



**CORPORATE POLICY ON
FOOD QUALITY AND SAFETY IN THE
NUEVA PESCANOVA GROUP**

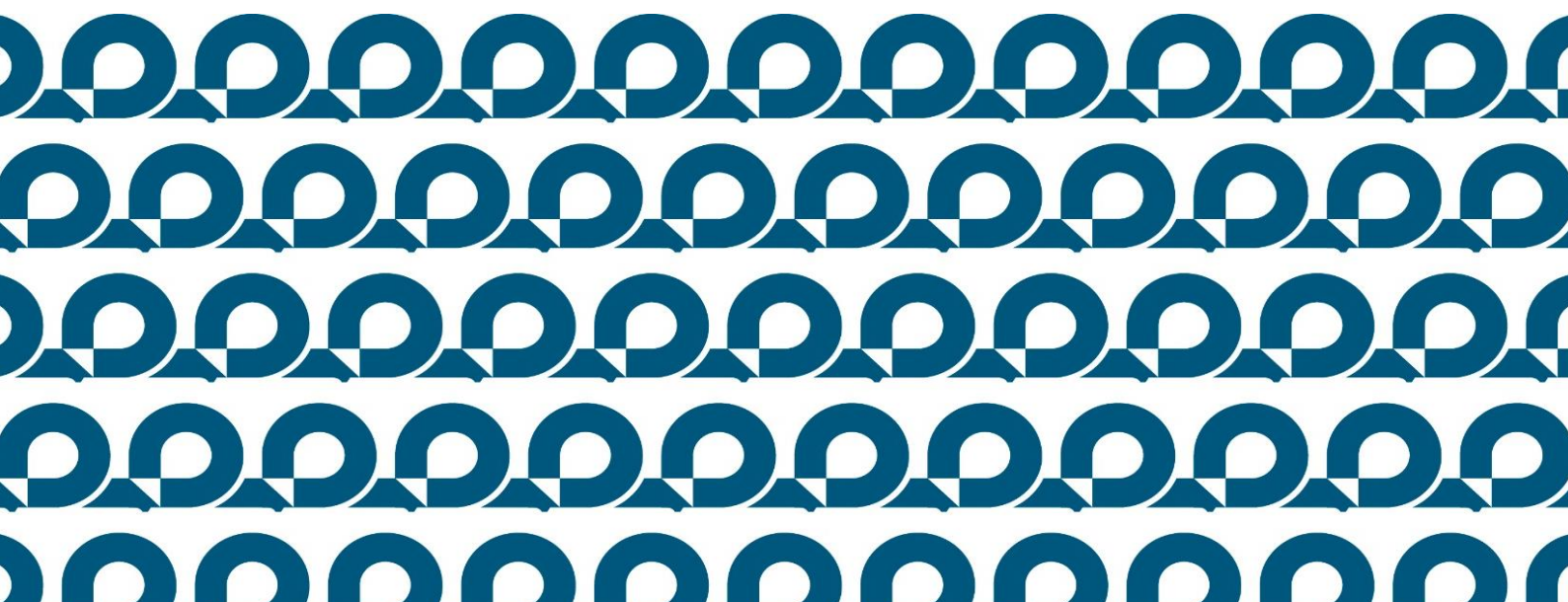


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Preamble

1. The Nueva Pescanova Group is a multinational business group engaged in the fishing, farming, processing and marketing of seafood products, especially fish and shellfish.
2. This is the DNA of the Nueva Pescanova Group:
 - a. Work to be the best food company in the market bringing the freshness of the sea to the consumer's table.
 - b. Rely on our brand and innovation to fish, farm, select and process the best product wherever it may be.
 - c. Our commitment to the sustainability of natural resources and of our partner communities, whose trust we build and maintain acting ethically and creating value.
3. The Nueva Pescanova Group has its own code of conduct and good business practices entitled "Our Code of Ethics", which lays out a set of principles and guidelines for conduct intended to guarantee ethical, upright and responsible behavior from all its professionals. Thus, in terms of Food Quality and Safety, we state in "Our Code of Ethics" the following:
 - a. The quality and excellence of the products offered by the Nueva Pescanova Group is one of its essential and strategic objectives. In this regard, the Group undertakes to offer high-quality food products, meticulously respecting food safety and conservation regulations, carrying out comprehensive control on food safety and health in all its processes.
 - b. The Group will only market products that comply with the guarantees established by legislation on quality, composition and expiration, supplying suppliers that accredit the quality and food safety certificates established for this purpose. Furthermore, the Group will at all times have the necessary internal procedures to detect susceptible risks to people's health, which will imply all the necessary measures to resolve any incident. In this regard, the Group has implemented the guidelines and policies necessary to offer its customers and consumers fresh and top-quality products.
4. In terms of the management of food crisis situations, "Our Code of Ethics" marks our principles of action in this matter in the following terms:
 - a. The principles of action in food crisis situations within the Nueva Pescanova Group are cooperation and coordinated action, the adequacy and proportionality of resources throughout the chain, the lack of malicious or unfair use of food crisis situations, and good and loyal communication:
 - Using the principle of cooperation and coordinated action, the Group undertakes to provide cooperation and coordinate with the other affected stakeholders in the chain as quickly as possible.
 - The principle of adequacy and proportionality of resources throughout the chain guarantees that the Group agrees to provide adequate and proportionate resources, always with a global vision of the food chain and respecting the principle of the priority of product safety.
 - The Nueva Pescanova Group will not, under any circumstances, use a food crisis situation to support marketing actions that negatively affect this crisis situation.
 - In food crisis situations between multiple companies in the industry and several companies of food distribution and in the absence of any conflict of interest situations, the Group will promote coordinated actions with the rest of the affected companies, valuing the benefit derived from the joint action. In any crisis situation, the Group undertakes to not carry out any communication to the media which alludes

- c. Maintain value, including nutritional value, of the seafood products offered to our consumers.
 - d. Offer our customers and consumers a seafood product guaranteeing their food safety and respecting the highest quality standards.
 - e. Develop sustainable and responsible seafood products, optimizing the definition and design of our products, packaging, and processes, meeting criteria of efficiency and environmental performance.
 - f. Offer the consumer innovative and healthy seafood products, investigating and communicating the importance of the nutritional value of the products in their diet.
 - g. Promote the consumption of fish and seafood products as an essential part of a balanced diet.
8. The Nueva Pescanova Group, which is thus reflected in its Corporate Policy on Food Quality and Safety, takes as its starting point the principles of the most internationally prestigious Reference Systems and Certification Schemes, especially those recognized by the Global Food Safety Initiative (GFSI) and, in connection with the principles of food quality and safety, also those approved by the Global Sustainable Seafood Initiative (GSSI).
9. Finally, this Corporate Policy on Food Quality and Safety of the Nueva Pescanova Group is faithful to the standards, guidelines, and codes of practice of the *CODEX ALIMENTARIUS* of the Joint FAO-WHO Food Standards Program.

Article 1. Object and Purpose

1. This Corporate Policy has the following object:
 - a. Define the scope, 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 offered by the Nueva Pescanova Group.
 - b. Contribute to the promotion of a Culture of Quality and Excellence, developing the communication, awareness-raising, and training actions necessary for all our professionals and collaborators to gain their commitment and actively participate in their achievement.
2. This Corporate Policy is a commitment to:
 - a. The Consumer, as the foundation of our value offer, based on satisfying their needs and complying with their expectations.
 - b. Our products, in compliance with the strictest levels of food quality and safety; so that they are always healthy, nutritious, and pleasant.
 - c. The productive processes of our value chain, which are created using the best techniques available and are based on efficiency and sustainability.
3. This Corporate Policy is complemented by Manuals and other internal management regulations on matters of Food Quality and Safety – Technical Food Standards (TFS) or other internal documents of the Management Systems– regarding the different types of operations which take place in our value chain, both in operational areas and functional areas of the Nueva Pescanova Group.

Article 2. Scope of application

1. This Corporate Policy must be complied with by all the companies and professionals of the Nueva Pescanova Group.

2. The Nueva Pescanova Group is made up of the Spanish company Nueva Pescanova, S.L., and all the Spanish and foreign companies controlled, directly or indirectly, by Nueva Pescanova, S.L.
3. This Corporate Policy links all administrators, managers, workers, and any other person who similarly provides services for any company of the Nueva Pescanova Group, similar to such positions, regardless of the legal nature of the bond that connects them.
4. The suppliers of goods and services of the Nueva Pescanova Group may be linked fully or partially to this Corporate Policy, in accordance with what they expressly state through their corresponding written commitment or, where and when appropriate, by signing the Responsible Declaration of the Supplier's Ethical and Social Charter of the Nueva Pescanova Group.

Article 3. Grounds of Food Quality and Safety in the Nueva Pescanova Group

Food Quality and Safety in the Nueva Pescanova Group are based on the following principles:

- a. Focus on the Consumer.- In the Nueva Pescanova Group, we work continuously to surpass the expectations of our consumers and provide the best value offer; striving to recognize their requirements and needs in advance.
- b. Management Commitment.- Senior Management of the Nueva Pescanova Group, in accordance with the organizational chart and model, the Group at the corporate level in force at all times, as well as the Corporate Management that holds the duties on Food Quality and Safety, takes on the task of transferring the importance of an effective Food Quality and Safety management, facilitating the availability of the necessary resources, and ensuring that the expected results are obtained.
- c. Involvement of the entire organization.- All professionals of the Group are aware of their responsibility regarding Food Quality and Safety; encouraging their participation and constant commitment to continuous improvement.
- d. Activity with Suppliers.- We collaborate with our suppliers in the commitment to achieve the Food Quality and Safety objectives of our products, considering them to be an integral part of our Food Quality and Safety Management System.
- e. Risk Analysis.- We understand that the correct determination of risks and opportunities allows us to prevent or reduce unwanted effects, increase desirable results, make improvements, and ensure the intended objective of the system.
- f. Decisions based on evidence and data.- We develop analyzes and trials based on widely accepted practices for the scientific evaluation of Food Quality and Safety.
- g. Continuous Improvement (PDVA Cycle).- We encourage continuous improvement of the quality of processes based on the evaluation of data and information, as a result of the application of the PDVA Cycle (Plan, Do, Verify, Act) in our daily work.
- h. Training, information, and awareness.- We dedicate the necessary resources for the correct training and raising awareness on matters of Food Quality and Safety for our professionals; especially those who, due to their activity, are the most involved in any process related to Food Quality and Safety.
- i. Product Superiority.- We develop specific programs to meet and exceed the wishes and expectations of our consumers at all times in order to be their choice.
- j. Transparency.- The Nueva Pescanova Group will always act with transparency with its Stakeholders, providing them noteworthy, adequate, and accurate information on the safety of processes, products, and packaging.

- k. Disposition of Objectives.- We establish and communicate the objectives of Food Quality and Safety aimed at the continuous improvement of our processes and products in accordance with each of our Requirements of Food Quality and Safety and in line with the needs and expectations of our consumers.
- l. Efficiency and uniqueness in the management of Food Quality and Safety.- We proactively and efficiently incorporate all the principles of Hazard Analysis and Critical Control Points (HACCP) of the Codex Alimentarius and other requirements of the main Reference Systems as recognized by the Global Food Safety Initiative (GFSI). We adopt a Focus on Processes for the development, implementation, and improvement of the System. In this sense, the Food Quality and Safety standards of the Nueva Pescanova Group are the same anywhere we manufacture or sell our products.

Article 4. Requirements of Food Quality and Safety in the Nueva Pescanova Group

The Requirements of the Food Quality and Safety System of the Nueva Pescanova Group are the basis on which our operations are based in order to guarantee the quality, safety, and excellence of the products produced and marketed by the Group in any country or market; which are the following:

- a. Equipment and training.- All professionals and collaborators of the Nueva Pescanova Group (our own, subcontractors, and visitors) have the necessary equipment suited to the requirements identified in each case, proactively monitoring compliance with established personal hygiene standards and receiving technical training that ensures the correct performance of their duties.
- b. Specifications.- All the products have their corresponding specifications, which are clear, complete, and precise; including, where appropriate, specific requirements established by our clients.
- c. Validation and prior approval of the development and design of products.- The process of Development and Design of new products includes an approval phase which ensures a correct HACCP, the validation of their commercial life and an adequate labeling according to the legal requirements on the matter and, where appropriate, the requirements and specifications of our clients.
- d. Suppliers and Purchases.- Our suppliers are another element of our Food Quality and Safety System and are an essential part to our guarantee of excellence; their selection needing to always and without exception comply with the criteria established in the Supplier Approval Procedure (on raw materials and final products) and Purchasing Procedures, as well as prior undertaking of the commitments contained in the Supplier's Ethical and Social Charter of the Nueva Pescanova Group.
- e. Packaging.- The packaging materials are suitable for the functions and uses of the product, being an additional object of verification by the Hazard Analysis and Risk Assessment System.
- f. Facilities and Equipment.- The facilities always and without any exception comply with the technical and regulatory requirements necessary to guarantee the quality and safety of the products that are made in them, their equipment being properly designed and possessing the best available techniques to carry out safe, efficient, and sustainable processes.
- g. Cleaning, disinfection, pest control, and waste disposal.- In the facilities of the Nueva Pescanova Group where our products are made, the appropriate Cleaning and Disinfection Plans, Pest Control Systems, and Waste Disposal Procedures are available, in accordance with the specific case study of each productive unit, equipment, process, and elaborated product.
- h. Raw materials.- Our raw materials conform to the specifications agreed upon with our suppliers, in addition to scrupulously complying with the obligations of regulatory compliance

in matters of quality and food safety, having to previously move to use the preceptive reception controls in the production units, in accordance with the evaluation of potential risks for Food Safety, Quality, Legality and Authenticity of the product.

- i. Traceability.- A traceability and batching system is available which allows manufactured products to be connected to the origin of the raw materials and packaging materials used in their preparation, and allows us to know the details of their distribution to our customers.
- j. Food Fraud.- The Nueva Pescanova Group is especially proactive, through the establishment of effective surveillance, supervision, and control measures suitable for the prevention and control of food fraud in any of its forms. The Nueva Pescanova Group understands Food Fraud (to be eliminated and prevented) as any malicious action of substitution, addition, manipulation, or misleading presentation of food, food ingredients, or food packaging, or false or misleading claims made about a product or raw material. In this way, as regards the weight and identification of species and ingredients, weight and identification of species and ingredients, our products are elaborated and labeled following the highest levels of demand and robustness in the processes, ensuring that the quality always maintains legal compliance in the indication of the weights of the containers, as well as in the use of fishing species and other ingredients of the products.
- k. Nutrition and Health.- The nutritional value and health benefits of our products are determined based on national and international recommendations established in this regard, following the guidelines of the bodies and institutions created for this purpose.
- l. Consumer information and labeling.- The labeling of our products is clear, complete, and truthful, always striving to provide our consumers with the most relevant and valuable information; emphasizing sensitive mentions to groups with specific food or nutritional needs (those who are allergic, intolerant, or others).
- m. Food Defense.- Our production centers regularly carry out the appropriate Hazard Analysis and Risk Assessment associated with "Food Defense" in order to identify vulnerable areas for food security and determine the measures to be taken to adequately defend against deliberate contamination or any other act of sabotage or food fraud.
- n. Consumer and Customer Service.- The Nueva Pescanova Group has a Corporate Consumer and Customer Service System to expedite the process of obtaining and internally disseminating any query, complaint, or claim, harmonizing the actions undertaken and providing information which allows us to make decisions aimed at improving the satisfaction of consumers and customers.
- o. Inspection and Control (Self-control).- There are procedures and practices that verify the adequacy of the products created according to the corresponding legal and technical specifications.
- p. Corrective actions and analysis of opportunities (Preventive actions).- In order to avoid the repetition of nonconformities, the Group has an adequate System of Corrective Actions and Opportunity Analysis.
- q. Audits (internal and external).- The verification of the Food Quality and Safety Systems of the Nueva Pescanova Group is carried out through internal audits carried out by experts with the necessary experience, as well as by external auditing entities of recognized international prestige in relation to the different certifiable Reference Systems that we have in the Group.
- r. Management of food crises.- The principles of action in food crisis situations in and outside the Group are cooperation and coordinated action, the adequacy and proportionality of resources throughout the chain, the lack of malicious or unfair use of said actions, and good, transparent, and loyal communication. In the Nueva Pescanova Group, there are effective management,

coordination, and communication mechanisms to be implemented in the event of an unforeseen event that may pose a threat to the health of the consumer and/or affect the reputation or credibility of the Nueva Pescanova Group, in order to minimize possible adverse effects.

- s. Product withdrawal.- A Product Withdrawal Plan is available (immobilization, withdrawal, and/or recovery), which considers the development of a specific strategy in each case, and the peculiarities of each client and their own linear withdrawal systems.
- t. Measurement and control (KPIs) ç.- A Periodic Activity Results Monitoring System is established, based on key performance indicators and adapted to the different levels of reporting.

Article 5. "Quality Excellence Pescanova" Program

In order to contribute to a better deployment of the Quality and Food Safety Function in the Nueva Pescanova Group, the "Quality Excellence Pescanova" Program is formally established, the pillars of which are as follows:

- A. Promotion of the Culture of Food Quality and Safety within the Group through:
 - a. Raising awareness and knowledge throughout the organization.
 - b. Monitoring all processes of the Value Chain; encouraging decision-making based on data.
 - c. Implementing a Global Reporting system based on significant KPIs.
 - d. Developing a training plan adapted to each of the levels and functions of the organization.
- B. Ensuring the best Industrial and Operational Food Quality and Safety:
 - a. Ensuring the Food Safety of our products.
 - b. Developing the Constant Improvement of processes, services, and products.
 - c. Promoting self-checking of production processes of our Industrial Centers.
 - d. Providing control to internal and external productions.
- C. Ensuring the Superiority of the Quality Received by the following stakeholders:
 - a. By the consumer; as the best product.
 - b. By the customer; as the best service.
 - c. By the organization.

Article 6. Governance and Management of Food Quality and Safety in the Nueva Pescanova Group

- 1. The Corporate Directorate of R&D, Quality and Environment has the responsibility of laying out the guidelines to establish the Food Quality and Safety Management Systems of the Nueva Pescanova Group and verify compliance with them:
 - a. The Corporate Directorate of R&D, Quality and Environment has its own intranet or thematic web portal on Food Quality and Safety Systems to be used by people with authority in this area. This is the basic management and improvement tool, and it includes a home page with open access to authorized users of all Nueva Pescanova Group companies and a set of pages intended for the particular Systems of each company with restricted access to authorized users in each one (the access codes are provided by the Corporate Directorate of R&D, Quality and Environment).

- b. It is managed by the aforementioned Corporate Directorate and its objective is to offer, in an easy and integrated way, access by users to a series of resources and services related to Food Quality and Safety (Applicable documentation – Technical Food Standards, Manuals, specifications , etc.-; Documentation for consultation –referentials, guides, legislation, etc.-; Applications –claims management and action management-; Forums; News and events; or Links of interest).
 - c. The management, consultation, and monitoring of claims received is carried out through the aforementioned portal:
 - The Corporate Directorate of R&D, Quality and Environment carries out monitoring on the management of the claims received individually in order to establish the supervision of the management and/or make the request to open corrective and/or preventive actions if deemed necessary.
 - A monthly follow-up is carried out in which the claims received during the last 12 months are reviewed, classified by origin/cause.
 - In cases where the severity and/or repetitiveness advise it, the implementation of broader corrective actions and/or improvement projects is requested to ensure eliminate them.
 - The Corporate Directorate of R&D, Quality and Environment sends a Monthly Report to the commercial companies and industrial centers of the Group in order to facilitate the review of incidents and the establishment of actions.
 - In addition, and as an indicator of quality, claims are monitored monthly by analyzing:
 - (i) The number of claims of the last 12 months compared to the same period from the previous year;
 - (ii) The details of the claims of the last month;
 - (iii) The number of claims based on the classification (origin) of the last 12 months; and
 - (iv) The number of claims per manufactured tons.
 - d. All updated documents and formats related to the Hazard Analysis and Critical Control Point System (HACCP) are available on the portal. All Group companies have to provide to the Corporate Directorate for R&D, Quality and Environment, either through the portal itself or by email, with the frequency established in the system or as soon as a series of obligatory records are received or generated (Certificates of Certified Standards, Auditing Reports of standards and action plans, Auditing Reports of clients and action plans, inspection records of competent authorities, updated product control plan, results of microbiological and chemical analysis, claims that would not have been processed through the Portal, etc.).
2. The managers of the Industrial Centers, other productive and commercial units are ultimately responsible for the proper and effective operation of the Food Quality and Safety System.
 3. Those responsible for Food Quality and Safety in the Industrial Centers, which depend hierarchically on the Managers of their Center and functionally on the Corporate Directorate of R&D, Quality and Environment, are in charge of the daily management of Food Quality and Safety in the Industrial Centers, in accordance with the guidelines laid out by the aforementioned Corporate Management, must issue the relevant information, and promptly report whenever there are non-conformities and/or serious deviations.

Article 7. *Transparency and Accounting*

1. The Corporate Directorate of R&D, Quality and Environment will perform accounting on their activity and results in the scope of this Corporate Policy on Food Quality and Safety in a periodic, truthful, and transparent manner.
2. Specifically, the Corporate Directorate of R&D, Quality and Environment will provide information about their activity and results to the different stakeholders of the Nueva Pescanova Group through the following pathways:
 - a. Annual Food Quality and Safety Report, to be drafted in the first three (3) months of each year, addressed to the COMEX of the Nueva Pescanova Group.
 - b. Reports, memories, or other relevant and applicable documents that provide an evaluation based on the corresponding relevant indicators. This information may be integrated into the corresponding Annual Activities Report of the Corporate Directorate of R&D, Quality and Environment.
3. The dissemination of the Food Quality and Safety activities will be coordinated with the Corporate Communication Department and carried out by them, in accordance with the Corporate Communication Policy, to whom the Corporate Department of R&D, Quality and Environment will provide the contents which are then adapted to internal and external audiences through the different channels and communication tools of the Nueva Pescanova Group. Communications will be carried out with the collaboration and approval of the Corporate Department of R&D, Quality and Environment. For final approval, they will be sent to COMEX and/or the CEO whenever necessary.

Article 8. Development and Control

The Corporate Director of R&D, Quality and Environment of the Nueva Pescanova Group is in charge of controlling the implementation, development, and compliance of this Corporate Policy throughout the entire Group, as well as ensuring and coordinating the implementation of programs or other Food Quality and Safety actions aimed at continuous improvement.

Article 9. Evaluation

The Corporate Directorate of R&D, Quality and Environment will annually evaluate the compliance and effectiveness of this Corporate Policy and the Food Quality and Safety programs and actions that are carried out in the Nueva Pescanova Group in the appropriate Annual Activities Report, the which will be presented to the Executive Committee (COMEX) of the Nueva Pescanova Group.

Article 10. Dissemination, Training, and Communication

The Corporate Directorate of R&D, Quality and Environment, in collaboration with the Corporate Communication Department, and in accordance with the Corporate Communication Policy, is in charge of the appropriate dissemination, training, and communication actions to guarantee the effective knowledge of this Corporate Policy, as well as any internal regulation that develops it, including its translation into the relevant languages within the Nueva Pescanova Group and its eventual dissemination and publication both through the PESCANET corporate intranet and on the corporate websites, in the section corresponding to Food Quality and Safety.

Article 11. Revision and Changes

1. This Corporate Policy will be revised regularly, at least annually, by the Corporate Directorate of R&D, Quality and Environment.
2. Any changes to this Corporate Policy will be approved by the Nueva Pescanova Group's Executive Committee (COMEX) at the request of the Corporate Director of R&D, Quality and Environment.

Article 12. Approval, Effective date, and Validity

This Corporate Policy was approved by the Executive Committee (COMEX) of the Nueva Pescanova Group at its Meeting on November 28, 2019 which was held at its headquarters in Chapela (Redondela – Pontevedra – Spain), being in force and valid for all the Nueva Pescanova Group as of that date.

Article 13. Modification Control

Version	Modification Summary	Modification Promoter	Modification Approval Entity	Modification Approval Date
v_1	Initial approval of this Corporate Policy	Corporate Director of R&D, Quality and Environment	COMEX	11/28/2019

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