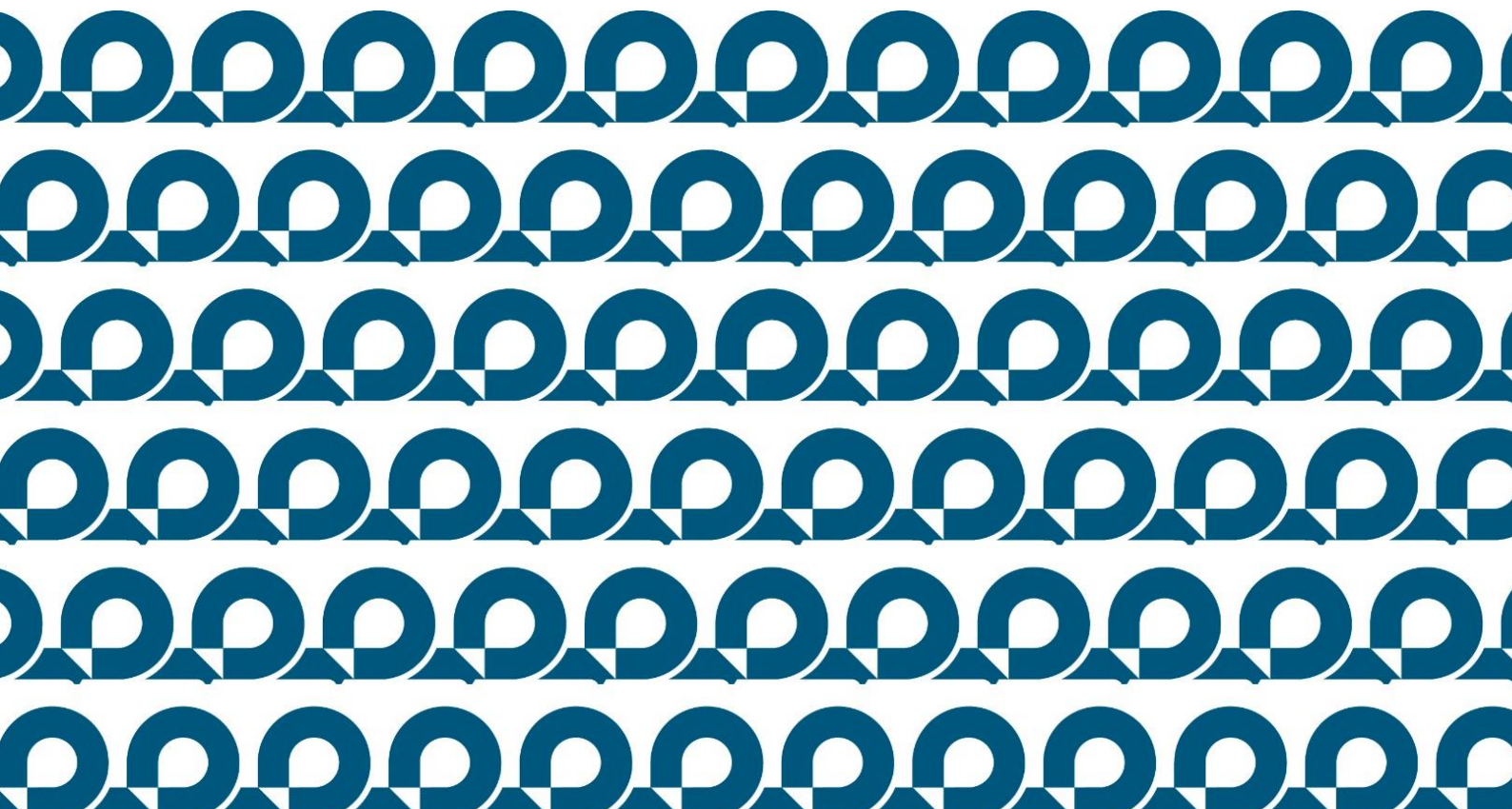




**REPORT ON THE NON-FINANCIAL  
STATEMENT OF  
NUEVA PESCANOVA, S.L.,  
AND ITS GROUP COMPANIES,  
FOR THE YEAR 2020**

*This is a free translation of a document originally written in Spanish.  
In the event of any discrepancy, the Spanish language version prevails.*



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## I. INTRODUCTION

The Report on the Non-financial Statement (hereinafter, the Report) of the Nueva Pescanova Group (hereinafter the Group) has been authorized for issue by the Board of Directors of the parent company (Nueva Pescanova, S.L.), in the terms and with the content set out in Law 11/2018, of 28 December, amending the Commercial Code, the consolidated text of the Companies Law approved by Royal Legislative Decree 1/2010 of July 2, and Law 22/2015, of July 20, Audit of Accounts, on non-financial information and diversity; and is part of the Management Report for the year ended December 31, 2020 of the Consolidated Annual Accounts of Nueva Pescanova, S.L.

The Report includes information on environmental, social, people (i.e., our professionals), human rights, anti-corruption, and bribery issues, as well as other information on the Group, in accordance with the requirements set out in Law 11/2018 and considering the International Global Reporting Initiative (GRI) framework. In accordance with these regulations, the Report have been verified by the independent external firm, KPMG Asesores, S.L.

The scope of the information contained in this Report comprises all Nueva Pescanova Group companies that are included in the consolidation scope, as described in the Consolidated Annual Accounts.

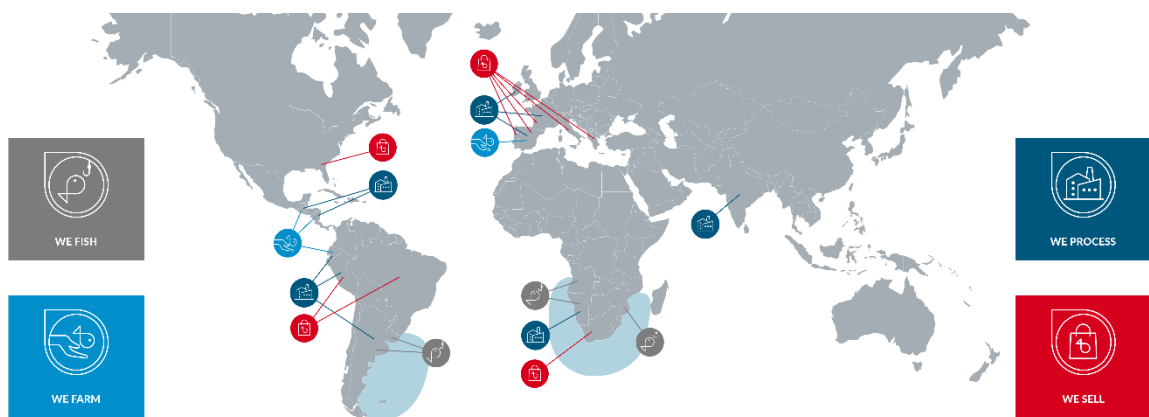
## II. GENERAL ISSUES ON THIS NON-FINANCIAL STATEMENT FOR THE 2020 FINANCIAL YEAR

### 1. Business model

#### 1.1 Overview and major markets

The Nueva Pescanova Group is a Spanish multinational company engaged in capture fisheries, aquaculture, processing, and commercialization of seafood products that was born to transform the seafood industry and bring the freshness of the sea to consumers' tables.

With more than 10,000 employees, we are present in 19 countries on four continents, selling almost 70 seafood species in more than 80 countries.



The Nueva Pescanova Group has had the opportunity to fully transform itself to become a leader, a leadership that is sustainable over time and is recognized internationally for all its activities.

Within this process, the Nueva Pescanova Group has shaped its current **DNA**, which gives life and meaning to the whole Group. **Our DNA** is based on three basic pillars:



**We work** together to be the best food company in the market by bringing the freshness of the sea to the consumer's table.

The Nueva Pescanova Group is one of a kind in the seafood sector due to the level of vertical integration. The control over seafood products from origin to market is one of our differential values, which allows to have a fully traceable value chain to always offer the best quality to consumers.



#### **WE FISH**

with more than **60 fishing vessels** in the best fishing grounds of the Southern Hemisphere:

**Argentinean red shrimp, cephalopods and hake**, to name a few, in South America  
**Prawns, hake and kingklip**, among other, in Africa



#### **WE FARM**

in a 7,000 ha farming area:

**Vannamei shrimp** in Ecuador, Guatemala and Nicaragua.  
**Turbot** in Spain.



#### **WE PROCESS**

in **17 processing plants** located in **10 countries**:

Spain, Peru, Ecuador, France, Namibia, Nicaragua, Guatemala, Argentina, Ireland and India



#### **WE SELL**

In **80 countries** on 5 continents.

Our commercial offices are located in:

Spain, France, Greece, Italy, Portugal, USA, Brazil, Peru and South Africa.



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

The Group has been bringing the best seafood to millions of homes around the world for more than 60 years, making innovation, freshness, and quality the hallmarks of the **Pescanova** brand. Today, in the Spanish market, our brand is at the 'top of mind' of consumers, being the 4<sup>th</sup> brand in household penetration and ranking 8<sup>th</sup> among the most chosen brands by Spaniards, according to Kantar Worldpanel's 'Brand Footprint Spain2020'.

In addition, works are being concluded for the launching in the first half of 2021 a R&D+i Center that will be an international reference in Aquaculture: the **Pescanova BioMarine Center**. This facility, located in O Grove (Pontevedra, Spain), will mark a turning point in aquaculture studies worldwide through our research techniques on genetics, nutrition, and health, as well as in sustainability. With its research we will be able to improve, not only the farming of species such as turbot, but also find better techniques to assist in the rearing of new species, such as octopus. The 4,000 m<sup>2</sup> facility will be equipped with the latest technology and will position the Group as an international leader in aquaculture R&D+i.



**We believe** our first responsibility is the sustainability of natural resources and of our partner communities, whose trust we build and maintain by acting ethically and creating value.

Respect for the planet and the communities in which the Group is present, for the people who make up the Nueva Pescanova Group and the commitment to the markets through our products, are the pillars that support our *Corporate Social Responsibility Strategy*.



**PLANET**

The sustainable management of natural resources and respect for ecosystem and the environment, to ensure availability and quality for future generations, guarantee the success of our operations and the future of our Group.



**PEOPLE**

The respect for diversity, safety, professional growth and the pride of belonging to the Group are the foundations of our success along with the trust relationships with suppliers, customers, consumers and communities.



**PRODUCT**

Facilitating the access of nutritious, healthy, tasty, innovative and responsibly produced seafood products to the markets.



**COMMUNITIES**

We acknowledge the value of seafood products and we strive for the development of more prosper communities by generating wealth and job and training opportunities wherever we are present.

The Nueva Pescanova Group, a leader in the seafood sector, has prepared and implemented, in 2020, a new Strategic Plan, to be developed over the temporary horizon 2020-2024: The Strategic Plan "Journey to Growth". With this new strategic framework, the Group aims to put the focus on the consumer, turning the Pescanova platform into a differential competitive advantage, based on five pillars:

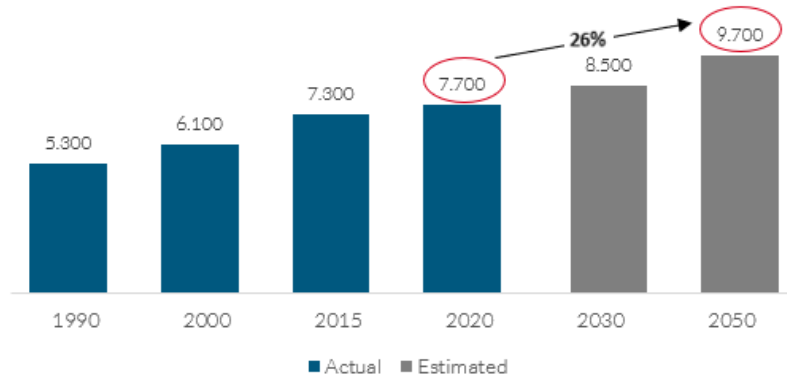
- (i) Bring differentiated seafood products to those markets that value them most.
- (ii) Consumer-centric, by adding value.
- (iii) Improve productivity, efficiency & sustainability throughout the whole value chain.
- (iv) Transform the organization to materialize change.
- (v) Assess the best way to get there: organically, through mergers or alliances.

With the implementation of this new Strategic Plan, the Group will be able to strengthen its position as a reference in the marketing of seafood, based on an agile and dynamic organizational structure based on the knowledge and experience of the Group in all the activities that make up its value chain.

## 1.2 Business environment, competitive framework, and future trends

The expected increase in the world's population and economic growth will affect demand for food and animal protein. By 2030, the world's population is expected to reach 8.5 billion, and 9.7 billion by 2050, which will mean an increase in demand for marine protein:

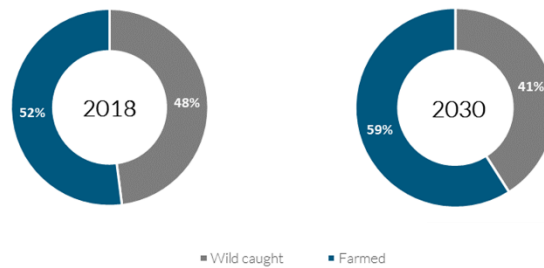
**Projected World Population**  
(1990-2050E, Million)



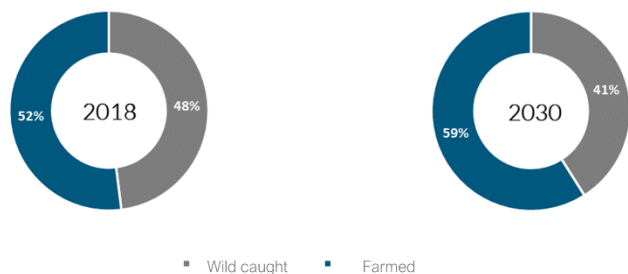
Source: Nueva Pescanova compilation based on UN's reports.

Aquaculture is the answer to meet the increasing demand for marine protein since capture fisheries productions will remain stable, subject to the continuous search for sustainable resources and their preservation. In this regard, according to FAO's estimates, farmed species are expected to contribute a 53% share of the global fisheries production and 59% of the fisheries production destined to human consumption by 2030:

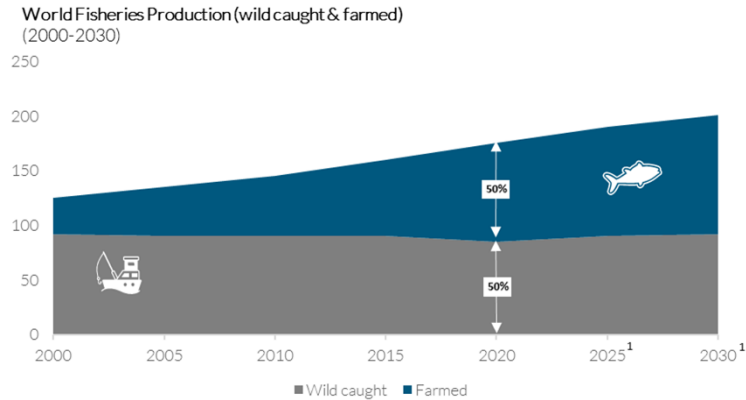
WORLD FISHERIES PRODUCTION (WILD CAUGHT & FARMED)



FISHERIES PRODUCTION DESTINED FOR HUMAN CONSUMPTION







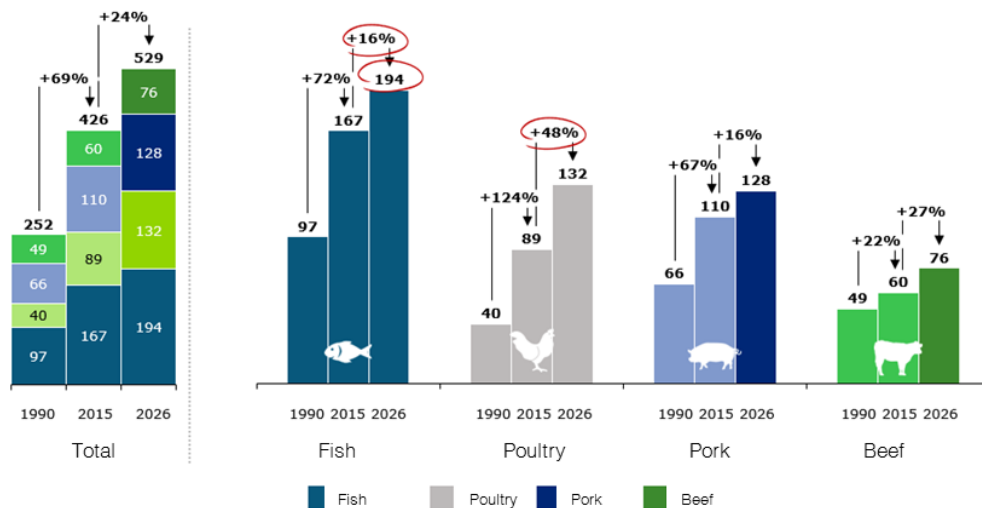
(<sup>1</sup>) FAO's Projected Global Fisheries Production

Source: Nueva Pescanova compilation based on FAO's data.

Marine protein competes with other animal proteins, the charts below show the expected growth in poultry, pork, and beef production for the 2015-2026 period:

**Projected global consumption of fish, poultry and livestock**  
(1990-2015-2030E, Billion)

Source:  
Nueva



Pescanova compilation based on OECD and FAO data.

Fishery products consumption is a habit and a tradition in many countries, being a primary source of essential nutrients. Seafood consumption provides energy, protein, and other important nutrients, such as long-chain polyunsaturated fatty acids. All this makes it possible to foresee that the demand for seafood consumption will keep on increasing.

From an operational point of view, the main risks and uncertainties of the Nueva Pescanova Group are associated with its activities, mainly fishing and aquaculture, being closely linked to exogenous factors related to weather, biology, regulations and macroeconomy. That is why geographic diversification of origins (fishing and aquaculture) is a key factor in mitigating these risks. The risk does not go away, but its likelihood and impact on the Group's operating results are significantly reduced.

In addition, 2020 has exposed new environmental, operational, and economic risks, with the outbreak, at the beginning of the year, of the Coronavirus **COVID-19** pandemic, which affects the whole Group

due to its global scale. The Group has had to adapt to this environment of economic uncertainty and serious global health and humanitarian crisis through different actions, always prioritizing the *safety of our professionals and the quality and food security of our products*.

In fact, on March 11, 2020, the World Health Organization (WHO) declared the **COVID-19** outbreak a global pandemic, as it was rapidly spreading worldwide. Since then and up to date, Governments of different countries have adopted restrictive measures to contain the spread, ranging from population confinement, restriction of the free movement of people, closure of borders and closure of public and private premises, among other measures.

This situation has affected and continues to affect, significantly, the global economy, as supply chains became disrupted or slowed down, as well as for a considerable increasing economic uncertainty.

Obviously, the Nueva Pescanova Group was also affected and impacted by this situation, and right from the outset, prepared and implemented contingency plans to ensure *the safety of our employees and the continuity of the business*.

The scale of our Group, the added complexity of being present throughout the whole supply chain, and the fact of operating in countries with certain risk or instability, have resulted in a greater effort on the part of all staff to be able to contain the effects of the pandemic on our daily operations. Protocols had to be designed and measures were implemented at Group level and, at the same time, particular measures and protocols had to be implemented for the different divisions, i.e., fishing, taking into account the exceptionality of crews movements; aquaculture, because our professionals live at the farms; processing, particularly relevant as the Group is part of the food industry (an essential activity); and commercial, being present and carrying on operations in more than 80 countries worldwide.

The activity of the Group has been considered *essential activity*, for being a Group engaged in fishing, farming, processing and commercialization of seafood products, and the latter being considered staple goods. It is for this reason that the Group had to face a double challenge, on the one hand try to comply with its commitment of distributing and supplying basic goods to the Society and at the same time safeguard the safety and health of the more than 10,000 professionals that make up the Nueva Pescanova Group.

The Management identified the main risks affecting of the Group as a consequence of the **COVID-19** outbreak, among which there are the operational risks from potential inventory shortages or slowdown of supply chains; cybersecurity and data protection; environmental risks related to economic uncertainty affecting price volatility and possible drop in purchasing power in those countries in which we are present; and finally, the commercial risk associated with changes in household consumption patterns.

Throughout this Report, we have included information about the measures and protocols implemented by the Group, as well as **COVID-19** related data.

### 1.3 Organization and structure of the Nueva Pescanova Group

The governing body of the parent company of the Nueva Pescanova Group (Nueva Pescanova, S.L.), is a Board of Directors, consisting of 5 members and organized in 3 commissions that have their own rules and regulations.



#### Governance and Corporate Responsibility Commission

With competencies in appointments and corporate governance, remuneration, business ethics, institutional integrity, and compliance.



#### Audit, Control and Finance Commission

With competencies in the field of Risk Control, Internal Control System, Financial Reporting, the process of preparation and issue of Annual Accounts and monitoring Auditors' work.



#### Commerce and Strategy Commission

With competencies in the field of commercial strategy and compliance with the Group's Strategic Plans.

At a corporate level, the Nueva Pescanova Group is organized around a functional or matrix structure, that has been updated with the implementation of the new 2020-2024 Strategic Plan "**Journey to Growth**". The Executive Committee of the Nueva Pescanova Group (which we internally call COMEX) consists of the CEO, the Chief Officers of the Business Divisions (Fishing, Aquaculture, Industrial and Commercial) and the Chief Officers of the Cross-Functional Divisions (Categories, Marketing & Innovation, Finance and Administration, Operations, Human Resources, and Systems and Processes). There are two other Corporate Offices, whose Chief Officers are not part of the COMEX, and report directly to the CEO, these are the Corporate Office for Communication and Institutional Relations, and the Corporate Office of Corporate Social Responsibility.

And last, there are certain Corporate Offices that report directly to the Board of Directors of Nueva Pescanova, S.L., through their Commissions, namely, the Corporate Office for Upstream Strategy, through the Commerce and Strategy Commission; the Corporate Office for Internal Audit, through the Audit, Control and Finance Commission; and the Corporate Office for Legal Counselling and Compliance through the Governance and Corporate Responsibility Commission, and through the Audit, Control and Finance Commission.

In 2020 Abanca Corporación Bancaria, S.A., the majority shareholder of the Group, have increased its shareholding in the capital of Nueva Pescanova, S.L. and on April 13, 2020. The Annual General Meeting resolved the appointment of the new Board of Directors, which as mentioned above, consists of five members. Also, in February 2021, the majority shareholder has again increased its shareholding from what it held at year-end 2020.

## 2. Corporate Social Responsibility (CSR)

As explicitly written in our Corporate *DNA*, “*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*” is one of the undisputable principles on which we base our business activity.

The Nueva Pescanova Group's *CSR Master Plan* is based on this *DNA* principle and lies on the respect for the *Planet*, the personal and professional development of the *People* who make up the Group, the commitment to the markets through our *Products* and the contribution to improving the quality of life of our partner *Communities*, all ensuring the comprehensive observance of the principles of *business ethics, institutional integrity and compliance with the applicable regulations*, as stipulated in *Our Code of Ethics* and other provisions in our *Corporate Governance and Compliance Regulatory System*.

Our *CSR Strategy* also bears in mind our *Partners*, who make possible the existence and growth of the Group, our *Stakeholders*, and the *Society* as a whole, considering its changes and demands that are particularly sensitive to the *environmental impacts* of our business activity, to *fair and equitable treatment of workers* and *social rights* and *good corporate governance*, all in line with *ESG* criteria.

Thus, in 2020 and with the implementation of our *CSR Management Plan* we have worked on the application and development of the ‘*Pescanova Blue*’ *Sustainability Programme*, the *Responsible Action Programme (RAP)* and in the conceptualization of other programs such as: *Measurement and Performance*, *Transparency*, and *Compensation*, thus supplementing our *Master Plan*. We have also worked on strengthening the *Governance* of our activities and launched an *updated Materiality Analysis*, the results of which are included in this chapter and helps us to *align our CSR Master Plan with our Strategic Plan “Journey to Growth” and the demands of the Society*. Likewise, we have also worked on transparency through several publications on our corporate website, to make everyone aware of approved policies and diffusion of the reports on responsible action, contribution to sustainable development, and on materiality (<http://www.nuevapescanova.com/en/engagement/corporate-social-responsibility/>).

As proof of our firm commitment to the *Sustainable Development Goals* of the UN 2030 Agenda, in 2020 we have upgraded our affiliation from signatory to *participant* of the *UN Global Compact* initiative through its *Spanish Network*. In May 2020, the Group has *endorsed* the *Principles for a Sustainable Ocean* of the UN Global Compact, and in September of that same year our CEO *signed* the *Statement from Business Leaders for Renewed Global Cooperation of the United Nations*.

All the above help us to open and maintain the dialogue with our stakeholders on matters of relevance and social, environmental, or economic impact.



Outline of our CSR Master Plan, based on our DNA and guiding principles (Planet, People, Product, and Communities), which defines corporate and sectoral policies, and establishes the current Responsible Action and Sustainability Programmes and the coming Performance and Measurement, Transparency in Sustainability, and Environmental Compensation Programmes.

## 2.1 Materiality

In the last quarter of 2020, we have updated our *Materiality Analysis*, on which we started working in 2018 and published in 2019, incorporating to this study a **significant number of relevant issues** for our stakeholders, which have an impact on our fishing, farming, processing, and commercial activities. Thus, from having analyzed 17 relevant issues in the first analysis in 2018 to **46 in the 2020 edition**. The **scope of respondents has also been opened out** by incorporating internal representatives and external stakeholder from all countries or geographic areas where the Group is present. We got 213 responses back from a total of 445 questionnaires sent, i.e., a 48% response rate.

For the identification and prioritization of these material aspects out of the 46 relevant issues, we followed the methodology of the *Global Reporting Initiative* Guide (G4 version) with the following steps: (i) Identification of the relevant aspects that affect or likely affect the Group's ability to create value; (ii) Assessment of the importance (prioritization) of relevant issues for each stakeholders' group; (iii) Validation and review of the materiality and its results; and finally, (iv) preparation of the *Materiality Matrix* of the Nueva Pescanova Group on the basis of the material issues prioritized by representatives of external and internal stakeholders.

Below is the table showing the relevant issues assessed and the graphic showing the prioritization results of these aspects to become the current *Materiality Matrix* of the Nueva Pescanova Group.

**CSR Pillar: ETHICS, INTEGRITY AND COMPLIANCE – General Plan: *Governance, Ethics and Compliance***

- 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

**CSR Pillar: PLANET – General Plan: *Our Common Planet***

- 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 recovery
- 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

**CSR Pillar: PEOPLE – General Plan: *People First***

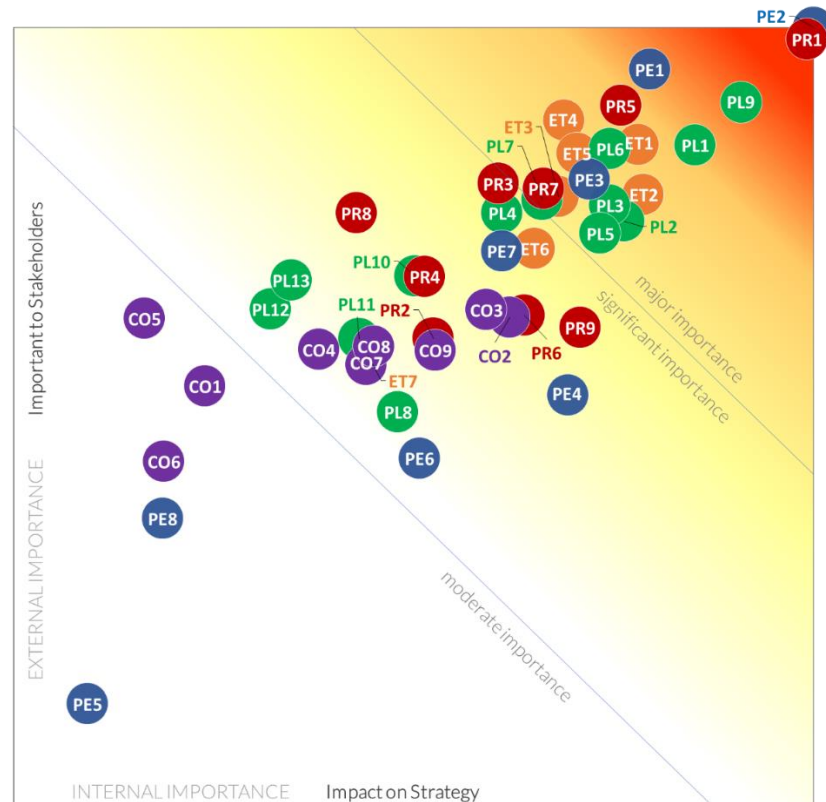
- PE1** Establish responsible and transparent labor relations
- PE2** Ensure the health and safety of our employees
- PE3** Promote equality and diversity
- PE4** Support the professional and personal growth of all employees (training)
- PE5** Promote corporate volunteering
- PE6** Strengthen the pride of belonging
- PE7** Reconcile work and family life
- PE8** Promote healthy habits among employees

**CSR Pillar: PRODUCT – General Plan: *Product Excellence***

- PR1** Food safety and product quality assurance
- 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

**CSR Pillar: COMMUNITIES – General Plan: *Growing Together with Our Partner Communities***

- CO1** Invest in assets and infrastructure in communities
- 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



Group's Materiality Matrix, resulting from the Prioritization Analysis of material aspects and importance according to stakeholders.

Of the most important aspects, the two below clearly stand out:

- *PE2 Ensure the safety and health of our employees.*
- *PR1 Food safety and product quality assurance.*

Both are imperative aspects for a responsible company, which ensures high quality and food safety, for all food products it harvest, handles and processes in all its facilities, and offers to the society, while providing excellent labor relations where safety and health plans for the protection of the physical and moral integrity of its nearly 10,000 employees are key elements.

In addition, in this category of most urgent implementation or assurance are the following aspects, in accordance with the *Materiality Matrix*:

- Seven environmental aspects centered on a fundamental aspect of the Group's activity (sustainable fisheries and aquaculture) and on essential issues of rational management of the use of natural resources and energy, and the resulting emissions and discharges:
  - *PL9 Promote sustainable and transparent fishing 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 recovery.*
- Five governance, ethics and compliance aspects that prove the need to define strategies and plans aligned with tacit principles and commitments with 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.*
- Other **four aspects** of great importance to the Group's activity such as **labor responsibility** for all employees ensuring legal, fair, dignified, inclusive and respectful labor relations, with equal expression and importance in all countries where the Group's companies operate, and **two key aspects** related to products, such as **traceability** and **transparency**, which connect directly with our upstream activities, sustainability, food safety and quality, among others:
    - *PE1 Establish responsible and transparent labor 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 above mentioned 18 aspects, identified as priorities, are defined as material aspects for the Nueva Pescanova Group for the following period 2021-2022. These material aspects require a rapid and objective response, as they may 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 importance priority and impact by the Group's stakeholders.

## 2.2 Action Programs

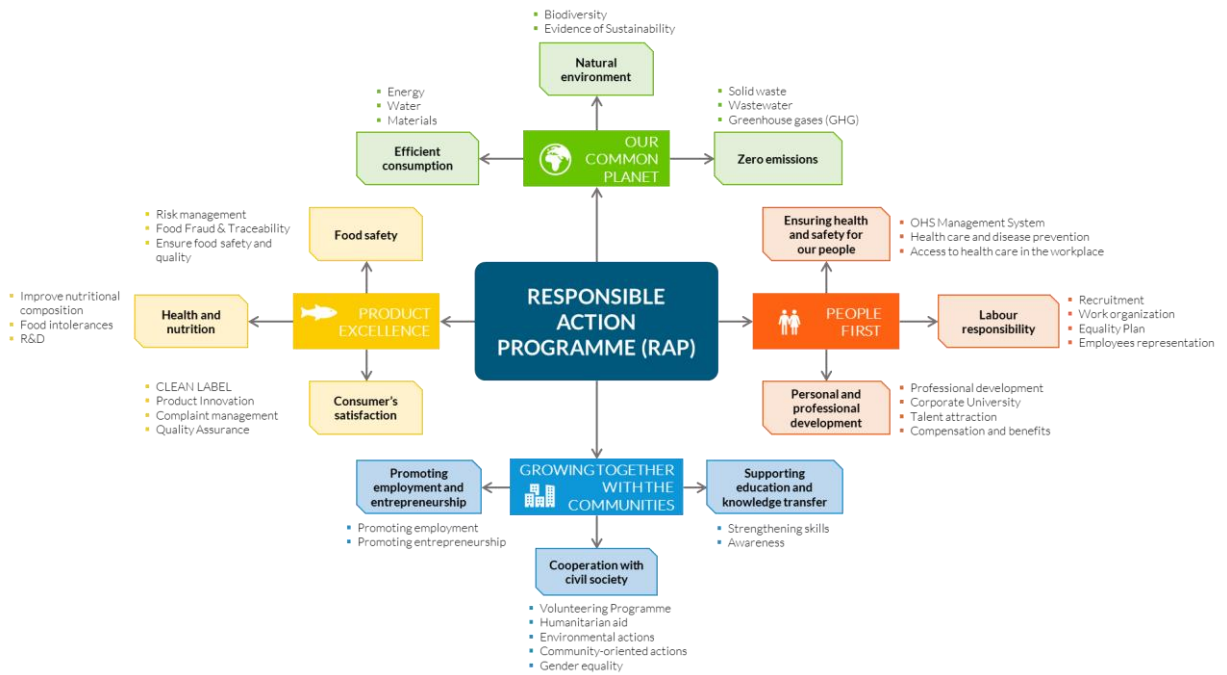
### 2.1.1 Responsible Action Programme

The **Responsible Action Programme** (hereinafter, **RAP**) is set out in 4 general plans inspired by the guiding principles of the **CSR Master Plan**:

- (i) 'Our Common Planet'.
- (ii) 'People First'.
- (iii) 'Product Excellence', and
- (iv) 'Growing Together with the Communities'.

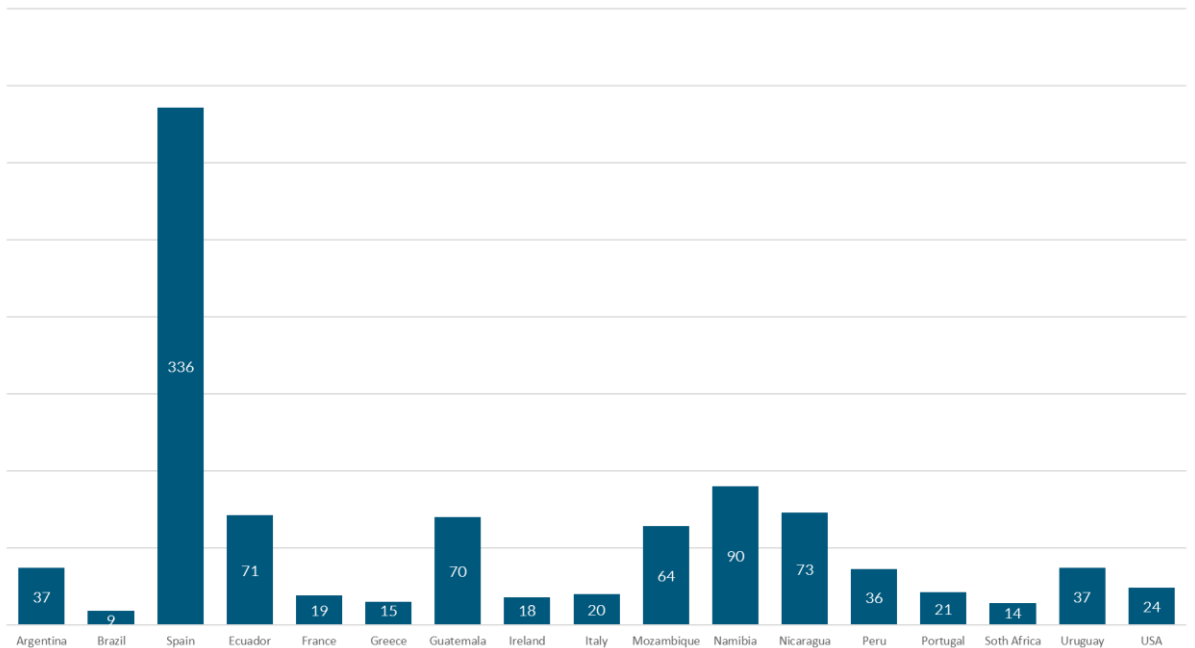
These 4 general plans are in turn expanded in 12 specific plans that respond to the material aspects identified as relevant in our **Materiality Matrix** and to business-related topics and their environmental, social, or economic impact. At present there are 40 topics, grouped into projects and actions that are implemented in all companies of the Group:





To manage the *RAP*, we prepared a *CSR* action management tool ('*RAP switchboard*'), which serves as a database and updated repository of the General and Specific Plans and Projects, documenting and measuring the progress of all actions included within the framework of the Group's *CSR Strategy*.

In 2020, a total of **954 actions** have been inventoried and documented in the Group companies in every country and business divisions, i.e., fishing, aquaculture, industrial and commercial, as shown in the chart below:



These actions are grouped in the relevant General and Specific Plans in our **RAP**, and each of which may impact in one or several Plans:

			
<b>OUR COMMON PLANET</b>	<b>251</b>	<b>PEOPLE FIRST</b>	<b>487</b>
01 Natural environment	71	01 Ensuring health and safety for our people	230
02 Efficient consumption	118	02 Labour responsibility	87
03 Zero emissions	155	03 Personal and professional development	201
			
<b>PRODUCT EXCELLENCE</b>	<b>99</b>	<b>GROWING TOGETHER WITH THE COMMUNITIES</b>	<b>117</b>
01 Health and nutrition	24	01 Supporting education and knowledge transfer	25
02 Consumer satisfaction	88	02 Promoting employment and entrepreneurship	36
03 Food safety	59	03 Cooperation with civil society	93
<b>- TOTAL 954 ACTIONS -</b>			

### 2.1.2 'Pescanova Blue' Sustainability Programme



The 'Pescanova Blue' Sustainability Programme is the Nueva Pescanova Group's operational answer to its positioning in the 4 **CSR** pillars (**Planet**, **People**, **Product** and **Communities**). With this programme we ensure that we transparently document all the work the Group does to make its operations and products more sustainable. To meet this objective, we have defined the Corporate Sustainability Policy of the Nueva Pescanova Group, as a governance tool, to align the Group's activities with:

- **Five sustainability principles** in the areas of **sustainable sourcing**, **labor responsibility**, **responsible operations**, **prosperous communities**, and **ethical and upright behavior** aligned with compliance obligations and objectives.
- The concept of **sustainability evidence**, through a system for the recognition of such evidence in its environmental, social, and economic spheres, which is used to prove compliance with the five principles mentioned above.
- A **comprehensive plan of initiatives** designed to conduct and document the sustainable use of natural resources and the responsible action in the activities carried out by the companies of the Nueva Pescanova Group.

Regarding sustainable sourcing, the 'Pescanova Blue' Sustainability Programme uses 4 types of sustainability evidence:

- **Type I – Third-party audit certifications** from private sustainability standards for fisheries or aquaculture (*ecolabels*) that comply with FAO's principles for responsible fishing, such as the sustainability certification schemes recognized by the *Global Sustainable Seafood Initiative* (GSSI).

- **Type II – Compliance with the requirements of the Private Standard for Sustainable Fisheries** of the Nueva Pescanova Group in the countries or species to which it is in force.
- **Type III – Complementary actions on fisheries or aquaculture sustainability**, such as fisheries or aquaculture improvement projects (FIPs or AIPs) managed and documented in a transparent and adequate manner.
- **Type IV – Compliance with fisheries performance assessment criteria** according to globally accepted sustainability measures as per the FishSource scientific profiles platform.

In 2020 we have worked in different aspects related to the 'Pescanova Blue' Sustainability Programme, below are the most outstanding actions:

- The homologation of the **sustainable origin for raw materials** in industrial centers and sustainability information of the finished products with the incorporation of the conformity label '**Pescanova Blue**' on PESCANOVA branded packages (up to 70% of the raw materials used at the Industrial Center in Porriño and 50% at the Industrial Center in Chapela).
- The launch of the traceability project for **PESCANOVA** products, for which we have joined the *Global Dialogue Seafood Traceability* (GDST) initiative, promoted by the UN Global Compact.
- The cooperation with third-party **auditing schemes**, such as ASC in Nicaragua, MSC in Namibia, and the promotion and monitoring of the participation in FIPs, such as the one related to Argentine Red Shrimp in Argentina.
- Contributing to the international standardization of **working conditions** of the crews on board the Group's fleets, through our participation in the working group FISH STANDARD FOR CREW.
- The development of **web communication platforms**, through the Pescanova brand website in Spain (<https://www.pescanova.es/sostenibilidad>) by including a tab on Sustainability where reports on several initiatives and projects implemented by Group companies can be found, as well as on the Group's Corporate website (<http://www.nuevapescanova.com/en/engagement/corporate-social-responsibility/>) where information can be found on initiatives and projects on Responsibility and Sustainability such as Sustainable Development, Responsible Action Programme, Our Commitment with the Planet, Responsible Fishing and Responsible Aquaculture. Also through the platform COMparte (<https://compactlink.pactomundial.org/plataforma-buenas-practicas-comparte>) of the Spanish Network of the UN Global Compact, which is focused on governance, sustainability, Group's positioning and programs developed.
- Dissemination of the commitments and initiatives of the Nueva Pescanova Group in respect of the "International Days": World Environment Day (June 5); International Day for the Fight against Illegal, Unreported and Unregulated Fishing (June 5); World Oceans Day (June 8); and World Sea Turtle Day (June 16).

### 2.3 Sustainable Development Goals

The **CSR Master Plan**, through the **Responsible Action Programme**, and the '**Pescanova Blue**' **Sustainability Programme** is aligned with the UN 2030 Agenda. This alignment has been achieved by the adoption of the commitment to **Sustainable Development Goals (SDGs)** in all our activities. This commitment is relevant to all countries where our companies operate.

We firmly believe in the role that the **SDGs** play in society and economy in improving the quality of life and our environment. For this reason, back in 2019 (October 30) we joined the Spanish Network of the **United Nations Global Compact**. This is the largest association of private companies and public entities that have aligned their strategies and operations with 10 universal principles on human rights, labor, environment, and anti-corruption, which also has a mandate of the UN to promote Sustainable Development Goals (SDGs) in the private sector.

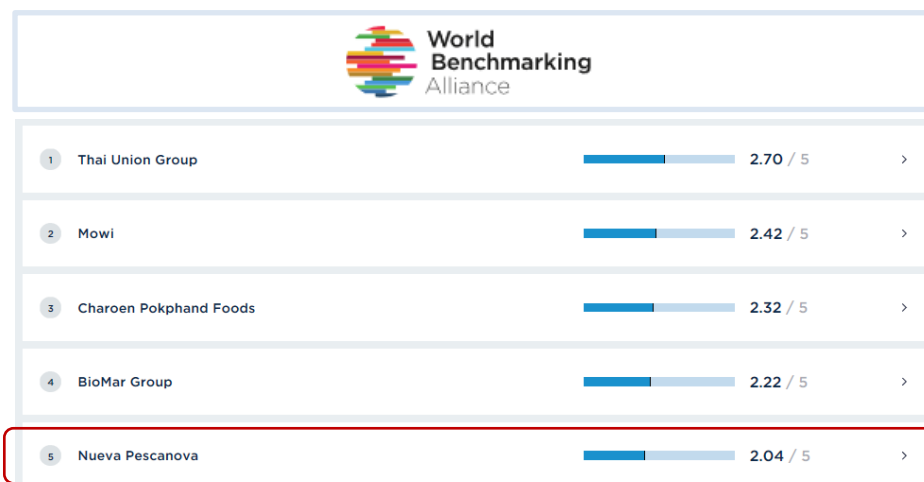
The **954 actions** documented by the previously mentioned **RAP**, within the Group's Corporate Social Responsibility, to meet the contribution to **SDGs** and their 169 specific targets, show how the Nueva Pescanova Group is contributing to each of the 17 goals. Thus, our **RAP** reflects our performance towards the 17 **SDGs**, with a greater impact on Objectives 8 "*Decent work and economic growth*", 10 "*Reduced inequalities*", 12 "*Responsible consumption and production*", and 9 "*Industry, innovation and infrastructure*":



Number of CRS projects and their contribution to the Sustainable Development Goals in the 18 countries analyzed in which the Nueva Pescanova Group is present.

## 2.4 Recognition

In 2020 the Group took part in a consultation processes of the *World Benchmarking Alliance*, for the preparation of the ranking on international seafood companies and global food companies' contribution to the UN 2030 Agenda for Sustainable Development Goals. In 2019, Nueva Pescanova was ranked as the 1<sup>st</sup> fishing company and 5<sup>th</sup> among the top international seafood companies for its contribution to the UN 2030 Agenda for Sustainable Development Goals.



## 3. Business ethics, institutional integrity, and regulations compliance

The Nueva Pescanova Group's *CSR Master Plan* guarantees, as discussed in the previous Chapter, the comprehensive observance of the most demanding principles of business ethics, institutional integrity, and regulatory compliance. This commitment to ethical, honest, responsible and transparent behavior is oriented and implemented through our *Corporate Governance and Compliance Regulatory System* (or *Internal Regulatory System*), that consists of Our Code of Ethics, our Providers' Ethical and Social Charter the Governance Rules for Corporate Bodies and other Internal Committees, Corporate Policies, Sectoral or Local Policies and Internal Norms, as clearly explained in our corporate website (<http://www.nuevapescanova.com/en/engagement/corporate-social-responsibility/integrity/>), as well as in our commercial website in Spain (<https://www.pescanova.es/integridad/>).

To ensure the knowledge and compliance with Our Code of Ethics and the other standards that make up this *Internal Regulatory System* we have our *Compliance Unit* headed by the Group's *Chief Ethics & Compliance Officer* who, among other functions and competencies contained in Our Code of Ethics and in our own Operating Rules, informs and advises employees of the Group so that they may have in-depth knowledge on the guidelines and work in line with them. Likewise, through the *Compliance Channel* (in the web application hosted on the corporate intranet *PESCANET*, in addition to other alternative communication channels) and managed by the Compliance Unit, any professional of the Group may submit any query on this matter and report possible non-conformities or breaches of our Regulatory System.

#### 4. Group's Policies relevant to the Non-Financial Statement

By December 31, 2020, the main policies of the Nueva Pescanova Group with an impact on the issues referred to in the Non-Financial Statement (environmental, social, and related to our people, respect for human rights, anti-corruption and related to society and other stakeholders) are summarized below:

- *Our Code of Ethics.*
- *Providers' Ethical and Social Charter of the Nueva Pescanova Group.*
- *Corporate Policy and Risk Control and Management Handbook.*
- *The Internal Audit Charter.*
- *Compliance Unit Regulations.*
- *Corporate Policy on Good Business Practices in Food Contracting and Conflict Resolution.*
- *Corporate Criminal Risk Prevention Policy.*
- *The Anti-Corruption Code of the Nueva Pescanova Group.*
- *Regulations and Privacy Policy of the Compliance Channel.*
- *General Procedure for the drafting of Internal Regulations (Norm O).*
- *Corporate Personal Data Protection Policy.*
- *Regulations of the Data Protection and Privacy Committee.*
- *Users' Manual of the Information and Communication Systems of the Nueva Pescanova Group.*
- *General Plan on Security Measures for the Protection of Personal Data in the Nueva Pescanova Group.*
- *Inventory of Personal Information Assets of the Nueva Pescanova Group in Spain.*
- *Registration of Data Processing Activities of the Nueva Pescanova Group in Spain.*
- *Security Document on the Protection of Personal Data of the Nueva Pescanova Group in Spain.*
- *Action Protocol for Food Donations.*
- *Corporate Policy and General Procedure on Procurement.*
- *Corporate Policy and General Procedure for Travel and Representation Expenses.<sup>1</sup>*
- *Corporate Policy and General Procedure on Talent Management.*
- *Corporate Policy and General Procedure for Recruitment, Selection, Onboarding and Offboarding.*
- *Corporate Policy on Occupational Safety and Health.*
- *Corporate Policy on Proxies.*
- *Corporate Policy on Corporate Social Responsibility.*
- *Corporate Policy on Institutional Relations.*
- *Corporate Policy on Sustainability.*

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<sup>1</sup> The second version of these documents were ratified by the COMEX at the meeting held on December 20, 2020.

- *Corporate Policy on Cooperation and Development Aid.*
- *Sectoral Policy on Responsible Capture Fisheries.*
- *Sectoral Policy on Responsible Aquaculture.*
- *Corporate Procedure for the Approval of Raw Materials from Sustainable Capture Fisheries and Aquaculture.*
- *Visual Identity Handbook of the 'Pescanova Blue' Conformity Label.*
- *Corporate Policy on Corporate Volunteering.*
- *Corporate Policy on Quality and Food Safety.*
- *Corporate Policy and General Procedure for the Management of International Mobility.*
- *Corporate Policy and General Procedure on Compensation and Benefits Management.*
- *Corporate Policy on Remote Working in the Nueva Pescanova Group and General Procedure on Remote Work Management of the Nueva Pescanova Group in Spain.*
- *General Procedure for the Telematic System for the Recording of Working Hours at certain companies and / or work centers of the Nueva Pescanova Group in Spain.*
- *Protocol of Action in the field of Mobbing, Sexual and/or Gender Harassment and Discrimination of Pescanova España, S.L.U.*
- *Integrity Program Manual of ARGENOVA, S.A.*
- *Corporate Policy on Environmental Responsibility.*

## 5. Risks related to issues included in the Non-Financial Statement

The Nueva Pescanova Group, like any other multinational group of companies of its size and geographical diversity, is subject to various inherent risks in the different countries, activities, and markets in which it operates. Therefore, the relevant corporate risks of all the Group's activities and businesses are adequately identified, assessed, managed and controlled, having established the basic mechanisms and principles for an adequate management of the same, with a level of risks that allows to: **(i)** Achieve the group's strategic objectives, by taking control of volatility; **(ii)** Provide the highest level of guarantees to partners; **(iii)** Protect the Group's results and reputation; **(iv)** Defend the interests of partners, customers, suppliers and other stakeholders; and **(v)** Ensure the Group's business stability and financial strength in a sustainable manner over time.

For the management of risks, the Board of Directors of Nueva Pescanova, S.L., has set up an Audit, Control and Finance Committee that, as advisory body of the Board, supervises and reports on the evaluation, control and monitoring of relevant risks, in coordination with the Corporate Department of Internal Audit and the different Business and Cross-functional Departments of the Group, which have the duty of implementing specific risk policies and the analysis and close monitoring of the same, regardless of the powers related to governance and corporate responsibility (including non-financial reporting issues), on an advisory basis, have been granted to the Governance and Corporate Responsibility Committee, in coordination with the Compliance Unit and the Corporate Department of Corporate Social Responsibility.

The Nueva Pescanova Group has its own *General Inherent Risks Map* on which 128 relevant risks events have been assessed, considering their impact and probability of occurrence, it also has its own *General Residual Risks Map* which has been prepared after analyzing the mitigation actions implemented by the Group for each of the inherent risks. As regards the general inherent risks assessed related to the Non-Financial Statement, the following stand out: **(i)** Social and political unrest and legal uncertainty; **(ii)** Shortage /depletion of marine resources; **(iii)** Breach of Prevention of Corruption Regulations; and **(iv)** Breach of Criminal Regulations. The review of the General Inherent Risks Map is carried out annually by the Executives of the Group, being supervised, approved, and validated by the Board of Directors. At present, the Group is working on the implementation of a specific Governance Model for Risk Management, and in the building of a proactive culture towards risk management aligned with the corporate risks profile.

When preparing the above-mentioned Risk Maps, the Group has identified a series of risks arising from **COVID-19** pandemic. When analyzing how the pandemic has affected and continues to affect the Group, we noticed that, apart from a generic risk that is the potential outbreak of other pandemics in future, there are also other risks and threats stemming from it. We have identified operational risks fundamentally related to a potential disruption or slowdown of supply chains in case some of our suppliers through the value chain closed down, and related to cybersecurity, as working from home made communications much more vulnerable. In the commercial sphere, there is a risk related to changes in consumption patterns, resulting from lockdowns and right of assembly restrictions. And last, we have also identified risks linked to the economic environment, as the global crisis triggered by the pandemic has led to a reduction in purchasing power for many families, due to businesses little resilience, causing added uncertainty about price volatility, exchange rates and other macroeconomic magnitudes.

Similarly, the assessment of the inherent criminal risks relevant to the Group in Spain – taking into account the system of criminal liability of legal entities and the ancillary consequences of articles 31 bis and 129 of the Spanish Criminal Code–, is contained in our *Matrix of Criminal Risks and Controls*, which was last updated by the Compliance Unit on November 12, 2020, and is an integral part of the *Criminal Risk Prevention Program of the Nueva Pescanova Group* (which also includes the Corporate Policy on the Prevention of Criminal Risks, the Anticorruption Code, the Manual for the Prevention of Criminal Risks (General Part), the Manual for the Prevention of Criminal Risks (Specific Part), and the Guidelines for the Supervision and Monitoring of the Criminal Risk Prevention Program). In view of the Group's activities, for the purposes of Non-Financial Statement, the relevant inherent criminal risks are: **(i)** Corruption between individuals and public authorities or officials in international business activities; **(ii)** The omission of occupational safety and health measures in breach of occupational risk prevention rules; **(iii)** The conduct of polluting activities in violation of the rules for the protection of natural resources and the environment; **(iv)** The shipping, dispatch, handling or alteration of medicinal products for veterinary use; **(v)** Improper handling or adulteration of food, additives or other food agents; **(vi)** Bribery of public authorities or officials; **(vii)** Trafficking influences to official or public authority.



### III. INFORMATION ON ENVIRONMENTAL ISSUES

#### 1. General Overview

The *Materiality Analysis* (already mentioned in chapter II, section 2 of this Report) clearly identifies the priority of developing performance optimization measures for our companies that validate the improvement of the efficiency of processes and equipment regarding fishing, aquaculture, and seafood processing activities. This *Analysis* highlights the optimization of the use of natural resources and energy. In both cases, this optimization means producing more (biomass or packaged finished products) and better (more efficient and better quality) with less (resources, energy, and waste).

At the same time, the Group has implemented projects to protect the natural environment, to preserve biodiversity, and to improve environmental quality, having enforced for this purpose the *Sustainability* and *Responsible Action Policies* for the Fishing and Aquaculture Divisions.

The governance of the activities entails a commitment to compliance, measurement, reporting and transparency. The key indicators presented in the following sections comply with this commitment and are aligned with the guiding principle 'Planet' of the Nueva Pescanova Group's *CSR Master Plan*.

In addition, the *Food Safety, Quality and Environment System (FSQEMS)* (SACMA in Spanish) of the Nueva Pescanova Group is based on the appropriate hazard analysis and critical control points (HACCP), the identification and assurance of compliance with all legal requirements relating to food safety, quality, and the environment, in every country we are present, as well as on the certification of quality and environmental matters. The previous establishes the reference framework of the Nueva Pescanova Group when setting and reviewing business objectives aimed at improving our products, the service to our customers, and the environmental respect.

The Nueva Pescanova Group, aware of its environmental responsibility, and the possible impact on the environment that its activities may produce, is firmly committed to the protection and conservation of the environment and the prevention of pollution in all its activities, products, and services. To this end:

- We set objectives that consider environmental aspects as an integral part of our business decisions.
- We comply with applicable legal requirements (*hard law*) and other voluntarily assumed requirements (*soft law*) in all our activities, products, and services.
- We promote the continuous improvement of our *Food Safety, Quality and Environment System (FSQEMS)*.
- We develop training and/or awareness plans for our people on food safety, quality, and environmental issues related to their work.
- We promote the sustainable use of the natural resources and the reduction of waste generated in our current and future operations.
- We carry out communication and awareness-raising actions on our environmental policy to all our people, implementing it, and keeping it present at all levels of the organization.

In this sense, the Nueva Pescanova Group has, within its organization, a Corporate Quality and Environment Office, whose responsibility is to lay down the guidelines and ensure compliance with our *Food Safety, Quality and Environment System (FSQEMS)*, as described in detail in section 3 of Chapter VII of this Report. The Corporate Quality and Environment Office consists of 30 people in the environmental

area (as per December 31<sup>st</sup>, 2020), who ensure the prevention and the mitigation of environmental hazards in every company of the Group.

The Nueva Pescanova Group has an environmental liability policy for up to 5,000,000 euros, to cover potential costs for restoring environmental and pollution damages that could arise from conducting our fish farming, logistics, commercialization, seafood processing, fishing and/or any other related activities. In this sense, the Nueva Pescanova Group does not recognize any provision for risks and expenses, or contingencies related to environmental protection, since such risks are covered by the environmental liability policy.

As regards to *Certifications*, in the field of environmental management, all industrial and aquaculture centers in Spain are *ISO 14001* certified, also our turbot farming operation is *EMAS (Eco-Management and Audit Scheme)* certified. As to our vannamei shrimp operations, our farms, hatcheries, and processing plants are certified as follows: Ecuador (*GLOBALG.A.P.*, *GAA BAP* and *ASC*), Guatemala (*GAA BAP* and *ASC*) and Nicaragua (*GLOBALG.A.P.*, and *ASC*), for which details will be presented later in this report. In addition, the Group has implemented a Private Standard for Sustainable Fisheries for Cape hake fishing in Namibia, which complies with *FAO's* principles of responsible fishing, and it is further subject to independent annual verification by *Bureau Veritas* since its implementation in 2013.

The scope of the environmental data contained in this Chapter is the group of countries where we have fishing, aquaculture, and product processing activities, except for Ireland and South Africa as they have not a significant contribution in the context of the Nueva Pescanova Group. Therefore, the countries we report environmental risks in this document are Argentina, Ecuador, Spain, France, Guatemala, Mozambique, Namibia, Nicaragua, Peru, and Uruguay.

## 2. Sustainable use of resources

The optimization of the use of natural resources, including biological resources, aims to drive efficient production through more sustainable processes. Due to the importance of natural resources in the Group's activities, already identified as key in our *Materiality Analysis*, our commitment is focused on the rational use of water, materials, and energy.

### 2.1 Rational use of water

The rational use of water in the different processes identified in the companies of the Nueva Pescanova Group is a cross-cutting operational management and environmental sustainability objective. Depending on the particularities of the activity that uses this resource, a distinction is generated between the consumptive use (in which water is used for its characteristics and its quality or quantity is in some way reduced) and non-consumptive (in which the use of water is temporary and does not affect its quantity or quality, as is the case, for example, of the use of water as culture medium in aquaculture).

The table below shows the total volume of water used by source, indicating the relative usage of each of the Group companies in the respective countries and the generic activity in which it is used:

2020			
Source	Volume of water used [x1,000 m <sup>3</sup> ]	Geographic Scope	Assigned use
Surface water, including water from wetlands, rivers, lakes and oceans	821,2	Ecuador, Spain & Nicaragua	Industrial use
		Argentina & Namibia	Purification through reverse osmosis, to be used by the fishing fleet and/or processing plants
Ground water	1.263,0	Ecuador, Spain, Guatemala, Nicaragua & Peru	Human consumption, washing and cleaning
Rainwater collected directly and stored by the organization	0,5	Mozambique	Washing and cleaning
Municipal water supplies or other public or private water utilities	601,5	Argentina, Ecuador, Spain, France, Mozambique, Nicaragua, Namibia & Uruguay	Human consumption, processing, washing and cleaning
<b>Total</b>	<b>2.686,2</b>		
Water use efficiency indicator [m <sup>3</sup> /MT produced]	14,2		
Non-consumptive use			
Surface water, including water from wetlands, rivers, lakes and oceans	2.708.272,8		

Given the importance of the responsible use and consumption of water resources, several projects have been implemented to improve our performance in the activities and countries where the Group operates. Specific measures and projects focused on responsible water management are set out in the following sections.

#### i. Technical solutions for streamlining water usage

##### a. PROMARISCO (Ecuador)

At the processing plant of the Group company in Ecuador, PROMARISCO, we have optimized industrial processes through the installation of semi-automatic systems for the control of the maximum level of water in storage tanks, as well as through the installation of meters at specific locations where the use is greater. Thanks to these actions **annual savings** of freshwater have reached **6 m<sup>3</sup> per ton** produced.

##### b. PESCANOVA ESPAÑA (Industrial Centers)

Good practices have been implemented to improve cleaning processes; also, other processes have been developed to minimize water usage. These measures were implemented, together with ISS, at the different Industrial Centers of the Group in Spain achieving **savings of 3.44 m<sup>3</sup> per ton** of water used.

##### c. NOVAGUATEMALA (Guatemala)

In the half yearly checks water leaks were found in the processing areas, and they have been repaired obtaining **annual water savings of 900 m<sup>3</sup>**.

d. NOVAPERU (Peru)

Good practices for water saving have been introduced at the Group's NOVAPERU processing plant by installing automatic taps that prevent careless water loss, sea water is used for bathrooms and floor cleaning, and for the detection of or leaks. Through the implementation of all these measures, **water savings of 1.02 m<sup>3</sup> of per ton of product** have been achieved.

e. NUEVA PESCANOVA FRANCE (France)

The programming of the sequential line has been optimized to achieve a reduction in annual water use of **1,137 m<sup>3</sup>** between May and October 2020.

f. PESCAMAR (Mozambique)

A rainwater capture system has been implemented for washing and cleaning processes. In addition, an evaporative water treatment plant has been installed to reduce dependence on the external supply of drinking water and achieving savings of **189 m<sup>3</sup>** of water.

ii. Wastewater treatment to reduce pollution and environmental impact

In response to compliance with the different regulatory frameworks for the control of industrial environmental impacts, as well as environmental management and monitoring programs derived from monitoring measures indicated in impact studies or environmental licenses, wastewater generated by the activities of the Group companies is treated. The Group has its own treatment plants in INSUIÑA (Spain), the Industrial Centers in Arteixo, Chapela, and Porriño in Spain, and in PROMARISCO in Ecuador, that replace the septic tanks and allow the reduction of wastewater with a consequent reduction in energy use and financial costs for the treatment.

Similarly, sewage and bilge water are treated on board our fishing vessels prior to their discharge.

## 2.2 Consumption and efficient use of raw materials

The responsible use of natural resources through the different steps of the value chain of our products requires all our companies to conduct a day-to-day management of raw materials regarding their origin, quantity, and quality, whether renewable or not. The use of certified raw materials in our seafood products implies responsible action in occupational health and safety, as well as in animal welfare. Raw materials identified as relevant are quantified for management purposes and for performance indicators (KPIs) reporting and are classified as: Principal (from capture fisheries and aquaculture, i.e., biomass of fish, crustaceans, cephalopods, etc.); Auxiliary (ingredients and other materials necessary for the preparation of the finished product), and Packaging material (such as cardboard for packs and cartons, or plastics for pouches, trays, film, etc.).

The indicator shown below translates the investment in identified raw materials into finished products, from the different Group's activities: Fishing, in Argentina, Mozambique, Namibia and Uruguay; Aquaculture (including hatcheries, nurseries, grow out, and processing facilities), in Ecuador, Spain, Guatemala and Nicaragua; Processing and production, in France (Industrial Centers in Boulogne-Sur-Mer and Lorient), Spain (Industrial Centers in Arteixo, Catarroja, Chapela, Paterna and Porriño), Namibia and Peru.

2020	
Activity & Country	Raw material efficient consumption indicator [kg of RM/kg produced]
<b>Aquaculture</b>	
Ecuador	1.79
Spain	1.16
Guatemala	1.54
Nicaragua	2.90
<b>Fishing</b>	
Argentina	1.08
Mozambique	1.07
Namibia	1.48
Uruguay	1.40
<b>Processing</b>	
Spain	1.05
France	1.12
Namibia	1.32
Peru	1.30

### 2.3 Energy consumption, efficiency and use of renewable energies

Apart from natural resources, optimization of energy use is essential to improve the environmental performance derived from our activities, as the production of electricity from non-renewable sources and the combustion of fossil fuels result in the emission of greenhouse gases (hereinafter GHGs) to the atmosphere. Of the decarbonization measures defined for the companies of the Nueva Pescanova Group, it is worth mentioning those that aim at reducing the environmental impact on the atmosphere through the reduction of GHG emissions, are intended to industrial reconversion, by encouraging the substitution of more polluting fuels by less polluting ones in the processing equipment, and the switch to energy from renewable sources. In respect of the latter, the investment made for the installation of photovoltaic power stations in NOVANAM (Namibia) has been significant, which represents a unique and pioneering project in that country, which was accompanied in the industrial centers in Spain.

Energy used in our activities and energy efficiency indicator in year 2020 are shown below:

2020	
Energy source	Energy Use [MWh]
Diesel	446.989,3
Natural gas	36.469,1
Other fuels	5.986,3
Electricity (national electricity grids)	161.301,9
Electricity from renewable sources (29%)	46.362,9
<b>Total</b>	<b>697.109,5</b>
Energy efficiency indicator [MWh/MT produced]	3,69

Energy efficiency indicator (energy used to produce finished products), by activity and country, in year 2020, is shown in the table below:

2020	
Activity & Country	Energy efficiency indicator [MWh/MT produced]
<b>Aquaculture <sup>1</sup></b>	
Ecuador	2,5
Spain	7,8
Guatemala	2,8
Nicaragua	9,2
<b>Fishing <sup>2</sup></b>	
Argentina	5,2
Mozambique	38,2
Namibia	4,5
Uruguay	5,9
<b>Processing <sup>3</sup></b>	
Spain	1,8
France	1,7
Namibia	1,0
Peru	0,3

<sup>1</sup> This indicator depends on the farming process (intensive/extensive) and life cycle of the species reared.

<sup>2</sup> This indicator depends on the specific usage for navigation, operation, and freezing processes on board the fishing vessels. The indicator for Mozambique shows a lower catch/fishing day.

<sup>3</sup> This indicator depends on the complexity of the processing line and freezing requirements.

### 3. Circular economy and waste prevention and management

The different Group companies conduct a proper waste management for the different types of waste, thus complying with legislation in force in the countries the Group is present, and international waste-related regulations. Waste from our fishing fleet, aquaculture operations, and processing plants is classified, segregated, and managed, working with the best technical solutions available in each case, by entering alliances with stakeholders or with *Approved Waste Management Operators*. In addition, the Group participates, through the Green Dot system, in the IWMS (Integrated Waste Management Systems) in the countries we have a commercial presence.

#### 3.1 Waste generated by the Nueva Pescanova Group

The Nueva Pescanova Group, in its fishing, aquaculture, and processing operations classifies the waste generated by hazardousness and recovery method used. The table below shows the quantities identified in year 2020:

2020	
Type of waste and recovery method	Quantity generated [tons]
Hazardous waste to Approved Waste Management Operators	208,6
Non-hazardous waste	12.336,7
Recycled	4.497,0
Recovered	4.402,8
Composted	1.333,2
To Approved Waste Management Operators	2.103,7
Recovered organic byproducts	12.548,9

Pursuant to good practices and applicable regulations, hazardous waste must be shipped to *Approved Waste Management Operators* in charge of performing the proper waste treatment.

#### 3.2 Prevention measures, recycling, and reuse of waste material

In the different countries where the Group is present there are plans and programs that contribute to improve environmental management regarding prevention, recycling, and reuse of waste material.

##### i. PROMARISCO (Ecuador)

In the Group's company in Ecuador (PROMARISCO) we have implemented a program for Non-Hazardous (common and organic) Waste at the shrimp farms and the processing plant, and another program for non-recyclable (inorganic and non-biodegradable) waste. This waste is stored at the processing plant and afterwards shipped to Guayaquil for management by municipal bodies.

##### ii. NOVAGUATEMALA (Guatemala)

At the Group's processing plant in Guatemala (NOVAGUATEMALA) Non-Hazardous Waste Management Plans have been implemented. In parallel with the management of the plant's waste, actions have been carried out to clean the streets and estuaries of the villages Champerico or Ixtan.

##### iii. PESCANOVA HELLAS (Greece)

Several actions have been taken to reduce the consumption of plastic such as the installation of specific containers, in addition to the installation of water fountains for a better responsible waste management. Thanks to this last action, generated waste was reduced by 50 kg.

iv. **PESCANOVA ESPAÑA (Industrial Centers)**

In the Group's processing plants in Spain various actions have been carried out for waste reduction and recycling, having achieved a reduction in **organic waste of 70 kg**. In addition, other actions have been taken for a progressive replacement of some components of plastic materials with other components from recycled materials.

v. **PESCANOVA ESPAÑA (Commercial Offices and Back-office)**

Measures have also been implemented at the Group's headquarters and commercial offices in Spain to reduce waste generation through actions such as the placement of recycle bins and providing reusable mugs to be used at the office.

vi. **PESCAMAR (Mozambique)**

A Waste Management Plan has been developed at the shipyard that allows the segregated collection of cardboard, plastic, glass, metal, oil sludge and sediments, which are delivered to the waste management operator in the port facilities. This collection has allowed the proper management of **69,072 kg of waste**.

### 3.3 Other ways for waste recovery and disposal

To guarantee a responsible and sustainable use of marine biological resources, the Group encourages circular economy solutions of fisheries by-products. We believe that the integral use of fish is essential to fulfill this purpose. Thus, projects are implemented, and alliances are promoted in those countries where we conduct fishing, or seafood processing activities, to define solutions for the recovery of by-products from these activities, to produce fishmeal and fish oil for animal feed industries. The total organic by-products recovered in **2020** reached **12,560.8 tons**. Apart from reducing the amount of organic waste and misused valuable natural resources, these partnerships contribute, in many cases, to generating jobs and contribute to the socio-economic development of the communities there.

i. **PROMARISCO (Ecuador)**

In the processing plant of our Ecuadorian Group company, PROMARISCO, shrimp organic by-products are reused by selling shrimp heads and shells to produce feed for animals. This has allowed the circularity of **4,427,6 tons of organic byproducts**.

ii. **PESCANOVA ESPAÑA (Industrial Centers)**

At the Industrial Center in Catarroja, salmon trimmings are used for processing salmon hamburgers, making use of **27,000 kg of this by-product**.

iii. **PESCANOVA ESPAÑA (Commercial offices)**

By-products generated at the Group's commercial office in Vigo, such as trimmings from filleting fresh fish, are recovered and turned into fishmeal, **reducing waste by 21,814 kg**.



### 3.4 Actions to combat food waste

The fight against food waste is a priority and constant concern for a food Group of companies like Nueva Pescanova. In 2020 we have worked and intensified agreements, operations, practices, and programs to reduce waste from/of the food we produce. The following summarizes the most relevant actions taken involved in this regard:

- Reduction of organic leftovers and waste at our processing plants.
- Prevention of food waste in our operations through the continuous improvement of demand management and stocks optimization.
- Donations to non-profit entities and institutions that collect food to meet the food needs of the most disadvantaged people and groups, in precarious and/or social exclusion situations. To regulate donations of our products and prevent their destruction, we have an Action Protocol for Food Donations, approved by the Executive Committee.
- Collaborative work through the associations we are members of, through their working committees (for instance, Asociación Española de Codificación Comercial –AECOC– and Clúster Alimentario de Galicia –CLUSAGA–), by participating in their sustainability committees.

## 4. Climate change

The Group is aware that the activity of our companies in the different phases of the value chain and production involves the emission of certain substances, including GHGs, which, depending on their warming potential, contribute to the greenhouse effect in the atmosphere and consequently favor climate change.

It is our duty to work to identify and quantify our environmental footprint caused by the emission of the substances for which the Group is responsible and, with this information, to decide responsibly on the switch to more efficient processes and practices with a lower environmental impact. These change actions include improving the energy efficiency of combustion equipment and electricity usage, the preferential use of materials and products that, throughout their life cycle, generate fewer emissions and lower energy usage, the energy recovery of the waste we generate, the increase in the production and/or usage of renewable energy, and the reduction of food losses and waste, as well as the recovery of by-products at all stages of our chain. We determine the sources, inefficient processes and identify opportunities to improve or replace equipment or processes to achieve a reduction in consumption and the corresponding GHG emission per unit of finished product.

The Group is currently measuring the footprint of its activities, describing processes, and identifying opportunities to improve performance and efficiency. The Group is working to get a more precise picture of our profile and our operations to be able to define both the short and medium-term goals, and the most suitable strategies to achieve them, always aligned with the principles described in the *Corporate Sustainability Policy* of the Nueva Pescanova Group.

To increase our knowledge, partnerships, and the ability to generate the change necessary to improve our performance, the Group has taken part, in 2020, of various governance initiatives and scientific platforms on environmental sustainability and climate change in the seafood sector. We often collaborate in discussion forums, working groups and relevant sectoral conferences; namely:

- Discussion and informative events organized by *UN Global Compact* regarding issues like: *Climate Action, Business Ambition for 1.5 °C, High Level Meeting on Sustainable Ocean Business and the 2030 Agenda, Clean Energy & Sustainable Oceans, Ocean Stewardship Annual Review, Action-Oriented UN Ocean Conference and the 2030 Agenda* and *Blue Bonds and Sustainable Ocean Business*.
- Dialogue and informative events on industry sustainability and climate change like: *Seafood 2030 Sustainability Forum: Aligning Industry and Government Sustainability Efforts!* (organized by *SeafoodSource*), *Blue Deal Debate Series* (organized by *Political Festival*), *Fishing and Sustainable Oceans, Energy for the future and circular energy*, of the series '*Committed to the Environment and the Oceans*' (organized by *Afundación - ABANCA*).
- Participation in working groups and informative events of the Spanish Network of the UN Global Compact, having joined as participant focused in the integration of the SDG in business strategy and sustainable oceans.
- Participation in the Sustainable Committees of AECOC and the Clúster Alimentario de Galicia (CLUSAGA).

The incidence of climate change, especially when it involves atmospheric and ocean circulation of temperature and nutrients, may have a potential impact on the availability of commercial fisheries species and, therefore, represents a risk to the fishing activity, both by decreasing ecosystem productivity, species recruitment and growth (with impact on fishing grounds management and access to fishing quotas), and in fish distribution at different depths (with an impact on fishing effort) or geographic distribution (with impact on the access to resources and fishing rights). In both cases, the potential impacts on food safety and access to marine animal protein, as well as the political impact on the management of access to fishing grounds and resources, is considered. Similarly, it can be anticipated an effect on the productive and regenerative capabilities in extensive aquaculture due to the interference of the provision, regulation and support services offered by these ecosystems.

Increasing the efficiency of industrial processes currently emitting GHGs is an essential aspect of the Nueva Pescanova Group's environmental management, and we understand it as described by the *United Nations Intergovernmental Panel on Climate Change* (IPCC). In the Nueva Pescanova Group, we are aware that our fishing, aquaculture, and processing activities require the use of a significant amount of energy (electricity and fuels), we also need to use refrigerant gases in our freezing and product preservation processes, we also consider product transport and distribution, as well as of the raw materials used.

Measures to mitigate and offset our environmental footprint and adaptation to climate change advocate the focus of most of our actions aimed at improving efficiency, both in the use of energy and natural resources, as well as in the generation of emissions, waste, and effluents. In this sense, it is considered important to highlight the effort that the Nueva Pescanova Group makes in technological modernization and investment in new equipment to measure, control and optimization of the operations, pursuing maximum efficiency. At the same time, we work with our people on changing habits and adopting good practices; with supply chains in the search for better technical solutions, materials, and services; and with the communities where the Group plays a relevant role, in raising awareness and direct collaboration in projects for mitigating and offsetting emissions, with a particular focus on biodiversity and environment.

We collaborate with governments and their scientific agencies in establishing better legal and biological frameworks for marine resources and for the protection and conservation of the environment like the adaptation to climate change effects, both in capture fisheries and aquaculture, in seeking how to minimize the risks that would lead to a lower availability of resources and control the access to the these.

Based on the methodology recommended by the *Greenhouse Gas Protocol* of the *World Business Council for Sustainable Development* (WBCSD) and the *World Resources Institute* (WRI), in 2020, the Group reported direct and indirect emissions linked to the operations of the Nueva Pescanova Group companies. Thus, emissions are classified under **Scope 1** (direct emissions) emissions resulting from the operation of fossil fuel combustion equipment owned or controlled by Group companies (both from static sources, including fugitive gas emissions from cooling and air conditioning equipment, as well as mobile, like the fishing fleet and other vehicles); under **Scope 2** (indirect emissions) those linked to the generation of electricity acquired and consumed; and under **Scope 3** (indirect emissions) those caused by the shipment of raw materials and products (logistics), business trips on means of transport and those associated with water supply:

2020	
Source of GHG Emissions	GHG Emissions [tons of CO <sub>2</sub> -eq]
<b>Scope 1<sup>1</sup></b>	
Emissions from static sources	50.452,4
Emissions from mobile sources	95.314,3
Cooling and air conditioning	146.857,4
<b>Total Scope 1</b>	<b>292.624,1</b>
<b>Scope 2<sup>2</sup></b>	
Electricity consumption	38.244,7
<b>Total Scope 2</b>	<b>38.244,7</b>
<b>Scope 3<sup>1</sup></b>	
Business trips	1.590,9
Shipment of raw material and products	35.281,1
Water consumption	237,6
<b>Total Scope 3</b>	<b>37.109,6</b>
<b>Total emissions</b>	<b>367.978,4</b>

GHG emission intensity indicator [tons CO<sub>2</sub>-eq/tons product] 1,95

<sup>1</sup> Source for the conversion factor used: *Oficina Catalana del Cambio Climatico (2020) Practical guide for the calculation of greenhouse gas emissions.*

<sup>2</sup> Source for the emission factor by country: *CO2 Emissions from fuel combustion (IEA, 2019)*

Reducing relative GHG emissions is the result of continuous efforts to optimize the environmental performance of our fishing, aquaculture, and processing operations. For this reason, the Group works to promote specific projects and actions in some of the countries where we are present.

#### i. Fishing fleet

Measures for reducing the use of fuel in the fishing fleet are continuously applied on all our vessels in the different countries where the Group operates. The objective is to reduce direct emissions and achieve a more efficient fishing activity through the optimization of the *fish/fuel* ratio. The project for the partial renewal of the fleet, with the construction of 3 new units for Namibia and 4 for Mozambique results in a significant increase in the efficiency of the fishing operation. Also, projects such as the reduction of the weight of fishing gear, the optimized design of doors and winches to haul the fishing gear and the change of lighting to LED systems on board have reduced the demand for power to the engine and indirectly save fuel. These savings, along with other energy efficiency management measures (such as the design and implementation of engine and other equipment maintenance programs, the installation of particulate filters and the use of more environmentally friendly fuels), have achieved a significant improvement in the environmental sustainability of our fleet.

In this regard, it is worth mentioning that Group's wet-fish and freezer fleet in Namibia has achieved a **28% reduction in annual diesel consumption** comparing the usage in the 2012-2020 period, as well as an equivalent reduction in annual emissions – (these data correspond to a gross saving in fuel use of about 8 million liters per year and 23,115 tons of CO<sub>2</sub>-eq). Fuel consumption performance indicator by total catch has dropped from 0.41 to 0.25 liters of diesel/ton of fish (-37.8% from 2012 to 2020 and -22% in the last financial year alone), while fishing efficiency has risen from 14.5 to 24.5 tons of fish/fishing day in the same period (2012-2020).

#### ii. Processing Plants

With similar management principles, industrial equipment replacement and maintenance programs are identified in the Group's plants to ensure a more efficient operation. These programs also pursue direct or indirect savings from fuel consumption and improved activity, expressed in a "fuel consumption by product quantity" indicator.

We have implemented projects that pursue savings in electricity use through proper maintenance, replacement, and optimization of the operation of industrial equipment that can increase their *Coefficient of Performance* (COP) and generate significant savings in energy use. In this regard:

##### a. PESCANOVA ESPAÑA (Industrial Centers) and INSUIÑA (Spain)

The electricity supply of all the Group's Industrial Centers in Spain and the centers of INSUIÑA (turbot aquaculture) comes from a Power Purchase Agreement (PPA) with the supplier ENDESA covering 50% of the electricity needs with energy from renewable sources, with the corresponding reduction of GHG emissions. The capacity of the pasteurizer in the surimi line has been increased, replacing part of the equipment. This change allows to increase the capacity whilst power consumption is equivalent to last year's.

b. **PROMARISCO (Ecuador)**

A preventive replacement and maintenance program for older generator and stationary engine equipment has been implemented, achieving power savings of **73,669 kWh** per year.

c. **CAMANICA (Nicaragua)**

A solar-powered water heating system replaced the former diesel-powered system at the Miramar hatchery, thus achieving savings of **112 thousand liters of diesel** per year since 2009. An improved performance and the implementation of a more efficient process have an additional positive impact on product quality, as well as in handling or processing times, narrower thermal ranges, cleaner processes, etc.

iii. **Power supply**

The shift to more environmentally friendly energy sources covers several specific projects and mainly seeks to reduce indirect emissions. We have worked on the implementation of technical solutions suitable to the characteristics of each country by changing, when possible, the source of electricity from fossil fuels to renewable sources. Thus:

a. **PESCANOVA ESPAÑA (Industrial Centers)**

A solar power plant has been set up at the Industrial center, which has started operating in December 2020, with a production of 139,101 kWh that month.

b. **NOVAGUATEMALA (Guatemala)**

The Group's processing plant in Guatemala (Champerico), entered an agreement for the supply of electricity with a 70% share from renewable sources (hydroelectric).

c. **PESCANOVA ITALIA (Italia)**

At the Group's Commercial Office in Italy (Bologna) a photovoltaic system has been set up.

d. **NOVANAM (Namibia)**

A 13,500 m<sup>2</sup> solar park has been set up at the Group's processing plant in Lüderitz, generating 1,079,135 kWh in 2020.

5. **Protecting biodiversity**

5.1 **Preserving and restoring biodiversity**

Fishing is intrinsically the capture of commercial (economically valuable) species that, when poorly managed, can cause the depletion of populations of the targeted species and/or interfere with other species and thus threaten the balance of the marine ecosystem. For this reason, the Group seeks to ensure that its fishing activity is always governed by the principles of a rational management of biological resources and the maintenance of the biodiversity and environmental quality necessary for the proper performance of this ecosystem on which we depend.

In this regard, as expressly stated in Article 44.5 of *Our Code of Ethics*, in the Nueva Pescanova Group we are committed to and assume the principles and guidance set out in FAO's *Code of Conduct for Responsible Fisheries*, and to the compliance and respect for international, national, regional, or local regulations governing the Law of the Sea and the aquaculture activities in force in the countries where we conduct our fishing and aquaculture activities.

The Group's principles of responsible fishing are centered on combating illegal, unreported and unregulated (IUU) fishing; adopting selective and environmentally safe fishing gear and practices; avoid overfishing in compliance with relevant management measures; minimizing waste in the capture, handling, processing and distribution of fish and seafood products; and on participating with governments and non-governmental organizations (NGOs) in the conservation of fishery resources and fisheries management.

Like we do with our fishing activity, we support aquaculture as an important source of animal protein, and that reduces pressure on fishing grounds and ensure sustainable, safe, healthy, and controlled resources. Consequently, the Group is committed to responsible farming at its aquaculture farms to contribute positively to the preservation and long-term sustainable use of natural resources. Thus, we endorse an optimal use, to maintain availability and quality for current and future generations. Likewise, good environmental management and sustainable development are achieved, as we have adopted efficient and environmentally safe farming practices; we avoid overloading the ability of natural ecosystems to absorb waste and regenerate resources, we meet all relevant management measures and bring waste to the minimum in the rearing, handling, processing, and distribution of aquaculture products.

In addition, we have strengthened our commitment to responsible fishing and aquaculture and to the certification of all our fishing and aquaculture activities by relevant sustainability standards, internationally recognized, whose principles align with those mentioned above, or at least comply with FAO's Code of Conduct for Responsible Fisheries.

In addition, equivalent principles are adopted for our processing activities with a particular focus on performing a prior assessment of the effects of our activity and/or facilities on the diversity and integrity of ecosystems in a potentially affected environment, based on the most reliable scientific and technical information, in order to minimize harmful ecological changes and the corresponding economic or social consequences arising from the activity, specific consumptions and emissions, including land use and occupation, and to design and implement environmental and ecological mitigation and management plans deemed necessary.

In this regard, we have implemented the principles described above in several ways:

- By the continuous improvement in the design of fishing gear used to minimize the impact on non-targeted species, the reduction of by-catch and the direct impact on the seabed, with the invaluable assistance of our expert net makers.
- By preventing by-catch and the commercialization of *Endangered, Threatened and Protected species*, in accordance with the *International Union for Conservation of Nature (IUCN)*.
- Ensuring the proper implementation of fisheries control measures pursuant to the close seasons in countries like Mozambique, by stopping the fishing activity out of season with measures that discourage this practice, as well as a continuous monitoring.

- Using *tori lines* which are aimed at minimizing seabird bycatch. In fact, the group is pioneer on the design and implementation of the use of this type of lines in the fishing grounds in Namibia.
- By reducing the death of seabirds in fishing operations in Uruguay (BELNOVA) through the seabird respect program being implemented on fleet vessels. Thanks to this measure, seabird mortality has been reduced by 84%.
- By implementing a conservation program for iguanas (*Iguana iguana*) in Nicaragua through our Group company CAMANICA (with animal nurseries, cooperation with the National University and a campaign for releasing 400 newborn iguanas in 2020).
- Sponsoring programs for mangrove (*Rhizophora mangle*) reforestation, at the initiative of CAMANICA in Nicaragua (by planting 4,200 propagules); and PROMARISCO in Ecuador (by planting 18,000 propagules) with the benefits associated (building habitats and breeding grounds, reducing environmental pollution, or controlling soil erosion).
- By the installation of native plants nursery in CAMANICA's farms in Nicaragua, with 27,850 plants, aimed at reforesting the environment of the farms and helping to combat soil erosion.
- Organizing and participating in clean-up campaigns of beaches, riverbanks and estuaries in Ecuador, Mozambique, and Spain, thus contributing to improve the quality of the environment and recovering habitats.

## 5.2 Potential impact on protected areas

Our business responsibility and sustainability programs pay special attention to environmental protection and conservation of the ecological characteristics and resources of ecosystems that may be affected by the specific activities of the companies of the Nueva Pescanova Group.

The Group is committed to comply with all national and international regulations applicable to monitoring the environmental and socio-economic impact of our activities through the design and implementation of supervising and monitoring programs under the scope of the Environmental Impact Assessments (EIA) of our facilities and operations; environmental monitoring and farm management plans, by designing and promoting ecological conservation projects; and by conducting complementary studies of biodiversity, environmental and social impact.

Bearing in mind that the consumption of living natural resources from the Group's aquaculture and fisheries activities in Nicaragua, Angola, Guatemala, Ecuador, Namibia, and Mozambique can have a potential impact on biodiversity and depending on the sensitivity of the environment regarding biodiversity and protection status, our aquaculture and fishing activities in these countries are governed by management plans and responsible action; namely:

- Implementation of evaluation, monitoring and mitigation programs related to our aquaculture activity.
- Conservation projects designed for impact mitigation and ecosystem health improvement.
- Sponsoring the rearing in captivity of iguanas and subsequent release to the natural environment (400 individuals released) or reforestation of mangrove areas (ca. 90 ha) and endemic trees.

## 6. Other pollution disclosures

The emission of ozone-depleting substances (ODS) (GRI 305-6) refers, exclusively, to chlorodifluoromethane (HCFC-22 or R-22), and is reported in the following table:

2020	
Activity & Country	ODS emissions [t CFC-11-eq] <sup>1</sup>
<b>Aquaculture</b>	
Ecuador	0,302
Spain	-
Guatemala	-
Nicaragua	0,003
<b>Fishing</b>	
Argentina	0,986
Mozambique	0,129
Namibia	-
Uruguay	0,634
<b>Processing</b>	
Spain	-
France	-
Namibia	-
Peru	-
<b>Total</b>	<b>2,054</b>

<sup>1</sup> Source of Ozone Depletion Potentials (ODP): Montreal Protocol

We have identified as ODS emission prevention and minimization measures, regular maintenance of refrigerating equipment for cold stores on both fishing vessels and processing plants, as well as the necessary conversion of this equipment by switching to refrigerant gases with less or no Ozone Depletion Potential (ODP).

The *Materiality Matrix* for our fishing, aquaculture and processing activities has not identified any relevant noise or light pollution cases. Atmospheric emissions of nitrogen oxides (NO<sub>x</sub>), sulfur oxides (SO<sub>x</sub>) and other significant air emissions (GRI 305-7), are not considered relevant in respect of the Group's activities.



#### IV. DISCLOSURES ON SOCIAL ISSUES AND OUR PEOPLE

##### 1. Employment

##### 1.1 Employees

Total head count of the Nueva Pescanova Group and its distribution by country and gender, by December 31, 2020, is shown below:

	2020		
	Female	Male	Total
Argentina	54	685	739
Brazil	-	7	7
Ecuador	497	1.634	2.131
Spain	634	535	1.169
France	110	100	210
Greece	7	11	18
Guatemala	902	259	1.161
Ireland	15	16	31
Italy	9	10	19
Mozambique	30	503	533
Namibia	1.342	1.041	2.383
Nicaragua	193	1.430	1.623
Peru	62	53	115
Portugal	13	17	30
South Africa	1	5	6
Uruguay	8	72	80
USA	12	10	22
<b>Total</b>	<b>3.889</b>	<b>6.388</b>	<b>10.277</b>

Total head count of the Nueva Pescanova Group and its distribution by country and age group, by December 31, 2020, is shown below:

	2020			
	<25	25-45	>45	Total
Argentina	12	449	278	739
Brazil	-	4	3	7
Ecuador	515	1.177	439	2.131
Spain	10	601	558	1.169
France	28	106	76	210
Greece	-	10	8	18
Guatemala	355	692	114	1.161
Ireland	1	13	17	31
Italy	2	8	9	19
Mozambique	25	256	252	533
Namibia	88	1.482	813	2.383
Nicaragua	266	1.145	212	1.623
Peru	14	78	23	115
Portugal	-	9	21	30
South Africa	-	3	3	6
Uruguay	4	48	28	80
USA	1	14	7	22
<b>Total</b>	<b>1.321</b>	<b>6.095</b>	<b>2.861</b>	<b>10.277</b>

Total head count of the Nueva Pescanova Group and its distribution by country and professional category, by December 31, 2020, is shown below:

Country	2020			Total
	Senior Management	Middle Management / Technicians	Qualified Staff / Blue Collar Staff	
Argentina	6	137	596	739
Brazil	2	2	3	7
Ecuador	6	257	1.868	2.131
Spain	76	387	706	1.169
France	6	86	118	210
Greece	5	13	-	18
Guatemala	5	40	1.116	1.161
Ireland	1	9	21	31
Italy	4	5	10	19
Mozambique	7	201	325	533
Namibia	8	170	2.205	2.383
Nicaragua	9	166	1.448	1.623
Peru	2	30	83	115
Portugal	5	19	6	30
South Africa	1	2	3	6
Uruguay	1	15	64	80
USA	7	11	4	22
<b>Total</b>	<b>151</b>	<b>1.550</b>	<b>8.576</b>	<b>10.277</b>

## 1.2 Type of employment contract

Total head count of the Nueva Pescanova Group and its distribution by type of employment contract, as December 31, 2020, is shown below:

	2020		
	Full-time	Temporary	Total
Argentina	722	17	739
Brazil	7	-	7
Ecuador	2.130	1	2.131
Spain	1.040	129	1.169
France	156	54	210
Greece	18	-	18
Guatemala	932	229	1.161
Ireland	29	2	31
Italy	15	4	19
Mozambique	189	344	533
Namibia	1.268	1.115	2.383
Nicaragua	1.436	187	1.623
Peru	29	86	115
Portugal	26	4	30
South Africa	6	-	6
Uruguay	80	-	80
USA	22	-	22
<b>Total</b>	<b>8.105</b>	<b>2.172</b>	<b>10.277</b>

Total head count of the Nueva Pescanova Group and its distribution by type of employment contract by gender, age group, and professional category, by December 31, 2020, is shown below:

Professional Category	Full-time						Temporary						Total
	F			M			F			M			
	<25	25-45	>45	<25	25-45	>45	<25	25-45	>45	<25	25-45	>45	
Senior Management	-	16	22	-	34	78	-	-	-	-	1	-	151
Middle Management/Technicians	2	261	175	12	460	428	19	29	5	9	69	81	1,550
Qualified Staff/Blue Collar Staff	255	1,287	827	727	2,499	1,022	144	758	89	153	681	134	8,576
<b>Total</b>	<b>257</b>	<b>1,564</b>	<b>1,024</b>	<b>739</b>	<b>2,993</b>	<b>1,528</b>	<b>163</b>	<b>787</b>	<b>94</b>	<b>162</b>	<b>751</b>	<b>215</b>	<b>10,277</b>

Average headcount in 2020 by full-time or temporary employment, gender, age group and professional category is shown below:

Professional Category	Full-time						Temporary						Total
	F			M			F			M			
	<25	25-45	>45	<25	25-45	>45	<25	25-45	>45	<25	25-45	>45	
Senior Management	-	15	22	-	37	82	-	-	1	-	2	1	160
Middle Management/Technicians	5	257	169	14	458	407	17	31	4	12	76	82	1,532
Qualified Staff/Blue Collar Staff	261	1,297	807	746	2,600	1,012	343	1,240	159	375	1,022	203	10,065
<b>Total</b>	<b>266</b>	<b>1,569</b>	<b>998</b>	<b>760</b>	<b>3,095</b>	<b>1,501</b>	<b>360</b>	<b>1,271</b>	<b>164</b>	<b>387</b>	<b>1,100</b>	<b>286</b>	<b>11,757</b>

*Part-time employees excluded. In Spain, the number of part-time employees 123, by December 31, 2020. Part-time contracts are not considered in the collective agreements (or in industrial relations frameworks provided by local labor laws) in the other countries in which we are present.*

### 1.3 Lay offs

The number of layoffs, by gender, age group and professional category, in 2020, is shown in the table below:

2020						
Professional Category	Female			Male		
	<25	25-45	>45	<25	25-45	>45
Senior Management	-	1	1	-	1	9
Middle Management/Technicians	1	5	2	-	14	12
Qualified Staff/Blue Collar Staff	17	52	3	26	108	24
<b>Total</b>	<b>18</b>	<b>58</b>	<b>6</b>	<b>26</b>	<b>123</b>	<b>45</b>

The Group has taken the decision to maintain its headcount levels during the 2020 financial year and has not resorted to furloughing (Record of Temporary Employment Regulation (RTER)) in the exceptional context caused by the COVID 19 pandemic.

### 1.4 Average remuneration

The average remuneration of the professionals of the Nueva Pescanova Group by December 31, 2020, should be read in the context of the geographical diversity in which we operate, considering the differences in GDP and purchasing power of the different countries. That is why we will include a comparison below considering the weighting of such circumstances. Notwithstanding the above, the 2020 average remuneration per cash-generating unit (CGU), age and professional classification is shown below:

2020			
Vannamei Aquaculture			
Professional Category	<25	25-45	>45
Senior Management	-	49,112	96,055
Middle Management/Technicians	6,592	11,063	15,866
Qualified Staff/Blue Collar Staff	3,943	4,081	4,586
Commercial and Other			
Professional Category	<25	25-45	>45
Senior Management	-	95,267	116,854
Middle Management/Technicians	12,512	33,844	46,033
Qualified Staff/Blue Collar Staff	16,871	20,727	24,921
Fishing - Africa			
Professional Category	<25	25-45	>45
Senior Management	-	54,423	54,650
Middle Management/Technicians	2,410	7,508	7,380
Qualified Staff/Blue Collar Staff	1,703	1,666	2,080
Fishing - Southern Cone			
Professional Category	<25	25-45	>45
Senior Management	-	69,501	91,247
Middle Management/Technicians	6,490	15,777	28,074
Qualified Staff/Blue Collar Staff	4,300	6,729	6,068

*For calculation purposes we have taken gross annual salaries, including night shift bonuses. Since the calculation method has changed, the data for the previous reporting period has not been included as evolution is not comparable. It will be included for future reporting periods.*

*We have excluded remuneration for fleet staff on board of fishing vessels, as well as for remunerations for part-time employees hired in Spain, flexible time employees, and expats since data are not comparable to the rest of the data provided.*

Average remuneration of fleet staff on board Nueva Pescanova Group's fishing vessels, by December 31, 2020, by age group and professional category, is shown below:

Professional Category	2020		
	Male		
	<25	25-45	>45
Captains & Chief Engineers	-	42,887	58,416
Desk Officers & 1st Engineers	-	34,720	40,739
Maintenance & Junior Staff	7,438	10,405	11,246

*For calculation purposes we have taken gross annual salaries, including night shift bonuses. Since the calculation method has changed, the data for the previous reporting period has not been included as evolution is not comparable. It will be included for future reporting periods.*

*Remuneration to female workers has not been included because they are not comparable. By December 31, 2020, the number of females on board of fishing vessels is 12, whilst males are 1,233 (a total of 1,235).*

The Nueva Pescanova Group has analyzed the competitiveness of employees' remuneration, by comparing average remunerations, by December 31, 2020, by country, category, and gender, with National Minimum Wages (NMW) as published in the countries in which it is present. Below are the indexes calculated on a 100 basis:

CGU /Country	2020			
	Average Remuneration		Index on NMW	
	Female	Male	Female	Male
<b><u>Vanamei - Aquaculture</u></b>				
Ecuador				
Senior Management	79,961	94,890	2,007	2,381
Middle Management/Technicians	17,216	13,983	432	351
Qualified Staff/Blue Collar Staff	5,291	5,254	133	132
Guatemala				
Senior Management	29,872	25,763	923	796
Middle Management/Technicians	8,263	8,583	255	265
Qualified Staff/Blue Collar Staff	3,254	3,816	101	118
Nicaragua				
Senior Management	63,702	91,434	3,497	5,019
Middle Management/Technicians	7,571	9,736	416	534
Qualified Staff/Blue Collar Staff	3,481	3,183	191	175
<b><u>Fishing - Africa</u></b>				
Namibia				
Senior Management	34,743	-	3,332	-
Middle Management/Technicians	6,851	11,847	657	1,136
Qualified Staff/Blue Collar Staff	1,690	2,072	162	199
<b><u>Fishing - Southern Cone</u></b>				
Argentina				
Senior Management	-	67,520	-	3,424
Middle Management/Technicians	17,919	17,280	909	876
Qualified Staff/Blue Collar Staff	7,515	7,956	381	403
Peru				
Senior Management	-	96,879	-	3,863
Middle Management/Technicians	12,379	14,293	494	570
Qualified Staff/Blue Collar Staff	3,794	3,593	151	143

CGU /Country	2020			
	Average Remuneration		Index on NMW	
	Female	Male	Female	Male
<b>Commercial &amp; Other</b>				
Spain				
Senior Management	89,335	97,795	784	858
Middle Management/Technicians	37,522	42,069	329	369
Qualified Staff/Blue Collar Staff	21,667	22,188	190	195
France				
Senior Management	90,999	112,657	493	610
Middle Management/Technicians	30,376	39,419	164	213
Qualified Staff/Blue Collar Staff	22,778	22,598	123	122
Greece				
Senior Management	49,633	69,158	636	887
Middle Management/Technicians	24,447	31,942	313	410
Ireland				
Senior Management	42,012	46,250	223	246
Middle Management/Technicians	27,120	35,974	144	191
Portugal				
Senior Management	79,783	98,770	897	1,111
Middle Management/Technicians	28,190	32,785	317	369
Qualified Staff/Blue Collar Staff	19,391	20,866	218	235
USA				
Senior Management	137,500	152,500	1,022	1,133
Middle Management/Technicians	38,348	30,269	285	225
Qualified Staff/Blue Collar Staff	97,500	90,000	725	669

For calculation purposes we have taken gross annual salaries, including night shift bonuses, of all professional categories of Group, except for the Management, as these are not comparable. Since the calculation method has changed, the data for the previous reporting period has not been included as evolution is not comparable. It will be included for future reporting periods.

Remuneration for fleet staff on board of fishing vessels, part-time employees hired in Spain, flexible time employees, and expats are excluded since data are not comparable to the rest of the data provided.

We have also excluded remunerations in Group companies in Brazil, Italy, Mozambique, South Africa, and Uruguay since information is not broken down by gender and therefore not comparable.

The formula used for calculating the index is: (MW by country of the Group's blue-collar staff, specialists, technicians, and middle managers/ MW by country) x100. We have only included the categories that represent the largest number of employees in the Group.

Source for NMWs: <https://wageindicator.org/salary>

## 1.5 Pay gap

The Nueva Pescanova Group is committed to and ensures the prevention of any type and form of direct or indirect discrimination based on gender, providing objective criteria and analytical systems for determining wages for its professionals, thus responding to any possible gender pay gap.

Gender pay-gap percentage data in the Nueva Pescanova Group by December 31, 2019 is shown in the table below:

CGU / Country	Pay Gap
Vannamei - Aquaculture	
Ecuador	5.5%
Guatemala	(0.6%)
Nicaragua	1.0%
Commercial & Other	
Spain	3.4%
France	(3.8%)
Greece	(21.5%)
Ireland	(9.4%)
Portugal	0.8%
USA	0.6%
Fishing - Africa	
Namibia	(4.7%)
Fishing - Southern Cone	
Argentina	(7.6%)
Peru	(0.3%)

*The formula used for the calculation of pay gap is: the median of the female pay less the median of the male pay divided by the median of the male pay. The median for each country by gender is calculated weighting the medians of the professional categories by gender. A positive gap means the % by which the median female pay is higher than the median of the male pay and vice versa.*

*For calculation purposes we have taken gross annual salaries, including night shift bonuses, of all the Group's professional categories. Only the Management category has been excluded since there is no comparable data by gender.*

*Remuneration for fleet staff on board of fishing vessels, part-time employees hired in Spain, flexible time employees, and expats are excluded since data are not comparable to the rest of the data provided.*

*We have also excluded remunerations in Group companies in Brazil, Italy, Mozambique, South Africa, and Uruguay.*

## 1.6 Average remuneration of members of the Board of Directors and Senior Officers

Remuneration of the members of the Board of Directors and Senior officers of the Nueva Pescanova Group is detailed in **Note 17.3** of the Consolidated Annual Accounts of Nueva Pescanova, S.L., and its Group Companies, for the year ended December 31, 2020, although it is not broken down by gender for data protection reasons.

The remuneration of members of the Board of Directors in 2020, for the performance of their duties, for attending Board meetings, allowances and other consideration as provided in the articles of association is the same regardless of the member being male or female. Senior Officers are ten people, of which 9 are male and 1 female.

## 1.7 Disconnect from work

The Nueva Pescanova Group policies on the right to disconnect from work are included in the relevant collective bargaining agreements (of the company or the sector, as the case may be) and, failing that, as set out in the labor regulations that apply in each country. In addition, "Our Code of Ethics" and other regulations in our Internal Regulatory System, expressly regulate the regime of use of information and communication systems provided to employees for the performance of their work.

In Spain, after the enforcement of the Organic Law 3/2018, of December 5, on Personal Data Protection and guarantee of digital rights, the right to digital disconnection, outside legal or conventionally established working hours, for workers is recognized, to guarantee respect for their rest time, leave and vacation, as well as their personal and family privacy. The arrangements for the exercise of this right shall consider the nature and object of the employment relationship, enhance the right to reconcile work and personal life and shall be subject to the provisions of collective bargaining agreements or, failing that, to what was agreed between the company and workers' representatives.

In this regard, Article 6.7 of the *General Procedure on Remote Working Management of the Nueva Pescanova Group* approved by the Executive Committee (COMEX) on December 22, 2020, provides as follows:

*"The Nueva Pescanova Group guarantees the right of its employees to enjoy their leisure time without work interferences, as well as the prevention and reduction of the hazards from technological overexposure of its workers, all to avoid the negative consequences that could entail on their health and safety.*

*Therefore, the Nueva Pescanova Group recognizes all its employees the right to disconnect outside of the working hours. To promote this right, the Nueva Pescanova Group is committed to promoting measures that supports respect for the leisure time of all its workers.*

*To this end, the Nueva Pescanova Group expressly recognizes all employees, except for force majeure, exceptional situations or urgent need, the right not to respond to emails, messages, and calls outside their working hours.*

*The Nueva Pescanova Group is committed to prepare a corporate policy or internal standard on the right to disconnect".*



## 1.8 People with disabilities

By December 31, 2020, the Group was hiring 130 persons with disabilities.

## 2. Work Organization

### 2.1 Working time

Working time is regulated in own or sectoral collective bargaining agreements or in the labor regulations of application in each country in which we are present, establishing a maximum annual working time, with established shifts, among other issues. The Group considers the irregular distribution of the day, depending on the needs of the organization of the work, and rules the overtime, in accordance with the ceiling established in the labor laws applicable in the countries where we are present.

The Nueva Pescanova Group respects the minimum daily and weekly breaks provided for in the labor regulations of application, as well as the holidays established in the relevant work schedule.

Group's employees have the right to leave work, entitled to remuneration, for different reasons such as attending to/care of family members or the fulfillment of an inexcusable duty of a public and/or personal nature, through paid leave schemes.

As regards the *Register of Working Hours* in Spain, with the enforcement of Royal Decree-Law 8/2019, of 8th March, on urgent measures for social protection and the fight against job insecurity in the workplace (hereinafter RDL 8/2019 of 8 March) a series of provisions have been introduced to establish the register of the working hours, with a view to ensuring compliance with time limits and creating a framework of legal certainty.

In this sense, Article 10, second section, of Royal Decree-Law 8/2019 of 8 March, amended Article 34 of the Workers' Statute, adding a new paragraph 9, which lays down the legal obligation to register working hours, using a system for daily registration which shall include a specific beginning and end of the working day for each employee, without prejudice to the flexibility of working time.

Therefore, in the companies Novapesca Trading, S.L.U., Nueva Pescanova S.L. and Pescanova España S.L.U. (Centers of Commerce and Back-Office of Chapela and Madrid), in compliance with the existing regulations, and in accordance with the provisions in Article 34.9 of the Workers' Statute, the *Telematic System for the Recording of Working Hours* was implemented in 2020 through the regulation contained in a new *General Procedure* (which aims to regulate the Telematics System for the Recording of Working Hours), as well as the disciplinary regime for non-compliance with the obligations to register working hours for all workers in the aforementioned work centers through such Telematic System.

In the field of *Remote Working*, a practice that became generalized during the *COVID-19* pandemic, on July 1, 2020, the Group approved the *Corporate Policy on Remote Work of the Nueva Pescanova Group* and the corresponding *General Procedure on Remote Work Management of the Nueva Pescanova Group* whose objectives are to formally establish the criteria and requirements to qualify for the benefit granted by the Group to its professionals to work remotely.

In fact, these Group's policies on Remote Working seek to offer its employees a way of working that allows them to carry out their duties outside the premises of their usual workplace in the manner that best suits their personal needs, to achieve the balance between personal and professional life, and to achieve greater productivity and optimization of personal and Company's resources, as well as to comply with the recommendations of the authorities to promote remote working.

After the publication of Royal Decree-Law 28/2020, of September 22, on remote working, the above-mentioned Corporate Policy and the relevant General Procedure has been amended, this second version was approved by the Executive Committee (COMEX) at the meeting held on December 22, 2020.

As mentioned above, with the declaration of the State of Emergency in Spain, on March 14, 2020, due to the exceptional health situation arising from the **COVID-19 pandemic**, the Nueva Pescanova Group implemented the voluntary adoption of remote working measures for all Group administrative or back-office staff worldwide, to ensure the safety and health of its employees and the continuity of the business. However, for obvious operational reasons, those remote working measures could not be applied at the industrial and aquaculture centers, which continued operating as usual, their activity being classified as essential.

In September 2020, the protocols for returning to the workplace were revised, to become 100% effective by September 7, 2020, the system consisted of alternate return to the offices, in shifts of 50% of the staff, and for full weeks. Afterwards, it was decided that by October 13, 2020, everyone was to return to the workplace maintaining the 40% remote work formula in accordance with the **Corporate Policy on Remote Work** and the **General Procedure for Remote Work Management** above mentioned.

## 2.2 Absenteeism

The total number of hours of absenteeism for common illness in the companies of the Nueva Pescanova Group reached 409,581 in 2020. We have not included data from Portugal, Italy, Greece, South Africa, USA, and Brazil, since this is not significant in the context of the Group.

Also, it is worth noting that **COVID-19** related employees absenteeism hours in 2020 totaled 118,841.

## 2.3 Reconciliation and co-responsibility of both parents

The professionals of the Nueva Pescanova Group may adapt the duration and distribution of working hours to implement their right to work-life balance, within the possibilities that the Group always has, provided that the weekly/annual calculation of working hours is adhered to all in the terms and with the scope provided for in the collective bargaining agreements or labor regulations in force.

In addition, to the collective bargaining agreements or, where appropriate, the implementation of labor regulations, regulated paid permits such as for breastfeeding, reduction of work hours for the care of minors or a disabled person, leave to attend to personal or family circumstances, etc., which favor the reconciliation of the personal, family and work life of the Group's workers.

### 3. Health and safety

#### 3.1 Health and Safety Conditions in the workplace

The Nueva Pescanova Group has a *Corporate Occupational Safety and Health Policy* applicable to the whole Group. This Corporate Policy includes the commitment of the Group's Management to strict compliance with the obligations in the field of Safety and Health at Work, in accordance with the provisions of the different national and international standards and regulations, complying in all its aspects and being subject to an audit by *BUREAU VERITAS*, which certifies its compliance.

Within the Corporate Department of Human Resources of the Nueva Pescanova Group there is a Corporate Division of Prevention of Occupational Risks and Integral Safety, which has designed and implemented for each field of activity of the Group a *Comprehensive System for the Management of the Prevention of Occupational Health & Safety Hazards* (described and structured in the *Handbook for the Management Occupational Health & Safety Hazard Prevention Plan*), strictly following the legal requirements of the countries in which we are present and even going beyond them in those cases where the regulations are not as advanced as in the Spanish legislation.

Likewise, there is a *Handbook on Work Operational Procedures* that contains a total 21 Preventive *Procedures* duly communicated to workers, thus ensuring compliance with the activities under specific labor safety standards and ensuring basic principles of safeguarding the safety of Group's workers.

*Safe Work Sheets* are also available for the Group's four main activities (fishing, aquaculture, processing and administration/commercial) that have been given to the Group's workers in the appropriate face-to-face training sessions.

On the other hand, *Safety Handbooks* prepared according to the activities performed by the Group set the guidelines for safe work for the employees in of the four main activities mentioned in the above paragraph.

Each Group work center keeps the following *Records*, that are reviewed on an annual, quarterly, or monthly basis, in agreement with a set schedule:

- Occupational health and safety risks Assessment.
- Action plan.
- Ergonomic analysis.
- Hygienic measurements.
- Emergency and self-protection plans.
- Health surveillance.
- Regular safety visits.
- Accident inquiries.
- Activity report.
- Annual activity plan.
- Setting annual targets.
- Health and Safety Committee meetings.
- Prevention training.

- Accidents' statistics.
- Analysis of accidents costs.

The Corporate Division of Prevention of Occupational Risks and Integral Safety prepares, annually, its *Activities Report*, *Efficiency Reports*, and the corresponding *Statistics Data* in all the countries where the Group is present. The improvement of health and safety conditions is checked year after year in the light of the results obtained, which prove a gradual reduction of the overall accidents in the Group. Also, the *Health and Safety Committees* set up in all our work center prepare the relevant *Annual Plans* setting objectives to be met every year.

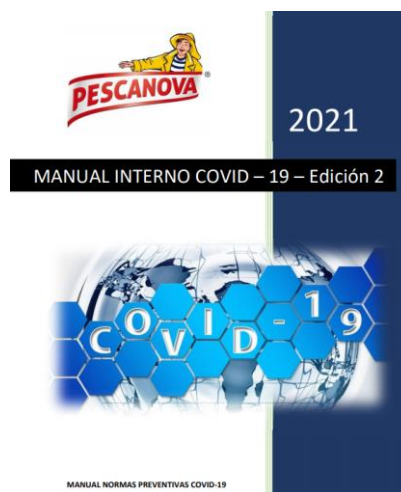
As regards to the *COVID-19* related *measures and protocols*, the Nueva Pescanova Group designed since the start of the pandemic and throughout 2020 a series of protocols and implemented certain measures to ensure the safety and health of our professionals:



After the confirmation of the *COVID-19* pandemic in the first quarter of 2020, the Corporate Division of Prevention of Occupational Risks and Integral Safety assessed the risks and hazards arising from *COVID-19* at all Group's workplaces, to be able to adapt them and ensure that all employees were working in a safe place. At the same time, an assessment of all staff at risk or especially sensitive staff to *COVID-19* was carried out to be able to define prevention, adaptation and protection measures so that they could carry out their work without putting their health at risk. The following are the measures and protocols implemented in the Group, globally, to fight against *COVID-19*, it is worth mentioning that at the start of the pandemic the Group made a great effort, economical and in human resources, to be in a position to ensure, firstly, the safety and health of our professionals and, secondly, as it could not be otherwise, the continuity of the business, the total investment amounted to more than **5 MILLION EUROS (€5,000,000)** in 2020.

A. *Protocols and messages:*

- Publication of a general handbook that was given to all the Group's staff, that includes, among other things, **COVID-19** related standards for safe behavior at the workplace as well as Preventive and Reactive Protocols.
- Regular messaging to all staff, informing about the latest news on the pandemic, emphasizing on the need for compliance with all safe behavior standards. Among these messages, the CEO also gave periodic and regular video messages, updating the situation of the pandemic in the Group which were sent via email to the Group's professionals and were also uploaded to our intranet *PESCANET*.
- Training sessions for all employees.



B. *Personal Protective Equipment:*

- Individual:  
More than 600,000 masks, 1,500 face shields, 11,500 safety glasses, 1,000 hydroalcoholic (disinfectant) gel bottles and more than 50,000 pairs of nitrile gloves.
- Collective:
  - Fitting protective screens to separate job stations.
  - Placement of signage at every workplace.
  - Placement of hydroalcoholic gel dispensers for hand disinfection.
  - Increased cleaning and disinfection of workplaces, including weekly space spraying.
  - Installation of air purification systems and automatic temperature taking systems.

C. *Covid-19 testing:*

- Serological rapid tests for antibodies detection: The group bought **15,000 tests for antibodies detection**, for weekly testing of the staff at the different work centers and fleet staff. Also, all external visits are tested prior to entering the premises. At December 31, 2020, **9,000 tests were made**.
- Antigens tests: The Group bought **6,000 tests for antigens detection**, these are used when a member of our staff is suspect of having been in close contact or confirmed contact with a **COVID-19** patient or shows **COVID-19** symptoms. By December 31, 2020, a total of **1,500 tests were made**.
- In 2020 the Group entered two **cooperation agreements with laboratories**, both national and international, to make available to our professionals and their families the possibility to be tested for **COVID-19**. By December 31, 2020, more than **2,000 PCR tests** were performed at those laboratories and more than another **700 PCR test** in cooperation with the SERGAS (*Galician health Authorities*).

D. *Organization measures:*

- As mentioned above, remote working was implemented when the first State of Emergency was declared in March 2020 in Spain, so that staff could continue working from home.
- Implementation, for subsequent reactivation, of the 50-50 split between office and remote working, that consisted in making up two separate groups of workers who would be rotating on a weekly basis to minimize risk of transmission and ensure the continuity of the business.
- Delivery of the *Welcome Pack* containing the necessary protective elements for returning to the office such as masks, hydroalcoholic gel and gloves, as well as information on safety and health advice to prevent the spread of **COVID-19**.
- Reduction of movement between work centers ban travel unless strictly necessary to ensure business continuity.
- Strict control of visits and contractors accessing work centers.
- Launching of a flu vaccination campaign, making them available and vaccinating all employees who request it. In this regard, a total of **447 professionals** were vaccinated globally during the 2020 flu vaccination campaign, compared to 86 in 2019.
- The Group took out an insurance to cover hospital admission because of **COVID-19** for all employees and repatriation for expats or frequent travelers.
- Process for obtaining AENOR certificate for the Protocols against **COVID-19** followed by the Group. Certificates were received in the first quarter 2021.

**E. Specific measures for the fishing division:**

Also, the Group has designed measures adapted to the fishing activity, preparing protocols for the crews to start the fishing seasons, advancing their travel arrangements for their quarantine, PCR testing prior to embarking and 3 or 4 days stay at port, to confirm there are no positive cases onboard prior to departing to the fishing grounds.

**F. Specific measures for the aquaculture division:**

Similarly, specific measures were implemented at the farms in Ecuador (PROMARISCO) and Nicaragua (CAMANICA), by changing work shifts to make the least possible changes and reduce contacts, and screening all staff entering the farms.

### 3.2 Occupational accidents and diseases

**i. Occupational accidents and rates**

The table below shows the number of accidents by gender and the relevant accident rates of the whole headcount of the Nueva Pescanova Group in 2020:

	2020		
	Female	Male	Total
Nº of work-related accidents	61	198	259
Incidence rate	14.36	29.90	23.83
Frequency rate	6.53	13.41	10.74
Severity rate	0.12	0.26	0.20

*Worked hours are the theoretical working hours in the collective bargaining agreements.*

*Data in relative numbers, whose calculation basis is as follows:*

*Incidence rate: number of accidents per 1,000 workers ( $n^{\circ}$  of accidents/ $n^{\circ}$  workers X 1,000).*

*Frequency rate: number of accidents per 1,000,000 hours worked ( $n^{\circ}$  of accidents/hours worked X 1,000,000).*

*Severity rate: Days lost per 1,000 hours worked (days lost due to an accident/hours worked X 1,000).*

**ii. Occupational diseases**

In 2020, no occupational disease has been reported in the Nueva Pescanova Group (this refers only to countries where the legislation provides for the existence of occupational diseases).

## 4. Industrial relations

### 4.1 Social dialogue

Regular meetings are held with workers' representatives of the different work centers (Workers' representatives, delegates, or whatever name that is given to the representatives of employees) in the countries in which the Group is present, to discuss issues related to the activities of the center; namely: work calendar; shifts; safety and health at the workplace; well-being; etc.

## 4.2 Collective bargaining agreements

The percentage of employees of the Nueva Pescanova Group covered by a collective bargaining, of the company or the sector, by December 31, 2020, is shown below:

	2020
Country	% of employees
Argentina	83
España	98
Francia	100
Italia	100
Mozambique	100
Portugal	100
Uruguay	100

*In the rest of the countries where the Nueva Pescanova Group is present and not shown in the table above, are covered by the framework of industrial relations set out in local labor legislation.*

## 4.3 Occupational health and safety in the collective bargaining agreements

### i. General principle

The collective bargaining agreements or the applicable labor legislation in each of the countries in which we are present include specific chapters or sections on Occupational Health and Safety, thus promoting the safety and health of workers through the implementation of measures and the development of activities necessary for the prevention of occupational risks.

On October 16, 2020, **PESCANOVA ESPAÑA, S.L.U.**, agreed with the Employee's Representatives of the Commercial Center and Bank-Office Chapela, Industrial Center in Paterna and Industrial Center in Catarroja, the regulation for Remote Working.

### ii. Prevention services

To ensure due participation in prevention, the Group facilitates the set-up of Safety and Health Committees in the workplaces in the countries in which we are present, also relying on the appropriate own- or third-party health prevention services.

### iii. Health surveillance

The Group's workers are also guaranteed regular monitoring of their health condition, based on the risks inherent in the work, by the appropriate own- or third-party health surveillance provider.

In 2020, in Ecuador (PROMARISCO), in collaboration with the Ministry of Public Health, talks on breastfeeding, healthy diet, family planning, vector diseases, biosecurity standards to prevent **COVID-19** spread, voluntary blood donations and HIV prevention were held.

In Nicaragua (CAMANICA) health care awareness campaigns, with special emphasis on personal hygiene, and healthy habits, prevention of chronic diseases, breast cancer, human papilloma and **COVID-19**, as well as blood donation and vaccination of common diseases were carried out in cooperation with Nicaraguan Health Ministry.

In Guatemala (NOVAGUATEMALA) the Health Day for Diabetes Control and Detection was implemented for the staff at the Champerico processing plant, approximately 350 employees participated in this program. There was also an HIV campaign for 100% of the



professionals at the processing plant in Champerico, apart from the monitoring of the health plans required by the Labor Ministry in Guatemala and talks to pregnant women.

#### iv. **Workwear and personal protective equipment**

The Group's workers are provided, according to the needs of each workplace, activity, and occupation, with appropriate uniforms and work clothing for the prevention of occupational hazards to which they are exposed.

### 5. **Talent development and management**

In the Nueva Pescanova Group talent management is aligned with the Strategic Plan with a comprehensive approach, where all processes are interdependent, which allow us to standardize the policies on staff selection, training, and development pursuing excellence in all of them, aimed at contributing to creating value for the Group and our people.

Investing in the talent of our people allows us to continue to grow and launch future projects, to position the Nueva Pescanova Group as the best food company.

Therefore, the Group's DG People, has implemented innovative talent management strategies, aligned with present and future business challenges, that enable the development and satisfaction of the people who make up Group.

The corporate documents setting the principles for the Group's talent management are: *Corporate Policy on Talent Management* and our *General Procedure on Talent Management*. The latter establishes 4 separate subprocesses: namely, training and learning, internal promotion, performance assessment and succession.

#### 5.1 **Training and learning**

To ensure that the Nueva Pescanova Group has trained people based on the requirements in its Strategic Plan and that serve as a reference in the ways of doing in the overall scope of the Group, the main objective of the training and learning process is to make available to workers an Annual Training Plan adapted to existing training needs, contributing to the development and growth of the professionals who are part of the Group.

The detection of training needs is carried out annually, in October. To do this, the HR Managers of the different Business Divisions of the Group proceed, in coordination with the different Managers (people who have the responsibility to lead others), to define what are the needs to be covered in the next year. Compulsory training (i.e., the one marked by the legislation of each country) must necessarily be included within the training needs. In addition, there is also the possibility to include training actions derived from the employee's annual assessment process through Abaco (*Success Factors*) tool.

Based on the information gathered in the detection of training needs, HR Managers proceed to establish the priority of these needs and, if deemed appropriate, include additional training necessary to meet the objectives of the relevant Business Division. Based on the above a budget for training is prepared and sent to the DG People that analyses those needs to prepare the relevant *Annual Training Plan*.

For the training to reach all the employees of the Nueva Pescanova Group in the different countries and centers, in 2019 we launched the online training tool "Campus Nueva Pescanova"

which continued its deployment in 2020, at present **879 people** can access the tool, in 8 countries, this represents a 22.5% increase when compared to the previous year.

## 5.2 Internal promotion

To provide greater transparency to the processes of promotion and appointments within the Group and establish validation criteria and circuits that ensure equal opportunities, the absence of any type of discrimination and, ultimately, the objectivity and impartiality in talent management, the Nueva Pescanova Group has implemented an internal process based on professional merits, the degree of compliance with performance objectives and competencies of the professionals of the Group. In 2020 there have been **29 internal promotions**.

## 5.3 Performance assessment

To guarantee continuous training that ensures the maintenance of the competences of the Group's professionals, we have an annual performance assessment process of professionals based on two fundamental criteria: the degree of fulfillment of the objectives established and the skills required of each of the positions. In 2020, **954 professionals** were assessed through the Abaco platform.

## 5.4 Succession

The Nueva Pescanova Group has established a succession process within the organization whose purpose is to train and prepare the best possible talent to occupy positions of responsibility that are fundamental to the permanence, retention, sustainability, and good development of the Group. This is a project that is still in the process of design and implementation.

## 5.5 Training hours

The table below shows the total number of training hours received by professionals in all Nueva Pescanova Group companies, by category, in 2020:

Professional category	Training Hours	2019 vs 2020
Senior Management	2,844	↓ 33.86%
Middle Management/Technicians	24,076	↓ 9.32%
Qualified Staff/Blue-Collar Staff	35,963	↑ 4.23%
<b>Total</b>	<b>62,883</b>	

*The reach of the reported training hours is 71.2% of the workforce.*

The number of professionals that have received some training in 2020 is **7,042 people**, this means a ratio of 8.93 hours training per professional.

The table above, is a clear example of what happened in 2020 due to **COVID-19 pandemic**. The first cross-divisional training sessions were programmed in early March, these were targeted to core staff, and had to be cancelled because of the state of emergency declared by the Spanish Government and the preventive measures established accordingly, which meant a reduction in the number of training hours as follows, Senior Management 33.86%; Middle Management and Technicians 9.32%. However, there was an increase in training hours for Qualified and Blue-Collar Staff 4.06% since the Group's industrial centers continued with their activity, being food

production an essential activity, prioritizing and promoting training related to these preventive measures and other measures implemented internally to safeguard the safety and health of all members of the company.

Despite of this situation, the number of training hours, globally, were equivalent to those in 2019, since in the last quarter of the year there is an intensification of training sessions, which were mainly online.

## 6. Equality

### 6.1 Promoting equal treatment and opportunity for women and men

Both *Our Code of Ethics* (article 13) and *Our Providers' Ethical and Social Charter* (article 5.7) expressly include the principles on non-discrimination and equal opportunity for women and men.

Similarly, our *Corporate Policy on Talent Management* is based on the establishment of equal opportunity and treatment regardless of gender, race, religion, disability, marital status, sexual orientation, family situation, age, or any other condition (Article 4.d). Also, our *Corporate Policy on Recruitment, Selection, Onboarding and Offboarding* of professionals of the Group includes, among the basic values and principles of action in this field, the principles of non-discrimination (Article 3.a) and equal opportunity (Article 3.b).

In addition, article 5.4 of our *Corporate Policy for the Prevention of Criminal Risks* ("Defense of fair labor relations") reflects the Group's commitment to the rejection of any form of employment discrimination on the basis of ideology, religion, beliefs, membership of an ethnicity, race or nation, gender, sexual orientation, family situation, illness or disability, for holding the legal or union representation of workers, by kinship with other professionals of the Group or by the use of official languages in each of the countries where we operate.

On the other hand, collective bargaining agreements and/or labor regulations in the countries where we operate establish the general principle of promoting equality between women and men, a commitment to equal treatment and opportunity in the workplace, as well as to the adoption of measures aimed at preventing any type of labor discrimination between men and women.

Also, in Spain, there is an initiative carried out by a group of female professionals of the Nueva Pescanova Group called *Women in Pescanova (WIP)*, that appears in June 2018 aimed at:

- Give visibility to the women in the Group.
- Generate forums for debate and improvement, be a think tank for the company in certain matters.
- Encourage the setting of integration practices in the processes of selection, training, promotion, and remuneration, without undermining the principles of merit and capacity.
- Create a coalition to detect and support female talent.

*WIP* brings together a group of women with very similar interests, who operate in network and in small circles, with leaders or moderators responsible for strengthening the groups and any projects related to their objectives. In 2020, we started the implementation of *WIP* in Ecuador, Nicaragua, and France through presentations by the Group and actions.

In 2020, we arranged two *online sessions* to which we invited successful women at national level, to discuss about topics of interest for the Group and seeking to generate debate from its presentation, and the *Debating Society* met on six occasions to mull over and learn the skills required for the development of a professional career.

## 6.2 Equality plans

In the work centers in Spain, which are subject to Collective Bargaining Agreements, an *Equal Opportunities Committee* has been set up with the aim of analyzing, designing, and developing the Equality Plans of the Nueva Pescanova Group companies in Spain. This Equality Committee is preparing the Equality Plans which will contain an analysis of the initial situation, a program with specific measures necessary to address the gaps identified and a monitoring and evaluation procedure that will include the indicators necessary to assess the degree of compliance with the actions of the Equality Plans. By December 31, 2020, the Equality Plan for Pescanova España, S.L.U. is in the final phase of negotiation, and is expected to be approved during the first half of 2021. Once this work has been completed and the appropriate Equality Plans have been drawn up, a Monitoring Committee will be set up to ensure the principle of equality and non-discrimination in the Group, carrying out surveillance, control and monitoring of the commitments made and how many actions are taken to meet the main objective of the Committee, i.e., the integration of the principles of effective equality between women and men and non-discrimination.

The negotiation of the Equality Plans of the companies of the Nueva Pescanova Group in Spain, is in the phase of proposal of measures whose priority objective is the integration of the gender perspective in the Policies and Plans of the Group in the different areas in which the actions to be developed are divided: selection; hiring; professional classification; training; professional promotion; remuneration; reconciliation and co-responsibility; under-representation; mobbing sexual and gender harassment and/or discrimination; gender related violence; company culture; communication and awareness-raising; occupational health and safety.

## 6.3 Measures adopted to stimulate employment.

The Nueva Pescanova Group has adopted certain measures to stimulate employment, such as:

- Participation in job fairs and other events organized by universities and training centers in the different countries where the Group performs its activity, which allow us to connect with students and recent university graduates entering the labor market.
- Recruitment of trainee students to encourage the insertion of young people into the labor market.
- The Group's commitment to bring down to the minimum temporary hiring through Temporary Work Agencies and, only use it exceptionally in search for a new recruitment model in which employment stability is the ultimate objective, as set out in the collective bargaining agreements and/or applicable labor regulations in the countries where we are present.
- In Nicaragua (CAMANICA) we visit local communities with little or no economic activity or sources of employment to establish contact with its people to let them know about the Group, as well as the labor benefits of belonging to it. Likewise, agreements are entered with universities, pursuant to which we welcome the best performing students who are given the opportunity of internships in different areas, and in turn serve as pools for the recruitment of new talent for the company as *trainees*.

- In Ecuador (PROMARISCO) we had the *III Trainee Program*, which is aimed to capture, develop, and attract new talent from young professionals recently graduated in Aquaculture, Agronomy, Fisheries and Environmental studies, who are given the opportunity to work and rotate through the different departments in PROMARISCO shrimp farms over a 6-month period. At the end of the process, those who successfully finish the program can take a position in the Company. In 2020, **6 trainees** took part in this program, that concludes on April 17, 2021.
- Also, in Ecuador (PROMARISCO), in 2020, the I Maintenance Apprentices Program took place, the purpose of this program is to capture, recently graduated students in Industrial/Automobile Mechanics, Electro-Mechanics, Electricity and/or Industrial Electronics. The methodology followed is *Learning-by-doing*, and lasts 3 months, during which they are constantly trained, and must face different challenges and responsibilities to end up having an opportunity to take a challenging position within the structure of the company. In November 2020, **5 young students** started their training in the Technical Division of the farms, and those who successfully complete the program will have the opportunity to have a full-time job.
- In Guatemala (NOVAGUATEMALA) we shared our recruitment plans with the people in villages surrounding Champerico, where the processing plant is located. Likewise, the Company participated in the Job Fair promoted by the Delegation of the Department Labor in Retalhuleu. Mass media, radio, television, and banners were used for these events.
- Also, in Guatemala (NOVAGUATEMALA) work was done to attract students graduated from the Centro Experimental del Pacífico (CEPAC), for administrative positions to give them the opportunity to develop professionally encouraging them to continue their university studies.
- In Mozambique (PESCAMAR), the Program for Strengthening of Professional Skills in Mozambique's Maritime-Fishing Sector was launched, in collaboration with Escola de Pesca de Matola, which aims to improve the employability of young people in the African country by adapting their training to the needs of the fishing industry and thus also contributing to enriching the generational replacement plan for fleet crews.

#### 6.4 Preventing sexual and gender harassment

Article 12.3 of *Our Code of Ethics*, states that the Group rejects all manifestations of violence, harassment at work, physical, sexual, mental, moral or any other types of abuse, abuse of authority and all other conduct that creates an intimidating, humiliating or offensive environment for Group's employees.

Similarly, *Our Providers' Ethical and Social Charter* provides, in article 5.2, that the providers of the Nueva Pescanova Group will not allow in their organization any form of harassment, abuse of authority or intimidation, humiliation or offensive treatment to the personal rights of their employees and collaborators.

Our *Corporate Policy for the Prevention of Criminal Risks* provides, in article 4.1, that the Nueva Pescanova Group rejects violence and will punish any manifestations of physical or verbal violence, threats, coercion or extortion, workplace, sexual, psychological or moral harassment, abuse of authority in the workplace and any other conducts that create a disturbing or offensive environment for the physical or moral integrity of its professionals or other third parties with which the Group interacts.

In the collective bargaining (where they exist) and applicable labor regulations include a ban on any type of harassment.

Additionally, as already mentioned in this Report, in Spain we are preparing Equality Plans, which among other issues include a Protocol for the prevention and treatment of moral, labor, sexual and gender harassment in the workplace. This Protocol establishes a commitment to providing information, prevention, mediation, and suppression of conduct in the field of harassment at work, as well as the establishment of an internal, summary procedure with all confidentiality guarantees that the matter requires, to channel the complaints that may occur and promote its solution within the Group, seeking as main objectives:

- The commitment to an environment free of sexual or gender harassment, by implementing appropriate conditions so that reporting procedures are known to all employees and the process is carried out with the maximum guarantees for all parties involved.
- The prevention of behaviors leading to sexual or gender harassment, by training people in the prevention of this type of situations.

In Pescanova España, S.L.U., within the scope of the Equality Plan, negotiations have taken place between the company and the legal representatives of employees to agree to *Protocol of Action in the field of Mobbing, Sexual and/or Gender Harassment and Discrimination of Pescanova España, S.L.U.* Under this Protocol, the company set up a Harassment Committee (consisting of three people representing the company, and two representing employees) which is primarily intended to receive, investigate, and resolve any Harassment Complaints that may occur, in accordance with the rules of procedure contained in this Protocol of Action. In the context of this Protocol of Action on Labor, Sexual and/or Gender Harassment and Discriminatory of PESCANOVA SPAIN, S.L.U., approved by the Company's Equality Commission on October 29, 2019, one (1) case was dealt with in 2020 because of the complaint of alleged sexual harassment filed by a professional of the Group. This case was dealt with by the Harassment Commission set up for this purpose in application of the mentioned Protocol (consisting of representatives of the company and employees), concluding that the alleged harassment episode had not been duly proved and the case was closed.

Likewise, our Portuguese Group company (PESCANOVA PORTUGAL LTDA.) has a *Code of Good Conduct for the Prevention and Combating Harassment at Work* (“*Código de Boa Conduta para a Prevenção e Combate ao Assédio no Trabalho*”), where, among other content, an internal procedure for reporting and investigating any form of harassment at work is described.

Similarly, NOVAGUATEMALA has a specific internal procedure regarding non-discrimination and harassment at work which also describes how to proceed if a professional of the Group knows or is the victim of an episode of this nature.

The onboarding process for new staff, includes the presentation of our Code of Ethics, and emphasis is placed on absolute rejection of harassment and discrimination at work.

In Nicaragua (CAMANICA) a "Zero Harassment Policy" was implemented aimed at creating a work environment free from any harassment or behaviors that violate the physical or emotional safety of people, by setting the guiding principles of behavior for all the professionals of the Group, as established in *Our Code of Ethics* (Chapter II. General Ethical Principles and Good Business Practices of Nueva Pescanova Group).

## 6.5 Universal access for people with a disability

In Spain, the Nueva Pescanova Group has entered a cooperation agreement with *Asociación Down Vigo* for the employability of people with Down Syndrome or intellectual disability to promote the integration of these people into society.

In our Ecuadorian Group company (PROMARISCO), in 2020, two social workers of the Welfare Division were trained in sign language to improve the communication with hearing impaired staff and facilitating their inclusion in the workplace. Also, in January 2020 it was arranged the visit of a civil servant from the Ministry of Labor, to give talks to 57 members of our staff, people with disability and managers, on the Regulatory Framework in Priority Groups dealing with Human Rights, Labor Inclusion, Discrimination and Labor Harassment.

Likewise, in our Nicaraguan Group company (CAMANICA), notices have been posted in health centers, schools and in the offices of the Ministry of Labor, with the aim of promoting internal vacancies for people with different capacities.

At present our Guatemalan company (NOVAGUATEMALA) hires staff with different disabilities with the same rights, opportunities, and benefits as any other member of the staff.

## 6.6 Fight against discrimination and diversity management

*Our Code of Ethics* reflects respect for people as a fundamental principle in labor relations, which promotes a respectful working environment to achieve a positive working climate, as well as the rejection of any type of conduct or behavior that could encourage discrimination, as already stated in preceding sections of this Chapter.

# V. INFORMATION OF RESPECT FOR HUMAN RIGHTS

## 1. Introduction

As stated in *Our Code of Ethics*, the Nueva Pescanova Group is committed and linked to human and labor rights recognized in national and international law and to the principles on which the *UN Global Compact* is based, which derive from statements by the United Nations on human rights, environmental and anti-corruption issues; the United Nations Norms on the Responsibilities of Transnational Corporations and Other Business Enterprises with Regard to Human Rights; the OECD Guidelines for Multinational Enterprises; as well as other documents that may replace or supplement those referred to above.

In this regard, as already mentioned in this Report, the Nueva Pescanova Group (through its parent company Nueva Pescanova, S.L.) joined in 2019 the *UN Global Compact* and the *Spanish Global Compact Network*.

## 2. Internal policies

Numerous normative documents of our *Corporate Governance and Compliance Regulatory System* show the principles of action and standards of conduct in relation to respect for internationally recognized human and labor rights, in particular as regards to **freedom of association**, the **right to collective bargaining**, the **elimination of discrimination** in employment and occupation, the **elimination of any form of forced or compulsory labor**, as well as the **effective abolition of child labor**, as set out below:

- *Our Code of Ethics* (article 10. "Commitment to human and labor rights"; article 12. "Respect for people"; and article 13. "Principles of non-discrimination and equal opportunity").

- *Our Providers' Ethical and Social Charter* (article 5. "Commitment to the internationally recognized basic human and labor rights").
- *Corporate Policy for the Prevention of Criminal Risks* (article 5. "Defense of fair labor relations").
- *Program for the Prevention of Criminal Risks in the Nueva Pescanova Group in Spain:*  
Crimes related to violation of human and labor rights (i.e.: imposition of harmful working or social security conditions; illegal employment of immigrant or minors; illegal labor trafficking; fraudulent emigration; labor discrimination; illegal limitation of freedom of association and the right to strike; omission of security and hygiene measures; and illegal or illegal immigration of foreigners) are duly assessed in the *Criminal Risks and Controls Matrix*<sup>2</sup> of the Criminal Hazard Prevention Program, having implemented both general and specific controls of surveillance and control for their prevention, detection and/or correction.
- *Corporate Policy on Corporate Social Responsibility* (articles 5. "People"; and 7. "Communities").
- *Sectoral Policy on Responsible Aquaculture* (article 3. "General principles and objectives for responsible aquaculture practices"); and article 4. "Specific measures for responsible aquaculture practices").
- *Sectoral Policy on Responsible Capture Fisheries* (article 3. "General principles and objectives for responsible capture fisheries practices"; article 4. "Specific measures for responsible capture fisheries practices"; and article 6. "Guidelines of Responsible Conduct for Fishing Vessels").
- *Corporate Policy on cooperation and Development Aid* (article 4. "Fields of action and projects for cooperation and development aid").
- *Corporate Policy on Corporate Volunteering* (article 3. "Corporate volunteering in the Nueva Pescanova Group"; and article 4. "Scope and reporting principles of corporate volunteering of the Nueva Pescanova Group").
- *Corporate Policy on Corporate Institutional Relationships* (article 4. "Commitments in Institutional Relations with our stakeholders"; article 5. "Operating principles in institutional relationships of the Nueva Pescanova Group with authorities and public officers").
- *Corporate Policy on Talent Management* (article 4. "Operating values and principles").
- *Corporate Policy on Recruitment, Selection, Onboarding and Offboarding* (article 3. "Basic operating values and principles related to recruitment, selection, onboarding and offboarding professionals in the Nueva Pescanova Group").
- *Corporate Policy on Remote Working in the Nueva Pescanova Group* (article 6. "Voluntariness and reversibility"; 7 "Employment conditions"; 8 "Equal opportunities", or 9 "Collective rights").

### 3. Due diligence and precautionary procedures

#### 3.1 Training and awareness raising

In 2020 the Director of the Compliance Unit has conducted several online training sessions with different professionals of the Nueva Pescanova Group both in Spain and abroad.

At those training sessions, approximately 2 hours each, different modules are devoted to human and labor rights issues (i.e.: rejection and absolute prohibition of any form of child labor and

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<sup>2</sup> The Criminal Risks and Controls Matrix classifies controls as follows: "Control Description"; "Evidence"; "Person Responsible for the Control"; "Control Classification" and "Type of Control".



forced or compulsory labor; protection of labor and social security rights; respect for the exercise of the rights of association, syndication, collective bargaining and strike; protection and defense of ethnic minorities and indigenous people; protection and promotion of occupational safety and health; safeguarding physical and moral integrity and indemnity; promoting equal opportunities for men and women; and seeking adequate reconciliation of work and family life).

In 2020, these online training sessions given by the Director of the Compliance Unit in Group companies were attended by a total of **28 professionals**, over a total of **12 training hours**.

In addition to these face-to-face training sessions, the Group's e-Learning platform ("*Campus Nueva Pescanova*") there is a specific section called "*Nueva Pescanova Group Compliance Academy*" in which there are hosted two mandatory training courses on compliance that deal with issues regarding respect for human and labor rights, namely:

- "*Our Code of Ethics and other standards of our Internal Regulatory System*" with an estimated duration of 1 hour. This online course specifically deals with the principles and behavior standards in the field of "Human and Labor Rights" followed by the Group.
- "*Prevention of Criminal Risks and Corruption*", a 1-hour duration course dealing specifically with the provisions in the Corporate Policy on Prevention of Criminal Risks regarding the defense of fair labor relations.

Both online courses which end with a Knowledge Questionnaire that all users have complete and pass (7 correct answers out of 10). Those Group professionals who do not pass, must take the course again.

In 2020 it has been compulsory to take the module on "*Prevention of Criminal Risks and Corruption*" and certain professional who have joined the Group in 2020, had to take and pass the above-mentioned module called "*Our Code of Ethics and other standards of our Internal Regulatory System*".

The total number of users that have taken and passed one or both two modules in 2020 has been **409 professionals** both in Spain and abroad (these online courses are available in Spanish, English, and Portuguese).

### 3.2 Notices and Corporate Intranet *PESCANET*

Whenever a corporate body approves a new corporate rule, this is communicated to the organization, via an e-mail from the owner of the standard containing a brief description of its content in Spanish and English and attaching the wording of the standard in Spanish, English, French, and Portuguese.

Similarly, the standards that make up the Group's Regulatory System of Corporate Governance and Compliance are hosted under the "**COMPLIANCE**" tab of the Corporate Intranet *PESCANET* in its different versions and languages (Spanish, English, French, and Portuguese). The "**COMPLIANCE**" tab is, in turn, subdivided into the following regulatory categories serving as a centralized repository of our internal standards: "Compliance Channel", "Governance Standards", "Ethics and Compliance", "Corporate Policies", "Internal Standards", "Personal Data Protection" and "Prevention of Criminal Risk".

In November 12, 2020 the Compliance Unit, through the e-mail account ([unidad.cumplimiento@nuevapescanova.com](mailto:unidad.cumplimiento@nuevapescanova.com)) sent a notice informing about the approval of a series of amendments to the Criminal Risk Prevention Program, (particularly, regarding the Handbooks – General and Special part – on Prevention of Criminal Risks) carried out to

incorporate new control activities related to our criminal risks arising from the Corporate Policies and Internal Standards approved in the last months, since the approval of the last version in November 2019.

### 3.3 Annual Responsible Statements on Compliance

Annually, the members of the Board of Directors and certain professionals of the Nueva Pescanova Group subscribe a *Responsible Statement on Compliance*, by which they take on, among other, commitments that expressly and specifically relate to human rights; in 2020 a total of **371 professionals** of the Group globally subscribed the relevant *Responsible Statement on Compliance* according to the following breakdown:

- In 2020, the members of the Board of Directors of Nueva Pescanova, S.L., (the **10** members of the former Board of Directors, until April 2020, and the current **5** members of the new Board) subscribed and signed a document titled “*Annual Responsible Statement on Regulatory Compliance, Performance of Office and Conflict of Interest Situations*”.
- In 2020, the members of the Executive Committee (COMEX) and the members of the Steering Committee (**36**) of the Nueva Pescanova Group, subscribed and signed a document titled “*Annual Responsible Statement of Personal Notification, Acceptance and Compliance with our Code of Ethics, our Corporate Policy on the Prevention of Criminal Risks and the rest of the standards in Corporate Governance and Compliance Regulatory System*”.
- Additionally, the professionals of the Nueva Pescanova Group, both in Spain and abroad, that are directors of the Group companies, attorneys-in-fact, persons authorized and/or with signature or electronic certificate or access to online bank accounts, as well as any other employee in key positions and/or responsible for managing teams, also subscribe the same document “*Annual Responsible Statement of Personal Notification, Acceptance and Compliance with our Code of Ethics, our Corporate Policy on the Prevention of Criminal Risks and the rest of the standards in Corporate Governance and Compliance Regulatory System*”. The **number of professionals** of the Nueva Pescanova Group who signed this document were **190** in Spain and **130 professionals** in foreign Group companies.

### 3.4 Document of Acknowledgment of Receipt and Acceptance of the Decalogue of Our Code of Ethics

Any new entrant to the Nueva Pescanova Group subscribes and signs at the time of hiring a document titled “*Document of Acknowledgement of Receipt and Acceptance of the Decalogue of Our Code of Ethics*”. This Decalogue contains 7 standards of conduct regarding “*Labor and Human Rights*”. In 2020, **1,850 professionals** have subscribed this “*Document of Acknowledgement of Receipt and Acceptance of the Decalogue of Our Code of Ethics*”<sup>3</sup>.

### 3.5 Responsible Statement of Our Providers’ Ethical and Social Charter

All Providers of the Nueva Pescanova Group (including providers, suppliers, or temporary employment agencies) shall subscribe the *Responsible Statement* attached to *Our Providers’ Ethical and Social Charter*.

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<sup>3</sup> In relation to this quantitative data, it must be borne in mind that there are professionals of the Group (especially in our Vannamei shrimp farms) who are hired on an casual, temporary or harvest basis, and every time they sign a new employment contract they must sign again the “*Document of Acknowledgement of Receipt and Acceptance of the Decalogue of Our Code of Ethics*”, this means that there may be professionals who subscribe and sign it several times in the same calendar or financial year.

By signing the said responsible declaration, a provider expressly and without reserves accepts *Our Providers' Ethical and Social Charter* (and, therefore, the standards of conduct and prohibitions provided in article 5 regarding “*commitment to the internationally recognized basic human and labor rights*”) and confirms, among other things, that neither the individual signing it (as legal representative) nor the company he/she represents, nor its directors or legal representatives, have been sentenced by final judgment for committing crimes, related to, among other, human trafficking, prostitution, sexual exploitation, corruption of minors, illegal trafficking of labor, immigration fraud, promoting or inciting hate, hostility, discrimination or violence against other people.

In 2020, a total of **550 Providers** worldwide have subscribed the *Responsible Statement* attached to the *Providers' Ethical and Social Charter of the Nueva Pescanova Group*.

### 3.6 Compliance channel

The Nueva Pescanova Group makes available to all its professionals anywhere in the world its “*Compliance Channel*”, whose operation is governed by the *Regulations* and *Privacy Policy of the Compliance Channel*. Consultations or allegations of non-compliance (confidentially, with all guarantees and without fear of retaliation) can be brought before the Compliance Channel. In 2020, of the **twenty-one (21)** Consultation and Complaint Files processed by the Compliance Unit, none dealt with possible human rights violations, related to the principles of non-discrimination, the prohibition of the use of child labor, as well as all forms of forced or compulsory labor, the rights of freedom of association and collective bargaining, as well as the rights of ethnic minorities and indigenous people (article 10 “*Commitment to human and labor rights*” and article 13 “*Principles of non-discrimination and equal opportunity*” in *Our code of Ethics*).

### 3.7 Providers' ethical channel

Pursuant to article 15 of *Our Providers' Ethical and Social Charter*, the Providers of the Nueva Pescanova Group (and third parties that participated in tenders for services or supplies to be Providers of the Nueva Pescanova Group) are entitled to make Inquiries and submit Non-Compliance Claims for behaviors that are contrary to Our Provider's Ethical and Social Charter (among which are behaviors contrary to article 5 regarding internationally recognized basic human and labor rights) by a professional at the Nueva Pescanova Group, or other by another Provider through the Providers' Ethical Channel ([canal.etico.proveedor@nuevapescanova.com](mailto:canal.etico.proveedor@nuevapescanova.com)), that is managed by the Chief Compliance Officer. In 2020, no complaints of possible human rights violations have been raised through the Providers' Ethical Channel.

## VI. INFORMATION REGARDING FIGHT AGAINST CORRUPTION, BRIBERY AND MONEY LAUNDERING

### 1. Introduction

The Nueva Pescanova Group strongly rejects any type or form of corruption and maintains a zero-tolerance policy against all kinds of corrupt behavior, conduct or practice in both the public and private sectors. Similarly, the Group is firmly committed to the prevention of corporate criminal risks and to the non-conduct of practices that may be considered irregular in the development of its relations with its stakeholders, including those relating to money laundering and the financing of terrorism.

## 2. Internal Policies

Various components of our Corporate Governance and Compliance Regulatory System demonstrate these commitments and reflect corporate measures for the prevention of any form of corruption, bribery, and money laundering, as stated below:

- ***Our Code of Ethics*** (articles 20. “Gifts and hospitality”; 21. “Conflicts of interest”; 39. “Relations with the public sector and political parties”; 40. “Donations and social activities”; y 41. “Corporate crime prevention”).
- ***Our Providers’ Ethical and Social Charter*** (article 7. “Honesty and integrity in the company’s activities”).
- ***Corporate Policy on the Prevention of Criminal Risks*** (articles 9. “Fight against corruption in the public and private sectors”; and 10. “Prevention of money laundering and financing terrorism”).
- ***Anticorruption Code of the Nueva Pescanova Group*** (article 3. “Gifts and invitations”; article 4. “Conflicts of interest”; article 5. “Use of intermediaries or consultants”; article 6. “Relations with public authorities and officials”; article 7. “Participation in political and/or public matters”; article 8. “Solidarity, Charitable and Sponsorship Actions”; article 9. “Truthful, fair and transparent financial and non-financial information”; article 10. “The alarm signals of corruption and its diligent management”).
- ***Criminal Risks Prevention program:***

Corruption and bribery offences (corruption between individuals and in international economic activities, bribery, influence trafficking and misappropriation of public funds), as well as those relating to money laundering and financing terrorism, are properly assessed in the ***Criminal Risks and Controls Matrix***<sup>4</sup> in the Criminal Risk Prevention Program, having implemented both general and specific controls of surveillance and control for their prevention, and/or correction.

- ***Integrity Program Handbook of ARGENOVA, S.A.:***

It establishes the model of organization, prevention, management and control of Integrity Risks (regarding corruption related to Public Bodies) of the company of the Nueva Pescanova Group in Argentina, in accordance with and under the requirements of Law No. 27,401 Criminal Liability of Legal Persons of the Argentine Republic and aligning the Corporate Compliance System at the Group level and the Company’s internal rules at local level with the provisions of Articles 22 (“Integrity Programs”) and 23 (“Integrity Program Contents”) of Law No. 27,401.

- ***Corporate Policy on Procurement*** (article 3. “Operational standards and principles in procurement”).
- ***Corporate Policy on Travelling and Representation Expenses*** (article 3. “General principles on travelling and representation expenses in the Nueva Pescanova Group”).
- ***Corporate Policy on Recruitment, Selection, Onboarding and Exit*** (Article 3. “Values and basic principles of conduct in respect of recruitment, selection, onboarding and exit for professionals of the Nueva Pescanova Group”).

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<sup>4</sup> The Criminal Risks and Controls Matrix classifies controls as follows: “Control Description”; “Evidence”; “Person Responsible for the Control”; “Control Classification” and “Type of Control”.

- *Corporate Policy on Institutional Relations* (article 4. "The Commitments in Institutional Relations with our Stakeholders"; and article 5. "Action principles in the institutional relations of the Nueva Pescanova Group with public authorities and officials").
- *Action Protocol for Food Donations* (article 3. "Exclusions to the implementation of this Action Protocol and prohibitions").

### 3. Due diligence and precautionary procedures

#### 3.1 Training and awareness raising

In 2020 the Chief Compliance Officer has conducted several online training sessions with different professionals of the Nueva Pescanova Group both in Spain and abroad, that include a specific part regarding prevention of public and private corruption, bribery, money laundering and financing terrorism, with regard to the analysis of the standards of conduct, principles of action and prohibitions contained in certain internal policies of our *Corporate Governance and Compliance Regulatory System* with an impact on this matter.

As mentioned in section 3.1 of Chapter V of this Report, these online (videoconferencing) training sessions given by the Chief Compliance Officer were attended by **28 professionals**, over a total of **12 training hours**.

In addition, as mentioned in section 3.1 *in fine* of Chapter V of this Report, the Group's e-Learning platform ("*Campus Nueva Pescanova*") in the specific section called "*Nueva Pescanova Group Compliance Academy*" in which there are hosted two mandatory online training courses on compliance, that deal with, among other aspects, issues regarding the prevention of corruption, bribery, and money laundering, namely:

- "*Our Code of Ethics and other standards of our Internal Regulatory System*". This one-hour online course specifically deals with the principles and behavior standards in the field of "*Integrity – Fight against Public and Private Corruption*".
- "*Prevention of Criminal Risks and Corruption*", a 1 hour duration course which specifically addresses the standards of conduct, principles of action and prohibitions existing in the field of combating any form of corruption and bribery, as well as on the prevention against money laundering and terrorism financing, and described both in our Corporate Policy on the Prevention of Criminal Risks (Articles 7 "*Prevention of Fraud and Other Conducts*"; 9. "*Fight against corruption in the public and private sectors*"; and 10. "*Prevention of money laundering and terrorism financing*"), as in our Anti-Corruption Code (Articles 1. "*Corruption and its forms*"; 2. "*General principles of action in fighting corruption*"; 3. "*Gifts and invitations*"; 4. "*Conflicts of interest*"; 5. "*Use of intermediaries or consultants*"; 6. "*Relations with public authorities and officials*"; 7. "*Participation in political and/or public matters*"; 8. "*Solidarity, charity and sponsorship actions*"; and finally, 9. "*Truthful, fair and transparent financial and non-financial information*").

Both online courses which end with a Knowledge Questionnaire that all users have complete and pass (7 correct answers out of 10). Those Group professionals who do not pass, must take the course again.

In 2020 it has been compulsory to take the module on "*Prevention of Criminal Risks and Corruption*" and certain professional who have joined the Group in 2020, had to take and pass the above-mentioned module called "*Our Code of Ethics and other standards of our Internal Regulatory System*".

As mentioned in Section 3.1 of Chapter V, the total number of users that have taken and passed one or both two modules, in 2020, has been **409 professionals** of the Pescanova Group both in Spain and abroad (these online courses are available in Spanish, English and Portuguese).

### 3.2 Notices, Corporate Intranet PESCANET, and awareness raising campaigns.

In addition to paragraph 3.2 of Chapter V of this Report, specifically and consistently, the Compliance Unit undertook the actions below directly and specifically related to the prevention of corruption and bribery, namely:

- On January 8, 2020, the Compliance Unit sent a communication, in Spanish and English, to the entire Group attaching the Anti-Corruption Code in the different languages of the Group (Spanish, English, French and Portuguese) with a short explanation/summary on rules of conduct and prohibitions on prevention and fight against corruption (public and private) contained in that internal regulatory document.
- On November 12, 2020 the Compliance Unit sent an email, in Spanish and English, whose subject was: *COMPLIANCE UNIT: CHRISTMAS GIFTS 2020*, to the entire Group giving the applicable instructions regarding Christmas gifts, in accordance with the rules of conduct for the prevention of corruption in the public and private sectors contained in our Internal Regulatory System and, more specifically, the provisions of our Anti-Corruption Code (whose text in Spanish, French, English and Portuguese was attached again to this email message)<sup>5</sup>.
- On December 10, 2020, the Compliance Unit sent an email to the entire Group, in Spanish and English, as a reminder of the mandatory instructions to be followed in relation to gifts, presents and hospitalities received at Christmas 2020, included in the previous email of November 12, 2020.
- On December 10, 2020, the Compliance Unit sent an email to all the professionals of the Group who have access to the platform Campus Nueva Pescanova as a reminder of the deadline for taking the mandatory online module "*Prevention of Criminal Risks and Corruption*", i.e., December 31, 2020.

### 3.3 Annual Responsible Statements on Compliance

As mentioned in the section regarding respect for human rights (Section 3.3 of Chapter V of this Report), every year, the members of the Board of Directors, members of the Executive Committee and members of the Steering Committee of the Nueva Pescanova Group as well as certain professionals of the Group subscribe and sign the "*Annual Responsible Statement regarding compliance with Our Code of Ethics, our Corporate Policy on the Prevention of Criminal Risks and the rest of the standards in Corporate Governance and Compliance Regulatory System*", in which among other things, they take on commitments regarding the prevention of public and private corruption, money laundering and financing terrorism.

As mentioned in Section 3.3 of Chapter V of this Report, in 2020 a total of **371 professionals** of the Group in the world subscribed the relevant *Annual Responsible Statement on Compliance*, in accordance with the breakdown there mentioned.

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<sup>5</sup> On this subject, it should be noted that the Christmas gifts received at the different Nueva Pescanova Group's work centers are deposited with the human resources office and subsequently raffled among employees of such centers at the "Christmas Cocktail" or similar event to be held on the Christmas holidays.

### 3.4 Document of Acknowledgment of Receipt and Acceptance of the Decalogue of Our Code of Ethics

The Decalogue of *Our Code of Ethics* that is subscribed by new hires of the Nueva Pescanova Group there are 8 standards of conduct that expressly refer to “Integrity” and “Transparency and Honesty”. In 2020, the “*Document of Acknowledgement of Receipt and Acceptance of the Decalogue of Our Code of Ethics*” has been subscribed and signed by a total of **1,850 professionals** of the Nueva Pescanova Group worldwide<sup>6</sup>

### 3.5 Responsible Statement of Our Providers’ Ethical and Social Charter

Upon signing the *Responsible Statement* accepting the *Providers’ Ethical and Social Charter of the Nueva Pescanova Group*, it is confirmed, among other things, that neither the individual signing it (as legal representative) nor the company he/she represents, nor its directors or legal representatives, have been sentenced by final judgment for committing crimes, related to, among other, public, or private corruption, money laundering, and financing terrorism. Similarly, the said *Responsible Statement* includes an express statement on the concurrence or non-concurrence of potential situations of conflict of interest with the Nueva Pescanova Group and its professionals.

As mentioned in section 3.5 of Chapter V of this Report, in 2020, **550 providers** worldwide have subscribed the *Responsible Statement of Our Providers’ Ethical and Social Charter*.

### 3.6 Compliance channel

As mentioned in Section 3.6 of Chapter V of this Report. (“information of respect for human rights”), the Nueva Pescanova Group makes available to all its professionals anywhere in the world its “*Compliance Channel*”, whose operation is governed by the *Regulations and Privacy Policy of the Compliance Channel*, that guarantee confidentiality and the absence of any kind of retaliation, among other principles, regarding informers (whistleblowers) that make use of this channel to connect with the Compliance Unit. Also, on the issue of corruption, the professionals of the Group may and must put forward any consultation or denunciation of non-compliance of the internal regulations of the Corporate Governance and Compliance Regulatory System of the Group on the subject of fight against corruption (already mentioned in previous sections, which are timely analyzed, investigated and resolved by the Compliance Unit, which could propose, if deemed appropriate and fitting, the adoption of preventive and/or corrective measures.

### 3.7 Providers’ ethical channel

In 2020, no complaints about possible irregular behavior regarding prevention of corruption, bribery, money laundering or financing terrorism in the terms provided in articles 6 and 7 of Our Providers’ Ethical and Social Charter were processed through the Providers’ Ethical Channel.

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<sup>6</sup> In relation to this quantitative data, it must be borne in mind that there are professionals of the Group (especially in our Vannamei shrimp farms) who are hired on an casual, temporary or harvest basis, and every time they sign a new employment contract they must sign again the “*Document of Acknowledgement of Receipt and Acceptance of the Decalogue of Our Code of Ethics*”, this means that there may be professionals who subscribe and sign it several times in the same calendar or financial year.

#### 4. Contributions to associations, foundations, and non-profit entities (NGOs)

In 2020, The Nueva Pescanova Group has made contributions to associations, foundations and non-profit entities amounting to 486,378 euros.

## VII. INFORMATION ON THE COMPANY AND OTHER STAKEHOLDERS

### 1. Introduction

The *Corporate Policy on Institutional Relations*, which was approved by the Board of Directors of Nueva Pescanova, S.L. at the meeting held on March 27, 2019, includes the identification and detail of our *key stakeholders* and our channels for communication with them, setting a Corporate Registry of Institutional Relations, that is reported to the Board of Directors through the *Corporate Governance and Responsibility Committee*. These are the specific stakeholders that have been identified: Public Bodies; Ruling and Supervising Organisms, Partners, Academy and Research; Non-Governmental Organizations, Employees, Providers and Suppliers; Customers, Consumers, Competitors, Environmental Agencies, Mass Media, Associations and Local Communities and the Society at large.

### 2. Sustainable development

#### 2.1 Local employment and development

The personal and professional development of the *People* who make up the Nueva Pescanova Group and the contribution to improve the quality of life of the *Communities* in which the Group is present are an essential part of the strategy of the *CSR Master Plan* of the Nueva Pescanova Group.

The capture fisheries activities in Africa and Latin America and the shrimp farming operations in Latin America encourages the creation of jobs and local development, favoring training in the fishing, farming, and processing of seafood products as well as the development of local economy.

The Group generates 85.4% of its employment in Africa and Latin America, where it develops projects that are part of the material aspects relevant to our Group. Thus, in the *People* pillar of the *CSR Master Plan* the Group is committed to promoting the professional and personal development of our people, enhancing their talent and professional career, as well as with labor responsibility ensuring compliance with the labor legislation in each country. In the *Communities* pillar of the *CSR Master Plan*, we promote the creation of jobs through knowledge and technology transfer, spearheading social development projects and investing in assets and infrastructures that improve living conditions in the local communities in which the Group is present.

The table below show the breakdown of the employees by Cash Generating Unit of Nueva Pescanova Group:

CGU Location	Female	Male	Total
Africa	1,373	1,549	2,922
Central and South America	1,716	4,140	5,856
Europe and the US	800	699	1,499
<b>Total</b>	<b>3,889</b>	<b>6,388</b>	<b>10,277</b>

In 2020 we have continued with literacy and basic general education programs in countries such as Ecuador and Namibia, which enable a better level of individual education among the Group's workers and a better organization as a team, 63 employees enrolled with the *Namibian*



College of Open Learning (Namcol) and with Ecuador's educational programs in 2016-2020 period.

In addition, we have continued with the professional internship programs in Ecuador and Nicaragua.

The focus on education and the ongoing training of the teams is the lever on which the Group promotes local development from investments in employment-generating assets in the communities in which it is present.

In 2020, it was implemented a public/private cooperation agreement (Public Private Alliances for Development (APPD in Spanish), *“to strengthen the maritime-fishing capabilities in Mozambique”* with the Spanish Agency for International Cooperation for Development (AECID in Spanish), the Mozambican Group Company (PESCAMAR), the School of Fisheries in Matola (Mozambique), the Maritime and Fisheries Polytechnic Institute of the Atlantic (IPMPA in Spanish), Nueva Pescanova, S.L. This project that has been conditioned by COVID-19, kicked-off with the approval by the Monitoring Committee of the delivery of 3 laptops and the set-up of a Wi-Fi network for the School in Matola, which have allowed the deployment of the same due to travelling restrictions, since then the technical Committee and the Accompanying committee have held the required meetings to boost this project, and the students of the School in Matola have been hired by our company, Pescamar.

## 2.2 Local population and territories

In Africa, the Group has a great presence in Namibia and Mozambique employing 2,383 people in Lüderitz and Walvis Bay (Namibia) and 533 people in Beira (Mozambique), where it has developed programs for the transfer of knowledge in fisheries-related trades, including fishing net manufacturing/repair, thus promoting the development of local employment.

The Group (through NOVANAM) contributes with education programs in Lüderitz (Namibia) with a Kindergarten for the children of our professionals, in which 91 boys and girls are cared for.

We have established programs to increase fish consumption among the Namibian population; in Mozambique we have helped the incorporation of fish protein into Mozambican meals through the commercialization of by-catch species accompanying our prawn fishing operation through local distribution channels.

In addition, we continue with programs that promote the recovery of flora such as palm trees in Lüderitz (Namibia), or to clean the environment and collect waste in the city of Beira (Mozambique).

In Latin America, the Group is present in Guatemala, Nicaragua, Ecuador, Peru, Brazil, Argentina, and Uruguay, where we continue to advance with environment management programs with the reforestation of native flora and mangroves and repopulation of native fauna, like the iguana, helping in the preservation of the Estero Real in Chinandega (Nicaragua). In 2020, we have carried out urban clean-up in Champerico (Guatemala).

In Spain we have symbolically taken part in the cleaning of the seabed along the Spanish coast, by agreeing with the environmental organization *Oceánicas* the donation of an amount of food products to Food Banks equal to the kilograms of garbage collected by them, i.e., 6,000 kg.

In the social aspect, the Group continues with our important education program, through Fundación Fundanova, at the school in the Guatemalan town of Champerico (called CEPAC), in 2020, there were 638 students enrolled, from primary education to vocational training. This year graduates where 25 chartered accounts, focused on computing, 8 trained as teachers, and 10 as food industry technical engineers. The CEPAC School had to adapt to the situation arising from **COVID-19**, by keeping constant contact with the students through a program for the delivery and collection of homework/assignments, and by taking part in programs implemented by the Ministry of Education for de delivery of food baskets to the students' families.

We have also cooperated in education with the shipment from Spain of a container with school supplies and books for the schools in the Estero Real area in Chinandega (Nicaragua).

In the context of the health, economic and social crisis caused by the **COVID-19** pandemic worldwide, the Group has contributed, in the social sphere, by carrying out various actions to support society, it is worth mentioning the donation of **90,351 kg** of food to different associations in Spain, as shown in table below:

RECIPIENT ENTITY	N° USERS	KGS DONATED
Concello Porriño - Asuntos sociales	1,200	2,983.2
Fundación Nuestra Señora de la Esperanza	400	174.8
Banco de Alimentos Rías Altas	25,000	6,100.3
Banco de Alimentos de Madrid	ND	144.0
Banco de Alimentos de Vigo - Pontevedra	25,000	6,635.9
CESAL	3,500	2,464.0
Concello Salceda de Caselas	140	110.0
Formació y Treball	1,477	7,549.7
Asociación Vida Digna	25,000	23,002.1
Larrumba - Fundación Ángel Nieto	3,000	1,530.0
Adecua Picassent	500	1,221.0
Asociación Ayuda al Necesitado - AFAN	2,000	2,169.7
La mano que ayuda	300	70.0
Parroquia la Sagrada Familia	400	1,353.0
REMAR - Vigo - Madrid	1,100	2,115.0
World Central Kitchen	ND	473.0
Hermanitas Ancianos Pobres	400	2,156.9
Banco de Alimentos de Las Palmas	ND	1,163.3
Federación Banco de Alimentos	1,500,000	9,293.0
Asociación La Horizontal	1,500	7,600.2
Parroquia San Pedro Regalado	1,500	8,166.7
Cáritas Diocesana - Meira	150	865.0
Fundació Barcelona Actua	100	610.3
Fundación Ayuda a una Familia	400	406.0
Afundación	3,000	1,073.0
Obra Social Sta. María Josefa	1,200	921.2
<b>TOTAL</b>	<b>1,597,267</b>	<b>90,351.1</b>

In addition, and in other countries, the Group's cooperation is shown below:

- In Namibia, 2,000 kg of seafood has been delivered to the Council of Walvis Bay to be delivered among the most disadvantaged families to reach, and 3,000 kg in Lüderitz.
- In Argentina, through the subsidiary ARGENOVA, the Group has cooperated with nearly half a million Argentine pesos in food and hygiene items for the families in need.

In 2020, the *Volunteers Office* of the Nueva Pescanova Group in Spain (governed by the *Corporate Policy on Corporate Volunteering*) has focused on promoting a culture of social action and participation, through the development of social or solidarity cooperation projects and environmental projects seeking and establishing alliances in the closest boundaries, thereby reinforcing the Group's commitment to society at large and, in particular, to the communities to which we belong through corporate volunteer actions. All this marked by the **COVID-19** pandemic that has affected the actions and their implementation. The main activities carried out in 2020 by the *Volunteers Office* are shown below:

- The delivery of the money collected in our Solidarity Breakfasts of 2019 and the first quarter of 2020 (this activity was suspended with the COVID-19 outbreak) to the Foundations INTEGRA and LENDA.
- Participation in the "Share Heat" campaign (blanket collection) with the CUME Foundation.
- Participation in the promotion of the action "A child – a toy" with VIDA DIGNA entity.
- Organization of a Christmas Market at the headquarters in Chapela where things made by users of the day care center of the LENDA Foundation were sold.
- In addition, we cooperated with the Foundation NUESTRA SEÑORA DE LA ESPERANZA DE VIGO by donating of a freezer cabinet.
- And last, our professionals carried out other volunteer actions like the painting of the facilities of the Foundation HOGAR SAN JOSÉ in Vigo.

### 2.3 Local communities and dialogue channels

The relationships of the Nueva Pescanova Group and its professionals with its Stakeholders are based on collaboration, cooperation, involvement, and two-way communication capable of building trust relationships on a continuous basis, built on ethical principles, equal treatment, transparency, and active listening, allowing to consider the legitimate interests of the same and effectively communicating information on the activities and businesses of the Nueva Pescanova Group. Among the Stakeholders formally identified, "local communities" understood as the group of people who relate to each other, according to certain legal and customary organizational rules, and who share the same culture in a certain space or time and are related to the companies of the Nueva Pescanova Group stand out.

The Nueva Pescanova Group has established channels of dialogue with these stakeholders to actively listen to their needs and expectations and to provide ethical and effective transfer of information from the activities of the different companies of the Group, thus establishing action plans that generate shared value. In addition to the usual communication channels in accordance with the Group's corporate communication strategy, which are the main channels for directing the Group's relationships with its stakeholders, there are other channels of dialogue with these local communities through the promotion, management, and development of educational, cultural or sports activities.

### 2.4 Association and sponsorship

In all the countries and locations where the Group is present, we are members of local, regional, or national associations that contribute to the social, economic, and environmental development, by setting permanent channels of dialogue with stakeholders in each country.

In a succinct way, such associations pursue the representation and interests of the fisheries, aquaculture, seafood processing and commercial industries, as well as the sustainability of

these products, improving their quality, innovation, or comprehensive waste management, among other objectives. In view of the relevant areas identified and merely enunciatively, below there are some of the associations of which Group companies of the Nueva Pescanova Group are member, in Spain or in the different countries where we are present; namely:

- a. **Capture Fisheries:** ARVI (Cooperativa de Armadores de Pesca del Puerto de Vigo); CEPESCA (Confederación Española de Pesca); AMAPIC (Asociación Mozambiqueña de Armadores de Pesca Industrial de Langostino); CAPA (Cámara de Armadores de Poteros de Argentina), NHFA (*Namibian Hake Fishing Association*); CNFA (*Confederation of Namibian Fishing*); o COLTO (*Coalition of Legal Toothfish Operators*).
- b. **Aquaculture:** APROMAR (Asociación Empresarial de Acuicultura de España); CETGA (Clúster de Acuicultura de Galicia); ANDA (Asociación Nicaragüense de Acuicultores); and CNA (Cámara Nacional Acuicultura de Ecuador).
- c. **Processing:** ASEFAPRE (Asociación Española de Fabricantes de Platos Preparados); ANFACO-CECOPECA (Asociación Nacional de Fabricantes de Conservas de Pescados y Mariscos – Centro Técnico Nacional de Conservación de Productos de la Pesca, España); AME (Asociación Multisectorial de Empresas de Alimentación y Bebidas, España); or FIAB (Federación Española de Industrias de Alimentación y Bebidas).
- d. **Commerce:** AECOC (Asociación Española de Codificación Comercial); CONXEMAR (Association of Wholesalers, Importers, Processors, and Exporters of Seafood products (wild caught and farmed); GS1 Portugal – CODIPOR (*Associação Portuguesa de Identificação e Codificação de Produtos*); PROMARCA (Asociación Española de Empresas Fabricantes de Marcas Líderes de Gran Consumo); CENTROMARCA (*Associação Portuguesa de Empresas de Produtos de Marca*); o FMRE (Foro de Marcas Renombradas Españolas).
- e. **Sustainability:** GSSI (*Global Sustainable Seafood Initiative*); SFP (*Sustainable Fisheries Partnership*); GAA (*Global Aquaculture Alliance*); ECOEMBES (Ecoembalajes España, S.A.); or SPV (*Sociedade Ponto Verde*, Portugal).
- f. **R+D & Quality:** AINIA (Instituto Tecnológico de la Industria Agroalimentaria, España); AIMEN Centro Tecnológico (Asociación de Investigación Metalúrgica del Noroeste, España); or AEC (Asociación Española para la Calidad).
- g. **Advertising and communication:** AEA (Asociación Española de Anunciantes); AUTOCONTROL (Organismo Independiente de Autorregulación de la Industria Publicitaria en España); or DIRCOM (Asociación de Directivos de Comunicación, España).
- h. **Governance:** Global Compact (Spanish Network of the UN Global Compact).

Regarding sponsorships, the Nueva Pescanova Group, through its Spanish and foreign companies, takes part in various initiatives and projects in the social, cultural, educational, development and cooperation fields, among other, in the countries and local communities in which it is present.

### 3. Subcontracting and providers

#### 3.1 Social, gender equality & environmental issues, social and environmental responsibility

Pursuant to our *Corporate Policy on Procurement* (article 3), in the approval and/or choice of suppliers, it shall be considered the ethical commitment, institutional integrity, sustainability and good corporate reputation of the candidates. To this end, the professionals of the Nueva Pescanova Group shall consider positive that a candidate has its own Code of Ethics or similar document in the field of conduct and good business practices and, in any case, shall ensure in a reasonable manner that the candidate to be approved or chosen is not or has not been related to activities or practices contrary to the principles contained in article 36.1 of *Our Code of Ethics*.

Additionally, upon subscribing the *Providers' Ethics and Social Charter* of the Nueva Pescanova Group, by signing the *Responsible Statement* attached thereto, our providers take on a series of commitments regarding social, gender equality, environmental and social and environmental responsibility issues, among other (articles 5, 6, 11 and 12).

#### 3.2 Provider's supervision and audits

Upon subscribing, signing, and accepting our *Providers' Ethics and Social Charter*, the providers of the Nueva Pescanova Grupo consent to carry out verification activities to verify their proper compliance. For these purposes, Providers shall authorize the Nueva Pescanova Group and/or third parties designated by the Nueva Pescanova Group to carry out the appropriate checks, facilitating the means and access to their facilities, as well as the necessary documentation to ensure such checks in relation to compliance with this document. A Provider's failure to comply with our *Providers' Ethics and Social Charter* may, considering its severity and other concurrent circumstances, entail the immediate and early termination of its contractual relationship with the Nueva Pescanova Group, without prejudice to any other measures that may correspond to the Nueva Pescanova Group in due defense of its legitimate interest.

In 2020 we have not been made aware of any breach to our *Providers' Ethics and Social Charter* by any of the Providers who have subscribe it worldwide.

Regarding the approval of our providers of raw material and in the field of Food Safety, Quality and Environment, in 2020 we have performed **48 audits** to providers of raw material, due to the **COVID-19** pandemic these audits were either onsite and/or remote.

### 4. Consumers

As mentioned in section 4 of Chapter II of this Report, the Nueva Pescanova Group has its own code of conduct and good business practice (*Our Code of Ethics*) that establishes a set of conduct principles and guidelines aimed at ensuring an ethical, honest, and responsible conduct of all its professionals. Thus, in terms of Quality and Food Safety *Our Code of Ethics*, reads:

- The quality and excellence of the products offered by Nueva Pescanova Group is paramount. In this regard, the Group is committed to selling high-quality food products that comply with the strictest standards on safety and food preservation. To do so, the Group shall carry out an extensive control of its products and processes regarding food safety and health.
- The Group only markets products that meet the requirements and guarantees set forth by applicable legislation on quality, composition, and shelf-life to offer its customers optimum products of the highest quality. To do so, the Group shall only work with providers that provide the relevant certificates on quality and food safety. In addition, the Group will maintain, always, internal processes in place to detect potential health risks, including necessary measures to

resolve quality issues. In this sense, the Group has implemented the guidelines and policies necessary to offer its customers and consumers fresh and top-quality products.

Following the constant development and improvement of these commitments, in the second half of 2020 we approved the second version of the *Corporate Policy on Quality and Food Safety* of the Nueva Pescanova Group (whose first version was approved in January of that same year), incorporating the changes in the organization arising from the implementation of the new 2020-2024 Strategic Plan "*Journey to Growth*". The purpose of this policy is to (i) define the scope, the principles and serve as a reference for the definition of the objectives of the actions that ensure and guarantee the Quality, Food Safety and Excellence of the products we offer, and (ii) contribute to the promotion of a Quality and Excellence Culture, developing the necessary communication, awareness and training actions for all our professionals and collaborators so that they acquire the commitment and actively participate in its achievement.

And this is because consumers are the foundation of our value offering, based on meeting their needs and meeting their expectations, therefore our products meet the strictest levels of food safety and quality, are healthy, nutritious, and pleasurable, and the production processes are developed with the best available techniques and are based on efficiency and sustainability.

#### 4.1 Measures for consumers' health and safety

In particular, the Group's *Corporate Policy on Quality and Food Safety* is aligned with our *Corporate Policy on CSR* and, more specifically, with the commitments we assume in the *Products* pillar in our *CSR Strategy*. One of the commitments assumed regarding this pillar is to offer consumers innovative and healthy seafood products, researching and communicating the importance of the nutritional value of seafood products in their diet. The most relevant projects in 2020 regarding nutrition and sustainability of packaging material are the following:

- **Melipop project:** The Group has collaborated in a study called 'Melipop', by donating seafood products for a clinical trial with boys and girls at risk of suffering from obesity, aimed at the prevention of childhood obesity by following a Mediterranean lifestyle.
- **Medkids project** consists of the development of new fish-based products that contribute to improve the eating habits of children, to prevent obesity, based on a Mediterranean diet pattern. The benefits for children will be endorsed by clinical studies.
- **NutriScore project** consists of an improvement, if that is possible, of the nutritional profile of Pescanova products as the healthiest option (green NUTRISCORE). To improve their nutritional profile, we enhance the use positive nutrients such as fiber and protein, whilst reduce other, such as salt and saturated fats.
- **PackScore project:** this is an internal methodology consisting in the assessment of the recyclability of our packaging material that we have implemented together with an action plan to achieve the goal of having all our packaging material recyclable by 2025, as well as material optimization and use of more sustainable materials.

To contribute to a better deployment of the *Quality and Food Safety Function* in the Group, we have formally established our **Quality Excellence PESCANOVA** whose pillars are:

**ENCOURAGING THE CULTURE OF QUALITY AND FOOD SAFETY**

- Awareness-raising and consciousness through the entire organization.
- Monitoring each of the processes in the value chain.
- Encouraging decision taking based on data.
- Implementing a global reporting system based on KPIs.
- Development of a training plan.

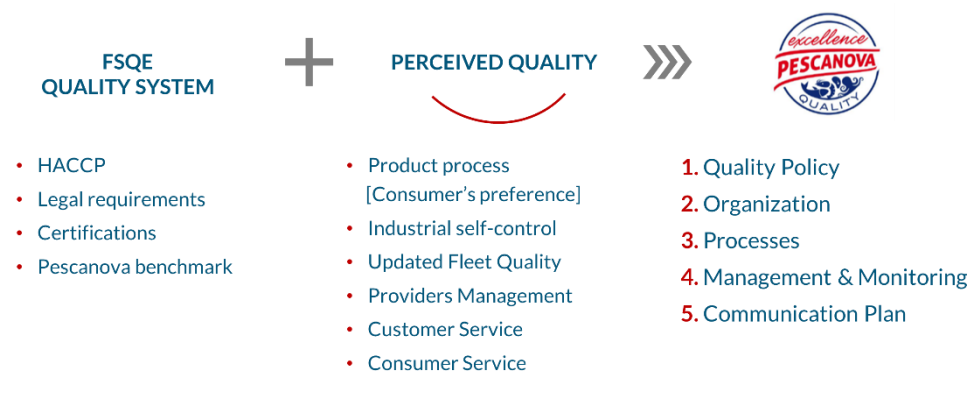
**ENSURING THE BEST INDUSTRIAL AND OPERATIONAL QUALITY AND FOOD SAFETY**

- Guaranteeing the food safety of our products.
- Developing continuous improvement of processes, services and products.
- Encouraging self-control of production processes
- Protecting the control of internal and external production.

**ENSURING THE SUPERIORITY OF PERCEIVED QUALITY**

- By consumers.
- By customers.
- By the organization.

The **Quality Excellence PESCANOVA** program is based on our *Food Safety, Quality and Environment Management System (FSQEMS)* with special reinforcement and improvement in aspects related to the *Quality perceived by the Consumer*:



Our *FSQEMS* pivots, in turn, around two systems:

- Compliance with legal requirements (*Food Compliance*): Through the *INTRAL* tool we receive a permanent, personalized, and updated service on Hygiene and Food Safety regulations.
- Hazard Analysis and Control of Critical Points (**HACCP**): A system to control and analyze the hazards and critical control points of potential food contamination by microbiological, physical, and chemical agents. Our HACCP sub-system has been implanted following the seven basic principles in the *Codex Alimentarius*.

As far as *Governance and Management* of our **FSQEMS**, the Corporate Office for Quality and Environment is responsible for setting the guidelines for the **FSQEMS** of the Nueva Pescanova Group and verifying its compliance.

On the other hand, the managers of the industrial centers, and other production and commercial units are the ultimate responsible for the proper and effective operation of **FSQEMS**. The person responsible of the **FSQEMS** in the industrial centers, who depend hierarchically on Corporate Office for Quality and Environment, is responsible for the daily management of **FSQEMS** in accordance with the guidelines set out by the Corporate Office and send the relevant information and report promptly whenever there are non-conformities and/or critical deviations.

As regards to *Certifications*, our **FSQEMS** are based on the compliance with requirements in the most demanding, international, most advanced, and most prestigious certifying bodies:



Apart from the implementation of these standards, certain Group's processing plants or centers may also have other certifications to adequately satisfy the requests of our customers, aligned with the recommendations coming from competent authorities and/or in the execution of the Group's strategies in this field.



Thus, the map of the certifications and benchmarks that we have in our centers and processing plants around the world are shown below:



In all cases, the certifications and benchmarks implemented at our centers and processing plants are *Audited* to evaluate compliance with the established requirements. These audits are carried out by external auditors belonging to duly accredited bodies and, where possible, by technicians of organizations of recognized international prestige in this field (such as, *LRQA*, *SGS*, *BUREAU VERITAS*, among others). The periodicity of these audits is set out by each of these certifying bodies.

Apart from these external audits, the Nueva Pescanova Group performs its own internal audits whose main objective is to monitor compliance with current legislation, identify deviations and implement corrective actions. In 2020 a total of **33 internal audits** have been carried out on *IFS*, *ISO14001*, *GLOBALG.A.P.*, *GAA BAP*, *INP* certifications and decalogues, the number of audits has been less than in 2019, as it was not possible to visit the international centers due to the **COVID-19** pandemic.

Similarly, in 2020 the Nueva Pescanova Group has assessed the impact on health and safety of 100% of product categories and the compliance with the information and labelling requirements of 100% of its products, as set in the legislation currently in force, by checking compliance with disclosure requirements regarding:

- (i) Origin for product components.
- (ii) Product contents through the list of ingredients.
- (iii) Safe use of products.
- (iv) Product elimination and social and environmental impacts.
- (v) The precautionary statement of ingredients.

Another important element or component of *FSQEMS* are our own *Food Technical Standards* (*hereinafter FTSS*), that set the specific requirements applicable to Nueva Pescanova Group companies in the field of Food Safety, Quality and Environment which are mandatory and inexcusable. Compliance with requirements in our *FTSS* is mandatory in all the Group. The number of *FTSS* approved by the Corporate Office for Quality and Environment and in force at December 31, 2020 is 32, plus three Handbooks and five Procedures.

Corporate Office for Quality and Environment has its own intranet or web portal on Food Safety, Quality and Environment Systems (*FSQEMS PORTAL*) to be used by all Group's employees with competence in this field. Our *FSQEMS PORTAL* is a basic management and improvement tool, it includes a home page with open access to those users authorized from all the Nueva Pescanova Group companies and a set of pages dealing with *FSQEMS* of each company whose access is restricted to the users authorized in each of them (access codes are provided by the Corporate Office for Quality and Environment).

The home page of the *FSQEMS PORTAL* is managed by the persons of this Corporate Office and its objective is to offer users, in an easy and integrated way, access to several resources and services related to Food Safety, Quality and Environment (Applicable Documentation – Food Technical Standards, Handbooks, Specifications, etc.); Applications – complaints and actions management-; Internet Fora; News and Events or Links of Interest).

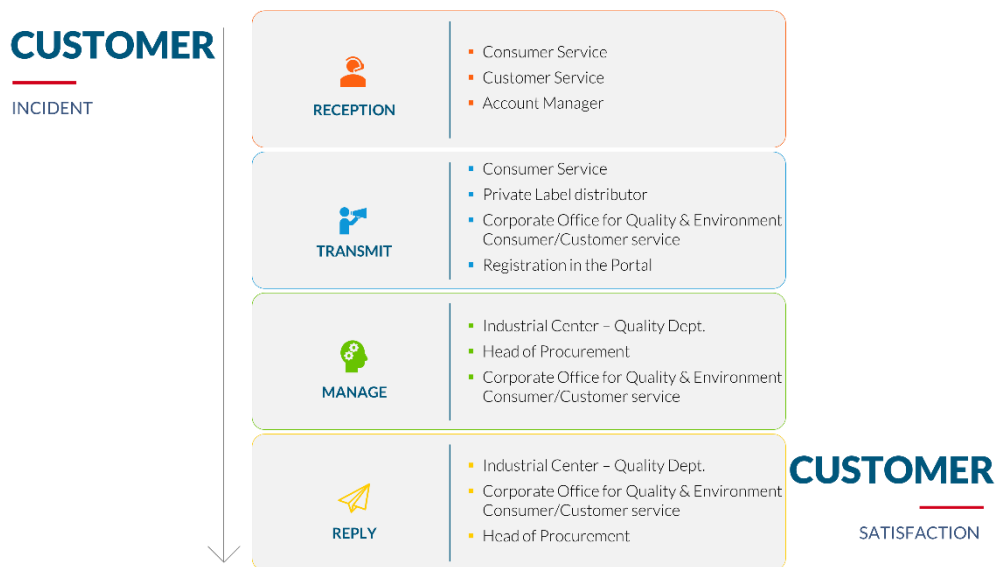
All the group companies, through the Portal or via e-mail, with the periodicity determined by the system or as soon it is received or generated, must provide the Corporate Office for Quality and Environment the following mandatory records:

- ***Food Safety, Quality and Environment***
  - Certificates of compliance with Standard (*IFS, GLOBALG.A.P., etc.*).
  - Audit reports on Action Regulations and Plans (*IFS, ISO 9001, etc.*).
  - Audit reports from customers and action plans.
  - Inspection records issued by competent authorities.
  - Updated Product Control Plan.
  - Results from microbiologic and chemical analysis ( $SO_2$ , contaminants, heavy metals, residues, etc.) included in the Product Control Plan.
  - Results from microbiologic and chemical analysis ( $SO_2$ , contaminants, heavy metals, residues, etc.) performed by customers or inspection authorities.
  - Complaints that have not been processed through the Portal.
- ***Environment***
  - Annual Environmental Legal Compliance Report.
  - Inspection records issued by competent authorities.
  - Result for environmental analysis (discharges, atmospheric emissions, noise, etc.).

Thus, apart from the routine filing of records in the *FSQEMS PORTAL*, the Corporate Office for Quality and Environment can monitor in real time any deviation and/or non-conformity that the people responsible for *FSQEMS* have reported.

#### 4.2 System for claims, complaints, and their resolution

Consumers and customers are at the heart of our activities, so the Nueva Pescanova Group has a *Complaint Management Handbook (M-02* as coded in *FSQEMS*), whose objective is to define the general for receiving, processing, and managing complaints made by customers and consumers. This handbook is based on the following process and graphic chart: getting and management of claims made by customers and consumers. The above handbook is based on the route and graphical diagram below:



The implementation of a *Complaints Management System* aims to:

- Streamline the process from reception to internal distribution of complaints.
- Standardize the actions undertaken by the different divisions of the Nueva Pescanova Group.
- Provide the information that enables decision-making oriented towards improving satisfaction of customers and consumers.

As regards to the *PROCESS FOR THE MANAGEMENT, CONSULTATION AND MONITORING THE COMPLAINTS RECEIVED*, this is done, through an application in our *FSQEMS PORTAL*:

- To access the complaints section, it is necessary to be registered as complaints manager with a “user code” and “access code” provided by and centralized in the Corporate Office for Quality and Environment.
- The commercial operator who receives a complaint must reply to the customer/consumer confirming that they have received the complaint and that the same will be immediately processed and managed within 24 hours, at most. All complaints are processed and managed through the system, regardless of their relevance or seriousness, and no prior assessment is made to consider their inclusion, or not, in the system.

- The commercial operator designated in each company of the Nueva Pescanova Group will open a complaint provided it has been received from a customer/consumer (External Complaints) or arises from having detected a non-conformity regarding a product/service supplied by another company belonging to the Group (Internal Complaints).
- On the other hand, those assigned to carry out the internal management of the system will also enter a complaint in case they receive it directly (via e-mail, telephone, internal communication etc.), indicating the company or office of the Group from which it was received. The entering of a complaint in the application must be done on the same day it is received or within 2 days at most.
- The description of the complaint must include all available information about the incident detected, providing photographs and other documents that can facilitate its internal management.
- The commercial operator designated will, as soon as possible, contact the affected customer/consumer to confirm the information available, give a final answer and if this is not possible indicate the next steps and the continuation of the internal investigation.

The Corporate Office for Quality and Environment monitors the steps taken regarding all complaints received on an individual basis to establish the supervision of the procedures carried out and /or make the request for the opening of corrective and /or preventive actions if deemed necessary. Specifically, in the *FSQEMS* there is a handbook for the Management of Corrective and Preventive Actions (*M-03* as coded in *FSQEMS*) aimed at:

- Standardize actions taken by the different business units of the Nueva Pescanova Group.
- Provide information that enables improvement-oriented decision-making.

These actions are also managed through a specific section in our *FSQEMS PORTAL*.

In this sense, all complaints received during the last 12 months, classified by origin/cause, are reviewed monthly. In those cases where seriousness and/or repetitiveness advises it, corrective actions and/or substantial improvement projects will be requested to ensure the eradication of the same. The Corporate Office for Quality and Environment sends a Monthly Report to the Group's commercial companies and industrial centers to facilitate the review of incidents and the implementation of actions.

In addition, and as a further quality indicator, complaints are reviewed, also monthly, by analyzing: **(i)** The number of complaints of the last 12 months compared to the same period of the previous year; **(ii)** Detail of last month's complaints; **(iii)** The number of complaints based on the classification (origin) of the last 12 months; and **(iv)** The number of complaints per tons processed.

In 2020, through the *FSQEMS PORTAL* we have received **1,319 complaints**, of which 443 were from consumers and 876 from customers, mainly related to organoleptic characteristics, packs and packaging, defective products, or presence of foreign matter. 100% of the complaints and objections received in 2020 were solved and closed at the date of issuance of this Report.

#### 4.3 Privacy and personal data protection

The Nueva Pescanova Group has a *Compliance Program for Personal Data Protection* contains the following documents:

- *Corporate Personal Data Protection Policy of the Nueva Pescanova Group.*
- *Regulations of the Data Protection and Privacy Committee.*
- *Users' Manual of the Information and Communication Systems of the Nueva Pescanova Group.*
- *General Plan on Security Measures for the Protection of Personal Data in the Nueva Pescanova Group.*
- *Inventory of Personal Information Assets of the Nueva Pescanova Group in Spain.*
- *Registration of Data Processing Activities of the Nueva Pescanova Group in Spain.*
- *Security Document on the Protection of Personal Data of the Nueva Pescanova Group in Spain.*

The *Data Protection and Privacy Committee* of the Nueva Pescanova Group is made up by the Director of the Compliance Unit, the Chief Systems and Processes Officer, a person of the Legal Counsel and Compliance Corporate Department, the Corporate Manager of Labor Relations and the Corporate Head of e-Commerce and Digital Marketing.

This Committee was set up to ensure and supervise the implementation of the *Corporate Personal Data Protection Policy*; its operation and actions are supervised by the Group's Executive Committee (COMEX). In addition, on October 1, 2020, this Committee was appointed and registered with the *Spanish Agency for Data Protection* (<https://sedeagpd.gob.es/sede-electronica-web/vistas/infoSede/consultaDPD.js>) as *Data Protection Officer* for the companies of the Nueva Pescanova Group in Spain, (Nueva Pescanova, S.L. and Pescanova España, S.L.U.; Novapesca trading, S.L.U., Insuiña, S.L.U. and Nueva Pescanova Biomarine Center, S.L.U.)

In 2020 the *Data Protection and Privacy Committee* met twice (June 16 and December 15), pursuant to the notices sent by the Chairman calling these meetings and including the relevant agendas. Minutes were drawn of these meetings indicated issues dealt with and resolutions adopted. Also in 2020, the *Data Protection and Privacy Committee* sent 3 emails to the professionals of the Nueva Pescanova Group informing about certain amendments to the Compliance Program on Personal Data Protection.

With regard to the exercise of individual rights on personal data of consumers and other users through the *Mailbox of the Data Protection and Privacy Committee* ([comite.datos.privacidad@nuevapescanova.com](mailto:comite.datos.privacidad@nuevapescanova.com)), in 2020 sixty-nine (69) files have been processed and favorably resolved, most of them were related to the erasure of personal data. In addition, in 2020, the Committee assisted in the resolution of 12 cases relating to consumers' exercise of individual rights on personal data that were received through the Consumer Service "Consumer Suggestions".

In accordance with the provisions in the *Users' Manual of the Information and Communication Systems of the Nueva Pescanova Group* and in the *Security Document on Protection of Personal Data of the Group in Spain*, there are procedures for the management of incidents and security breaches handled by the Corporate Office of Systems and Processes, which periodically reports to the *Data Protection and Privacy Committee*. In 2020, there have been no relevant incidents or security breaches that have presented a serious risk to the rights and freedoms of natural persons.

## 5. Tax disclosures

### 5.1 Results obtained.

The 2020 result before tax and consolidation adjustments by Cash Generation Unit (CGU)<sup>7</sup>, is shown below:

CGU	2020
Aquaculture - Vannamei	(7,611,114)
Commercial & Other	(30,668,928)
Fishing - Africa	(10,351,244)
Fishing - Southern Cone	560,855
<b>Total</b>	<b>(48,070,431)</b>

### 5.2 Corporate Income Tax

The global tax on corporate income paid in 2020 by the Nueva Pescanova Group was 3,089,560 euros.

### 5.3 Public Grants

In 2020 various Spanish and foreign companies of the Nueva Pescanova Group have been awarded public grants for a global amount of 2,042,324 euros.

<sup>7</sup> The countries in each of those CGUs are the following: **CGU Aquaculture - Vannamei** (Ecuador, Guatemala, and Nicaragua); **CGU Commercial & Other** (Brazil, Spain, France, Italy, Ireland, Greece, Portugal, South Africa, and USA); **CGU Capture Fisheries – Africa** (Namibia, Mozambique, and Angola); and **CGU Capture Fisheries – Southern Cone** (Argentina, Peru, and Uruguay).

## ANNEX I. TABLE OF CONTENTS REQUIRED BY LAW 11/2018 OF 28 DECEMBER

Pursuant to the provisions in Law 11/2018 of 28 December on Non-Financial and Diversity Information, the following is a table of equivalences between the issues to be covered by the Non-Financial Reporting Statement in accordance with Law 11/2018 of 28 December and the corresponding general and thematic standards of the *Global Reporting Initiative* (GRI) taken as a reference to report appropriate information on such material aspects, also indicating the page number in this Report containing such information:

Table of contents required by Law 11/2018, of 28 December	
Disclosures required by Law 11/2018	GRI Contents
<b>Overview</b>	
A brief description of the business model that must include the business environment, organization and structure	GRI 102-2 GRI 102-7
Markets in which the reporting entity operates	GRI 102-3 GRI 102-4 GRI 102-6
Objectives and strategies of the organization	GRI 102-14
Main factors and trends that may affect your future evolution	GRI 102-14 GRI 102-15
Reporting framework	GRI 102-54
Materiality Principle	GRI 102-46 GRI 102-47
<b>Environmental issues</b>	
<b>Management approach</b>	
Description and results of policies on these issues as well as the main risks related to these issues which are relevant to the group's activities	GRI 102-15 GRI 103-2
<b>Detailed overview</b>	
Detailed information on the current and foreseeable effects of the company's activities on the environment and, where appropriate, health and safety	GRI 102-15
Environmental assessment or certification procedures	GRI 103-2
Resources dedicated to the prevention of environmental risks	GRI 103-2
Application of the precautionary principle	GRI 102-11
Number of provisions and guarantees for environmental risks	GRI 103-2
<b>Pollution</b>	
Measures implemented to prevent, reduce or repair emission that seriously affect the environment; taking into account any type of atmospheric pollution from a certain activity, including noise and light pollution	N/A  GRI 305-6
<b>Circular economy and waste prevention and management</b>	
Prevention, recycling, reuse, other forms of waste recovery and disposal	GRI 103-2 GRI 306-4 (2020) regarding weight of hazardous and non-hazardous waste
Actions to combat food waste	GRI 103-2
<b>Climate change</b>	
Greenhouse gas emissions generated as a result of the company's activities, including the use of the goods and services it produces	GRI 305-1 GRI 305-2 GRI 305-3 GRI 305-4
Measures taken to adapt to the consequences of climate change	GRI 103-2
Voluntary medium- and long-term targets for the reduction of greenhouse gas emissions and the means implemented for this purpose	GRI 103-2
<b>Biodiversity protection</b>	
Measures taken to preserve or restore biodiversity	GRI 304-3 regarding measures adopted to preserve biodiversity
Impacts caused by activities or operations in protected areas	GRI 304-2
<b>Sustainable use of resources</b>	
Water usage and water supply according to local constraints	GRI 303-3 (2018) regarding source of water used GRI 303-5 (2018)
Consumption of raw materials and measures taken to improve the efficiency of their use	GRI 103-2 GRI 301-1 regarding efficiency of raw materials use
Direct and indirect energy usage	GRI 302-1 GRI 302-3
Measures taken to improve energy efficiency	GRI 103-2
Use of renewable energy	GRI 302-1

Table of contents required by Law 11/2018, of 28 December	
Disclosures required by Law 11/2018	GRI Contents
<b>Social and personnel issues</b>	
<b>Management approach</b>	
Description and results of policies on these issues as well as the main risks related to these issues which are relevant to the group's activities	GRI 102-15 GRI 103-2
<b>Employment</b>	
Total number and distribution of employees by country, gender, age group and professional category	GRI 102-8, GRI 405-1 regarding distribution of employees by country, gender, age group and professional category
Total number and distribution of employment contract modalities and annual average of indefinite contracts, temporary contracts and part-time contracts by gender, age group and professional category	GRI 102-8 regarding total number of employees by type of contract and type of contract by gender, age group and professional category
Number of layoffs by gender, age and professional category	GRI 103-2
Average remuneration and evolution broken down by gender, age group and professional category or equal value	GRI 405-2 regarding average remuneration by gender, age group and professional category
Pay gap, pay for equal jobs or average pay in society	GRI 405-2 regarding the comparison of average remuneration for female and male employees by professional category and location with significant operations
Average remuneration of directors and senior officers, including variable remuneration, allowances, compensation, payment to long-term savings systems and any other pay broken down by gender	GRI 405-2 regarding the comparison of average remuneration for female and male employees by professional category
Implementation of work disconnection policies	GRI 103-2
Number of employees with a disability	GRI 405-1 regarding employees distribution by other diversity indicators
<b>Organization of work</b>	
<b>Organizing working time</b>	
Number of absence hours	GRI 103-2 GRI 403-9 (2018) regarding absence hours
Measures to facilitate life-work reconciliation and encourage co-responsibility of both parents	GRI 103-2
<b>Health and safety</b>	
Occupational health and safety conditions	GRI 103-2 GRI 403-1 (2018) GRI 403-2 (2018) GRI 403-3 (2018) GRI 403-7 (2018)
Occupational accidents, in particular their frequency and severity, as well as occupational diseases; broken down by gender	GRI 403-9 (2018) regarding number and rate or accidents GRI 403-10 (2018) regarding occupational diseases
<b>Labor relations</b>	
Organization of social dialogue including procedures to inform and consult staff and negotiate with them	GRI 103-2
Percentage of employees covered by collective bargaining agreement and country	GRI 102-41
Balance of collective agreements, particularly in the field of occupational health and safety	GRI 403-4 (2018)
<b>Training</b>	
Policies implemented in the field of training	GRI 103-2 GRI 404-2
Total number of training hours per professional category	GRI 404-1 regarding total training hours by professional category
<b>Universal integration and access of people with a disability</b>	
<b>Equality</b>	
Measures taken to promote equal treatment and opportunities for women and men	GRI 103-2
Equality plans, measures taken to promote employment, protocols against sexual or gender harassment	GRI 103-2
Policy against all types of discrimination and, where appropriate, diversity management	GRI 103-2



Table of contents required by Law 11/2018, of 28 December	
Disclosures required by Law 11/2018	GRI Contents
<b>Respect for human rights</b>	
<b>Management approach</b>	
Description and results of policies on these issues as well as the main risks related to these issues which are relevant to the group's activities	GRI 102-15 GRI 103-2
<b>Implementation of due diligence procedures</b>	
Implementation of human rights due diligence procedures and prevention of human rights violation risks and, where appropriate, measures to mitigate, manage and remedy possible abuses committed	GRI 102-16 GRI 102-17 GRI 412-2
Complaints of human rights violations	GRI 103-2 GRI 406-1
Measures implemented for the promotion and enforcement of the fundamental provisions of ILO's Conventions relating to respect for freedom of association and the right to collective bargaining; elimination of discrimination in employment and occupation; elimination of forced or compulsory labor; effective abolition of child labor	GRI 103-2 GRI 407-1 GRI 408-1 GRI 409-1
<b>Fighting corruption and bribery</b>	
<b>Management approach</b>	
Description and results of policies on these issues as well as the main risks related to these issues related to the group's activities	GRI 102-15 GRI 103-2
Measures taken to prevent corruption and bribery	GRI 103-2 GRI 102-16 GRI 102-17 GRI 205-2
Measures to combat money laundering	GRI 103-2 GRI 102-16 GRI 102-17
Contributions to foundations and non-profit entities	GRI 102-13
<b>Information about society</b>	
<b>Management approach</b>	
Description and results of policies on these issues as well as the main risks related to these issues which are relevant to the group's activities	GRI 103-2
<b>Company commitments to sustainable development</b>	
The impact of society's activity on employment and local development	GRI 103-2
The impact of society's activity on local populations and the territory	GRI 103-2 GRI 413-1 GRI 413-2
The relationships with local community actors and the modalities of dialogue with local communities	GRI 102-43 GRI 413-1
Partnership or sponsorship actions	GRI 103-2
<b>Outsourcing and suppliers</b>	
Inclusion in the policy of purchasing social, gender equality and environmental issues	GRI 103-2
Consideration in relationships with suppliers and subcontractors of their social and environmental responsibility	GRI 102-9 GRI 103-2
Monitoring systems and audits and results of the same	GRI 102-9, GRI 308-2 GRI 414-2 regarding number of providers assessed
<b>Consumers</b>	
Measures for consumer health and safety	GRI 103-2 GRI 416-1
Complaint systems, complaints received and their resolution	GRI 103-2 GRI 418-1
<b>Tax</b>	
Benefits obtained by country	GRI 103-2
Corporate income tax paid	GRI 103-2
Public grants received	GRI 201-4 regarding public grants received