



CORPORATE POLICY ON CORPORATE SOCIAL
RESPONSIBILITY OF THE NUEVA
PESCANOVA GROUP

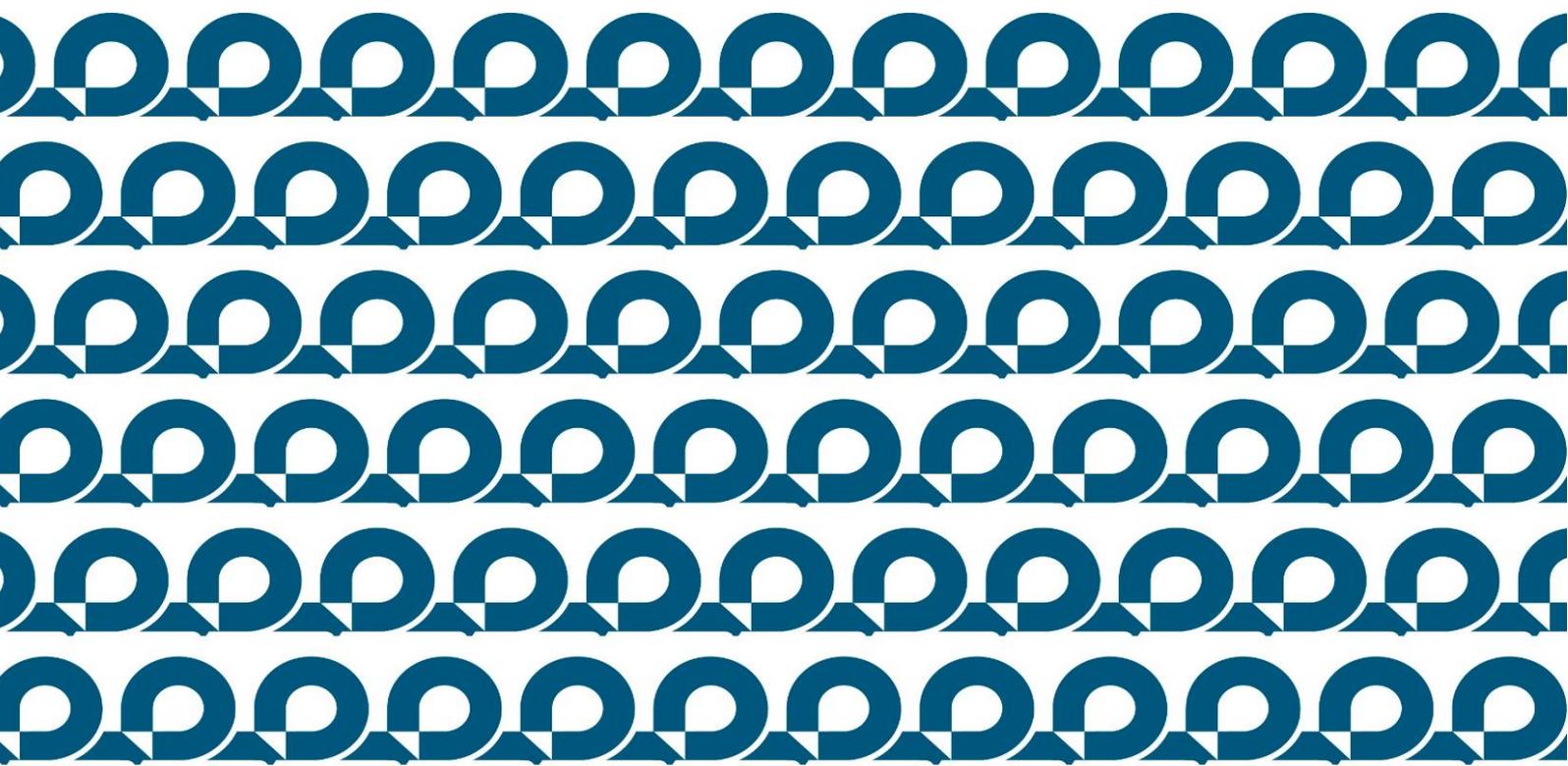


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Preamble

1. The Nueva Pescanova Group is a multinational business group engaged in the fishing, farming, processing and commercialization of seafood products, especially fish and shellfish.
2. The following is in the DNA of the Nueva Pescanova Group:
 - a. Working to be the best food company in the market bringing the freshness of the sea to the consumer's table.
 - b. Relying on our brand and innovation to fish, farm, select and process the best product wherever it may be.
 - c. Our commitment is the sustainability of natural resources and of our partner communities, whose trust we build and maintain acting ethically and creating value.
3. The responsible and sustainable undertaking of our activities in their biological, environmental, technological, economic, commercial, and social aspects is an essential and irredeemable part of the business culture of the Nueva Pescanova Group, and that is because these activities are determined by the extractive nature and/or consumption of natural resources, whether through fishing, aquaculture, or the production and marketing of seafood. The intrinsic value of these natural resources must always be transferred to the final product offered to the consumer in a responsible manner, in order to guarantee the sustainability of those activities. In a complementary manner, the benefit generated by the Group's activities includes within the social sphere, through the creation of shared value, employment, knowledge, infrastructures, among other things, to the benefit of society, and within the economic sphere, through the creation of material and immaterial value to the partners of the Nueva Pescanova Group. The conservation of natural resources and the generation of social and economic benefits resulting from responsible action, to the benefit of both present and future generations, lay out the definition of Sustainability for the Nueva Pescanova Group.
4. Corporate Social Responsibility is, thus, an essential and capital element of the business strategy of the Nueva Pescanova Group, always addressing the needs and legal requirements and the legal system of the countries and communities in which we are present.
5. The Nueva Pescanova Group aligns its Corporate Social Responsibility (CSR) strategy with the Sustainable Development Goals (SDG) of the United Nations Organization (UNO) as laid out in its 2030 agenda.
6. Nueva Pescanova Group has its own code of conduct and good business practices entitled "Our Code of Ethics", which lays out a set of principles and guidelines for conduct intended to guarantee ethical, upright and responsible behavior from all its professionals. In "Our Code of Ethics", we expressly state: **(i)** Our firm commitment to the best practices of CSR as an integrating framework for the programs and actions with our Stakeholders, as well as the generation of wealth and well-being in society, harmonizing the creation of value by its partners with sustainable development in the field of the environment, social cohesion, fair labor relations, and constant communication with the different groups related to the Nueva Pescanova Group in order to meet their needs and expectations; and **(ii)** Our assumption as belonging to the principles and norms established in the Code of Conduct for Responsible Fisheries of the Food and Agriculture Organization of the United Nations (FAO).

Article 1. Object

1. This Corporate Policy is intended to:
 - a. Formally establish the principles that will guide the responsible and sustainable undertaking of the activities of the Nueva Pescanova Group in its environmental, biological, technological, economic, commercial, and social facets.
 - b. Promote in the Group a culture of corporate responsibility that contributes to the creation of value in a sustainable way for the organization and in the long term for the partners, preserving the natural environment in which it carries out its activity, ensuring the professional and personal development of its workers, facilitating access to seafood products for our consumers and promoting the development of the communities in which we are present.
2. This Corporate Policy shall be complemented by internal management policies and regulations, regarding both the operational and functional units of the Nueva Pescanova Group.

Article 2. Scope of Application

1. This Corporate Policy must be complied with by all companies and professionals of the Nueva Pescanova Group.
2. The Nueva Pescanova Group is made up of the Spanish company Nueva Pescanova, S.L. and all the Spanish and foreign companies controlled, directly or indirectly, by Nueva Pescanova, S.L.
3. By professionals of the Nueva Pescanova Group we mean every director, manager, representative professionals, and other professionals and employees of the Nueva Pescanova Group, regardless of their location and employment relationship with the company.

Article 3. Pillars of our Corporate Social Responsibility

1. The four (4) pillars that make up the Corporate Social Responsibility strategy of the Nueva Pescanova Group with respect to the **Planet**, the personal and professional development of the **People** who make up the Nueva Pescanova Group, the commitment to the markets through our **Products**, and the contribution to improving the quality of life of the **Communities** where we are present. Likewise, we guarantee the full observance of **principles of business ethics, institutional integrity, and compliance** applicable according to that established, apart from other corresponding legal orders from countries where we operate, in "Our Code of Ethics" and in the rest of the provisions of our "Corporate Governance and Compliance Requirements System".
2. The aforementioned pillars consist of: **(i)** The effective conservation and management of natural resources, including live biological resources, with the respect owed to the ecosystem and biodiversity; **(ii)** Constant support to the growth and empowerment of professionals and employees of the Nueva Pescanova Group; **(iii)** Quality assurance, concerning food security, and value maintenance, including nutritional value, for seafood products offered to our consumers; and lastly, **(iv)** The contribution to the constant development of the communities in which we are present, to thus promote beneficial changes to society.
3. In this way, the programs and projects implemented or to be implemented in the area of Corporate Social Responsibility of the Nueva Pescanova Group are designed and will be designed around the pillars or guiding principles of its CSR strategy: **Planet, People, Product,** and **Communities**.

Article 4. Planet

1. In the **Planet** pillar, we seek sustainable management of resources, respect for natural ecosystems and the environment, in order to ensure its availability and quality for future generations and guarantee the continuity and operational success of our Group.
2. In its application, this pillar or guiding principle is expressed transversally in the four main areas of activity of the Nueva Pescanova Group: the capture, cultivation, processing and commercialization of seafood products.
3. Without prejudice to that stipulated in the appropriate **Responsible Action Policies** as referenced in article 8 of this Corporate Policy, taking into account the existence of important aspects in the specific characterization of responsible action in the aforementioned four areas of activity, all companies of the Nueva Pescanova Group shall, as applicable, follow the following guidelines in the scope of the **Planet** pillar:
 - a. Design and implement processes of responsible action on matters of fishing, in accordance with the commitment to responsible fishing principles from FAO and effective verification of this in our fishing operations.
 - b. Cultivate responsibly in aquaculture farms, in accordance with the commitment to FAO's principles of aquaculture responsibility.
 - c. Work responsibly in improving the processes of transformation and preparation of food products in all industrial units in each of the countries in which we are present.
 - d. Fulfill the commitment to responsible marketing and communication of all our products, including the FAO labeling of fish and fishery products.
 - e. Commit to the responsible management of water, energy, and raw materials by minimizing discharges, emissions, and waste.
 - f. Identify and assess environmental impacts from the activities carried out.
 - g. Establish and maintain an environmental management system in situations in which its activity involves significant environmental impact.

Article 5. Persons

1. In the **Persons** pillar, we are committed to respecting diversity, security, professional growth, and pride in feeling part of the Nueva Pescanova Group as the foundation for our success and the maintenance of trusting relationships with suppliers, customers, consumers, and communities.
2. In its application, this pillar or guiding principle is also expressed in a transversal and integral manner to all persons with an employment relationship with any company of the Nueva Pescanova Group in their areas of activity. Under these commitments, all companies of the Nueva Pescanova Group shall follow these guidelines:
 - a. Guarantee that the job offered is legal, safe, decent, and fair, and that employees have freedom of association, unionization, collective bargaining, and striking.
 - b. Guarantee the occupational safety, health, and well-being of workers by promoting a safe and healthy working environment for all of them, through an effective system of occupational hazard prevention and campaigns to improve health and the working environment.

- c. Respect, actively promote, and protect diversity, equal opportunities between men and women, and an adequate reconciliation of family and work life.
- d. Promote the professional growth of our workers with policies aimed at personal and professional development through constant training, assessment, and compensation programs.
- e. Create and maintain an identity, corporate culture, and pride in belonging to the Nueva Pescanova Group.

Article 6. Product

1. In the **Product** pillar, we are committed to providing access to the markets of nutritious, healthy, tasty, and innovative seafood products, prepared responsibly.
2. Within this pillar, all companies of the Nueva Pescanova Group shall follow these guidelines:
 - a. Offer seafood products to our customers and consumers guaranteeing their food safety and respecting the highest quality standards.
 - b. Develop sustainable and responsible seafood, optimizing the definition and design of our products, packaging and processes, meeting criteria of efficiency and environmental performance.
 - c. Offer the consumer innovative and healthy seafood, researching and communicating the importance of the nutritional value of the products in their diet.
 - d. Promote the consumption of fish and seafood products as an essential part of a balanced diet.

Article 7. Communities

1. In the **Communities** pillar, we are committed to the creation of more prosperous communities, generating wealth, job opportunities, and training wherever we are present.
2. Thus, all companies of the Nueva Pescanova Group must follow these guidelines:
 - a. Promote and generate stable and quality local employment (legal, safe, and fair), promote the constant training and professional development of all its employees.
 - b. Invest, according to the criteria of the Nueva Pescanova Group, in quality assets to promote productivity, efficiency, and working environment in all places where we are present.
 - c. Improve the quality of life of the environments in which we are present through social work programs, supporting actions, and projects for educational improvement and well-being, as well as invest in the necessary infrastructures, thus allowing for the correct and sustainable undertaking of the activities of the group in the community.

Article 8. Responsible Action Policies

1. In line with the CSR guiding principles of the Nueva Pescanova Group, the Corporate, Sectoral, or Local Policies are identified (as appropriate in accordance with the regulatory classification established in our "General Procedure of Internal Normative Production"), which integrate and complement this Corporate Policy with the commitments of responsible action assumed by the respective Corporate Departments.
2. The Corporate Sustainability Policy relates to the CSR guidance principles of the Nueva Pescanova Group, which is also the responsibility of the Corporate Department of CSR & IR.

3. Regarding the **Planet** pillar, the following Responsible Action Policies are associated with their respective responsible Corporate Departments:
 - a. Fishing Responsibility Policy (Corporate Fishing Department).
 - b. Aquaculture Responsibility Policy (Corporate Aquaculture Department).
 - c. Integrated Supply Chain Responsibility Policy (Corporate Integrated Supply Chain Department).
 - d. Commercial Responsibility Policy (Commercial Corporate Department).
 - e. Environmental Responsibility Policy (Corporate Marketing Department – Corporate R&D, Quality, and Environment Directorate).
 - f. Communication Policy (Corporate Communication Directorate).
4. In relation to the **People** pillar, the following Responsible Action Policies are associated with their respective responsible Corporate Departments:
 - a. Labor Responsibility Policy (Corporate Human Resources Department).
 - b. Occupational Health and Safety Policy (Corporate Human Resources Department).
 - c. Diversity and Equality Policy (Corporate Human Resources Department).
 - d. Talent Management Policy (Corporate Human Resources Department).
 - e. Recruitment, Selection, Incorporation, and Exit Policy for the Staff of the Nueva Pescanova Group (Corporate Human Resources Department).
 - f. Communication Policy (Corporate Communication Directorate).
5. Regarding the **Product** pillar, the following Responsible Action Policies are associated with their respective Corporate Departments:
 - a. Quality and Food Safety Policy (Corporate Marketing Department - Corporate R&D, Quality, and Environment Directorate).
 - b. Innovation Policy (Corporate Marketing Department - Corporate R&D, Quality, and Environment).
 - c. Communication Policy (Corporate Communication Directorate).
6. Regarding the **Communities** pillar, the following Responsible Action Policies are associated with their respective Corporate Departments:
 - a. Donation Policy for Food or other Goods or Assets (Corporate CSR Department).
 - b. Communication Policy (Corporate Communication Directorate).
 - c. Cooperation and Development Aid Policy (Corporate CSR Department).
7. The development, implementation, and maintenance of these Responsible Action Policies is the responsibility of the corresponding Corporate Departments, according to that laid out in this article.

Article 9. "Pescanova Blue" Sustainability Program

1. The "Pescanova Blue" Sustainability Program is the operational response of the Nueva Pescanova Group to the positioning of its CSR pillars (Planet, People, Product, and Communities) through: **(i)** The establishment of sustainability principles and goals; **(ii)** A system for the validation of evidence of sustainability in its environmental, social, and economic spheres; and **(iii)** An integrated plan of initiatives designed to orient and document the sustainable use of natural resources and responsible action in the activities carried out by the companies of the Nueva Pescanova Group.
2. Considering its nature and content, the "Pescanova Blue" Sustainability Program will have the function of identifying and validating the evidence of compliance with the declarations of principles of responsible action, as provided for in article 8 of this Corporate Policy.
3. The description, content, and other characteristics of the "Pescanova Blue" Sustainability Program are the subject of specification, development, and processing in the appropriate Corporate Sustainability Policy.

Article 10. Transparency and Accountability

1. The Corporate CSR & IR Department will render accounts to its hierarchy, in a transparent manner and on a regular basis, presenting reports of its activities with accurate and relevant information in relation to the actions of the Nueva Pescanova Group and its Corporate Social Responsibility Policy.
2. Accountability, in all its written form, shall be addressed to the multiple stakeholders, both internal and external, separately through:
 - a. Annual Activity Report of the Corporate CSR & IR Department, to be published in the first three (3) months of each year, addressed to the Board of Directors of Nueva Pescanova, S.L., through its Corporate Responsibility and Governance Committee. Likewise, said Report shall be notified to the COMEX of the Nueva Pescanova Group.
 - b. Reports, memories, or other pertinent and applicable documents, with an annual frequency and technical nature, which provide an evaluation based on the corresponding relevant indicators. This information can be integrated into the corresponding Annual Activity Report of the Corporate CSR & IR Department.
3. The dissemination of the Corporate Social Responsibility activities will be coordinated with Corporate Communication Directorate and carried out by them, in accordance with the Corporate Communications Policy, to whom the Corporate CSR & IR Department will provide the contents so that they can be adapted to the public internal and external channels through the different channels and communication tools of the Nueva Pescanova Group. Communications shall be carried out with the collaboration and approval of the Corporate CSR & IR Department. For final approval, they shall be sent to the COMEX and/or CEO whenever necessary.

Article 11. Development and Control

The Corporate CSR & IR Director of the Nueva Pescanova Group is responsible for controlling the implementation, development, and fulfillment of this Corporate Policy throughout the Group, as well as ensuring and coordinating the implementation of programs or other actions of Corporate Social Responsibility aimed at creating value.

Article 12. Evaluation

On a yearly basis, the Corporate CSR & IR Department will evaluate the compliance and effectiveness of this Corporate Policy and the Corporate Social Responsibility programs and actions executed in the Nueva Pescanova Group in the appropriate Annual Activity Report, which will be presented to the Governance and Corporate Responsibility Committee of the Board of Directors of Nueva Pescanova, S.L., for submission to the same, as well as to the COMEX of the Nueva Pescanova Group.

Article 13. Dissemination, Training, and Communication

The Corporate CSR & IR Department is in charge, in collaboration with the Corporate Communication Department, and in accordance with the Corporate Communications Policy, of the dissemination, training, and communication actions necessary to ensure the effective awareness of this Corporate Policy, as well as of any internal regulation that develops the same, including its translation into the relevant languages within the Nueva Pescanova Group and its eventual dissemination and publication both through the PESCANET corporate intranet and the corporate websites in the section corresponding to Corporate Social Responsibility.

Article 14. Revision and Changes

1. This Corporate Policy will be revised regularly, at least annually, by the Corporate CSR & IR Department.
2. Any change to the present Corporate Policy will be proposed to the Corporate Responsibility and Governance Committee by the Corporate Director of RSC & RI, for its consideration and, if applicable, submission to the Board of Directors of Nueva Pescanova, S.L., for eventual approval.

Article 15. Approval, Effective Date, and Validity

1. This Corporate Policy was approved by the Board of Directors of Nueva Pescanova, S.L., at the proposal of its Corporate Responsibility and Governance Committee, at its meeting held on March 27, 2019, entering into force and being in force from that day onwards for the entire Nueva Pescanova Group.
2. Any modification of this Corporate Policy shall have to be approved by the Board of Directors of Nueva Pescanova, S.L., at the proposal of its Corporate Responsibility and Governance Committee.

Article 16. Modification Control

Version	Modification Summary	Modification Promoter	Modification Approval Entity	Modification Approval Date
v_1	Initial approval of the Corporate Policy	Corporate Responsibility and Governance Committee	Nueva Pescanova, S.L. Board of Directors	27/3/2019

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