



CORPORATE POLICY FOR COOPERATION AND DEVELOPMENT AID FOR THE NUEVA PESCANOVA GROUP

Approved by the Executive Committee (COMEX) of the Nueva Pescanova Group in its Meeting held on May 24, 2019.

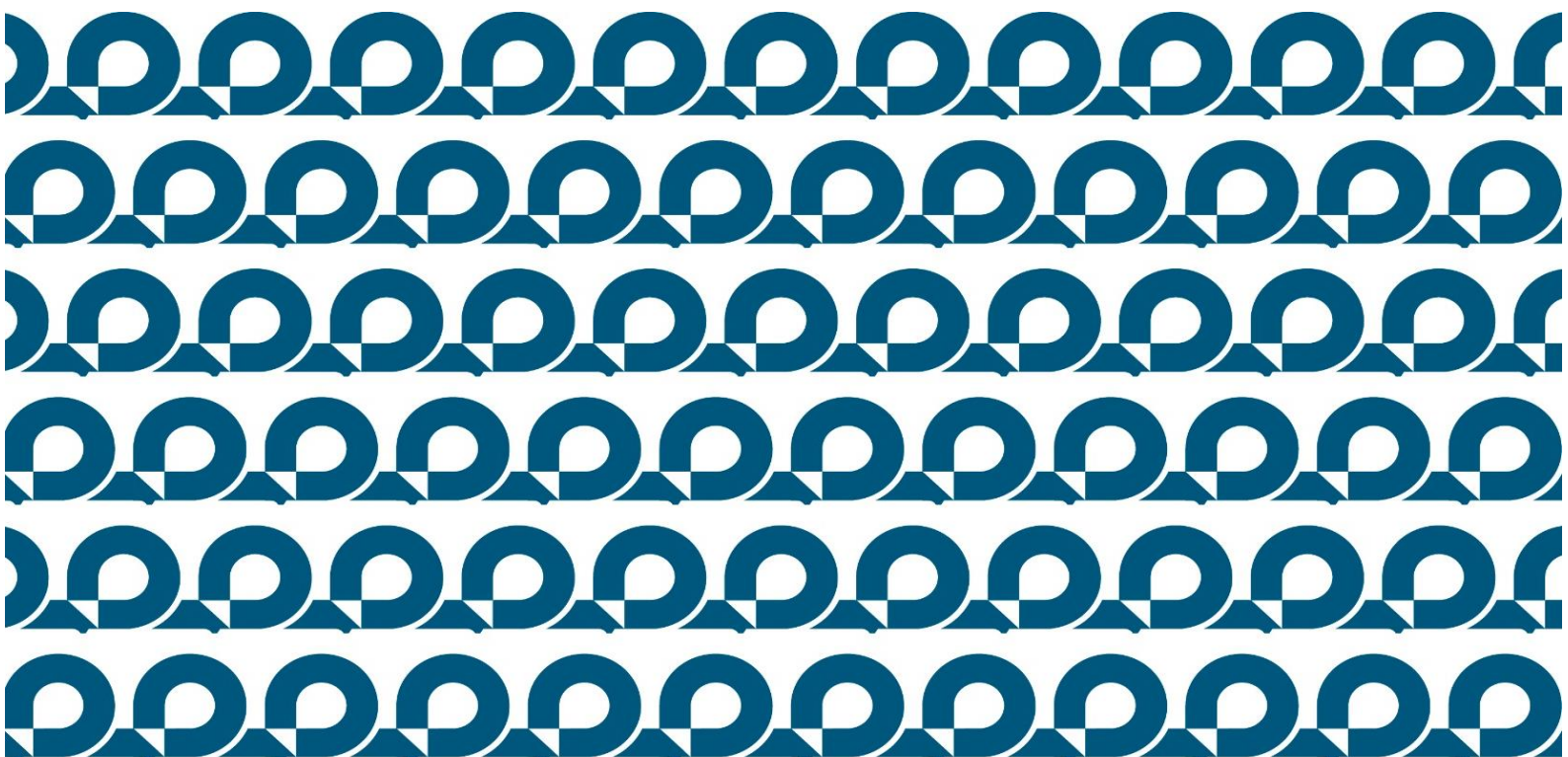


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Foreword

1. The Nueva Pescanova Group is a multinational business group engaged in the fishing, farming, processing, and commercialization of seafood products, especially fish and shellfish.
2. The following are a part of the DNA of the Nueva Pescanova Group:
 - a. Working to be the leading company in the food sector, bringing the freshness of the sea to consumers' tables.
 - b. Promoting our brand and innovation, fishing, farming, creating, and selecting the best products wherever they are.
 - c. Our commitment to the sustainability of natural resources and the communities where we are present, acting ethically, maintaining their trust, and creating value.
3. The Nueva Pescanova Group has its own code of conduct and good business practices called **"Our Code of Ethics"**, which establishes a set of principles and behavioral norms intended to guarantee ethical, honest, and responsible behavior among all professionals. In addition, the group has its own Corporate Social Responsibility (CSR) Policy, which formally establishes the principles or pillars guiding the responsible and sustainable development of the activities of the Nueva Pescanova Group in their environmental, biological, technological, economic, business, and social components, thus bringing it in line with the United Nations (UN) 2030 Agenda and the Sustainable Development Goals (SDGs).
4. In accordance with the Corporate CSR Policy, the four (4) pillars that make up our CSR strategy are respect for the **Planet**, the personal and professional development of the **People** that make up the Nueva Pescanova group, commitment to markets via our **Products**, and contributing to improving the quality of life in our partner **Communities** where we are present. In parallel, we guarantee comprehensive compliance with business ethics and institutional integrity principles, as well as compliance with applicable legislation in addition to the corresponding legal rulings in the countries in which we operate, in **"Our Code of Ethics"** and in the remainder of the provisions of our **"Standardized Corporate Governance and Compliance System"**. By doing so, the programs and projects implemented or to be implemented in the context of corporate social responsibility at the Nueva Pescanova Group are designed and will be designed around the pillars or guidelines of its CSR strategy: **The planet, people, the product, and communities**.
5. In the context of responsible actions with respect to **communities**, our CSR policy explicitly contains the group's commitment to developing more prosperous communities, generating wealth, work opportunities, and training wherever we are present, establishing a set of action guidelines that must be followed in this respect by all companies in the Nueva Pescanova Group.
6. Likewise, among the sustainability principles contained in our Corporate Sustainability Policy is improving the quality of life in the **communities** where we live and work, establishing the objective that 100% of the **communities** where we are present benefit from projects directed at skills transfer, job creation and job stability, investment in assets or structure, or social works.
7. This Corporate Cooperation and Development Aid Policy is the internal standard used to integrate and complement the guidelines established for this purpose in our Corporate CSR and Sustainability Policies.

Article 1. Purpose

1. The purpose of this corporate policy is the following:
 - a. To formally establish **the fields of action and guidelines governing cooperation and development aid activities in communities** in the countries where the different companies in the Nueva Pescanova Group are present, maximizing the value created for the community and trust in its interest groups.
 - b. To promote, within the group, a culture of business responsibility that contributes to creating value shared in a sustainable way, promoting the development of the communities where we are present and creating competitive advantages.
2. This corporate policy encompasses the guidelines established with respect to the **communities' pillar** in the **Corporate CSR** and **Sustainability** Policies of the Nueva Pescanova Group, and will be complemented with internal management procedures and standards regarding the group's functional areas of operation.

Article 2. Scope of application

1. The present corporate policy must be respected by all companies and professionals in the Nueva Pescanova Group.
2. The Nueva Pescanova Group consists of the Spanish business corporation Nueva Pescanova S.L. and all of the Spanish and foreign companies either directly or indirectly controlled by Nueva Pescanova S.L.
3. Professionals in the Nueva Pescanova Group refers to all advisors, board members, authorized representatives, and the remainder of the professionals and employees of the Nueva Pescanova Group, in any place in the world and regardless of the form of their employment.

Article 3. Communities as a pillar of our CSR actions

1. The Nueva Pescanova Group contributes to improving the quality of life in our partner **communities** where we are present, generating wealth, employment, and training opportunities, and promoting changes that are beneficial to society.
2. In accordance with our Corporate CSR policy, all of the companies in the Nueva Pescanova group must follow the following guidelines for their actions within the scope of the **communities' pillar**:
 - Promoting and generating stable, quality local employment (which is legal, safe, and fair), promoting the continuous training and professional development of all its employees. Nonetheless, temporary work contracts will be used whenever they comply with applicable legislation and their use is justified by an organization or production reason.
 - Investing, in accordance with the criteria and as a function of the budget of the Nueva Pescanova group, in quality assets to promote productivity, efficiency, and the work environment in all the places where we are present.
 - Improving the quality of the life in the areas where we are present via social works programs, supporting actions and projects to improve education and well-being, as well as investing in the necessary infrastructure, thus enabling the proper and sustainable development of the group's activities in the community.

Article 4. *Fields of action and projects for Cooperation and Development Aid*

1. The initiatives that group companies undertake for cooperation and development aid in the **communities** where they are present must be in line with the group's sectors of business, and will be expressly directed at the following fields of action:
 - **Employment:** Understood as the process of promoting quality employment and local entrepreneurship, with special attention to the most vulnerable groups, including those at a risk for social exclusion.
 - **Education:** Understood as the process of promoting quality education capable of offering the opportunity of a better life via personal growth and a fair social environment.
 - **The natural environment:** Understood as the process of raising awareness on caring for our natural environment, supporting biodiversity, and collaborating with interest groups promoting the same.
 - **Humanitarian aid:** Understood as the set of actions directed at protecting life, health, and well-being in emergency situations caused by natural disasters, wars, or similar catastrophic circumstances.
2. The cooperation and development aid actions that the Nueva Pescanova Group and its companies promote in the **communities** where they are present are related to the fields of action defined, and will be implemented via collaboration on specific public or private projects which must be selected based on the following criteria:
 - Long-term vision of collaboration with the community.
 - Alignment with the group's interests, its public image, and its corporate reputation.
 - Good reputation and management experience among partners/NGOs responsible for implementing projects.
 - Transparency in the tracking and quantification of projects.
 - Sustainability of the collaboration in the economic sphere, avoiding dependency.
 - The contributions can be monetary, in the form of products, or in the form of its employees' time. In the last case, the group will promote the commitment of its employees to the volunteer action.
 - Availability of the budget line item.

Article 5. *Cooperation and Development Aid Principles of the Nueva Pescanova Group*

The cooperation and development aid principles of the Nueva Pescanova Group are the following:

- **Dialogue and communication** by the Nueva Pescanova Group and its group companies with the different **interest groups** in the communities where it is present.
- The **monitoring of responsibility strategies and policies** in the Nueva Pescanova Group's different sectors of business.
- **Work in conjunction with** the communities and companies in our group, seeking shared value.
- **Knowledge and continuous learning** between the group's different business units based on the cooperation and development experiences of each of them.
- **Local entrepreneurship** and the **circular economy** in relation to the activities generated

by the group's businesses.

- The **pride of belonging** among our employees via the knowledge and participation in cooperation and development aid initiatives.
- The **alignment** of cooperation and development aid initiatives and actions among group companies with the fields of action established as being a priority.
- **Local actions** and **proximity to the field** where our companies operate.
- The culture of **honest cooperation** between all the people belonging to the group, without focusing it on one-time monetary contributions.

Article 6. *Relations with institutions and other Cooperation and Development Aid stakeholders*

1. The Nueva Pescanova Group will promote relationships with cooperation and development agencies and will forward cooperation and development aid projects with them in the countries and communities where it is present, in accordance with the provisions of our Corporate Institutional Relations Policy.
2. The Nueva Pescanova Group will register itself as a cooperation agent whenever this is necessary in accordance with applicable legislation in each case and will comply with the requirements of the different legislative frameworks to carry out cooperation and development aid activities.
3. The Nueva Pescanova Group will identify and provide synergy in the countries and communities where it is present, working with all interest groups whose goal is in line with the types of cooperation and development aid actions described in this corporate policy.

Article 7. *Transparency and accountability*

1. The CSR and IR Department will be accountable to its hierarchical superiors, transparently and regularly, presenting reports on its cooperation and development aid activities in the annual CSR activities report, providing accurate and relevant information related to the actions of the Nueva Pescanova Group and its Corporate CSR, Institutional Relations, Sustainability and Cooperation and Development Aid Policies.
2. Accountability, in all its written forms, will be directed at different interest groups, including both internal and external ones, in different ways via:
 - a. The Annual Report of Activities from the CSR and IR Department, which is published during the first three (3) months of each year, sent to the Board of Directors of Nueva Pescanova, S.L. by means of its Governance and Corporate Responsibility Committee. Likewise, this report will be passed on to the COMEX of the Nueva Pescanova group.
 - b. Reports, statements, or other relevant and applicable documents published annually and of a technical nature, which provide an assessment based on the corresponding relevant indicators. This information may be included in the corresponding Annual Report of Activities of the CSR and IR Department.
3. The dissemination of cooperation and development aid activities within corporate social responsibility actions will be coordinated by the Communications Department and will be carried out by this department in accordance with the Corporate Communications Policy, with the CSR and IR Department providing it with the content so that it can be adapted to internal and external publics via the different communication channels and tools available to the Nueva Pescanova Group. Communications will be carried out with the collaboration and oversight of the CSR and IR Department. For their final approval, they will be brought to the COMEX and/or CEO, when necessary.

Article 8. *Development and oversight*

It is the responsibility of the Director of CSR and IR of the Nueva Pescanova Group to oversee the implementation, development, and compliance with the present corporate policy across the entire group, as well as to ensure and coordinate the implementation of programs or other cooperation and development aid actions directed at creating value.

Article 9. *Evaluation*

The CSR and IR Department will annually assess compliance with and the efficacy of this corporate policy and of the cooperation and development aid programmes and actions being carried out at the Nueva Pescanova Group in the Annual Report of Activities, which is a part of the Annual CSR Report.

Article 10. *Diffusion, training, and communication*

It is the responsibility of the CSR and IR Department, in collaboration with the Communications Department, and in accordance with the Corporate Communication Policy, to carry out the actions to disseminate, train, and communicate opportunities to guarantee effective knowledge of the present corporate policy, as well as any other internal standard developed by it, including their translation into the relevant languages within the Nueva Pescanova Group and their potential dissemination and publication both on the corporate intranet, [PESCANET](#), as well as on the corporate websites in the section corresponding to corporate social responsibility.

Article 11. *Revision and modifications*

1. This corporate policy will be revised periodically and at a minimum annually by the CSR and IR Department.
2. Any modification to the present corporate policy must be approved by the Board of Directors of the Nueva Pescanova Group at the proposal of the Director of CSR and IR.

Article 12. *Approval, effectiveness, and validity*

The present corporate policy was approved by the Board of Directors of the Nueva Pescanova Group at the proposal of the Director of CSR at its meeting on June 24, 2019 and entered into force for the Nueva Pescanova Group as a whole on that date.

Article 13. *Modification control*

Version	Modification Summary	Promoter modification	Body approval modification	Modification Approval Date
v_1	Initial approval of the corporate policy	Director of CSR and IR	COMEX	6/24/2019

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