



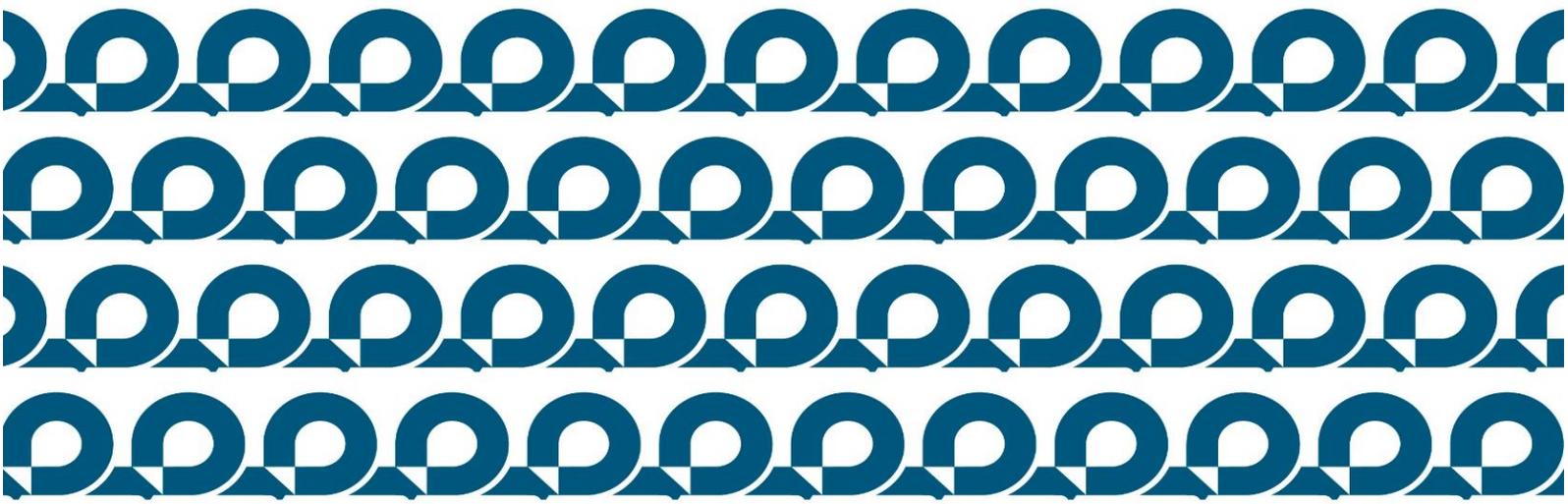
# Materiality Analysis 2021

*Responsibility and Sustainability Strategy – Nueva Pescanova Group*

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Global CSR Division

## Executive summary

At the Nueva Pescanova Group, we want to align our Corporate Social Responsibility (CSR) strategy with the priorities expressed by our stakeholders by conducting a **materiality analysis**. The materiality exercise helps us identifying important actions for implementation by the Group's companies in their different business areas.

We have followed a standardized methodology proposed by the Global Reporting Initiative (GRI) for defining relevant aspects, consulting internal and external stakeholders, prioritizing and identifying material aspects, and validating them. With these, we defined action plans that seek the alignment of our corporate strategies and specific operations of the Group's companies with the stakeholder's expectations, as consulted.

Based on the 4 pillars of our CSR strategy (**Planet, People, Product** and **Communities**), embraced by **Ethics, integrity, and regulatory compliance**, we have identified **46 relevant aspects**. To prioritize them, we have launched a consultation survey to all stakeholders in Spain and internationally in the countries we have operations, available by e-mail and online to expedite participation. We have sent **445 surveys to 236 people in 8 internal stakeholders' groups** and to **209 organizations and individuals representing 9 external stakeholders' groups**. We have received **213 (48%) surveys back, of which 125 (53%) were from internal and 88 (42%) external participants**.

From the prioritization of the 46 relevant aspects, **18 material aspects** were identified. The results highlight 2 that are indisputable due to their relevance: the **health and safety of our employees** and the **food safety and quality assurance** of our products. Of the remainder, 7 environmental aspects focus on the **sustainability of our operations and the rational use of natural resources and energy**, and on **emissions and effluents**, 5 aspects of good governance focus on the **governance and commitments** of the Group, and 4 other aspects on **labour responsibility, traceability, and transparency**.

Finally, and aligned with the objectives of the study, we have proposed **action plans** to be promoted by the different business areas or departments. Such plans are included into the CSR 2021-2022 strategic plan. The implementation of the specific measures of these plans will be monitored for **verification or assurance** by the programmes that are implemented, or are to be implemented, by the CSR and Sustainability departments, in clear agreement with the Group's Strategic Plan 2020-2024 'Journey to Growth'.

## 1. Preamble

The Nueva Pescanova Group is a multinational business group engaged in the fishing, farming, processing, and commercialization of seafood products, especially fish, cephalopods, and crustaceans.

The Nueva Pescanova Group's DNA require us to ensure:

*"We work to be the best food company, bringing the freshness of the sea to the consumer's table."*

*"We rely on our brand and innovation to fish, farm, select and process the best product wherever it may be."*

*"Our commitment to the sustainability of natural resources and of our partner communities, whose trust we build and maintain by acting ethically and creating value."*

The responsible and sustainable development of our activities in their biological, environmental, technological, economic, commercial, and social aspects is an indisputable and essential trait of the business culture of the Nueva Pescanova Group. This is more relevant as our activities involve the extraction and/or consumption of natural resources through the capture fishing, aquaculture farming, processing, and marketing of our seafood products.

In this context, we see **Corporate Social Responsibility (CSR)** as a key element in the business strategy of the Nueva Pescanova Group, in addition to the strict compliance of all legal requirements in those countries where we operate. The Nueva Pescanova Group aligns its CSR strategy with the Sustainable Development Goals (SDG) of the United Nations (UN), framed in their 2030 Agenda. In that sense, we have joined the **UN Global Compact** initiative, as participants, through their Spanish Network.

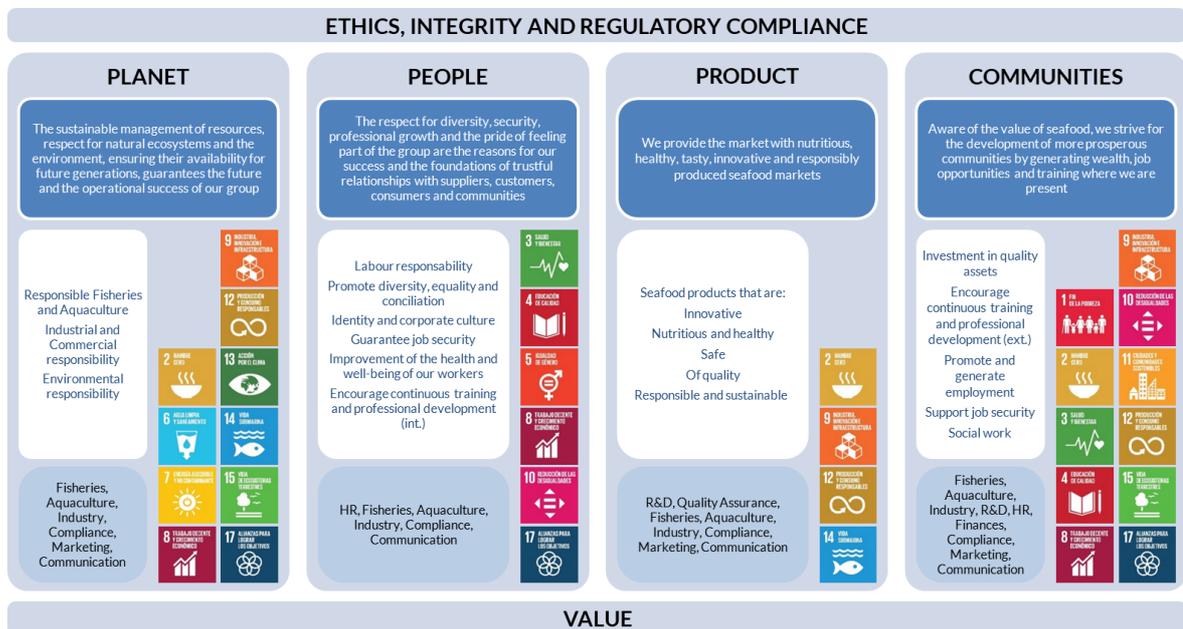


Figure 1. The structure of the Nueva Pescanova Group's Corporate Social Responsibility strategic plan combines its four pillars (Planet, People, Product and Communities) and Ethics, integrity, and regulatory compliance to generate Value. It also links the most representative UN Sustainable Development Goals with each CSR pillar.

The guiding principles, or pillars, of the Nueva Pescanova Group's CSR strategy (Figure 1) are the respect for 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 our partner **Communities**. Simultaneously, we guarantee the full observance of the principles of **business ethics, institutional integrity and regulatory compliance** as established in "Our Code of Ethics", and in the rest of the provisions of our Regulatory System of Corporate Governance and Compliance, in addition to strict compliance of the legal systems of the countries where we conduct operations.

In recent years, the Nueva Pescanova Group has fostered specific projects and actions in the scope of its four CSR pillars: **Planet, People, Product**, and **Communities**, and implemented by the various companies with fishing, aquaculture, industrial and commercial activity. These actions have been inventoried and described by the local CSR ambassadors in the **Responsible Action programme (RAP)** since 2018 in the countries we operate on.

The inventory of actions, the report of their indicators and classification by general and specific plans in the RAP, as well as their contribution to the specific goals of each **SDG of the UN 2030 Agenda**, have contributed with valuable information to the materiality analysis process. The RAP is helpful to identify the relevant aspects to work on, that ensure the creation of shared value in the economic, social, and environmental dimensions of the activities of the companies in the Group.

Throughout the present document, we address the methodology followed to deliver this materiality analysis and present some guidance on the **Group's action plans** for the following 2 years. By doing that, we intend to meet the expectations of our stakeholders while ensuring the necessary alignment with the Group's Strategic Plan "Journey to Growth".

## 2. Methodology

We define **relevant aspect** as one that can substantially affect, either positively or negatively, the companies' ability to create shared value in the short, medium, or long run. Detailing this vision, we include all those aspects that may generate significant economic, environmental, or social impacts or that may influence the decisions of our stakeholders.

Finally, a **relevant aspect with sufficient importance** in any of the two dimensions (impact and influence) will be defined as a **material issue** and will imply that we draw an action plan and report on its impacts, risks, and expectations.

Therefore, the materiality exercise helps us identifying the aspects that are material. We believe it is a helpful tool to improve our CSR strategy by defining action plans that are aligned with the perception of needs, interests, and expectations of the stakeholders, and in turn, in line with the market demands.

### 2.1. Materiality steps

The materiality analysis follows a GRI methodology (*Global Reporting Initiative*, version G4), including stakeholder participation, sustainability context, materiality, and completeness. The process draws on the following steps:

1. **Identification** of relevant aspects, focusing on those that affect, or could affect, the company's ability to create value, or that influence, or could influence, stakeholder's decisions.
2. Assessment of the importance (**priority**) of the important items, taking into consideration their relative weight for the business and for each of the stakeholders. This stage leads to the construction of the materiality matrix.
3. The **validation** of the results of the prioritization by the Validation Committee to ensure the legitimacy and balance of the important items and the material issues based on their scope, coverage, and reporting period.



The last step of this process requires the participation of the Validation Committee, which is part of the Governance and Corporate Responsibility Committee of the Board of Directors of Nueva Pescanova, S.L. The role of this Committee, with regards to materiality, is to analyse the coverage, consistency and temporal scope of each material issue and deliberate on its validity.

The identification and prioritization of relevant aspects into material issues aims at supporting the Nueva Pescanova Group in the definition of a CSR action plan for the 2021-2022 period. The main contribution from the materiality analysis to this plan is the design of action plans around the material issues as previously identified and bound to each pillar of the CSR strategy.

## 2.2. Mapping stakeholders and consultation scope

As defined in our *Corporate Policy of Institutional Relations*, and for the purpose of this document, stakeholders are **those groups, whose needs, interests, or expectations may, directly or indirectly, affect the activity of the company or be affected by it, and, therefore, can, directly or indirectly, influence the definition and implementation of its strategy.**

The Nueva Pescanova Group's vertical integration strategy that stems from fisheries and aquaculture farming, establishes a long value chain from raw materials to the final products for market, and thus making the stakeholders with whom we interact to be numerous.

All employees were identified as internal stakeholders, with the ability to influence the Group's strategy. We have identified employees' subgroups based on the degree of influence they may have on the definition and implementation of the strategy. Internal stakeholders were grouped into:

- Board of Directors.
- Executive Committee (COMEX).
- Senior Leader Team.
- Executives with key positions, not members of the above Committees.
- Others with key positions, not members of the above subgroups
- CSR ambassadors.
- Workers' legal representatives.

Similarly, the external stakeholders were grouped into:

- Academia, researchers, and technical experts.
- Public administration and intergovernmental organisms.
- Industry or sectorial associations, Unions.
- Non-Governmental Organizations (ONG) and Foundations.
- Shareholders, Investors.
- Suppliers of goods and services.
- Clients.
- Consumers.
- Media.

Stakeholders were classified according to the relevance the Group's activities have for them and vice versa. We have identified the relevant representatives in each group to whom the invitation was sent for the prioritization consultation and encourage him/her to participate.

The survey responses were classified and weighted per stakeholder group on their relative capacity to influence, or be influenced, by the Group's strategy.

Table I. Internal and external stakeholders, as identified and classified according to their relevance to the Group's strategy and activities.

Stakeholder group	Description	What we need from them?	What interests have they on the Nueva Pescanova Group?
Board of Directors, Executive Committee (COMEX), and Senior Leader Team.	Members of the Committees with the capacity to influence the company's strategy.	Information on the business strategy and its involvement with the creation of Shared Value and Corporate Social Responsibility.	Profitability, generation of quality and sustainable employment and respect and conservation of the environment.
Employees and their legal representatives.	The people who work in the Nueva Pescanova Group, under any labour or commercial relationship.	Involvement in business development.	Generation of quality and sustainable employment.
Academia, researchers, and technical experts.	Prominent individuals or institutions in their scientific field, who collectively conduct activities in relation to the Group's operations.	Adaptation of training and practical programs to the needs of the sector. Participation in research lines of strategic interest.	Internships and stable hiring. Participation in research projects.
Public administration and intergovernmental organisms.	Set of public institutions and organizations with which the Nueva Pescanova Group must interact in the exercise of its business activity.	Design of adequate policies for business development in terms of innovation, competitiveness, as well as tax and labour.	Regulatory compliance and sectoral development, generation of wealth and sustainable employment.
Industry or sectorial associations, Unions.	Organizations for the defence of common interests in a specific field and territory.	Information on trends. Support and accompaniment in strategic lines of work.	Prescription of trends, establishment of alliances.
Non-Governmental Organizations (NGO) and Foundations.	Non-profit institutions that carry out activities of social, environmental, labour, etc. relevance, which can be related to the operations of the Nueva Pescanova Group.	Information on trends. Support and accompaniment in strategic lines of work.	Prescription of trends, establishment of alliances.
Shareholders, Investors.	Natural or legal persons that participate as partners or shareholders of the capital of the companies or facilitate the necessary investments for the development of projects.	Information on trends in new investment formulas or criteria for access to company capital, particularly aligned with ESG (Environmental, Social, Governance) criteria.	Regulatory compliance, return on investments, risk analysis
Suppliers of goods and services.	Natural or legal persons that provide goods or services to the Nueva Pescanova Group.	Financing, adaptation of inputs to market trends (traceability).	Viability and profitability. Continuous supply.
Clients.	Natural or legal persons who purchase products marketed by the Nueva Pescanova Group.	Information on demand and demand trends. Marketing agreements.	Response to market trends.
Consumers.	People who frequently or occasionally consume a product marketed by the Nueva Pescanova Group in their diet.	Information about their preferences.	Quality, price, diversity, others.
Media.	Understood as the instruments used in society to inform and communicate messages in textual, sound, visual or audio-visual supports.	Information on market trends. Support in communication on strategies and performance of the Nueva Pescanova Group.	Information.

### 3. Identification and prioritization of relevant aspects

The process of identifying those aspects that are relevant to the scope and activity of the Nueva Pescanova Group has had several phases to ensure a robust methodology.

The relevant aspects were defined and explained upon the analyses presented next. We have then examined the coherence and suitability of such aspects considering the specific topics they refer to, and analysing their scope, representativeness, and integrity.

#### 3.1. Internal relevance analysis

We have started with an internal analysis of the aspects related to the definition and implementation of “Our Code of Ethics”, the Global CSR and Sustainability Policies, the Risk Analysis of the Group's businesses, and the contents of the Strategic Plan 2020-2024 “Journey to Growth”.

#### 3.2. Revision of the previous materiality analysis

We have reviewed the materiality analysis published in 2019. In this critical exercise we have mainly addressed the study methodology, focusing on the identification of the stakeholders' members to consult, on improving effectiveness of the communication, a wider and greater representation of the proposed topics and on eliminating possible gaps in the study itself. As a result, we have decided to increase the detail of the proposed relevant aspects, which has meant narrowing the scope of each topic.

#### 3.3. Background analysis

We started by conducting a trend analysis in the competitive environment of the Nueva Pescanova Group – the fishing, aquaculture, and industrial sectors – as well as in other sectors within the Group's scope, such as energy, technology, banking, or scientific development. Therein, we found large national and multinational food production and mass consumption companies, public administration, governmental and non-governmental organizations, academia, etc. This analysis consisted of identifying trending aspects marked by national or international relevance in corporate responsibility and technical or scientific progress, in the mentioned sectors, and along the most relevant value chains. We then benchmarked these, under the dependencies on, and implications to, the activities of the Nueva Pescanova Group and its own value chain, which stems from its primary production sources in fishing and aquaculture, to the production and marketing of its seafood products.

We have participated in various initiatives organized by governance and scientific platforms on responsibility and sustainability topics, and collaborated in discussion fora, working groups, conferences, and seminars, both on presential and online formats with the aim of strengthening our knowledge on the current issues that are most relevant to the Group's mission and vision, such as:

- Attending the FAO's International Symposium on Fisheries Sustainability.
- Participating in the Sustainable Aquaculture and Food Security event back-to-back with the COP25 meeting.
- Adhering to the Spanish Network of the UN Global Compact as *participant member* and attending their workgroups and communication platforms.
- Joining the Global Impact Initiative (GII) of the *Business Ambition for 1.5°C* campaign.
- Participating in the Seafood Stewardship Index and the Food and Agriculture Benchmark of the World Benchmarking Alliance (WBA).
- Participating in the Sustainability Committees of both AECOC and Galician Food Cluster (CLUSAGA).

- Participating in the steering group and working committees of the Global Sustainable Seafood Initiative (GSSI).
- Participating in the steering group and working committees of the FISH CREW Labour Standard Group (Fairness, Integrity, Safety, and Health Standard for Crew).
- Participating in meetings, workshops, seminars, etc. with the Marine Stewardship Council (MSC), Aquaculture Stewardship Council (ASC), Sustainable Seafood Partnership (SFP), and others.

### 3.4. Inventory of projects and identification of relevant aspects

We have identified the different activities of each business area that relate to the four CSR guiding principles, as well as their respective sponsors or promoters, who must lead and outline the implementation of specific actions. These are to be proposed as part of the action plans resulting from the materiality analysis, and which implementation complies with the company's strategy and commitment to a responsible actions management.

As in previous occasions, we have used the work already developed under the Responsible Action Programme (RAP) on CSR projects covering sustainability, innovation, education, social development, etc. Such documentation work had resulted from the collaboration with the CSR ambassadors in the various countries where the Group operates.

The consulted RAP report's version referred to in the current materiality exercise included 668 documented actions in 8 countries, representing 96% of the Nueva Pescanova Group's workforce, covering the fishing, aquaculture, and industrial processing activities. Clusters of projects were established according to matching classification criteria on general and specific plans. This aggregation facilitates the identification of aspects with comparable relevance and detail, with similar potential for implementation and follow-up, as well as representativeness and completeness within the scope of action of the Group's companies and the impact or influence of the CSR and Sustainability departments.

We have identified **46 relevant aspects** (cf. section 3.6 below) with significant importance in the implementation of the Group's strategy, in the sense that those aspects could depend on, or impact, positively or negatively, said strategy. Similarly, the listed aspects may be sensitive to the expectations or interests of external groups or generate a positive or negative impact on them.

### 3.5. Assigning the relevant aspects to the CSR plans

We have classified and assigned the relevant aspects to the general plans under each the CSR pillar:

- General plan: *Good governance, ethics, and compliance* (CSR pillar: *Ethics, integrity, and regulatory compliance*).
- General plan: *Our Common Planet* (CSR pillar: *Planet*).
- General plan: *People First* (CSR pillar: *People*).
- General plan: *Product Excellence* (CSR pillar: *Product*).
- General plan: *Growing Together with our Partner Communities* (CSR pillar: *Communities*).

### 3.6. Prioritization survey and consultation to stakeholders

A survey was conducted among all stakeholders based on the relevant aspects grouped into five general plans. A copy of the questionnaire is available in Annex I, which includes an explanation for each aspect listed.

In the survey, participants were asked to prioritize each aspect according to the **RELEVANCE (for the external stakeholders)** to their expectations, and the **IMPACT (for internal stakeholders)** on the Group's

strategy. The prioritization survey has met specific criteria to secure maximum participation and representativeness:

- National and international scope covering all countries where we operate.
- Large number of invitations sent. We have contacted **236 people of the internal stakeholders' groups** and **209 organizations and representatives of external stakeholders**, in a total of **445 questionnaires** sent.
- Added an explanation of the relevant aspects presented, to harmonize its understanding and interpretation.
- Added different ways to respond to the questionnaire for stakeholders' convenience, either answering on an online version over their mobile phone or computer, directly on the invitation e-mail body, or by filling in a digital PDF version included in that same e-mail.

We have defined an assessment scale for the prioritization of the relevant aspects. The criteria set is as follows:

- **A** 'Issues with the highest RELEVANCE or IMPACT'.
- **B** 'Issues with medium RELEVANCE or IMPACT'.
- **C** 'Issues with the lowest RELEVANCE or IMPACT'.

The consultation process was limited to 2 months period, from the beginning of December 2020 to the end of January 2021.

### 3.7. Data treatment and weighting scheme

We have converted the **A-B-C** scale of the survey results on the prioritization of the relevant aspects into a corresponding numerical assessment of **3-2-1**. We have then assessed the distribution and dispersion of the results for the score of each aspect, from both the internal perspective of the impact on the strategy (internal stakeholders) and the external perspective on the relevance for the expectations (external stakeholders). Weighting factors were applied to each stakeholder group according to their level of relevance, i.e. their ability to influence or to be influenced by said strategy or that their opinion influences or depends on the Group's performance or strategy, today or in the future.

### 3.8. Validation

The validation process is the final step in the assessment of the results. It involves the presentation to, and the discussion within, the Governance and Corporate Responsibility Committee of the Board of Directors of Nueva Pescanova, S.L.

In this stage, the material aspects are validated based on their scope, completeness, and reference period. The validated aspects are then considered for further analysis on future actions. With validation we aim to ensure the legitimacy and a reasonable and balanced representation of the contributions to the Group's sustainability performance, whether these are positive or negative.

## 4. Results

### 4.1. Response rate

The number of responses in the consultation to stakeholders for the prioritization of relevant aspects amounts to a **total of 213 surveys** received, corresponding to a **48% response rate** based on the 445 surveys sent. We have received 125 responses from internal stakeholders (53% response rate) and 88 from external stakeholders (42% response rate). All categories of both internal (8) and external stakeholders (9) have responded to the survey and have been included in the results. We highlight that all members of the Group's decision-making bodies, i.e., the internal stakeholders Board of Directors, COMEX and Senior Leader Team have responded to the survey on relevant aspects.

### 4.2. Relevance matrix

The relevance matrix (Figure 2) shows the relative distribution of the prioritization of all aspects consulted with the stakeholders (Table II). The relevance values presented for each of the aspects were calculated as weighted means of the evaluations by stakeholder's group and distributed in two axes: one for the relevance for the external stakeholders, and another for the impact on the strategy as given by the internal stakeholders.

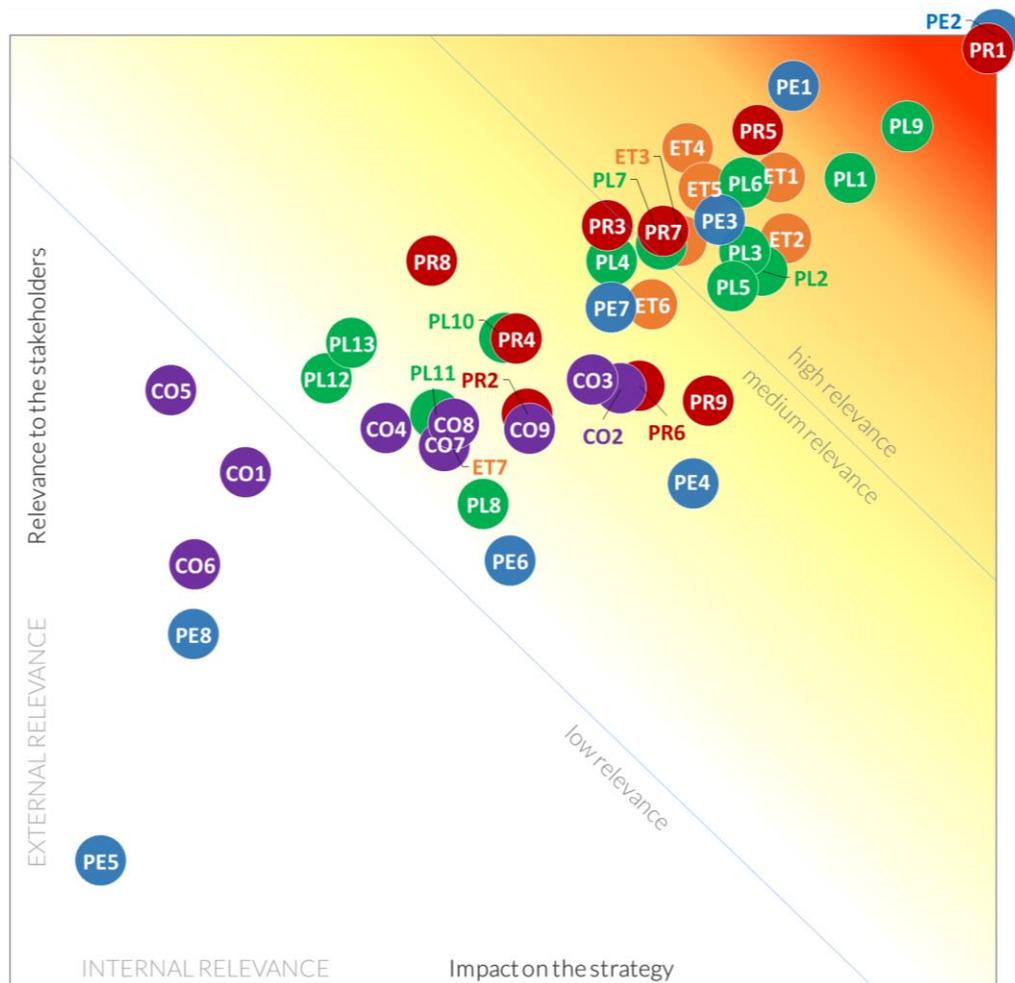


Figure 2. Matrix of relevant aspects resulting from the prioritization analysis after consultation with the stakeholders.

The relevance matrix makes it possible to quickly and easily identify those aspects that require the highest priority for implementation, or verification, in relation to the deployment of the Nueva Pescanova Group's CSR strategy.

Table II. Relevant aspects as evaluated and prioritised in the materiality analysis.

CSR pillar	Relevant aspect
<b>ETHICS, INTEGRITY AND REGULATORY COMPLIANCE</b>  General plan: <i>Good governance, ethics, and compliance</i>	(ET1) Establish internal governance tools (policies, standards, procedures)
	(ET2) Comply with the 10 Principles of the UN Global Compact
	(ET3) Align our activities with the Sustainable Development Goals (SDGs) of the UN 2030 Agenda for Sustainable Development
	(ET4) Ensure the transparency of all our activities
	(ET5) Adopt measures to combat illegal, unreported, and unregulated fishing
	(ET6) Adopt sectoral improvement commitments (reduction of plastics, circular economy, responsible communication, others)
	(ET7) Promote permanent dialogue with the Stakeholders
<b>PLANET</b>  General plan: <i>Our Common Planet</i>	(PL1) Optimise our energy consumption and switch to cleaner sources of energy
	(PL2) Optimise water management measures, preserving its quality
	(PL3) Pursue maximum efficiency in the use of raw materials (fish and other ingredients, and materials)
	(PL4) Design packaging with less plastic, reducing its environmental impact
	(PL5) Optimise processes to minimise atmospheric emissions (GHG and ODS)
	(PL6) Minimise wastewater discharges, ensuring their treatment
	(PL7) Minimise waste generation, ensuring its correct management and valorisation
	(PL8) Promote the circular economy of by-products, conserving resources and generating value
	(PL9) Promote sustainable and transparent fisheries and aquaculture
	(PL10) Promote responsible purchasing based on environmental and social sustainability criteria
	(PL11) Promote biodiversity conservation projects
	(PL12) Animal welfare in aquaculture
	(PL13) Sustainable sourcing of aquaculture feed ingredients
<b>PEOPLE</b>  General plan: <i>People First</i>	(PE1) Establish responsible and transparent labour relations
	(PE2) Ensure the health and safety of our employees
	(PE3) Promote equality and diversity
	(PE4) Support the professional and personal growth of all employees (training)
	(PE5) Promote corporate volunteering
	(PE6) Strengthen the pride of belonging
	(PE7) Reconcile work and family life
	(PE8) Promote healthy habits among employees
	(PR1) Food safety and product quality assurance
<b>PRODUCT</b>  General plan: <i>Product Excellence</i>	(PR2) Ensure the supply of seafood to society (food security)
	(PR3) Offer healthy and nutritious products
	(PR4) Promote the naturalness of products (clean label, fewer additives)
	(PR5) Evidence of the traceability of products, their origins, characteristics, and processes
	(PR6) Communicate the sustainable origin of our products on their packaging
	(PR7) Ensure transparency in product labelling
	(PR8) Minimise food waste
	(PR9) Innovate to improve consumer satisfaction, seeking maximum efficiency
	<b>COMMUNITIES</b>  General plan: <i>Growing Together with our Partner Communities</i>
(CO2) Promote job creation through knowledge and technology transfer	
(CO3) Promote professional training in the fishing, aquaculture, and food industry sectors	
(CO4) Promote education and awareness projects	
(CO5) Promote local purchasing to contribute to the communities' growth	
(CO6) Value the local history, tradition, and seafood of our partner communities	
(CO7) Promote social development projects	
(CO8) Participate in environmental improvement projects	
(CO9) Participate in mitigating the effects of emergency relief and social or economic crisis	

### 4.3. Prioritization of relevant aspects

Analysing the relevance matrix (Figure 2) one can see the distribution of the 46 relevant aspects and their classification into **3 categories of priority** is observed: high, medium, and low. These categories correspond to a degree of urgency in the implementation of measures, plans, projects, or actions to deploy around each aspect, or insuring its clear and transparent adoption and compliance, with the following key: (i) urgent and immediate, (ii) in the short and medium term or (iii) with less priority but ensuring its planning and implementation.

#### a) *Material aspects, the most urgent*

Among the most relevant aspects, **two essential aspects** clearly stand out for the Nueva Pescanova Group: **PE2 Ensure the health and safety of our employees** is one of the bases that allows us to offer excellent working conditions to our 10,000+ employees, and obviously **PR1 Food safety and product quality assurance** in the production and supply of our seafood products to society, a requirement throughout our value chain from the fishing and aquaculture sources to the markets.

Both aspects were already included as the most relevant in the 2019 materiality report and have been a hallmark of our Group during the COVID-19 pandemic in 2020 - guaranteeing the health of our employees while assuring the food safety and quality of the seafood that we put in the market.

In this category of most urgent implementation or assurance, we also find:

- **Seven environmental aspects** with a focus on a central aspect of the Group's activity (sustainable fishing and aquaculture) and on essential issues of sustainable use of natural resources and energy, and managing the resulting emissions and discharges:
  - PL9 Promote sustainable and transparent fisheries and aquaculture*
  - PL1 Optimise our energy consumption and switch to cleaner sources of energy*
  - PL6 Minimise wastewater discharges, ensuring their treatment*
  - PL3 Pursue maximum efficiency in the use of raw materials (fish and other ingredients, and materials)*
  - PL2 Optimise water management measures, preserving its quality*
  - PL5 Optimise processes to minimise atmospheric emissions (GHG and ODS)*
  - PL7 Minimise waste generation, ensuring its correct management and valorisation*
- **Five aspects of good governance, ethics and compliance** that prove the need to define strategies and plans aligned with principles and tacit commitments with the governance of our activities, with legal compliance and transparency, along with the commitment to principles of responsibility and sustainability:
  - ET1 Establish internal governance tools (policies, standards, procedures)*
  - ET2 Comply with the 10 Principles of the UN Global Compact*
  - ET4 Ensure the transparency of all our activities*
  - ET5 Adopt measures to combat illegal, unreported, and unregulated fishing*
  - ET3 Align our activities with the Sustainable Development Goals (SDGs) of the UN 2030 Agenda for Sustainable Development*
- **Four other aspects of great importance** for our activity of transformation of seafood products, such as **labour responsibility** towards all our employees, ensuring legal, fair, dignified, inclusive and respectful labour relations, with equal expression and importance in all countries where our companies operate, and two key aspects associated with the products, such as **traceability** and **transparency**, around our activities at source, sustainability, quality, and food safety, among others:

- PE1 *Establish responsible and transparent labour relations*
- PR5 *Evidence of the traceability of products, their origins, characteristics, and processes*
- PE3 *Promote equality and diversity*
- PR7 *Ensure transparency in product labelling*

The 18 highest priority aspects indicated above will be **defined as material aspects for the Nueva Pescanova Group for the period 2021-2022**. As material aspects, they imply a quick and concrete response, since they can substantially, positively, or negatively affect the ability of the Group's companies to create shared value in the short, medium, or long term, as indicated by the prioritization of relevance and impact by the Group's stakeholders. The deployment of the response measures, as action plans, is presented and discussed in Section 5.2 ahead.

#### **b) Relevant aspects of medium priority**

Twenty-three aspects have been classified with medium relevance, and with it, medium priority, and implementation in the short and medium term. These are still important aspects that will also benefit from the Group's responsible actions proposed for the material aspects and are similarly covered by current governance tools. In decreasing order of average score, the following are medium priority aspects:

- PR3 *Offer healthy and nutritious products*
- PL4 *Design packaging with less plastic, reducing its environmental impact*
- ET6 *Adopt sectoral improvement commitments (reduction of plastics, circular economy, responsible communication, others)*
- PR9 *Innovate to improve consumer satisfaction, seeking maximum efficiency*
- PE7 *Reconcile work and family life*
- PR6 *Communicate the sustainable origin of our products on their packaging*
- CO2 *Promote job creation through knowledge and technology transfer*
- CO3 *Promote professional training in the fishing, aquaculture, and food industry sectors*
- PE4 *Support the professional and personal growth of all employees (training)*
- PR4 *Promote the naturalness of products (clean label, fewer additives)*
- PR8 *Minimise food waste*
- PL10 *Promote responsible purchasing based on environmental and social sustainability criteria*
- PR2 *Ensure the supply of seafood to society (food security)*
- CO9 *Participate in mitigating the effects of emergency relief and social or economic crisis*
- CO8 *Participate in environmental improvement projects*
- PL11 *Promote biodiversity conservation projects*
- ET7 *Promote permanent dialogue with the Stakeholders*
- PL13 *Sustainable sourcing of aquaculture feed ingredients*
- CO7 *Promote social development projects*
- PL8 *Promote the circular economy of by-products, conserving resources and generating value*
- CO4 *Promote education and awareness projects*
- PL12 *Animal welfare in aquaculture*
- PE6 *Strengthen the pride of belonging*

#### **c) Relevant aspects of lower priority**

Relevant aspects of lower priority are those of lower relevance for the stakeholders and that will be planned with a medium and long-term vision, but implemented, nonetheless. Like in the previous category, the low priority aspects may also benefit from the implementation of the most urgent material ones.

In decreasing order of average score, the following are low priority aspects:

- CO5 *Promote local purchasing to contribute to the growth of the communities*
- CO1 *Invest in assets and infrastructure in communities*
- CO6 *Value the local history, tradition, and seafood of our partner communities*
- PE8 *Promote healthy habits among employees*
- PE5 *Promote corporate volunteering*

#### 4.4. Assessing the scores of both relevant and material aspects

We have analysed the average scores by CSR pillar and by group of stakeholders (Figure 3), the dispersion of the scores per aspect in each of the five pillars (Figure 4), distribution trends (Figure 5) and relevant disparate results, and by respondent's sex (Figure 6). Analysis of the average scores by topic, group and dispersion can reveal significant trends in less urgent aspects.

##### a) Comparison between internal and external stakeholders

The comparison between the stakeholders' score (Figure 3) points to a slight overestimation by the external stakeholders for aspects belonging to the *Communities* and *Planet* CSR pillars. We believe these two major issues are precisely those that can generate more disparate readings among stakeholders, given the significant presence of the Group's companies in countries with fishing and aquaculture operations, and source for these raw materials.

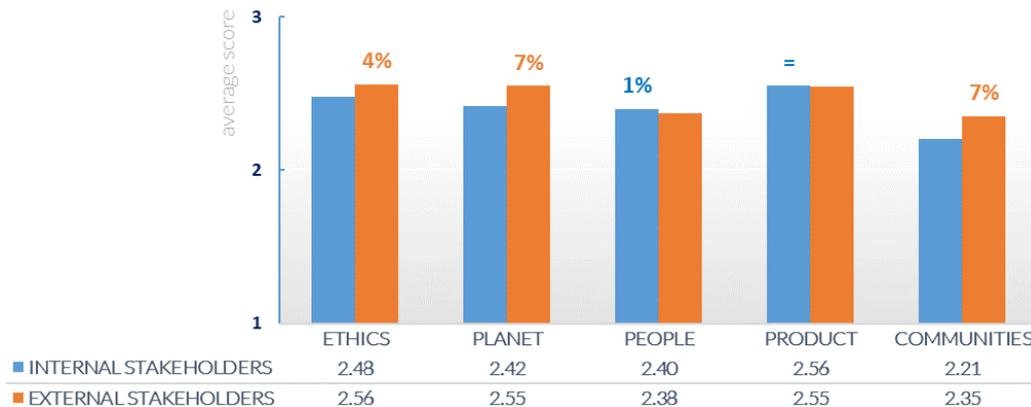


Figure 3. Comparison of the average score between internal and external stakeholders for the relevant aspects by CSR pillar.

An unequal perception among stakeholders could lead to a different prioritization of the most familiar aspects when comparing the average scores from those in 'source' countries, in Spain, or in 'destination' countries (mostly limited to commercial activity). This interpretation could justify the overestimation of aspects that imply an investment, local implementation, or impact in the communities in such countries.

It would also be worth considering the burden shifting of potential impacts on natural environments there, since this is where our primary activities (fishing and aquaculture) take place. We may conclude from this reflection, that we should work on a more effective and transparent communication of the various actions in responsibility and sustainability that we implemented in such 'source' countries.

##### b) Dispersion of the relevant aspects' scores

The dispersion analysis of the scores (Figure 4) points to a more homogeneous distribution of the aspects belonging to the *Ethics, integrity, and regulatory compliance* CSR pillar with a main cluster, and the *Planet* pillar



the industrial transformation and the communication of their properties that arouse significant importance, which will surely deserve our attention, such as nutritional and healthy properties and food naturalness of the products' formulations.

*c) Trends analysis per subgroups of stakeholders*

We have analysed the scores between different external stakeholders' subgroups: the **prescribers**, who represent current and future references to follow (here we include academia, scientists and technical experts, public administration, governmental and intergovernmental organizations, and industry or sector associations), and those representing **market expectations** regarding the Group's main activity in the production and supply of seafood products (here we include suppliers, customers and consumers), and also between internal stakeholders' subgroups: the **decision-makers**, who define the Group's strategies (here we include the Board of Directors, the Executive Committee, and the Senior Leader Team), and the **practitioners** as those executing strategies implementing projects and action plans (here we include all those who occupy key positions in the deployment of the strategies and that do not belong to the previous subgroup) (Figure 5).

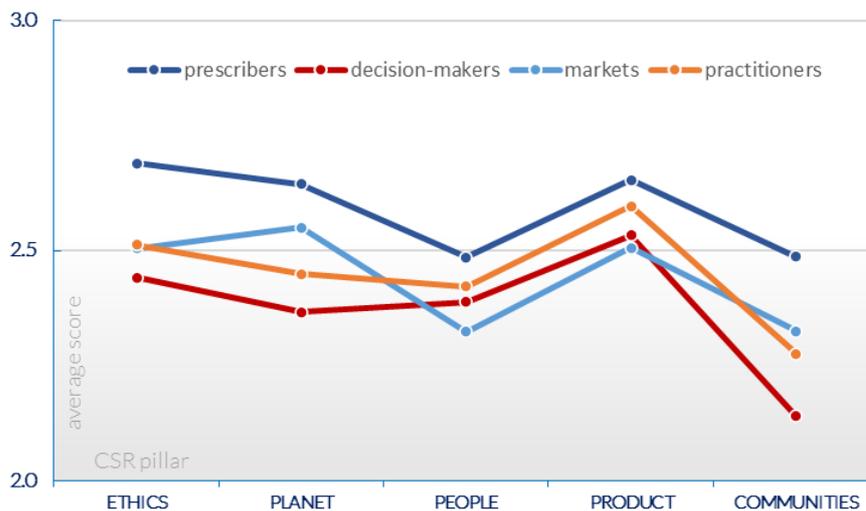


Figure 5. Comparison between the scores of the external stakeholders' subgroups (prescribers and market expectations) and internal (decision-makers and practitioners).

We see a clear lower average score of the aspects belonging to the *Communities* CSR pillar given by the internal stakeholders, which can also be seen from Figure 3. A potential explanation for this is a possible internal perception that these aspects are sufficiently developed and therefore would not require any further push beyond the actions we already have on the ground, or on a contrary vision, that, internally, these actions are not being given sufficient importance due to poor visibility.

We note an alignment between the four subgroups in what regards to the five CSR principles, generally reporting **higher scores from the prescribers, followed by both internal groups and finally, lower requirements from the market expectations**. An explanation for the **higher score of practice over decision making may be due to the higher detail** that these aspects are being handed by both subgroups and that they would generate more familiarity with those individuals who implement or manage them (such as consumption and emissions), while decision-makers tend to deal with them at a more strategic level (such as governance and alignment of such aspects with other programmes or principles).

Worth of notice, and trending contrary to the above, is the **overvaluation of the external expectation by consumers, customers, and suppliers (market) on aspects related to the Planet CSR pillar**, as a possible result

of the effect of communication in the media, including digital social media, on the trending aspects with the most visibility, such as climate change, plastics, and environmental protection/conservation.

**d) Comparison with the results of the 2019 analysis and all new aspects**

Comparing the current results with those obtained in the previous materiality study (in 2019) we find a match for the two most valued aspects, i.e., **health and safety of the employees** and the **quality and food safety of the products**. The finding is not surprising, since, as widely mentioned, they are essential aspects for our Group and an expected requirement from society.

The **environmental management** aspects, such as those related to the use of water, energy, and materials and waste generation, score as top priorities. This matches the topics breakdown that we have identified in 2019 as priorities (back then we have proposed *reducing the consumption, the emissions, and the waste generation*). Similarly, the aspects on **governance** and **labour responsibility** are recurrent in this prioritization. In contrast, new aspects related to **traceability** and **transparency** arise, which, due to their importance and surge in popularity, require our reflection and, necessarily, their inclusion in the action plans to be developed.

**e) Aspects with more disparate scores**

The analysis of the aspects with a greater disparity between internal and external stakeholders shows three of the least urgent aspects in the *Communities* pillar (CO5, CO1 and CO6) and two in the *People* pillar (PE8 and PE5).

**f) Comparison of responses by sex of internal stakeholders**

In the comparative analysis of the survey responses from 47 female and 78 male participants belonging to the internal stakeholders, 'Women' show a higher valuation of aspects, understood as a higher average score (up to a maximum of 17% in the *PL12 Animal welfare* and a minimum of -8% in the *ET3 SDG Agenda 2030*, and an average of 4%) in each of the survey blocks (results shown in Figure 6 by CSR pillar, for a maximum of 6% in *Planet* and *Product*, average 4%). Checking the standard deviation of the responses indicates that the A-B-C differentiation is very similar (only 3% more variation between responses by male participants). The study methodology, promoting online responses, and the non-classification of external responses by gender, does not allow us to contrast this trend with any external stakeholders.



Figure 6. Differences in the average assessment of priority of the aspects consulted by CSR pillar between sex of the participants (internal stakeholders only).

## 5. Action plans drawn on the results of this study

We see all 46 relevant aspects evaluated in this materiality study as important. Together or alone, they are unavoidable issues for the correct and modern management of a wide group of companies such as our Group's that included fishing, aquaculture, industrial and marketing operations. Nevertheless, for us to assign the sufficient and the right resources for their management, including specific measures to report and improve our performance, we need to restrict ourselves to a manageable number of topics on which to focus our action, i.e., those that are considered a priority based on their relative importance – the material aspects.

The consultation exercise carried out with our stakeholders has resulted in useful information that helps to design action plans that aim to aligning the Group's strategy with the most relevant aspects. At the same time, we expect to learn about the best ways to meet the expectations of the external stakeholders and consider the current prescriptions and trends in science, good practices, and regulatory compliance, applied towards the continuous improvement, modernization and efficiency of our operations and our performance in general.

### 5.1. Material aspects for 2021-2022

From the prioritization of the 46 relevant aspects for the Nueva Pescanova Group's internal and external stakeholders, **18 material aspects** stand out for their importance scores (Figure 7).

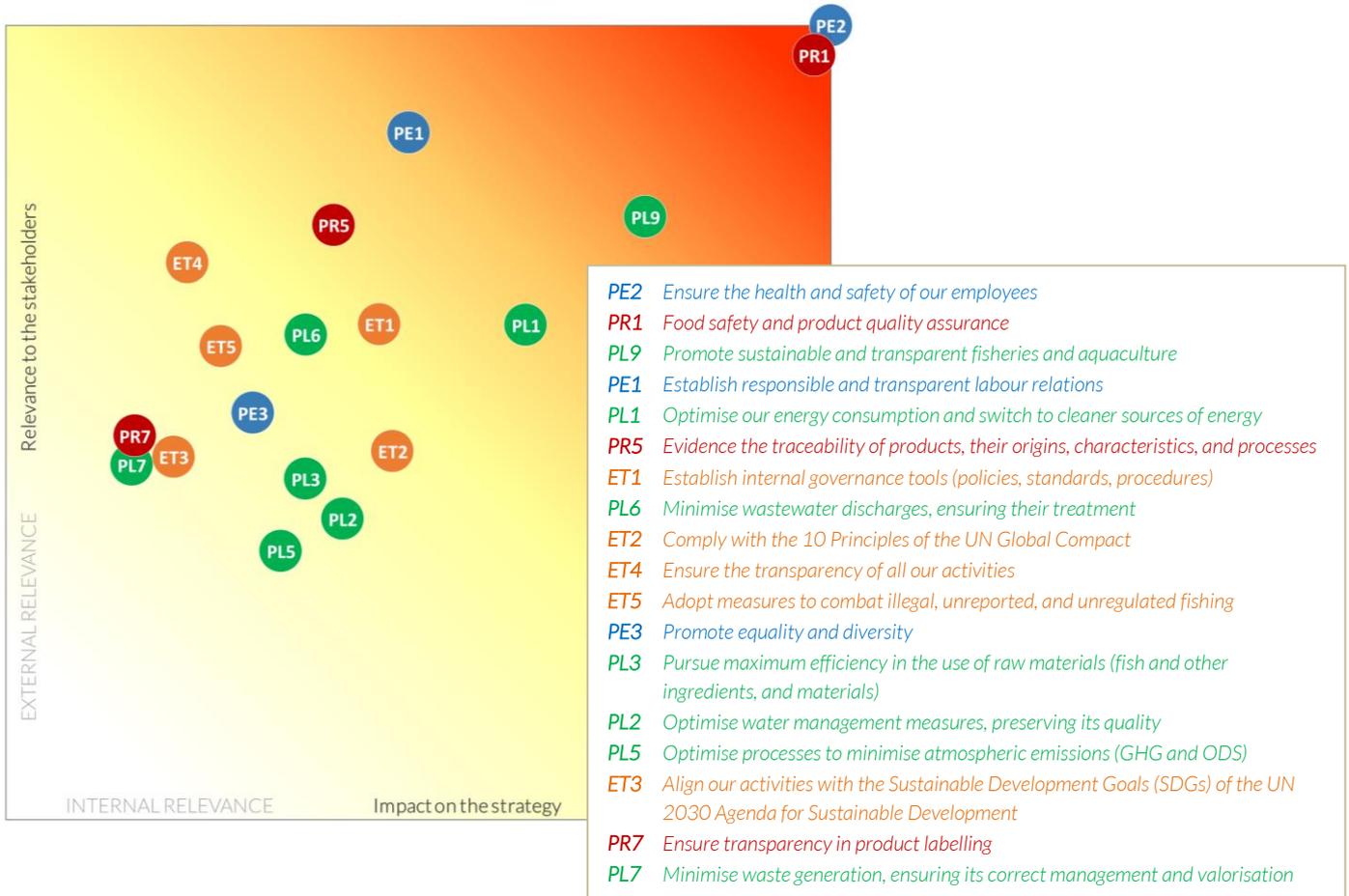


Figure 7. Material aspects matrix resulting from the prioritization analysis after consultation with stakeholders on their assessment of the relevance of each aspect.

## 5.2. Defining action plans for 2021-2022

One of the objectives of the materiality study was the definition of action plans for the 2021-2022 period. Therefore, based on the material aspects identified, we have designed the following action plans aiming to implement concrete measures or to ensure their adoption:

- To *Ensure the health and safety of our employees (PE2)* we intend to publicly and transparently report the pertinent information to evidence the results of the Group's *occupational health and safety management plan* in all work centres, presenting performance indicators and informing of the plans and timetable for their implementation. The Director of Occupational Health and Safety is responsible for this plan.
- For the *Food safety and product quality assurance (PR1)* we are committed to certify 100% of the facilities and processes for the transformation of seafood products by the pertinent standards, or to maintain the current applicable certifications, communicating clearly and transparently which products are produced in each industrial centre, or factory, and under which standards. We already have implemented the 'Quality Excellence Pescanova' Programme that seeks to comply with the highest food safety standards and ensure their application to all the products we make. The Group's Director of Quality and Environment is responsible for this plan.
- To *Promote sustainable and transparent fisheries and aquaculture (PL9)* we are committed to documenting and communicating in a transparent way the evidence of sustainability of all our raw materials, i.e., those resulting from our capture fisheries operations, cultivated on our aquaculture farms, or acquired from third parties, according to the criteria already defined in the *Corporate Sustainability Policy of the Nueva Pescanova Group* and in the 'Pescanova Blue' Sustainability Programme. From the Sustainability Department, we will launch an *annual report on transparency in sustainability* to communicate our performance and progress in terms of sustainability of raw materials of fishery and aquaculture origin, thus complying with our *Sectoral Policies on Fisheries and Aquaculture Responsibility*. The implementation of the measures of this plan is the responsibility of the Group's Fisheries and Aquaculture departments.
- We are committed to *Establish responsible and transparent labour relations (PE1)* by developing and implementing the necessary *responsible action policies* and/or procedures to ensure the application of our principles, code of ethics and regulatory compliance. The Director of Human Resources department is responsibility for this plan.
- To *Optimise our energy consumption and switch to cleaner sources of energy (PL1)* we are committed to promoting and implementing the necessary measures for the decarbonization of our activity, as recommended in the *Measurement & Performance Programme* and in the *Environmental Compensation Programme*. In this sense, we want to transparently communicate the progress of the implemented initiatives and relevant indicators of these measures (such as energy efficiency in key processes, industrial reconversion with substitution of the most polluting energy sources or investment in renewables, among others) through the communication in *non-financial information reports (EINF)* of the Group's companies and in a *transparency in sustainability report*. The Directors of Industry, Aquaculture, Fisheries, and Operations of the Group are responsible for the implementation of these plans and programmes with the collaboration of the Sustainability department in the integration and reporting of performance indicators in the mentioned programmes.
- To *Evidence the traceability of products, their origins, characteristics, and processes (PR5)* we commit to implement the necessary processes and systems that ensure the traceability of the pertinent information about the origin, quality, value, regulatory compliance, and sustainability of our products from source of raw materials, industrial transformation, and product marketing. We will implement a robust digital

traceability system that ensures compliance with traceability standards for seafood products. We are already participating with the Global Dialogue on Traceability of Seafood Products (GDST) of the UN Global Compact, and we will implement our [Fishery Products Traceability System](#) following the GDST 1.0 standard. This plan is promoted by the CSR department and includes the collaboration of the Group's Fisheries, Aquaculture, Industry, Commercial, Purchasing, Quality, Sustainability, and IT departments.

- We *Establish internal governance tools (policies, standards, procedures) (ET1)* by developing and implementing the necessary [responsible action policies](#) and/or procedures to ensure the application of our principles, code of ethics and regulatory compliance. The promotion and development of this plan is the responsibility of the Directors of the business or support areas with the assistance of the Director of the Compliance Unit.
- To *Minimise wastewater discharges and ensure their treatment (PL6)* we commit to develop and implement suitable environmental performance indicators and to continue investing in [rational use of water and properly address the wastewater discharges](#) through technological improvement of equipment and processes. This plan is the responsibility of the Group's Director of Quality and Environment in collaboration with the Directors of Industry, Aquaculture, Fisheries and Sustainability.
- *Complying with the 10 Principles of the UN Global Compact (ET2)* implies the commitment to communicate our [contribution to sustainable development](#) and to these principles on non-financial information reports annually and progress reports to the Spanish Network of the UN Global Compact. This plan is the responsibility of the Director of CSR in collaboration with the Director of the Compliance Unit.
- To *Ensure the transparency of all our activities (ET4)* we commit to communicate our performance on non-financial information in the EINF annual report, and in the [integrated and transparency sustainability reports](#), as well as the progress results of the [Measurement & Performance and Sustainability Programmes](#). This plan is the responsibility of the Directors of CSR and Sustainability in collaboration with the Communications Department.
- To *Adopt measures to combat illegal, unreported, and unregulated fishing (ET5)* we are committed to complying with our [Sectorial Policy on Fisheries Responsibility](#), to the implementation of traceability tools for a transparent compliance of regulations and voluntary efforts towards sustainable operations and resources use. The execution of this plan is the responsibility of the Fisheries department and promoted by the Sustainability department.
- To *Promote equality and diversity (PE3)* we propose to implement ways to characterize, quantify and communicate our commitment to equal gender opportunities, non-discrimination, and diversity in all its forms, in accordance with our [Corporate Policy on Responsible People Management](#), and implement the necessary concrete measures for its goal. This plan is the responsibility of the Director of Human Resources.
- To *Pursue the maximum efficiency in the use of raw materials (fish and other ingredients, and materials) (PL3)* we are committed to the implementation of the [best management practices](#) in our processes of seafood transformation and production to optimize the use of main raw materials (fish) and auxiliary materials (ingredients and others), as well as the packaging materials (plastic, paper/cardboard, others) in all steps of the value chain from capture or farming to the transformation and processing in plant. We intend to communicate the efficiency of the use of said raw materials and materials, by area of activity, in non-financial information annual reports and aligned with our Measurement & Performance Programme. The execution of this plan is the responsibility of the Group's Directors of Fisheries, Aquaculture, Industry and Operations, with the collaboration of the Sustainability department in the integration and reporting of performance indicators in the mentioned programme.

- To *Optimise water management measures and preserve its quality (PL2)* we commit to the implementation of *best practices in water management*, favouring efficiency in its use and investing in equipment where needed, while defining consumption indicators by production and ensuring we return it to the environment in compliance to the applicable regulations. The implementation of the measures in this plan is the responsibility of the Industry, Aquaculture and Fisheries departments, and promoted by the Group's Quality and Environment department in collaboration with the Sustainability department.
- To *Optimise processes and minimise atmospheric emissions (GHG and ODS) (PL5)* we commit to keep investing in *decarbonization measures and technological improvement of equipment and processes*. We will push on our industrial reconversion by substituting the most polluting fuels and switch on renewable sources of energy whenever possible, increasing the share of renewables from our electricity suppliers, and intensify our own production of energy from renewable sources. We will continue to invest in more efficient equipment and processes in energy conversion or production and their proper maintenance. We want to improve our emission-related indicators, both for greenhouse gases (GHG) and for ozone depleting substances (ODS), per unit of production. The implementation of this plan is the responsibility of the Industry and Operations departments (in particular, Purchasing and Logistics) and promoted by the Group's Director of Quality and Environment in collaboration with the CSR and Sustainability department.
- To *Align our activities with the Sustainable Development Goals (SDGs) of the UN 2030 Agenda for Sustainable Development (ET3)* we commit ourselves to elaborate and communicate an annual progress report on our *contribution to sustainable development*, and how we impact, positively or negatively, on the relevant sustainable goals already defined by the UN 2030 Agenda. The measurement of said contribution must be analysed and, when necessary, *specific measures* will be defined to align our practices with the specific SDGs, pursuing continuous performance improvement. This plan is the responsibility of the CSR department.
- To *Ensure transparency in product labelling (PR7)* we commit to complying with the *labelling regulations and responsible communication*, anticipating the information requirements demanded by society through consumers and customers. The implementation of the measures of this plan is the responsibility of the Marketing, R&D and Quality and Environment Directors and promoted by the Category Directors and Country Managers.
- To *Minimise waste generation and ensure its correct management and valorisation (PL7)* we commit ourselves to collect information on the generation, segregation, and management of waste in each industrial centre or factory of the Group monthly, recording the progress of the measures for the optimization of the operations and waste management, working with the best options for authorized operators in each country, type of waste or technical solution for its elimination, treatment, or recovery. We will promote *circular economy solutions* for the by-products of our activity so that they do not result in waste. This plan is the responsibility of the Directors of Industry and Operations and promoted by the Quality and Environment, R&D (in particular, circular economy), CSR and Sustainability departments.

The plans and programmes we are committing to, and their associated actions, are incorporated into the 2021-2022 CSR strategic plan, their implementation will be monitored, and their impact will be measured through the Responsible Action Program (RAP) annually, which also establishes the contribution to specific targets of the Sustainable Development Goals of the UN 2030 Agenda.

**Annex I.** Survey used for the prioritization of relevant aspects in a consultation to the stakeholders of the Nueva Pescanova Group between December 2020 and January 2021.

# 1

CSR pillar: ETHICS, INTEGRITY, AND REGULATORY COMPLIANCE

General plan: Good Governance, Ethics, and Compliance

Relevant aspects		A	B	C
ET1	<p><b>Establish internal governance tools (policies, standards, procedures)</b>  <i>Advocate for good governance ensuring compliance with the highest standards of ethics and integrity, and regulatory compliance at the national and international level, through internal tools such as Policies, Standards, Procedures, and other internal regulatory documents.</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ET2	<p><b>Comply with the 10 Principles of the UN Global Compact</b>  <i>Implement compliance measures in matters of human and labour rights, respect for the environment and the fight against corruption.</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ET3	<p><b>Align our activities with the Sustainable Development Goals (SDGs) of the UN 2030 Agenda for Sustainable Development</b>  <i>Align the Group's strategies on sustainable development with the UN 2030 Agenda, incorporating the measurement of the impact of its activities on the SDGs.</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ET4	<p><b>Ensure the transparency of all our activities</b>  <i>Publicly communicate the impact of our activities on environmental and labour/social sustainability, regardless of the degree of performance obtained.</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ET5	<p><b>Adopt measures to combat illegal, unreported, and unregulated fishing</b>  <i>Support the fight against illegal, unreported, and unregulated (IUU) fishing, through the implementation of concrete and transparent measures of good practices that govern our fishing activity.</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ET6	<p><b>Adopt sectoral improvement commitments (reduction of plastics, circular economy, responsible communication, others)</b>  <i>Promote and implement sector improvement measures at a pre-competitive level such as the reduction of plastics, circular economy, responsible communication, improvement of formulations, etc.</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ET7	<p><b>Promote permanent dialogue with the Stakeholders</b>  <i>Understand how we affect Stakeholders and how they affect the Group's operations, establishing and maintaining two-way communication channels.</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Relevant aspects		A	B	C
PL1	<p><b>Optimise our energy consumption and switch to cleaner sources of energy</b>  <i>Reduce the energy intensity of our products and ensure more efficient operations, reducing energy consumption (electricity and fuel) per product unit, and opt for cleaner energy sources.</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PL2	<p><b>Optimise water management measures, preserving its quality</b>  <i>Manage water use more efficiently, reducing its consumption per product unit and optimising processes.</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PL3	<p><b>Pursue maximum efficiency in the use of raw materials (fish and other ingredients, and materials)</b>  <i>Maximise the use of fishery and aquaculture raw materials and auxiliary materials, improving the efficiency of the use of natural resources.</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PL4	<p><b>Design packaging with less plastic, reducing its environmental impact</b>  <i>Eco-design packaging based on the life cycle of their materials and products, with special attention to the use of plastic.</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PL5	<p><b>Optimise processes to minimise atmospheric emissions (GHG and ODS)</b>  <i>Minimise emission of greenhouse gases and ozone depleting substances originating from our activities.</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PL6	<p><b>Minimise wastewater discharges, ensuring their treatment</b>  <i>Optimise water use processes, improving technologies that ensure its adequate treatment and/ or reuse to minimise the volume and polluting load of discharges from our activities.</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PL7	<p><b>Minimise waste generation, ensuring its correct management and valorisation</b>  <i>Optimise our processes to minimise the generation of waste, ensuring its correct and adequate management, including valorisation, by authorised operators.</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PL8	<p><b>Promote the circular economy of by-products, conserving resources and generating value</b>  <i>Define and implement measures for the recovery and circular use of the by-products of our seafood processing activities.</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PL9	<p><b>Promote sustainable and transparent fisheries and aquaculture</b>  <i>Implement sustainable fisheries and aquaculture management measures and transparent reporting, applying the principles of FAO's Code of Conduct for Responsible Fisheries.</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PL10	<p><b>Promote responsible purchasing based on environmental and social sustainability criteria</b>  <i>Implement criteria on environmental and labour/social sustainability in support of the purchasing processes of relevant raw materials, with the necessary evidence from its suppliers.</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PL11	<p><b>Promote biodiversity conservation projects</b>  <i>Contribute to the conservation of biodiversity in the areas of our operations, supporting projects for the conservation and repopulation of native fauna and flora, and helping to mitigate the impacts of our activities.</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PL12	<p><b>Animal welfare in aquaculture</b>  <i>Implement measures for the welfare and respect of farmed animals throughout their development phases in all our aquaculture operations, aligned with applicable national and international standards.</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PL13	<p><b>Sustainable sourcing of aquaculture feed ingredients</b>  <i>Verify the sustainable origin of the feed ingredients used in our fish and shrimp farming, and source the relevant information from its suppliers.</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

# 3

CSR pillar: PEOPLE

General plan: People First

Relevant aspects		A	B	C
PE1	<p><b>Establish responsible and transparent labour relations</b>  <i>Ensure the compliance with pertinent labour legislation in each country, the regulations of the International Labour Organization (ILO), and guarantee fair and equitable wages.</i></p>			
PE2	<p><b>Ensure the health and safety of our employees</b>  <i>Always safeguard the physical and moral integrity of the professionals of the Nueva Pescanova Group and for all types of situations.</i></p>			
PE3	<p><b>Promote equality and diversity</b>  <i>Guarantee equity, inclusion, and equal opportunities for all professionals of the Nueva Pescanova Group.</i></p>			
PE4	<p><b>Support the professional and personal growth of all employees (training)</b>  <i>Ensure access to talent and career development tools for all employees of the Nueva Pescanova Group.</i></p>			
PE5	<p><b>Promote corporate volunteering</b>  <i>Encourage the voluntary participation of the Group's employees in social and environmental activities in what relates to our partner communities.</i></p>			
PE6	<p><b>Strengthen the pride of belonging</b>  <i>Create a group culture, where teamwork, recognition of merit, equal opportunities, job security and respect, make us feel proud of belonging to the Nueva Pescanova Group.</i></p>			
PE7	<p><b>Reconcile work and family life</b>  <i>Promote the correct balance between family and work life for all employees of the Nueva Pescanova Group.</i></p>			
PE8	<p><b>Promote healthy habits among employees</b>  <i>Inform about the benefits and motivate the adoption of healthy habits and physical activity.</i></p>			

Relevant aspects		A	B	C
PR1	<p><b>Food safety and product quality assurance</b>  <i>Ensure safe production processes and controls to offer high quality seafood, superior to the competition, that customers and consumers can trust.</i></p>			
PR2	<p><b>Ensure the supply of seafood to society (food security)</b>  <i>Ensure the supply of sustainable and quality seafood to markets and society, continuously over time.</i></p>			
PR3	<p><b>Offer healthy and nutritious products</b>  <i>Guarantee that the seafood we fish, farm, buy, and transform are a healthy alternative for consumers.</i></p>			
PR4	<p><b>Promote the naturalness of products (clean label, fewer additives)</b>  <i>Develop formulations and processes that result in safe and more natural food products, avoiding the use of additives.</i></p>			
PR5	<p><b>Evidence of the traceability of products, their origins, characteristics, and processes</b>  <i>Implement tools and systems to guarantee the traceability of all information related to the characteristics of our raw materials, ingredients and products, and the processes used.</i></p>			
PR6	<p><b>Communicate the sustainable origin of our products on their packaging</b>  <i>Inform about the sustainable origin of our products to the consumer, adding the appropriate sustainability labels or text on the packaging.</i></p>			
PR7	<p><b>Ensure transparency in product labelling</b>  <i>Communicate with our consumers in a responsible and transparent way, adding all the information required by the legislation and the consumer in the labelling of our products.</i></p>			
PR8	<p><b>Minimise food waste</b>  <i>Implement measures that contribute to reducing food waste in the transformation/elaboration and consumption phases, designing processes and products that avoid their waste or expiration.</i></p>			
PR9	<p><b>Innovate to improve consumer satisfaction, seeking maximum efficiency</b>  <i>To be a leading brand driving market growth and adding value to seafood products while attending to consumer needs.</i></p>			

Relevant aspects		A	B	C
CO1	<p><b>Invest in assets and infrastructure in communities</b>  <i>Promote projects to improve infrastructure or services for the benefit of our partner communities, positively contributing to their quality of life.</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CO2	<p><b>Promote job creation through knowledge and technology transfer</b>  <i>Transfer knowledge and technology as a formula for creating quality employment and fixing the population to the territory.</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CO3	<p><b>Promote professional training in the fishing, aquaculture, and food industry sectors</b>  <i>Favour the improvement of professional training in our partner communities, strengthening employability in those trades related to our activity.</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CO4	<p><b>Promote education and awareness projects</b>  <i>Support quality education in our partner communities as a formula for growth and development.</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CO5	<p><b>Promote local purchasing to contribute to the growth of the communities</b>  <i>Promote the growth of nearby suppliers, supporting the economy of local communities and reducing the environmental footprint of products.</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CO6	<p><b>Value the local history, tradition, and seafood of our partner communities</b>  <i>Promote the history, culture, and consumption of seafood, as ambassadors of the country of origin and their communities, contributing to its development.</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CO7	<p><b>Promote social development projects</b>  <i>Contribute to the well-being of the community and to the integration of groups at risk of social exclusion, including solidarity and humanitarian donations in kind.</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CO8	<p><b>Participate in environmental improvement projects</b>  <i>Help to improve the quality of the environment through cleaning, conservation, protection, or regeneration projects, and dissemination actions.</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CO9	<p><b>Participate in mitigating the effects of emergency relief and social or economic crisis</b>  <i>As part of the community, actively get involved in situations of emergency response and humanitarian relief caused by climatic episodes or natural disasters, as well as in social, health, or economic crises.</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>