



Tracking and Tracing Policy Statement

A robust tracking and tracing system is of crucial importance in today's global seafood industry. Traceability is legally binding according to, for example, the general European Commission feed and food directive 178/2002. In addition, stakeholders like consumers, NGO's, public institutions insist that seafood companies are able to track and trace their seafood products during all stages of the value chain; from the moment the fish, crustacean and shellfish is caught or harvested until it ends up on the consumer's plate. Food safety, social or sustainability considerations may underlie this. Tracking and tracing is therefore one of the pillars of the CSR Policy of PP Group.

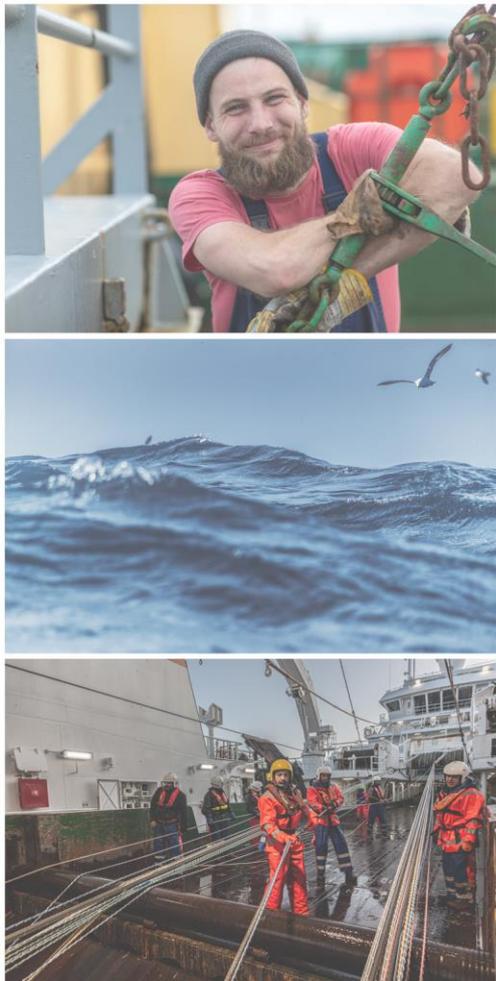
The tracking and tracing framework policy of PP Group is a part of responsible sourcing and founded on a principle based model. The companies which belong to the PP Group have set up and implemented their own tailor made tracking and tracing systems which conform to the principles of the framework policy. Beside the principles several important recommendations are part of the tracking and tracing policy as well. In view of the unique characteristics, divergent business models and unique cultures of the companies belonging to PP Group, the choice has been made for tailor made, decentralized tracking and tracing systems. Worth mentioning is that all companies are certified against a Chain of Custody Standard like MSC, ASC, GLOBALG.A.P. and/or BAP.

The framework policy encompasses the following principles:

- Ensure compliance with the regulatory legal framework (IUU, food safety and health, social, control of fisheries);
- Traceability applies to processed and unprocessed fishery products, the ingredients and additives, the packing materials that comes into direct contact with food stuffs and relates to the recordings of relevant data during processing as well;
- Assure coverage of all seafood products, whether sourced locally, imported or produced by the company self;
- Enable tracing of all wild-caught and aquaculture products back to its origin and tracking it throughout the whole supply chain.

In addition to the principles the companies are encouraged to:

- Apply new digital technologies like block chain into their tracking and tracing systems and apply best practices in relation to reliability and transparency;
- Prepare environmental, legal and social risk assessments tracking the seafood products throughout the supply chain back to its origin, in order to identify the stages in the supply chain that are at a higher risk of potential irregularities;





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- Collect additional data elements beside the minimum data elements that need to be documented in order to be compliant. Examples are the IMO number and the gear-type of the catching vessel;
- Partner with an independent third party, who can benchmark the company against these principles and the to follow recommendations;
- Amend the working practice in relation to batches. Fishery products are normally separated at source in batches of similar species, size groups and freshness categories for legal and commercial reasons. Batches with a defined identity are thus inevitably fragmented into smaller batches, potentially impairing the concept of traceability. These relatively small batches are subsequently clustered into batches of operational and commercial sensible volumes. This inevitable traditional process can however be managed in a responsible manner through limiting the clustering of different batches raw materials into final larger batches finished product in order to maintain maximum accuracy in traceability. In addition, traceability from a legal perspective may differ from the consumer perception. The concept of 'defined origin' can be strengthened by only clustering of batches preferably of the same consignment, supplier and regional area. Following this policy, the concept of traceability is maintained at maximum given the constraints related to the grading processes upstream.

Above mentioned requires a meticulously and flawlessly functioning administration, whereby a considerable number of smaller batches are generated with their own specific distinctive identification. In order to support this process, a policy is in place to encouraging and implementing the use of most advanced techniques enabling swift scanning and registration of identities throughout the entire production process.

Questions?

If you have questions about this policy or wish to raise a concern please contact the CSR Department of PP Group via csr@pp-group.eu or telephone number +31(0)71 789 00 00 (Monday-Friday during office hours).

This policy, our procedures and internal audits are designed to ensure that PP Group complies with all applicable laws and regulations and will be reviewed and updated on a regular basis to ensure that it remains current and effective.

Approved by the board of PP Group

Valkenburg, 1 July 2022

