



Group Climate Change Policy

Title	Group Climate Change Policy
Scope	Regal Springs Group, all its operations and grow out feeds.
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Sponsor	Head of Corporate Affairs, Group Sustainability Manager.

1. Purpose

We are a fully integrated pioneer in sustainable and responsible aquaculture. Sustainability has been our founding principle and core to our DNA for over 30 years. Still to this day, we remain passionately committed to farming in the most sustainable and responsible way possible across all operations.

Regal Springs recognizes that climate change is one of the most pressing global challenges of our time, requiring immediate and sustained action. Current climate change models predict changes in key environmental factors such as rising temperatures, shifting monsoon seasons, in precipitations patterns and more extreme weather events. These changes do not only impact our farming areas but also the communities that rely on Regal Springs as a critical employment provider.

Regal Springs is committed to contributing to upholding the Paris Agreement on climate change by implementing a **greenhouse gases (GHG) emissions** reduction plan and by incorporating climate change adaptation strategies to secure long term sustainability for our company and the communities that we are integrated with.

2. Scope

This policy provides the guiding principles that all Regal Springs Group's operational sites adopt to reduce GHG emissions and adapt to climate change. As the majority of our GHG emissions come from aqua feeds, this policy extends to collaborations with external feed suppliers who play a key role in reducing our carbon footprint.

3. Guiding Principles

Staying true to our roots, we remain committed to keeping our Naturally Better™ tilapia at the forefront of delivering the highest quality and most responsibly produced fish in the world. Regal Springs' climate change commitments are guided by the following principles:

3.1 Climate change is an integral part of our governance and risk systems.

Climate change is formally acknowledged at the group's highest management levels, including at the Group's Audit Committee, and is identified as a material risk in the annually updated enterprise risk





register. The register describes physical, regulatory, market and technological climate change risks and suggests mitigation measures. This document is reviewed and tailored annually for each country of operation.

3.2 Compliance with national and international laws on climate change.

The legislation in many countries is increasingly focused on ensuring that private companies play a role in mitigating climate change. Regal Springs is committed to complying with the Swiss laws on climate change, including regulations implementing the Taskforce on Climate- Related Financial Disclosures (TCFD). Looking ahead, with the Corporate Sustainability Reporting Directive (CSRD) set to take effect in 2027, Regal Springs will also report on its climate change impacts in line with relevant Swiss regulations.

3.3 Improving our understanding of climate change impacts:

Climate change is a complex topic which requires collaboration to be adequately understood and addressed. We collaborate with external consultants and organizations which can assist us in improving the accuracy of our climate change impact assessments and mitigation measures.

3.4 Data driven decisions

GHG reduction plan can only be effective if based on robust emission data. Since 2023, we are a member of the Aquaculture Working Group¹ led by the Sustainable Trading Initiative (IDH) to support the implementation of a scientific data collection system. Specifically:

- a) Each Regal Springs production site collects GHG emissions data in line with ISO 14040/14044 standards or equivalent. Therefore, our data cover Scope 1,2,3.
- b) Data on Scope 3 emissions relate entirely to our feeds, which are partly supplied by external feed mills with whom we collaborate extensively to ensure accuracy of information

4. Regal Springs Climate change action plan

In 2024, our focus is setting a reliable starting point, upon which to build our climate change action plan. Our action plans will involve actions to adapt to the inevitable consequences of climate change, as well as addressing and mitigating its root cause: GHG emissions. Our commitments are explained in this paragraph.

4.1 Setting the starting point:

Regal Springs has initiated an internal evaluation to assess the potential impacts of climate change on its operations, with the aim of strengthening future operational resilience. This effort will enable us to identifying and prioritize key adaptation strategies across the organization.

To uphold our commitment to GHG reduction, we started the estimation on GHG emission at product and company level in 2023 and our commitment is to conclude this work by the end of 2026. These data will serve as the basis for setting GHG reduction plans. The IDH Aquaculture Working Group provides external technical expertise to ensure these data are reliable.

1: <https://www.idhsustainabletrade.com/initiative/aquaculture-working-group-on-environmental-footprint/>



4.2 Reduction plans:

Within the next two years, we will develop third party reduction commitments in line with regulatory requirements or other sector specific initiatives such as the ones set by the Science Based Target Initiative (SBTi) for the Forest, Land and Agriculture (FLAG) sector in which we fall.

4.3 Adaptation plans:

Innovation is at the heart of Regal Springs, and it is through innovation and collaboration that we ensure we adapt to a changing world to maintain a high quality and a responsibly farmed tilapia. We involve all levels of our supply chains in new adaptation projects, fostering innovation with our suppliers and within our own operations. Below we report examples of adaptation efforts from our farms and nearby communities:

a) On-going and fully integrated approaches to adaptation:

Critical adaptation plans are already an integral part of our operations' management. For example, our tilapia stock adaptation to ever changing environmental conditions is supported through genetic improvement programs. We also continually invest in our hatchery and processing technology in all our countries of operations to respond to environmental and societal changes.

Our commitment to adapting to new climatic changes extends to our corporate social responsibility projects (CSR) to support local communities facing increasingly difficult conditions. Every year, our CSR teams in Indonesia, Mexico and Honduras, consult with local communities to decide together how Regal Springs can help. More information on our CSR projects is available on our website under the section '[sustainability](#)'.

b) Looking at the future, our policy remains to continuously test new solutions to assess their possible long term positive impact.

For example, we continuously scrutinise our feeds to ensure the formulation we use deliver the best nutritional value to our fish and their immune system and also to identify new ingredients and new ingredients suppliers who can work with us to lower our feed carbon emissions (also see our [responsible feed sourcing policy](#)).

Our data collection efforts will provide clearer pathways towards more targeted and efficient reduction and adaptation plans. As new information becomes available, Regal Springs will continue to collaborate with its stakeholders, including customers, NGOs, policy makers and local communities, to ensure together we uphold the Paris Agreement on Climate Change.