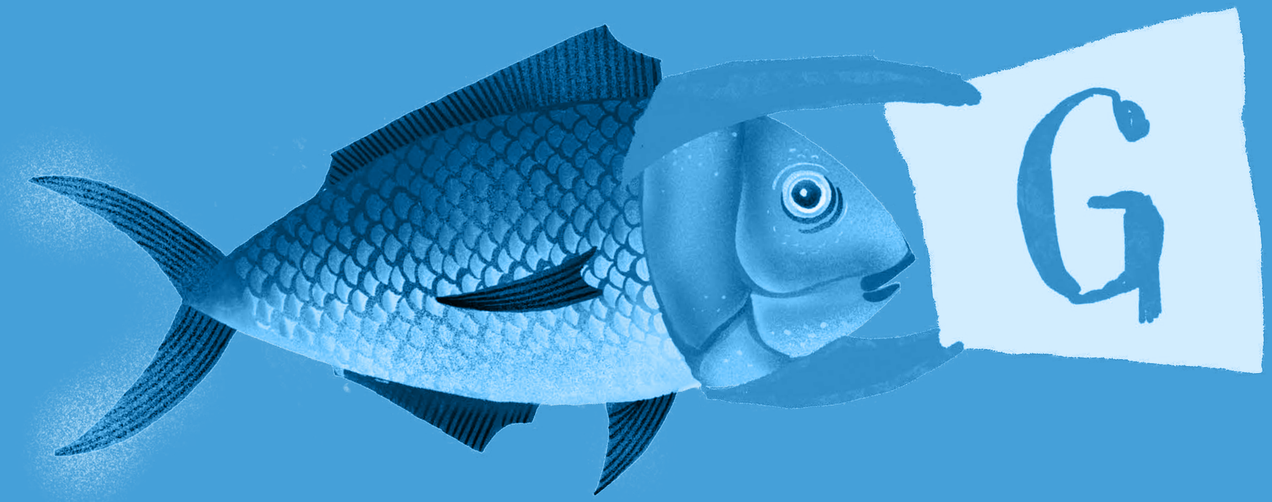
For 2024, Cromaris set targets to monitor the effectiveness of policies and measures aimed at managing material impacts, risks, and opportunities associated with consumers and end-users. These targets were based on market research into types and characteristics of packaging used for fish, market trends, and consumer habits related to BIO products and products certified for sustainable business practices.



Goal	Description and effectiveness of measures implemented
Retain the ASC Farming (Aquaculture Stewardship Council – Farm Standard Seabass, Seabream and Meagre) certificate at all farms	*By retaining the ASC certificate in 2024, Cromaris confirmed:* • Sustainable production at the farms • Product traceability • Alignment with market trends and with customer and consumer demand for certified products
Increase sales of organic fish by 25 % compared with 2023 performance	• Organic-fish production – the 2024 target was achieved
Fair marketing practices and consumer education[191]	*All planned measures for 2024 were carried out:* • Educating consumers about sustainable practices and the benefits of fish consumption via digital platforms and social networks • Promoting the BIO range • Providing high-quality product information through clear and informative labels and communication channels • Working with well-known chefs to promote healthy recipes
Use fish packaging that is recyclable and contains recycled content, in compliance with EU and Croatian food-safety regulations and with the packaging available on the market	• Despite market analyses and direct contacts with packaging suppliers in 2024, Cromaris did not find producers offering an alternative solution to plastic EPS crates • Cromaris will remain in contact with packaging suppliers to identify solutions for reducing the amount of plastic placed on the market
Continually reduce the number of founded complaints and grievances during the reporting year as evidence of greater process efficiency, maintenance of product quality, and lower operating costs	• In 2024 the total number of complaints fell by one third compared with 2023, and the cost of complaints was 57 % lower • Compared with 2023, the number of grievances was 33 % lower[192]

191 S4-4, 31 c
192 MDR-T, 79 a,b,c,d, MDR-T 80

Business Conduct



Business Conduct ESRS G1

Governance

Role of the Administrative, Management and Supervisory Bodies ESRS 2 GOV-1

Cromaris adheres to high standards of corporate governance and conducts its business in line with the principles of legality, transparency, accountability, and ethical conduct. In accordance with the Code of Ethics, the administrative, supervisory, and management bodies are responsible for the implementation of these principles across all levels of the company's operations.

- The Management Board makes operational and strategic decisions, ensures the implementation of ethical standards, and is responsible for compliance with legal regulations, standards, and internal procedures.
- The Supervisory Board oversees the work of the Management Board, monitors the implementation of sustainability and ethical business policies, and safeguards the interests of stakeholders.
- The Ethics Committee supervises the application of the Code of Ethics, regularly informs employees, and facilitates the anonymous reporting of irregularities and ethical concerns.

Transparency and Legal Compliance

- The Cromaris Management Board conducts regular assessments of business compliance, including the implementation of internal anti-bribery and anti-corruption policies.
- All employees and managers are committed to the principles of lawful and responsible business conduct, including the protection of confidential information and personal data.
- Ethical human resource management is promoted at all levels.
- Cromaris' governing bodies ensure equality and non-discrimination in recruitment and promote a safe and healthy working environment.
- Special attention is given to open communication and employee participation in decisions affecting working conditions.

Responsible Management of Business Relationships

- Cromaris ensures an impartial selection of business partners and compliance with environmental and socially responsible business standards.
- All contractual relationships are based on fairness, transparency, and accountability, with

clear guidelines for managing conflicts of interest.

Oversight of ESG Policies and Stakeholder Engagement

- The Management Board and ESG officers, together with their teams, regularly monitor performance in environmental, social, and corporate responsibility (ESG) areas, including marine ecosystem protection, sustainable farming, and carbon footprint reduction.
- Collaboration with local communities is fostered through support for sustainable development and social responsibility projects.

Whistleblowing Mechanisms and Ethical Concerns

- Cromaris has established an anonymous whistleblowing system through a designated confidential person or the Ethics Committee to ensure ethical conduct and the protection of whistleblowers.
- The Ethics Committee organises employee training on the principles of ethical conduct.[193]

Expertise of Administrative, Management and Supervisory Bodies in Business Conduct Matters

Cromaris' administrative, management, and supervisory bodies possess relevant expertise in corporate governance, ethics, legal compliance, and sustainable business practices, ensuring the effective implementation of the Code of Ethics and related policies.

Management Board

The Cromaris Management Board consists of highly qualified professionals with extensive experience in aquaculture, corporate governance, and business ethics. Board members have long-standing managerial experience in the food processing and aquaculture sectors. They regularly participate in training programmes on business ethics, ESG policies, and compliance with regulatory requirements.

Supervisory Board

Members of the Supervisory Board possess expert knowledge in corporate law, finance, and ethical governance. Key competencies include expertise in finance and auditing, and familiarity with legal and regulatory standards.

Education and Competence Development

Cromaris continuously invests in the professional development of its governing bodies through regular training on business ethics, legal and financial matters, human resources management, and compliance with sector-specific sustainability and responsible management initiatives. Management and supervisory body members attend internal training sessions as well as external expert seminars, conferences, and congresses.[194]

193 GOV-1, 5 a

194 GOV-1, 5 b

Management of Impacts, Risks and Opportunities

Description of Processes to Identify and Assess Material Impacts, Risks and Opportunities ESRS 2 IRO-1

As part of the 2024 double materiality assessment, one impact, two opportunities, and six risks were identified as material. The impact, both opportunities, and four of the risks relate to Cromaris' own operations, while two risks are linked to the upstream value chain. The material value chain components connected to business conduct include employees, suppliers, customers and consumers, animal welfare associations, and nature as a silent stakeholder.[195]



195 ESRS 2 IRO-1, 11 a i b

Impacts – Business Conduct

Topic	Sub-topic	Impact	Impact	Description of Impact
Business Conduct	Animal Welfare	Post-harvest handling	Actual, negative, short-term impact from own operations	*In aquaculture and fisheries, fish are placed in a mixture of ice and water after harvesting, where they die.* • This practice affects animal welfare by prolonging the time between harvesting and death.

Risks and Opportunities – Business Conduct

Topic	Sub-topic	Sub-sub-topic	Risk / Opportunity	Description
Business Conduct	Animal Welfare	Post-harvest handling	Medium - and long-term opportunity from own operations	*Fish are placed in a mixture of ice and water after harvesting, where they die* • Transitioning to electrical stunning methods could improve animal welfare.
Business Conduct	Animal Welfare	Cross-species disease transmission	Long-term risk from own operations	*Transmission of diseases from wild to farmed fish through pathogen introduction leads to:* • Increased fish mortality • Reduced production

Topic	Sub-topic	Sub-sub-topic	Risk / Opportunity	Description
Business Conduct	Animal Welfare	Broodstock disease	Short-term risk from own operations	*When healthy broodstock are kept alongside diseased fish, the likelihood of disease transmission increases, resulting in:* • Health impact on broodstock • Production losses • Reputational risk
Business Conduct	Animal Welfare	Cage-related diseases	Short-term risk from own operations	*Pathogen presence in cages can result in:* • Increased fish mortality • Production losses • Reputational risk
Business Conduct	Supplier relationship management incl. payment practices	Raw materials for fish feed	Short-term risk from own operations and value chain	*Disruptions in supply chains, rising prices of raw materials and energy, geopolitical and weather-related factors can affect:* • Raw material availability • Cost of fish feed • Changes to formulation • Increased R&D costs

Topic	Sub-topic	Sub-sub-topic	Risk / Opportunity	Description
Business Conduct	Supplier relationship management incl. payment practices	Supplier of fish bath treatments	Short-term risk from own operations and value chain	*Limited number of EU-registered antiparasitic treatment producers (to prevent infections on fish skin and fins) can lead to:* • Price increases • Drug unavailability • Higher mortality • Negative impacts on farming
Business Conduct	Supplier relationship management incl. payment practices	Supplier ESG questionnaire	Long-term opportunity from own operations	*ESG questionnaire for suppliers to assess environmental and social impacts may lead to:* • Improved data collection from the value chain • Potential positive effects across the value chain
Business Conduct	Sector-specific issue	Cybersecurity	Medium-term risk from own operations	*Due to globally rising cybersecurity threats, it is necessary to continuously raise employee awareness regarding potential threats and protection measures.* • Potential data loss • Business continuity risks • Operational losses

Business Conduct Policies and Corporate Culture G1-1

Cromaris operates in accordance with recognised business conduct and sustainability standards. Cromaris' policies, guidelines, and governance documents clearly define the principles of ethical conduct and management. The corporate culture reflects a commitment to sustainable development, regulatory compliance, and accountability to stakeholders. The key document governing business conduct is the Code of Ethics.

The Code of Ethics sets out principles, standards, and acceptable conduct in all forms of business and employment relationships.[196] Cromaris complies with all applicable laws related to occupational health and safety. The Code of Ethics applies to all Cromaris employees and is overseen by the Supervisory Board, based on reports submitted by the Management Board, the Ethics Committee, the Human Resources department, and other authorised bodies as required by law.[197]

The Code is publicly available on Cromaris' website and displayed on notice boards.[198] In the case of identified irregularities, corrective measures are applied in accordance with internal regulations and legal provisions.[199] Cromaris continuously raises employee awareness of the importance of ethical business practices through regular training and communication of key policies, ensuring consistent application of anti-corruption and ethical standards.[200]

Certified Standards for Confirming the Sustainability of Own Operations and Suppliers

Cromaris holds several certifications confirming traceability from sea to table, responsible resource management, organic farming, antibiotic-free farming, environmental protection, food safety, and compliance with labour standards. These certifications serve not only as proof of quality but also as tools for strengthening the trust of customers, consumers, regulators, and partners across the supply chain. Cromaris requires its suppliers to hold certificates verifying the organic origin and sustainability of their production processes, thereby promoting sustainability throughout the value chain.[201]

196 MDR-P, 65 a, d

197 MDR-P, 65 c, e

198 MDR-P, 65 f

199 G1-1, 10 a

200 G1-1, 10 g

201 G1-1, 7

Internal Reporting of Irregularities Policy

Cromaris applies clear procedures for investigating incidents of business misconduct, including corruption and bribery, in accordance with applicable laws and internal policies. The company maintains a zero-tolerance policy towards all forms of corruption and bribery. Any action involving the misuse of influence for personal or business gain is considered a serious violation of the Code of Ethics and is subject to internal investigations and appropriate sanctions.

Employees are obliged to report any suspicions or knowledge of corrupt practices. Reports are handled in accordance with the Internal Reporting of Irregularities Policy. Cromaris also ensures the independence and objectivity of its business decisions through transparent mechanisms for preventing and investigating potential conflicts of interest. A clear process exists for reporting and assessing conflicts of interest, which includes timely evaluation and decision-making based on established facts.

Internal oversight mechanisms include the Ethics Committee, which is responsible for conducting investigations in the event of reported irregularities. All investigations are carried out impartially, confidentially, and in accordance with whistleblower protection procedures. Upon completion of the investigation process, appropriate measures, including disciplinary sanctions, are taken if necessary.[202]

202 G1-1, 10 e

Animal Welfare

As of 2024, Cromaris has not yet adopted a formal Animal Welfare Policy in accordance with ESRS requirements. The development of such a policy is planned for 2025.[203] Although a formal policy is not yet in place, Cromaris ensures animal welfare through veterinary supervision, the implementation of zoohygienic measures, and farming practices aligned with sustainability principles certified by third-party standards. By integrating the Five Freedoms of Animal Welfare into its operations, Cromaris demonstrates responsibility toward the environment, consumer health, and the ethical farming of fish.

203 G1-1, 10 f



Management of Relationships with Suppliers G1-2

Payment in accordance with contract terms is essential for maintaining quality supplier relationships and ensuring supply chain continuity. Cromaris regulates the contracting, delivery, invoicing, and payment process through the General Terms and Conditions for the Procurement of Goods and Services, published on its website and integrated into the Ensolva e-procurement system used across the Adris Group. This system ensures transparency and timely execution of financial obligations.[204]

As a leading producer of high-quality Adriatic fish, Cromaris strategically manages its supply chain to reduce operational risks, ensure delivery continuity, and minimise environmental and social impacts. In this context, procurement risk management is a key aspect of the business strategy, implemented through the following measures:

- Supplier Diversification and Reduction of Dependency on Single Sources
  - In 2024, 84.8% of Cromaris' suppliers were based in Croatia, with the remainder located in other EU countries, thereby reducing exposure to disruptions in global supply chains.
- Supplier Assessment Using Environmental, Social and Governance (ESG) Criteria
  - Suppliers are assessed based on the General Terms and Conditions for the Procurement of Goods and Services, which include requirements related to environmental protection, anti-corruption, and labour rights. Cromaris requires suppliers to: implement measures to reduce carbon footprint, manage waste in compliance with legal regulations, protect the marine ecosystem and remediate environmental damage caused at Cromaris' sites.

204 G1-2, 14

Suppliers of raw materials, juveniles, and fish feed must be certified by independent bodies under the Global G.A.P. standard. Raw materials used in organic farming must be certified for their organic origin. All suppliers must comply with human rights, labour standards, and the prohibition of child labour. An anti-corruption clause prohibits all forms of bribery and undue influence on business decisions.

- Integration of Digital Tools for Procurement Management
  - Procurement processes are standardised across the Adris Group through the Ensolva e-procurement system, which provides transparency, supplier performance monitoring, and reduced administrative risks. Each year, Cromaris conducts an analysis of the compliance of all significant suppliers with its policies. The electronic tracking system in Ensolva allows for quick risk identification and timely response.[205]
- Resilience to Geopolitical and Market Risks
  - Cromaris continuously monitors changes in the geopolitical and regulatory environment, including trade barriers, legal reforms, and economic conditions that may impact supply chains.[206]

205 G1-2, 15 b

206 G1-2, 15 a

Indicators and Targets

Payment Practices G1-6

In accordance with the provisions of the General Terms and Conditions for the Procurement of Goods and Services, Cromaris undertakes to settle invoices within 60 days from the date of delivery/service execution, unless otherwise agreed in individual contracts. All contractual relationships with suppliers include clearly defined delivery, invoicing, and payment deadlines, thereby minimising potential risks of delay. Invoicing and administrative processes are carried out through the Ensolva digital system, which enables faster verification and processing of payments and reduces the likelihood of procedural delays. Cromaris also operates a supplier monitoring and evaluation system, including assessments of financial stability and delivery reliability, which supports stable cash flow—particularly towards small and medium-sized enterprises (SMEs). In 2024, there were no unresolved legal proceedings related to delayed payments.[207]

207 G1-6, 33 a, b, c ,d



Entity-specific Topic – Cybersecurity G1

Cybersecurity is essential for ensuring the confidentiality, integrity, and availability of data. As of 2024, Cromaris has not yet developed a standalone cybersecurity policy or established quantitative targets. In 2025, the company will work toward alignment with emerging legal requirements in the field of cybersecurity.[208]

Measures and Activities to Ensure Cybersecurity

The security of the network, applications, data and privacy protection are prescribed by the Code of Ethics. The Code of Ethics prescribes rules for employees concerning the responsible use of electronic communication and information technologies (computers, e-mail systems, the Internet). The use of Cromaris computer systems and networks for unauthorised activities is prohibited, including inappropriate communication, installation of unauthorised software and misuse of data. Sending sensitive business data by e-mail is permitted only if the recipients are authorised and if the communication is protected by appropriate security protocols. In 2024 no successful breach was recorded that could have resulted in the compromise of the confidentiality, integrity or availability of information and communication systems by malicious actors, thereby ensuring a systematic and proactive approach to information and cyber security, reducing risks and strengthening the resilience of the system against potential threats.[209]

Incident data are considered a business secret and will not be made public, except when requested by the competent authorities in accordance with legal provisions.[209]

Employee training and awareness-raising were carried out in 2024, with the aim of instructing employees on how to recognise and avoid malware and phishing attacks. The aim was also to raise awareness of the importance of responsible Internet use and to provide instructions for the effective protection of user accounts, password management and the protection of sensitive data.[210]

208 MDR-P 62, MDR-T 81

209 MDR-M 77

210 MDR-A 68 a, b, c

Annex I

Key performance indicators – Revenue, Capital expenditure (CapEx) and Operating expenditure (OpEx)

Below is a presentation of the calculation of key performance indicators (KPIs) that is, revenue, capital expenditure (CapEx) and operating expenditure (OpEx) in accordance with the methodology described in Annex I to Implementing Regulation 2021/2178/EU (consolidated version of 1 January 2024) on the manner of disclosing information.

Revenue

The share of revenue is calculated as the portion of net revenue generated from products, including intangible assets, associated with taxonomy-eligible and EU-Taxonomy-aligned activities and operations (numerator). The numerator is divided by net revenue in the denominator as prescribed in point 1.1.1 of Annex I to Implementing Regulation 2021/2178/EU (consolidated version of 1 January 2024) on the manner of disclosing information. Revenue from taxonomy-eligible and aligned activities related to 5.4 Sale of second-hand goods and 5.5 Collection and transport of non-hazardous waste in fractions separated at source. The share of revenue from taxonomy-eligible and aligned activities in 2024 was 0.005 per cent, and in 2023 it was 0.03 per cent. All other revenue in 2024 at Cromaris derived from taxonomy-non-eligible activities and operations that are not included in the lists of EU-Taxonomy implementing regulations. Cromaris's total revenue in 2024 was €107.76 million.

Form: Share of revenue from products or services related to taxonomy-aligned economic activities – disclosure for year 2024

In thousands of euros

Financial year 2024 N		Year		Substantial-contribution criterion						Do-No-Significant-Harm criterion (h)									
Economic activities (1)	Identifier (a) (2)	Revenue (3)	Share of revenue year N (4)	Climate-change mitigation (5)	Climate-change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate-change mitigation (11)	Climate-change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)	Share of revenue from taxonomy-aligned (A.1) or taxonomy-eligible (A.2) activities, year 2023 (18)	Category enabling activity (19)	Category transitional activity (20)
Text		Currency	%	Y; N; N/EL (b)(c)	Y; N; N/EL (b)(c)	Y; N; N/EL (b)(c)	Y; N; N/EL (b)(c)	Y; N; N/EL (b)(c)	Y; N; N/EL (b)(c)	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
A. **TAXONOMY-ELIGIBLE ACTIVITIES**																			
A.1. **Taxonomy-aligned activities**																			
5.4. Sale of second-hand goods	CE	3,66	0,00%					Y		Y	Y	Y	Y	Y		Y	%		
5.5. Collection and transport of non-hazardous waste in source segregated fractions	CCM	1,21	0,00%	D						Y	Y			Y		Y	%		
Revenue from taxonomy-aligned activities (A.1)		5	0,00%	%	%	%	%	%	%								0,03%		
Of which enabling		0	%	%	%	%	%	%	%								0,00%	0	
Of wich transitional		0	%	%													0,00%		P
A.2. **Taxonomy-eligible activities but not aligned with the taxonomy**																			

Financial year 2024 N		Year		Substantial-contribution criterion						Do-No-Significant-Harm criterion (h)									
Economic activities (1)	Identifier (a) (2)	Revenue (3)	Share of revenue year N (4)	Climate-change mitigation (5)	Climate-change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate-change mitigation (11)	Climate-change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)	Share of revenue from taxonomy-aligned (A.1) or taxonomy-eligible (A.2) activities, year 2023 (18)	Category enabling activity (19)	Category transitional activity (20)
Text		Currency	%	Y; N; N/EL (b)(c)	Y; N; N/EL (b)(c)	Y; N; N/EL (b)(c)	Y; N; N/EL (b)(c)	Y; N; N/EL (b)(c)	Y; N; N/EL (b)(c)	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
				EL; N/EL(f)	EL; N/EL(f)	EL; N/EL(f)	EL; N/EL(f)	EL; N/EL(f)	EL; N/EL(f)										
Revenue from taxonomy-eligible activities but not aligned with the taxonomy (A.2.)		0	0,00%	%	%	%	%	%	%										
A. **Revenue from taxonomy-eligible activities (A.1 + A.2)**		5	0,00%	%	%	%	%	%	%										
B. **TAXONOMY-NON-ELIGIBLE ACTIVITIES**																			
Revenue from taxonomy-non-eligible activities (B)		107.752	100,00%																
TOTAL		107.756	100%																

(a) The identifier consists of the abbreviation of the relevant objective to which the economic activity can make a substantial contribution and the section number of the specific activity in the relevant annex relating to that objective, namely:
— Climate change mitigation: CCM
— Climate change adaptation: CCA
— Water and marine resources: WTR
— Circular economy: CE
— Pollution prevention and control: PPC
— Biodiversity and ecosystems: BIO
For example, the identifier for the activity "Afforestation" would be: CCM 1.1.
If activities can make a substantial contribution to more than one objective, identifiers for all relevant objectives should be stated.
For example, if an undertaking indicates that the activity "Construction of new buildings" contributes substantially to climate change mitigation and the circular economy, the identifier would be: CCM 7.1./CE 3.1.
The same identifiers should be used in Sections A.1 and A.2.

(b) D – Yes, taxonomy-eligible and taxonomy-aligned activity with the relevant environmental objective
N – No, taxonomy-eligible but taxonomy-non-aligned activity with the relevant environmental objective
N/EL – Not eligible, taxonomy-non-eligible activity for the relevant environmental objective
(c) If an economic activity contributes substantially to several environmental objectives, non-financial undertakings shall indicate in bold the most relevant environmental objective for the purpose of calculating their key performance indicators, while avoiding double counting.
If the use of funds is not known, financial undertakings shall calculate, in their respective key performance indicators, the financial assets of the economic activity that contribute substantially to multiple environmental objectives under the most relevant environmental objective as indicated in bold by the non-financial undertakings in this template.
An environmental objective may be indicated in bold only once per row in order to avoid double counting for economic activities in the key financial performance indicators of financial undertakings.
This does not apply to the calculation of taxonomy alignment of economic activities for financial products as defined in Article 2(12) of Regulation (EU) 2019/2088.
In the template below, non-financial undertakings shall also disclose the extent of eligibility and alignment by environmental objective, which includes alignment with each environmental objective for activities that contribute substantially to multiple objectives.

	Share of revenue / total revenue	
	Aligned with the taxonomy by objective	Taxonomy-eligible by objective
CCM	0,00%	0,00%
CCA	0,00%	0,00%
WTR	0,00%	0,00%
CE	0,00%	0,00%
PPC	0,00%	0,00%
BIO	0,00%	0,00%

(d) The same activity may be aligned with one or more objectives for which it is taxonomy-eligible.
(e) The same activity may be eligible but not aligned with the relevant environmental objectives.
(f) EL – Taxonomy-eligible activity for the relevant objective
N/EL – Taxonomy-non-eligible activity for the relevant objective
(g) Activities are listed in Section A.2 of this template only if they are not aligned with any environmental objective for which they are eligible. Activities that are aligned with at least one environmental objective are listed in Section A.1 of this template.
(h) An activity listed in Section A.1 must meet all the Do No Significant Harm criteria and be carried out in accordance with the minimum safeguards.
Non-financial undertakings may voluntarily provide data in columns (5) to (17) for activities listed in Section A.2.
Non-financial undertakings may indicate in Section A.2 which substantial contribution and Do No Significant Harm (DNSH) criteria are fulfilled or not fulfilled, using:
(a) for substantial contribution – the labels D/N and N/EL instead of EL and N/EL, and
(b) for DNSH – the label D/N.



Capital expenditure (CapEx)

The share of capital expenditure is calculated according to the methodology laid down in points 1.1.2.1 and 1.1.2.2 of Annex I to Implementing Regulation 2021/2178/EU (consolidated version of 1 January 2024) on the disclosure of information.

For taxonomy-eligible activities and operations, the amount of CapEx relating to taxonomy activities—i.e. the share of CapEx from the denominator that concerns taxonomy activities is added to the numerator. For activities aligned with the EU Taxonomy, the amount of CapEx relating to taxonomy and EU-Taxonomy-aligned activities—i.e. the share of CapEx from the denominator that concerns taxonomy and aligned activities—is added to the numerator. The denominator comprises increases in tangible and intangible assets in the financial year, before their depreciation and re-measurements, including increases resulting from revaluations and impairments for the relevant financial year, excluding changes in fair value.

Capital investments in 2024 amounted to €4.19 million. The share of CapEx from non-taxonomy activities was 54.27 percent, and from taxonomy-eligible activities 39.33 percent (6.5, 6.10, 7.2 and 7.7). Of the total capital expenditure of €4.19 million, the share of taxonomy-eligible and aligned activities was 6.45 percent (7.3 and 7.6). The share of taxonomy-eligible and aligned activities in 2023 was 3.45 percent.

The investment plan for 2024 is aligned with the sustainability targets set by Cromaris for 2025 to reduce CO_2(eq) emission intensity per tonne of fish produced by 25 percent by 2025. In 2024 the target reduction in greenhouse-gas emission intensity was achieved at 0.421 tonnes CO_2(e) per tonne of harvested fish, representing a 33 percent reduction in Scope 1 and 2 carbon footprint, which exceeds the 2025 target of 25 percent.

Share of capital expenditure from products or services related to taxonomy-aligned economic activities – disclosure for year 2024

In thousands of euros

Financial year 2024	Year			Substantial-contribution criterion						Do-No-Significant-Harm criterion (h)									
Economic activities (1)	Identifier (a)(2)	Capital expenditure (3)	Share of Capital expenditure year 2004 (4)	Climate-change mitigation (5)	Climate-change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate-change mitigation (11)	Climate-change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)	Share of Capital expenditure from taxonomy-aligned (A.1) or taxonomy-eligible (A.2) activities, year 2023 (18)	Category enabling activity (19)	Category transitional activity (20)
Text		Currency	%	Y; N; N/EL (b)(c)	Y; N; N/EL (b)(c)	Y; N; N/EL (b)(c)	Y; N; N/EL (b)(c)	Y; N; N/EL (b)(c)	Y; N; N/EL (b)(c)	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
A. **TAXONOMY-ELIGIBLE ACTIVITIES**																			
A.1. **Taxonomy-aligned activities**																			
7.3. UInstallation, maintenance and repair of energy efficiency equipment	CCM	256	6,10%	Y						Y	Y		Y			Y	%		
7.6. Installation, maintenance and repair of renewable energy technologies	CCM	15	0,36%	Y						Y	Y						%		
Capital expenditure taxonomy-aligned (A.1)		271	6,45%	100,00%	0,00%	0,00%	0,00%	0,00%	0,00%								3,45%		
Of which enabling		0	0,00%	%	%	%	%	%	%								%	0	
Of which transitional		0	0,00%	%													%		P

Financial year 2024	Year			Substantial-contribution criterion						Do-No-Significant-Harm criterion (h)									
Economic activities (1)	Identifier (a)(2)	Capital expenditure (3)	Share of Capital expenditure year 2004 (4)	Climate-change mitigation (5)	Climate-change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate-change mitigation (11)	Climate-change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)	Share of Capital expenditure from taxonomy-aligned (A.1) or taxonomy-eligible (A.2) activities, year 2023 (18)	Category enabling activity (19)	Category transitional activity (20)
Text		Currency	%	Y; N; N/ EL (b)(c)	Y; N; N/ EL (b)(c)	Y; N; N/ EL (b)(c)	Y; N; N/ EL (b)(c)	Y; N; N/ EL (b)(c)	Y; N; N/ EL (b)(c)	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
A.2. **Taxonomy-eligible but not aligned with the Taxonomy**																			
				EL; N/ EL(f)	EL; N/ EL(f)	EL; N/ EL(f)	EL; N/ EL(f)	EL; N/ EL(f)	EL; N/ EL(f)										
6.5 Transport by motorbikes, passenger cars and light commercial vehicles	CCM	494	11,78%	EL	EL		EL	EL									%		
6.10. Sea and coastal freight water transport, vessels for port operations and auxiliary activities	CCM	289	6,90%	EL	EL		EL	EL									%		
7.2. Renovation of existing buildings	CCM	379	9,03%	EL															
7.7. Acquisition and ownership of buildings	CCM	487	11,62%	EL	EL												%		
Capital expenditure of taxonomy-eligible but activities non-aligned with the taxonomy (A.2.)		1.650	39,33%	100,00%	0,00%	0,00%	0,00%	0,00%	0,00%								24,50%		

Financial year 2024	Year			Substantial-contribution criterion						Do-No-Significant-Harm criterion (h)									
Economic activities (1)	Identifier (a)(2)	Capital expenditure (3)	Share of Capital expenditure year 2004 (4)	Climate-change mitigation (5)	Climate-change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate-change mitigation (11)	Climate-change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)	Share of Capital expenditure from taxonomy-aligned (A.1) or taxonomy-eligible (A.2) activities, year 2023 (18)	Category enabling activity (19)	Category transitional activity (20)
Text		Currency	%	Y; N; N/ EL (b)(c)	Y; N; N/ EL (b)(c)	Y; N; N/ EL (b)(c)	Y; N; N/ EL (b)(c)	Y; N; N/ EL (b)(c)	Y; N; N/ EL (b)(c)	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
A. **Capital expenditure of taxonomy-eligible activities (A.1 + A.2)**		1.921	45,79%	%	0,00%	0,00%	0,00%	0,00%	0,00%								27,95%		
B. **TAXONOMY-NON-ELIGIBLE ACTIVITIES**																			
Capital expenditure of taxonomy-non-eligible activities		2.274	54,21%																
TOTAL		4.195	**100%**																

(a) The identifier consists of the abbreviation of the relevant objective to which the economic activity can make a substantial contribution and the section number of the specific activity in the relevant annex relating to that objective, namely:
— Climate change mitigation: CCM
— Climate change adaptation: CCA
— Water and marine resources: WTR
— Circular economy: CE
— Pollution prevention and control: PPC
— Biodiversity and ecosystems: BIO
For example, the identifier for the activity "Afforestation" would be: CCM 1.1.
If activities can make a substantial contribution to more than one objective, identifiers for all relevant objectives should be stated.
For example, if an undertaking indicates that the activity "Construction of new buildings" contributes substantially to climate change mitigation and the circular economy, the identifier would be: CCM 7.1./CE 3.1.
The same identifiers should be used in Sections A.1 and A.2.
(b) D – Yes, taxonomy-eligible and taxonomy-aligned activity with the relevant environmental objective
N – No, taxonomy-eligible but taxonomy-non-aligned activity with the relevant environmental objective
N/EL – Not eligible, taxonomy-non-eligible activity for the relevant environmental objective
(c) If an economic activity contributes substantially to several environmental objectives, non-financial undertakings shall indicate in bold the most relevant environmental objective for the purpose of calculating their key performance indicators, while avoiding double counting.
If the use of funds is not known, financial undertakings shall calculate, in their respective key performance indicators, the financial assets of the economic activity that contribute substantially to multiple environmental objectives under the most relevant environmental objective as indicated in bold by the non-financial undertakings in this template.
An environmental objective may be indicated in bold only once per row in order to avoid double counting for economic activities in the key financial performance indicators of financial undertakings.
This does not apply to the calculation of taxonomy alignment of economic activities for financial products as defined in Article 2(12) of Regulation (EU) 2019/2088.
In the template below, non-financial undertakings shall also disclose the extent of eligibility and alignment by environmental objective, which includes alignment with each environmental objective for activities that contribute substantially to multiple objectives.

Share of capital expenditure / total capital expenditure		
	Aligned with the taxonomy by objective	Taxonomy-eligible by objective
CCM	6,45%	0,00%
CCA	0,00%	0,00%
WTR	0,00%	0,00%
CE	0,00%	0,00%
PPC	0,00%	0,00%
BIO	0,00%	0,00%

(d) The same activity may be aligned with one or more objectives for which it is taxonomy-eligible.
(e) The same activity may be eligible but not aligned with the relevant environmental objectives.
(f) EL – Taxonomy-eligible activity for the relevant objective
N/EL – Taxonomy-non-eligible activity for the relevant objective
(g) Activities are listed in Section A.2 of this template only if they are not aligned with any environmental objective for which they are eligible. Activities that are aligned with at least one environmental objective are listed in Section A.1 of this template.
(h) An activity listed in Section A.1 must meet all the Do No Significant Harm criteria and be carried out in accordance with the minimum safeguards.
Non-financial undertakings may voluntarily provide data in columns (5) to (17) for activities listed in Section A.2.
Non-financial undertakings may indicate in Section A.2 which substantial contribution and Do No Significant Harm (DNSH) criteria are fulfilled or not fulfilled, using:
(a) for substantial contribution – the labels D/N and N/EL instead of EL and N/EL, and
(b) for DNSH – the label D/N.



Operating expenditure (OpEx)

The share of operating expenditure is calculated according to the methodology set out in points 1.1.3.1 and 1.1.3.2 of Annex I to Implementing Regulation 2021/2178/EU (consolidated version of 1 January 2024) on the disclosure of information. For taxonomy-eligible activities, the numerator includes the amount of OpEx that relates to taxonomy activities—that is, the share of OpEx from the denominator that pertains to taxonomy activities. For EU-taxonomy-aligned activities, the numerator includes the amount of OpEx that relates to taxonomy and EU-taxonomy-aligned activities—that is, the share of OpEx from the denominator that pertains to taxonomy and aligned activities.

The denominator comprises non-capitalised research-and-development costs, non-capitalised building-renovation costs, non-capitalised short-term-lease costs (where the right-of-use recognition criteria are not met), non-capitalised maintenance and repair costs (including cleaning costs and the wages of employees engaged in maintenance and cleaning), and other direct non-capitalised costs for the day-to-day servicing of property, plant and equipment performed by the company or by a third party to whom such tasks are entrusted, and that are necessary for the proper functioning of that asset (consumed maintenance materials, mandatory worker training required for operating machinery, equipment, etc.).

The calculation of operating expenditure excludes the costs of raw materials and supplies, the wages of employees operating machinery, project management costs for research and development, overheads, electricity, fluids or reagents required for the operation of property, plant and equipment.

Of the total maintenance costs of €4.38 million, 71 percent related to taxonomy-non-eligible activities, and 28.94 percent to taxonomy-eligible activities (5.5., 6.5., 6.6., 6.10., 7.6., 7.7. and 8.2.). Of the total maintenance costs in 2024, 0.01 percent related to taxonomy-eligible and EU-taxonomy-aligned activities (5.5.).

Form: Share of operating expenditure from products or services related to taxonomy-aligned economic activities – disclosure for year 2024

In thousands of euros

Financial year 2024	Year			Substantial-contribution criterion						Do-No-Significant-Harm criterion (h)									
Economic activities (1)	**Identifier (a) (2)**	**Operating expenditure (3)**	**Share of operating expenditure year 2004**	**Climate-change mitigation (5)**	**Climate-change adaptation (6)**	**Water (7)**	**Pollution (8)**	**Circular economy (9)**	**Biodiversity (10)**	**Climate-change mitigation (11)**	**Climate-change adaptation (12)**	**Water (13)**	**Pollution (14)**	**Circular economy (15)**	**Biodiversity (16)**	**Minimum safeguards (17)**	**Share of operating expenditure from taxonomy-aligned (A.1) or taxonomy-eligible (A.2) activities, year 2023 (18)**	**Category enabling activity (19)**	**Category transitional activity (20)**
Text		Currency	%	Y; N; N/EL (b)(c)	Y; N; N/EL (b)(c)	Y; N; N/EL (b)(c)	Y; N; N/EL (b)(c)	Y; N; N/EL (b)(c)	Y; N; N/EL (b)(c)	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
A. **TAXONOMY-ELIGIBLE ACTIVITIES**																			
A.1. **Taxonomy-aligned activities**																			
5.5. Collection and transport of non-hazardous waste in source segregated fractions	CCM	0	0,01%	D						Y	Y			Y		Y	%		
Operating expenditure taxonomy-aligned (A.1)		0	0,01%	100,00%	0,00%	0,00%	0,00%	0,00%	0,00%	Y	Y	Y	Y	Y	Y	Y	0,35%		
Of which enabling		0	0,00%	%	%	%	%	%	%	Y	Y	Y	Y	Y	Y	Y	%	0	
Of which transitional		0	0,00%	%						Y	Y	Y	Y	Y	Y	Y	%		P

Financial year 2024	Year			Substantial-contribution criterion						Do-No-Significant-Harm criterion (h)								
Economic activities (1)	Identifier (a) (2)	Operating expenditure (3)	Share of operating expenditure year 2004	Climate-change mitigation (5)	Climate-change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate-change mitigation (11)	Climate-change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)	Share of operating expenditure from taxonomy-aligned (A.1) or taxonomy-eligible (A.2) activities, year 2023 (18)	Category enabling activity (19)	Category transitional activity (20)
Text		Currency	%	Y; N; N/ EL (b)(c)	Y; N; N/ EL (b)(c)	Y; N; N/ EL (b)(c)	Y; N; N/ EL (b)(c)	Y; N; N/ EL (b)(c)	Y; N; N/ EL (b)(c)	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
A.2. **Taxonomy-eligible activities but not aligned with the taxonomy**																	33,70%		
				EL; N/ EL(e)	EL; N/ EL(e)	EL; N/ EL(e)	EL; N/ EL(e)	EL; N/ EL(e)	EL; N/ EL(e)										
5.5. Collection and transport of non-hazardous waste in source segregated fractions	CCM	187	4,28%	EL	EL	EL	EL	EL	EL								%		
6.5 Transport by motorbikes, passenger cars and light commercial vehicles	CCM	71	1,62%	EL	EL		EL	EL									%		
6.6. Freight transport services by road	CCM	107	2,45%	EL	EL		EL	EL									%		
6.10. Sea and coastal freight water transport, vessels for port operations and auxiliary activitie	CCM	509	11,64%	EL	EL		EL	EL									%		

Financial year 2024	Year			Substantial-contribution criterion						Do-No-Significant-Harm criterion (h)									
Economic activities (1)	Identifier (a) (2)	Operating expenditure (3)	Share of operating expenditure year 2004	Climate-change mitigation (5)	Climate-change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate-change mitigation (11)	Climate-change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)	Share of operating expenditure from taxonomy-aligned (A.1) or taxonomy-eligible (A.2) activities, year 2023 (18)	Category enabling activity (19)	Category transitional activity (20)
Text		Currency	%	Y; N; N/EL (b)(c)	Y; N; N/EL (b)(c)	Y; N; N/EL (b)(c)	Y; N; N/EL (b)(c)	Y; N; N/EL (b)(c)	Y; N; N/EL (b)(c)	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
7.6. Installation, maintenance and repair of renewable energy technologies	CCM	13	0,30%	EL	EL												%		
7.7. Acquisition and ownership of buildings	CCM	362	8,26%	EL	EL												%		
8.2 Data-driven GHG emission reduction solutions	CCM	16	0,37%	EL	EL	EL		EL									%		
Operating expenditure of taxonomy-eligible but activities non-aligned with the taxonomy (A.2.)		1.266	28,93%	100,00%	0,00%	0,00%	0,00%	0,00%	0,00%								%		

Financial year 2024	Year		Substantial-contribution criterion						Do-No-Significant-Harm criterion (h)								
Economic activities (1)	Identifier (a) (2)	Operating expenditure (3)	Share of operating expenditure year 2004	Climate-change mitigation (5)	Climate-change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate-change mitigation (11)	Climate-change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)	Share of operating expenditure from taxonomy-aligned (A.1) or taxonomy-eligible (A.2) activities, year 2023 (18)	Category enabling activity (19)	Category transitional activity (20)
Text		Currency	%	Y; N; N/EL (b)(c)	Y; N; N/EL (b)(c)	Y; N; N/EL (b)(c)	Y; N; N/EL (b)(c)	Y; N; N/EL (b)(c)	Y; N; N/EL (b)(c)	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
A. **Operating expenditure of taxonomy-eligible activities (A.1 + A.2)**		1.266	28,94%	100,00%	0,00%	0,00%	0,00%	0,00%	0,00%								34,05%		
B. **TAXONOMY-NON-ELIGIBLE ACTIVITIES**																			
Operating expenditure of taxonomy-non-eligible activities		3.109	71,06%																
TOTAL		4.375	**100%**																

(a) The identifier consists of the abbreviation of the relevant objective to which the economic activity can make a substantial contribution and the section number of the specific activity in the relevant annex relating to that objective, namely:
— Climate change mitigation: CCM
— Climate change adaptation: CCA
— Water and marine resources: WTR
— Circular economy: CE
— Pollution prevention and control: PPC
— Biodiversity and ecosystems: BIO
For example, the identifier for the activity "Afforestation" would be: CCM 1.1.
If activities can make a substantial contribution to more than one objective, identifiers for all relevant objectives should be stated.
For example, if an undertaking indicates that the activity "Construction of new buildings" contributes substantially to climate change mitigation and the circular economy, the identifier would be: CCM 7.1./CE 3.1.
The same identifiers should be used in Sections A.1 and A.2.
(b) D – Yes, taxonomy-eligible and taxonomy-aligned activity with the relevant environmental objective
N – No, taxonomy-eligible but taxonomy-non-aligned activity with the relevant environmental objective
N/EL – Not eligible, taxonomy-non-eligible activity for the relevant environmental objective
(c) If an economic activity contributes substantially to several environmental objectives, non-financial undertakings shall indicate in bold the most relevant environmental objective for the purpose of calculating their key performance indicators, while avoiding double counting.
If the use of funds is not known, financial undertakings shall calculate, in their respective key performance indicators, the financial assets of the economic activity that contribute substantially to multiple environmental objectives under the most relevant environmental objective as indicated in bold by the non-financial undertakings in this template.
An environmental objective may be indicated in bold only once per row in order to avoid double counting for economic activities in the key financial performance indicators of financial undertakings. This does not apply to the calculation of taxonomy alignment of economic activities for financial products as defined in Article 2(12) of Regulation (EU) 2019/2088.
In the template below, non-financial undertakings shall also disclose the extent of eligibility and alignment by environmental objective, which includes alignment with each environmental objective for activities that contribute substantially to multiple objectives.

Share of operating expenditure / total operating expenditure		
	Aligned with the taxonomy by objective	Taxonomy-eligible by objective
CCM	1,03%	28,93%
CCA	0,00%	0,00%
WTR	0,00%	0,00%
CE	0,00%	0,00%
PPC	0,00%	0,00%
BIO	0,00%	0,00%

(d) The same activity may be aligned with one or more objectives for which it is taxonomy-eligible.
(e) The same activity may be eligible but not aligned with the relevant environmental objectives.
(f) EL – Taxonomy-eligible activity for the relevant objective
N/EL – Taxonomy-non-eligible activity for the relevant objective
(g) Activities are listed in Section A.2 of this template only if they are not aligned with any environmental objective for which they are eligible. Activities that are aligned with at least one environmental objective are listed in Section A.1 of this template.
(h) An activity listed in Section A.1 must meet all the Do No Significant Harm criteria and be carried out in accordance with the minimum safeguards.
Non-financial undertakings may voluntarily provide data in columns (5) to (17) for activities listed in Section A.2.
Non-financial undertakings may indicate in Section A.2 which substantial contribution and Do No Significant Harm (DNSH) criteria are fulfilled or not fulfilled, using:
(a) for substantial contribution – the labels D/N and N/EL instead of EL and N/EL, and
(b) for DNSH – the label D/N.



Annex II

List of disclosure requirements fulfilled by Cromaris sustainability report

Standard	Disclosure Requirement	Section in the Sustainability Report
ESRS 2	BP-1 – General basis for preparation of sustainability statements	27
	BP-2 – Disclosures in specific circumstances	30
	GOV-1 – Role of the administrative, management and supervisory bodies	33, 203
	GOV-2 – Disclosures on the governance of material sustainability matters	37
	GOV-3 – Integration of sustainability-related performance in incentive schemes GOV-3	38, 81
	GOV-4 – Statement on due diligence	39
	GOV-5 – Risk management and Internal Controls over Sustainability Reporting	41
	SBM-1 – Strategy, business model and value chain	42
	SBM-2 – Interests and Views of Stakeholders	47, 115, 172, 180
	SBM-3 – Material Impacts, Risks and Opportunities and their Interaction with Strategy and Business Model	52
	IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities	71, 95, 116, 143, 205
	IRO-2 – List of ESRS disclosure requirements covered in the undertaking's sustainability statement	74
	MDR-P – Policies adopted to manage material sustainability matters	In Thematic ESRS
	MDR-A – Actions and resources related to material sustainability matters	In Thematic ESRS
	MDR-M – Metrics associated with material sustainability matters	In Thematic ESRS
	MDR-T – Monitoring the effectiveness of policies and actions based on targets	In Thematic ESRS

Standard	Disclosure Requirement	Section in the Sustainability Report
ESRS E1	GOV-3 – Integration of climate-related performance in incentive schemes	In ESRS 2
	E1-1 – Transition plan for climate change mitigation	81
	IRO-1 – Processes to identify and assess material climate-related impacts, risks and opportunities	In ESRS 2
	E1-2 – Climate-related policies	98
	E1-3 – Climate-related actions and resources	98
	E1-4 – Climate-related targets	101
	E1-5 – Energy consumption and energy mix	106
	E1-6 – Gross GHG emissions (Scopes 1, 2, 3) and total GHG emissions	108
	E1-7 - GHG Removals and Mitigation Financed by Carbon Credits	115
	E1-8 - Internal Carbon Pricing	115
	E1-9 - Expected Financial Effects of Significant Climate-Related Physical and Transition Risks and Opportunities	115
ESRS E3	IRO-1 – Processes to identify and assess material water and marine resource-related impacts, risks and opportunities	In ESRS 2
	E3-1 – Water and marine resource policies	118
	E3-2 – Actions and resources related to water and marine resources	118
	E3-3 – Targets related to water and marine resources	120
	E3-4 - Water Consumption	120
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ESRS E4	IRO-1 – Processes to identify and assess material biodiversity and ecosystem-related impacts, risks and opportunities	In ESRS 2
	E4-1 – Biodiversity and ecosystem policies	121
	E4-2 – Biodiversity and ecosystem policies	132
	E4-3 – Biodiversity and ecosystem actions and resources	133
	E4-4 – Biodiversity and ecosystem metrics	138
	E4-5 – Anticipated financial effects of biodiversity and ecosystem-related risks and opportunities	138

Standard	Disclosure Requirement	Section in the Sustainability Report
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	E5-3 – Targets related to resource use and circular economy	151
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ESRS S1	SBM-2 – Stakeholder interests and views	In ESRS 2
	S1-1 – Own workforce policies	155
	S1-2 – Processes for engaging with own workforce and workers' representatives regarding impacts	159
	S1-3 – Processes to remediate negative impacts and grievance mechanisms for own workforce	159
	S1-4 – Actions for significant impacts, risk management approaches, and opportunity realisation for own workforce and their effectiveness	162
	S1-5 – Targets for managing negative impacts, enhancing positive impacts and managing risks and opportunities	164
	S1-6 – Characteristics of the undertaking's employees	164
	S1-9 – Diversity metrics	166
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	S1-16 – Compensation metrics (pay gap and total remuneration)	170
	S1-17 – Human rights-related complaints, grievances, and serious impacts	171
ESRS S3	SBM-2 – Stakeholder interests and views	In ESRS 2
	S3-1 – Policies for affected communities	176
	S3-2 – Engagement procedures with affected communities regarding impacts	176
	S3-3 – Remediation procedures and grievance mechanisms for affected communities	177
	S3-4 – Actions, risk management approaches, and opportunity realisation related to affected communities and their effectiveness	177
	S3-5 – Targets for managing significant negative impacts and risks and enhancing opportunities	179

Standard	Disclosure Requirement	Section in the Sustainability Report
ESRS S4	SBM-2 – Stakeholder interests and views	In ESRS 2
	S4-1 – Policies for consumers and end-users	189
	S4-2 – Engagement procedures with consumers and end-users regarding impacts	193
	S4-3 – Remediation procedures and grievance mechanisms for consumers and end-users	195
	S4-4 – Actions, risk management approaches, and opportunity realisation related to consumers and end-users and their effectiveness	196
	S4-5 – Targets for managing negative impacts, enhancing positive impacts and managing risks and opportunities	200
ESRS G1	GOV-1 – Role of the administrative, management and supervisory bodies	In ESRS 2
	IRO-1 – Processes to identify and assess material impacts, risks and opportunities	In ESRS 2
	G1-1 – Business conduct policies and corporate culture	209
	G1-2 – Management of relationships with suppliers	211
	G1-6 – Payment practices	213
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