



CORPORATE POLICY ON ENVIRONMENTAL RESPONSIBILITY OF THE NUEVA PESCANOVA GROUP

Approved by the Board of Directors of Nueva Pescanova, S.L., in its Meeting held on 30 September 2020

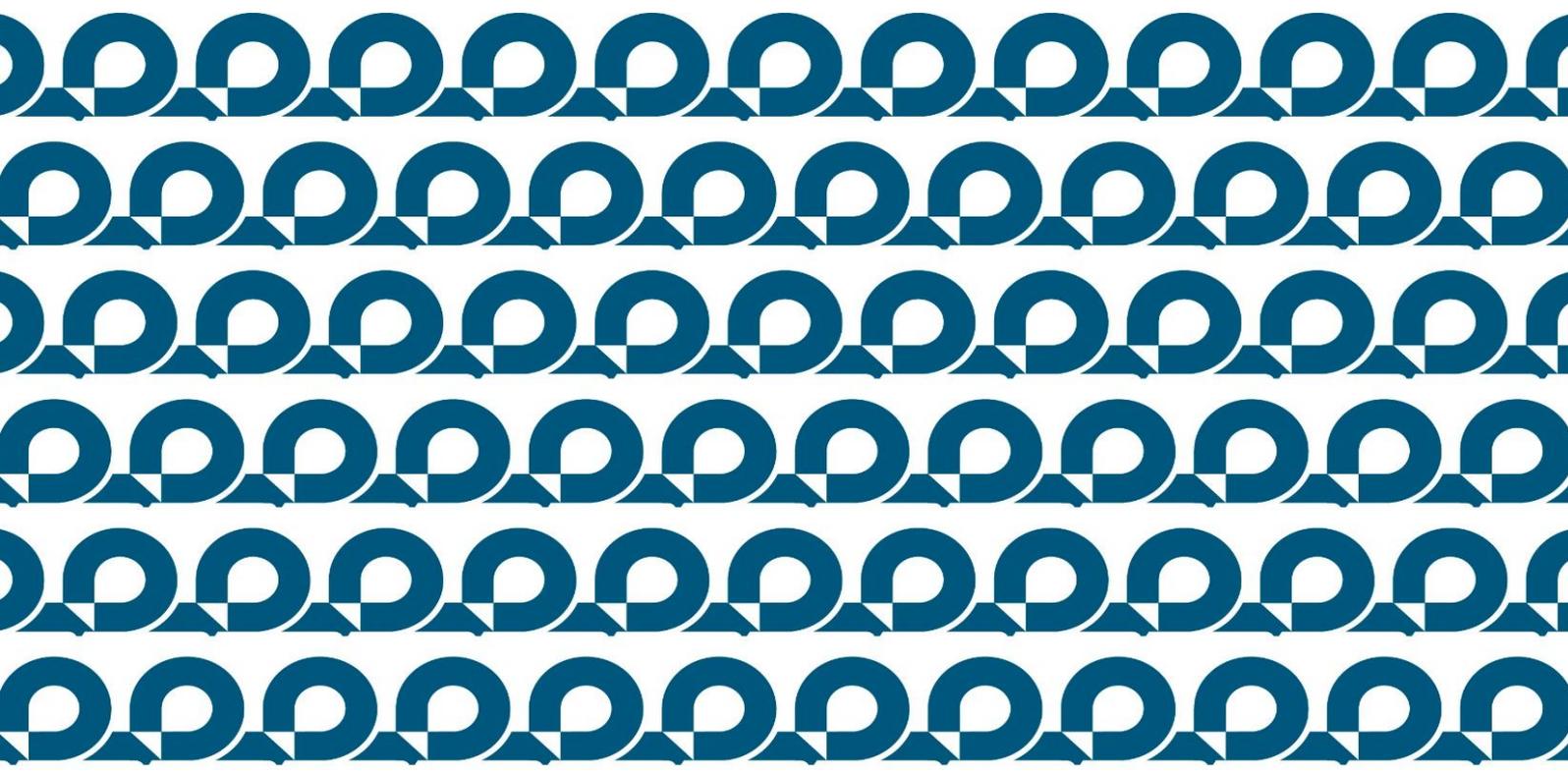


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Preamble

1. The Nueva Pescanova Group is a multinational business group engaged in fishing, aquaculture, processing, and commercialization of seafood products, particularly fish, cephalopods, and shellfish.
2. It is written in Nueva Pescanova Group's DNA that:
 - a. Together we work to be the best food company in the market by bringing the freshness of the sea to the consumer's table.
 - b. We rely on our brand and innovation to fish, farm, select and process the best product wherever it may be.
 - c. We are committed to the sustainability of natural resources and of our partner communities, whose trust we build and maintain by acting ethically and creating value.
3. The responsible and sustainable development of our activities in their biological, environmental, technological, economic, commercial and social aspects is an indispensable and essential aspect of the business culture of the Nueva Pescanova Group, and this because said activities are determined by the extractive nature and/or of consumption of natural resources, whether these are fishing, aquaculture, or the processing and marketing of seafood.
4. Within the scope of the pillar *Planet* of our Corporate Policy on Corporate Social Responsibility (article 4), we formally commit to seek the sustainable management of resources, respect for natural ecosystems and the environment, in order to ensure their availability and quality for future generations and guarantee the continuity and operational success of our Group. To this end, we have established the following guidelines: **(i)** Design and implement responsible action processes in the field of fishing, in accordance with the commitment to the principles of responsible fishing set by the FAO and its effective verification in our fishing operations; **(ii)** Farm responsibly on our aquaculture facilities, in accordance with the commitment to responsible aquaculture principles set by the FAO; **(iii)** Work responsibly to improve the processes of transformation and processing of food products in all our industrial facilities in any country we operate; **(iv)** Comply with the commitment of responsible marketing and communication of all our products, including FAO's fish and fishery product labelling guidelines; **(v)** Commit to the responsible management of water, energy and raw materials, minimizing discharges, emissions and waste; **(vi)** Identify and evaluate the environmental impacts derived from the activities conducted; and **(vii)** Establish and maintain an environmental management system in those situations in which our activity implies a significant environmental impact.
5. Our Corporate Policy on Corporate Social Responsibility precisely mentions this Environmental Responsibility Policy among the Responsible Action Policies referred for the pillar *Planet* (in article 8).
6. Our Code of Ethics also clearly reflects our firm business commitment to the protection of natural resources and the environment (article 44): **(i)** We carry out our activities with the outmost respect for the environment meeting or exceeding the applicable environmental standards, especially concerning preservation of the ecosystem and the marine resources, enforcing sustainable planning policies, devoting resources to fishing operations and research, implementing post-capture and trading practices, promoting sustainability, minimizing the environmental impact of its activities and helping combat climate change; and **(ii)** We assume as behavioural guidelines to minimizing waste and pollution, preserving natural resources and promoting energy and freshwater savings.

7. Finally, in the scope of the corporate crime prevention programme, article 11 of our Corporate Criminal Risk Prevention Policy contains an express prohibition on environmental matters consisting of conducting any type of business, industrial, fishing or aquaculture activity, or others, that contravene the applicable environmental protection legislation, particularly in matters of emissions and discharges, radiation, transfer and management of waste, sustainability and balance of natural systems.

Article 1. Object

1. The object of this Corporate Policy is:
 - a. To formally set the commitments and principles that will guide all fishing, aquaculture, industrial and marketing activities of the Nueva Pescanova Group, ensuring a respectful action with the environment, favouring the sustainable management of natural resources, the responsible management of water, energy and materials, as well as the conservation of biodiversity and the fight against climate change; and
 - b. To promote a culture of environmental responsibility in the Group that contributes to preserving the natural environment in which we operate.
2. This Corporate Policy will be complemented by internal management policies and regulations, relating to both the operational and functional areas of the Nueva Pescanova Group.

Article 2. Scope of application

1. This Corporate Policy is mandatory for all companies and professionals of the Nueva Pescanova Group.
2. The Nueva Pescanova Group is made up of the Spanish company Nueva Pescanova, S.L., and all Spanish and foreign companies controlled, directly or indirectly, by Nueva Pescanova, S.L., in the terms established in the applicable commercial legislation.
3. Professionals of the Nueva Pescanova Group are understood to be all the directors, managers, proxies and other professionals and employees of the Nueva Pescanova Group, anywhere in the world and whatever their form of hiring.

Article 3. Our commitments to environmental responsibility

1. Contribute to the maintenance of biodiversity and protect the ecosystem services offered by natural ecosystems, where applicable.
2. Minimize our contribution to global environmental impacts, such as climate change, depletion of the ozone layer or loss of biodiversity, as well as to local ones, such as pollution, depletion of natural resources, or desertification/deforestation, and implementing measures for its mitigation.
3. Progressively reduces the environmental impact by production unit of our activities, facilities, products, and services through:
 - a. The rational and efficient consumption of fishery and aquaculture raw materials that characterize our activity and auxiliary raw materials.
 - b. The rational and efficient consumption of energy and the transition to cleaner energies and renewable sources.
 - c. The rational and efficient consumption of water in all our operations, guaranteeing its sustainable management and sanitation.

- d. From the reduction of greenhouse gas emissions from our fishing, aquaculture, industrial and commercial activities.
 - e. Of the correct management and sanitation of discharges.
 - f. From promoting the circular economy, directing our activity towards a zero-waste strategy.
4. Develop these commitments to environmental responsibility through specific plans in each of the material aspects indicated and their continuous improvement, as well as carry out our activities in balance with the legitimate right of present and future generations to enjoy the environmental quality of our planet, and its resources.

Article 4. Principles of our environmental responsibility

1. Compliance with national or international environmental legislation applicable in the field in all our fishing, aquaculture, and industrial operations in every country they are carried out and to all products in those markets where they are marketed.
2. The identification of possible environmental risks derived from our activity to be able to prevent them, if any.
3. Consideration of environmental and related social variables, and the analysis of their impact in the planning and performance of our activities, i.e., fishing, aquaculture, processing and commercialization, particularly those related to energy management, water management, emissions of greenhouse gases, waste generation and the protection of biodiversity, by encouraging environmental awareness.
4. The setting of efficiency targets for environmental variables, the measurement of their progress and the transparency of their dissemination.
5. Preservation of the environment, developing actions to mitigate the impact of our activities on the environment by applying continuous improvement actions to environmental performance throughout the value chain of seafood from fishing and farming to markets, and in the whole of our environmental management system.
6. The guarantee of dissemination of this Corporate Policy among all our employees, and the promotion of environmental awareness among our suppliers, clients, consumers, and partner communities.
7. The establishment of dialogues with the authorities, local communities, NGOs, and other relevant stakeholders in the protection of the environment.

Article 5. Specific measures for a responsible environmental action

1. The establishment of a clearly defined organizational and role structure in the field of environmental responsibility, based on responsibility and compliance with the commitments and principles of this Corporate Policy and on environmental management systems, in general, decentralized and based on the principle of subsidiarity.
2. Consideration of the environmental factor in risk management and control.
3. The preparation of environmental management reports for the identification of risks and the establishment of mitigation plans and continuous improvement in our fishing, farming, and industrial activities.
4. The implementation of environmental management systems (ISO 14001, EMAS, or equivalent) in our activity centres that allow us to reduce environmental risks, improve resource management, optimize investments, and reduce costs.

5. Measurement of efficiency in consumption and emissions, setting goals and monitoring progress that allows us to continually improve our contribution to the achievement of our environmental commitments.
6. The provision of specific budgets.
7. Training and information for managers and employees.
8. Collaboration with suppliers and customers so that respect for the environment is a common principle throughout the Group's value chain.
9. Participation in international initiatives, ratings and benchmarking indices related to sustainability and the environment.

Article 6. *Transparency and accountability*

1. The Corporate Department of Environment will render accounts to its hierarchy, and to the Board of Directors, in a transparent and regular manner, presenting reports on its activities with truthful and outstanding information in relation to the actions of the Nueva Pescanova Group and its Corporate Policy of Environmental Responsibility.
2. The reporting, in all its written forms, will be addressed to the various interest groups, internal and external, differently through:
 - a. Annual Activity Report of the Corporate Department of Environment to be published in the first three (3) months of each year, addressed to the Board of Directors of Nueva Pescanova, S.L., through its Governance and Corporate Responsibility Committee. Likewise, this Report will be reported to the COMEX of the Nueva Pescanova Group.
 - b. Reports or other pertinent and applicable documents, with annual periodicity and technical character, that provide an evaluation based on the corresponding relevant indicators. This information may be included in the corresponding Annual Activity Report of the Corporate Department of Environment.
3. The dissemination of Environmental Responsibility activities will be coordinated with and carried out by the Corporate Communication Department, in accordance with the Corporate Communication Policy, to whom the Corporate Department of Environment will provide the contents to be adapted to internal audiences and external through the different communication channels and tools of the Nueva Pescanova Group. Communications will be made with the collaboration and approval of the Corporate Department of Environment. For their final approval, they will be submitted to the COMEX and / or CEO when necessary, and the Governance and Corporate Responsibility Committee will be informed.

Article 7. *Implementation and monitoring*

It is the responsibility of the Corporate Director of Environment of the Nueva Pescanova Group to control the implementation, development and compliance with this Corporate Policy throughout the Group, as well as to ensure and coordinate the implementation of programmes or other actions of Environmental Responsibility oriented to the creation of value.

Article 8. *Evaluation*

The Corporate Department of Environment will annually evaluate the compliance and effectiveness of this Corporate Policy and of the Environmental Responsibility programmes and actions carried out in the Nueva Pescanova Group in the appropriate Annual Activity Report, which will be presented to the Governance and Corporate Responsibility Committee of the Board of Directors of Nueva Pescanova, S.L., for its elevation to it, as well as to the COMEX of the Nueva Pescanova Group.

Article 9. Dissemination, training and communication

The Corporate Department of Environment, in collaboration with the Corporate Communication Department, and in accordance with the Corporate Communication Policy, is responsible for disseminating, training and communicating timely actions to ensure effective knowledge of this Corporate Policy, as well as any internal standard that it develops, 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 Environmental Responsibility.

Article 10. Review and modifications

1. This Corporate Policy will be reviewed periodically, and at least annually, by the Corporate Director of Environment.
2. Any modification of this Corporate Policy will be proposed to the Governance and Corporate Responsibility Committee by the Corporate Director of Environment, for its consideration and, where appropriate, submission to the Board of Directors of Nueva Pescanova, S.L., for its approval.

Article 11. Approval, entry into force and validity

1. This Corporate Policy was approved by the Board of Directors of Nueva Pescanova, S.L., at its meeting on September 30, 2020, at the proposal of its Governance and Corporate Responsibility Committee, coming into force and being in force since that time for the entire Nueva Pescanova Group.
2. Any modification of this Corporate Policy must be approved by the Board of Directors of Nueva Pescanova, S.L., at the proposal of its Governance and Corporate Responsibility Committee.

Article 12. Modification control

Version	Modification summary	Modification Promoter	Modification approval body	Date of approval of modification
v_1	Initial approval of this Corporate Policy	Governance and Corporate Responsibility Committee	Board of Directors of Nueva Pescanova, S.L.	30/09/2020

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