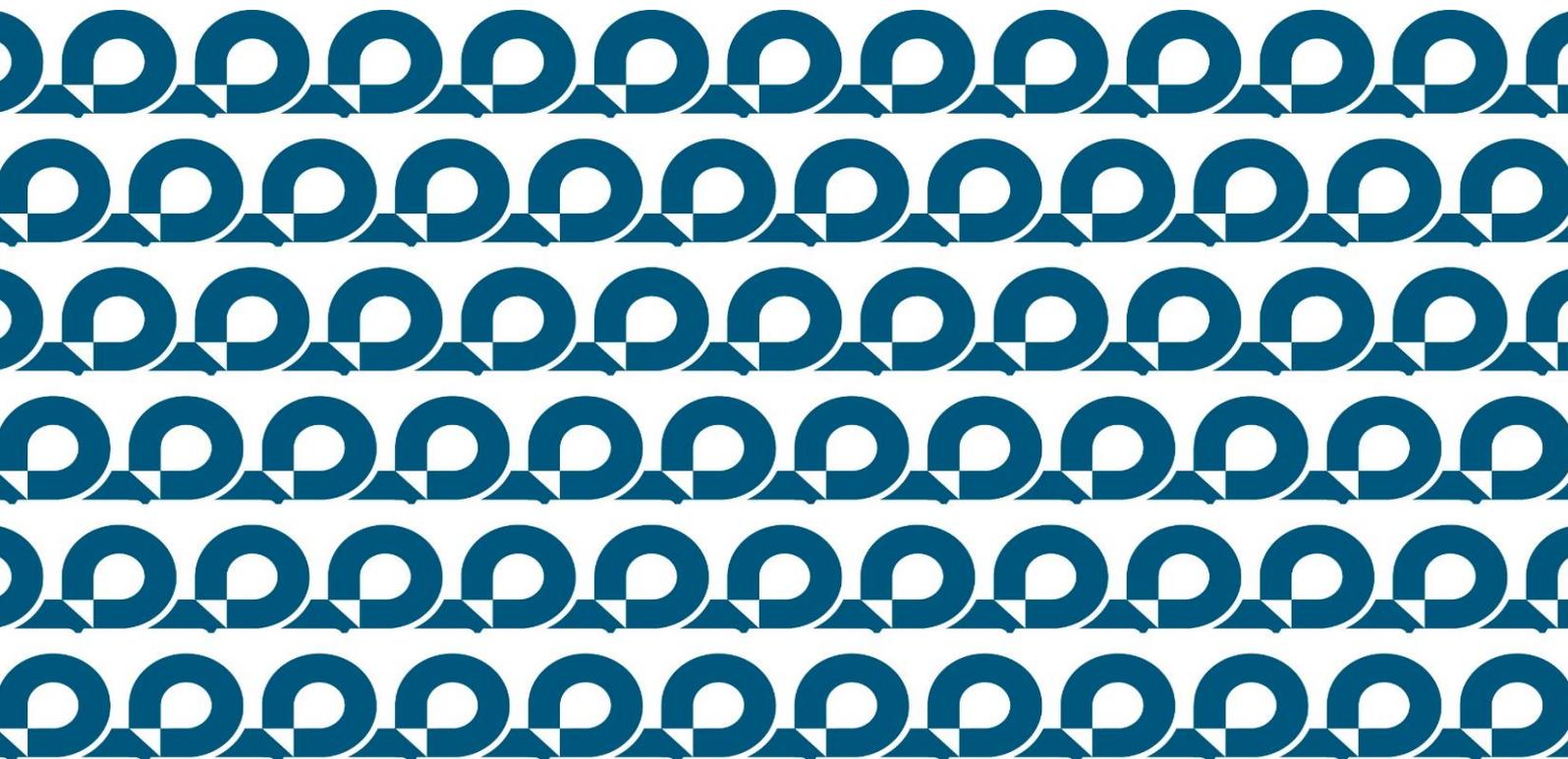




# CORPORATE POLICY OF CORPORATE VOLUNTEERING OF THE NUEVA PESCANOVA GROUP

*Approved by the Executive Committee (COMEX) of the Nueva Pescanova Group in its Meeting held on September 23<sup>rd</sup>, 2019.*



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## Preamble

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1. The Nueva Pescanova Group is a multinational business group dedicated to the capture, cultivation, production, and marketing of seafood, especially fish and shellfish.
2. It is in the DNA of the Nueva Pescanova Group:
  - 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 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 behaviour from all its professionals. In addition, the Group has its own **Corporate Social Responsibility (CSR) Policy** that identifies the four (4) pillars in which our CSR actions pivots, one of which aims at contributing to the improvement of the quality of life of our partner **Communities**.
4. This commitment to improving the quality of life of the **Communities** is also crystallized in the **Corporate Sustainability Policy** of the Nueva Pescanova Group, having set as an objective that 100% of our partner Communities must benefit from knowledge transfer projects, employment generation and job stability, investment in assets or infrastructures, or social work.
5. The Nueva Pescanova Group's **Corporate Policy for Cooperation and Development Aid** describes the areas of action and principles that should guide development aid and cooperation activities, maximizing the value created for our partner **Communities** and the trust of our stakeholders, generating wealth, employment, and training opportunities, and promoting beneficial changes for society.
6. This **Corporate Volunteering Policy** is created and approved in our internal regulatory framework. It contains, among others, the principles of action, guidelines, and conditions that all fostered, promoted, and supported corporate volunteering actions must have, or, in any way, promoted or disseminated within and/or by the Nueva Pescanova Group.

## Article 1. Object

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This Corporate Policy aims to:

- a. Formally establish the principles of action for Corporate Volunteering in the countries where the different companies of the Nueva Pescanova Group are present.
- b. Integrate the guidelines established in the matter of Corporate Volunteering in the Corporate Policies of CSR, Sustainability and Cooperation and Development Assistance of the Nueva Pescanova Group in force always.
- c. Reinforce the Group's commitment to society in general and to the Communities of which we are part through Corporate Volunteering actions.
- d. Promote in the Nueva Pescanova Group a culture of action and social participation, favouring the development of the Communities in which we are present and their environmental environments, through the development of social or solidarity collaboration projects that generate value.

#### *Article 2. Scope of application*

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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 the Spanish and foreign companies, controlled, directly or indirectly, by the parent company Nueva Pescanova, S.L.
3. By professionals of the Nueva Pescanova Group, we mean every director, manager, representative professionals, and other professionals and employees of the Nueva Pescanova Group, regardless of their location and employment relationship with the company.

#### *Article 3. Corporate volunteering in the Nueva Pescanova Group*

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1. Corporate volunteering in the Nueva Pescanova Group is configured as the set of activities promoted and supported institutionally or corporately by a Nueva Pescanova Group company when they pursue the free and altruistic involvement and participation of our employees and professionals (and other related persons with the Group) in causes, projects and non-profit organizations that benefit society, dedicating their time (during or outside working hours), skills and talent.
2. The Nueva Pescanova Group aspires to offer opportunities to carry out corporate volunteering to all the Group's employees as a demonstration of its commitment to our partner communities. Additionally, former employees, suppliers, clients and/or partners may be allowed to participate in corporate volunteering actions of the Nueva Pescanova Group, provided that the legislation of each country allows it and is deemed appropriate by the Corporate Department of CSR, by the CSR Ambassadors or by the Group's local Human Resources functions.
3. Grupo Nueva Pescanova grants 4 hours/month to each employee registered in a volunteer program for eleven (11) months a year (a total of 44 hours/year per employee), assignable to volunteer programs. For this, they must be registered in the **Corporate Volunteers Registry** that will be enabled for this purpose, which will be managed and maintained by the **Volunteer Office** of the Corporate Department of CSR, by the CSR Ambassadors and shared and communicated to the Corporate Department of Human Resources or HR Managers. The participation of volunteers in existing corporate volunteering actions must always be known and approved by their direct hierarchical/functional managers to correctly plan the work.
4. The corporate volunteering actions of the Nueva Pescanova Group may be global (reaching the entire Nueva Pescanova Group) or local (at the level of a subsidiary or group of subsidiaries of the Group in a specific country or territory). Regarding each of these actions, the persons responsible for the Corporate Department of CSR and/or the CSR Ambassadors of the Nueva Pescanova Group will establish the appropriate guidelines and indications, as well as the periodicity and content of the report of the corporate volunteering activity in question for the purposes of timely monitoring and accounting.

#### *Article 4. Scope and reporting principles of the Nueva Pescanova Group corporate volunteering*

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1. In line with the provisions of our Corporate Policy for Cooperation and Development Aid, the Group's corporate volunteering initiatives must be linked to the Group's business areas and expressly aimed at the following areas 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 risk of social exclusion.
  - **Education:** Understood as the process of promoting quality education capable of offering

the opportunity for a better life, through personal growth, and a fair social environment.

- **Natural environment:** Understood as the process of promoting awareness for the care of our natural environment, the promotion of biodiversity, and collaboration with the stakeholders that favour it.
  - **Humanitarian aid:** Understood as the set of actions aimed at the protection of life, health, and well-being, especially in emergency or relief situations caused by natural disasters, wars, or similar catastrophic circumstances.
2. The corporate volunteering actions of the Nueva Pescanova Group will be focused on initiatives that help to improve people's quality of life and to protect and conserve the environment in the areas and territories where we are present.
  3. The corporate volunteering of the Nueva Pescanova Group will meet the following criteria:
    - Knowledge of the needs for collaboration with the community.
    - Alignment with the interests of the Group, its public image, and corporate reputation.
    - The good reputation and experience of the partner organizations.
    - Transparency in the monitoring and measurement capacity of volunteer projects.
    - The economic sustainability of the action to prevent dependency.
  4. The basic principles of action that will govern the corporate volunteering actions of the Nueva Pescanova Group are:
    - The participation, in the preliminary preparation and in the actions themselves, of the interested parties and /or groups.
    - Commitment to the principles, ways of working, and objectives of our Cooperation and Development Aid Policy.

#### **Article 5. *The corporate volunteers of the Nueva Pescanova Group***

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1. The Nueva Pescanova Group Volunteers must seriously commit to the Corporate Volunteering actions in which they wish to participate in terms of adequate and sufficient availability and dedication.
2. For each Corporate Volunteering project or action and once the minimum and maximum number of people who can participate in it have been defined, the Corporate CSR Department and/or the CSR Ambassadors, as appropriate, will select the Corporate Volunteers available in a transparent and objective manner, according to their greater or lesser suitability according to the type of project in question and adjusting the number to their own management capacity.
3. To attract corporate volunteers for the volunteer projects and actions that are established or promoted in the Nueva Pescanova Group, any of the following communication and/or dissemination channels will be used, among others:
  - a. Publications, announcements, and calls through the **PESCANET** corporate intranet, in collaboration with the Group's Corporate Department of Communication.
  - b. Informative emails sent from the Corporate Department of CSR or through the corporate e-mails of the CSR Ambassadors, as appropriate, considering the global or local scope of the volunteering project or action.
  - c. Through workshops, conferences, sessions, or talks to raise awareness or inform about

the corporate volunteering programs underway or intended to be launched or about relevant matters or issues related to the areas on Cooperation and Development Aid in the Nueva Pescanova Group.

#### **Article 6. Stakeholders on volunteering**

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1. Relations with stakeholders regarding volunteering must attend to the information contained in the **Materiality Analysis** regarding CSR of the Nueva Pescanova Group, to ensure the generation of shared value and, in all cases, be aligned with the provisions contained in our **Corporate Policies on CSR, Institutional Relations, Sustainability and Cooperation and Development Aid**.
2. The Nueva Pescanova Group will register as a cooperation agent, when this is mandatory in accordance with the legal regime applicable in each case and will comply with all the requirements that the different legislative frameworks require to be able to exercise corporate volunteering on its own account or through of a collaborating entity.
3. The Nueva Pescanova Group will identify and promote synergies in the countries and partner communities with all those stakeholders whose objectives are aligned with the type of corporate volunteering actions described in this Corporate Policy and in the Cooperation and Development Aid Policy.

#### **Article 7. Collaboration agreements with volunteer entities**

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1. The Nueva Pescanova Group, through its various companies, may sign specific or general collaboration agreements (or other similar figures in accordance with the applicable legal regulations) with non-profit entities (NGOs, associations, foundations, religious entities, etc.) that develop, altruistically, volunteer actions in the different areas of action included in this Corporate Policy and in the Cooperation and Development Aid Policy.
2. So that a non-profit entity or institution can be selected as a collaborator in an action or project of corporate volunteering of the Nueva Pescanova Group or so that the Group can participate in an initiative, action, or project of volunteering managed or organized by an entity or institution of that nature, the following requirements must be met:
  - a. Be registered in the corresponding Public Registry (of associations, foundations, religious entities, etc.). To prove this requirement, the entity or institution in question must provide the corresponding certificate of registration in said Public Registry by means of a simple informative note, by copying the entries and documents deposited in said Registry or by any other means that it does proof of its nature.
  - b. Be able to issue, when required, the appropriate justifying certificate of the action carried out for informational purposes, for the evaluation and self-evaluation of projects or any other documents provided for in the legislation on volunteering that is applicable in each case.
3. If there are several entities or institutions likely to receive collaboration from the corporate volunteers of the Nueva Pescanova Group, the Corporate Department of CSR (or the persons of the Group delegated by its Director), will prioritize the selection of the entity or institution based on the following criteria:
  - a. Lower costs associated with collaboration (recruitment, transport, action, management, hours, etc.).
  - b. The greater or lesser trust on the entity or institution in question due to its trajectory with the Nueva Pescanova Group.
  - c. The existence of past or current framework or collaboration agreements of the Group

with the entity or institution in question.

- d. The existence of an express request for corporate volunteers by the entities or institutions in question.

#### **Article 8. Selection, approval and registration of collaborating entities of corporate volunteering**

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1. It is the responsibility of the Corporate Department of CSR (through its Director or the person to whom he/she delegates), to select the entities or institutions that can be collaborators in corporate volunteering of the Nueva Pescanova Group that comply with the requirements set out in the previous article.
2. For a corporate volunteering collaboration to be made with an entity, it must be approved by the Corporate Department of CSR, for which purpose the appropriate supporting documentation described in the previous article must be obtained from the corresponding entity or institution.
3. The Corporate Department of CSR will keep the **Corporate Registry of Collaborating Entities of the Nueva Pescanova Group Corporate Volunteering** duly updated and approved globally and locally.
4. Before submitting the decision to select a collaborating entity or institution at the local level, the CSR Ambassadors must verify that it is duly approved and registered in the **Corporate Registry of Collaborating Entities of the Nueva Pescanova Group Corporate Volunteering**. Otherwise, they must promote their approval and registration in accordance with the instructions given from the Corporate Department of CSR and as provided in this Corporate Policy.

#### **Article 9. Transparency and accountability**

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1. On the actions, projects, and programs of corporate volunteering, a complete, truthful, and transparent account will be given through:
  - a. The Annual Activity Report of the Corporate Department of CSR, 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 Executive Committee (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 CSR.
2. The dissemination of corporate volunteering activities within the CSR actions will be coordinated with and carried out by the Corporate Department of Communication, in accordance with the Corporate Communication Policy, to whom the Corporate Department of CSR will facilitate the contents so that they are adapted to internal and external audiences 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 CSR. For their final approval, they will be submitted to COMEX and/or the CEO of the Group when necessary.

#### **Article 10. Monitoring indicators for corporate volunteering actions**

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1. To ensure compliance and be able to measure the internal and external impact of the Group's corporate volunteering, as well as the objectives set, the subsidiaries in each country in which

corporate volunteering actions are developed or executed must collect and report every six months to the Corporate Department of CSR, a series of monitoring indicators; namely:

- Number of volunteers participating in corporate volunteering actions.
  - Number of hours of corporate volunteering in actions proposed or disseminated by the Group and, where appropriate, their amount in local currency.
  - Number of corporate volunteering projects in progress or completed in the reporting period.
  - Impact of volunteering actions.
  - In the case of Group companies in the Autonomous Community of Galicia (Spain), the number of shares registered in the Register of Voluntary Action of Galicia.
  - Number of direct beneficiaries and groups to which they belong (people with disabilities, young people, children, the elderly, immigrants, rural groups, indigenous peoples, or ethnic minorities, etc.).
  - Multiplying effect on families, social organizations, society in general, the environment and others, whenever possible.
  - Identity of the Collaborating Entities with which it collaborates.
  - Investment in volunteering or any other different economic contribution, where appropriate, of the hours of dedication of the corporate volunteers.
2. The follow-up will be completed with the sending at the end of a standard survey to the corporate volunteers who have participated for an adequate follow-up of satisfaction, degree of fulfilment of the objectives, as well as presentation of suggestions and points for improvement.
  3. It is the responsibility of the Human Resources function at the local level and/or the CSR Ambassadors to request in their respective areas the number of employees participating in social initiatives at the end of the corresponding fiscal year.

#### **Article 11. *Development and control***

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It is the responsibility of the Corporate Director of CSR of the Nueva Pescanova Group to control the implementation, development, and compliance of this Corporate Policy throughout the Group, as well as to ensure and coordinate the implementation of programs or other actions of corporate volunteering aimed at creating value.

#### **Article 12. *Dissemination, training and communication***

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The Corporate Department of CSR, in collaboration with the Corporate Department of Communication, 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 of 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 web pages in the section corresponding to Corporate Social Responsibility.

#### **Article 13. *Review and modifications***

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1. This Corporate Policy will be reviewed periodically, and at least annually, by the Corporate Department of CSR.

2. Any modification of this Corporate Policy must be approved by the Executive Committee of the Nueva Pescanova Group, at the proposal of the Corporate Director of CSR.

**Article 14. Approval, entry into force and validity**

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This Corporate Policy was approved by the Executive Committee (COMEX) of the Nueva Pescanova Group, at the proposal of its Corporate Director of CSR, at its meeting on September 23<sup>rd</sup>, 2019, entering into force and being valid from that day for the entire Nueva Pescanova Group.

**Article 15. Modification control**

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Version	Modification summary	Modification promoter	Body approval modification	Modification approval date
v_1	Initial approval of this Corporate Policy	Corporate Director of CSR	COMEX	23/09/2019

### Appendix 1: Volunteer registration form

At Nueva Pescanova we want to promote a culture of action and social participation, favouring the development of our partner communities as well as their natural environmental.

From the Corporate Department of CSR, we are launching the Group's Corporate Volunteering program with the aim of collaborating with social and environmental projects that generate value for the community.

If you want to participate in the Nueva Pescanova Corporate Volunteering program, fill out this form!

#### VOLUNTEER CARD Personal information

Sumames		Name:	
D.N.I.:		Date of birth:	
Telephone contact:			
Address/ Electronic address:		Postal code:	
		City:	
		Province:	
What is the best way and time to contact you?			
Area:		Department:	

1. Would you like to be part of the Nueva Pescanova volunteer group? Yes <input type="checkbox"/> No <input type="checkbox"/>			
2. Do you have previous volunteer experience? Yes <input type="checkbox"/> No <input type="checkbox"/>			
Comment what you want:			
Which ones?			
How long?			
In which tasks?			
How was your experience?			
3. Are you currently participating as a volunteer in a social/environmental entity? Yes <input type="checkbox"/> No <input type="checkbox"/>			
4. Would you help us in the creation of a volunteer program supported by the company? Yes <input type="checkbox"/> No <input type="checkbox"/>			
5. Would you be willing to participate in the initiatives that arise and/or are promoted through the Volunteering of the Nueva Pescanova Group? Yes <input type="checkbox"/> No <input type="checkbox"/>			
6. What is your availability? <input type="checkbox"/> 1 hour/day <input type="checkbox"/> 1 hour/week <input type="checkbox"/> 2 hours/month <input type="checkbox"/> Vacation time <input type="checkbox"/> others (indicate)			
7. What kind of initiatives would you like to collaborate on? Social <input type="checkbox"/> Environmental <input type="checkbox"/>			
Food Bank	<input type="checkbox"/>	<input type="checkbox"/>	Reforestation/Native repopulation <input type="checkbox"/> <input type="checkbox"/>
Homeless	<input type="checkbox"/>	<input type="checkbox"/>	Environmental conservation <input type="checkbox"/> <input type="checkbox"/>
Design technical projects	<input type="checkbox"/>	<input type="checkbox"/>	Environmental training <input type="checkbox"/> <input type="checkbox"/>
Training	<input type="checkbox"/>	<input type="checkbox"/>	Others (specify) <input type="checkbox"/> <input type="checkbox"/>
Donation campaigns	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>
Women at risk of exclusion	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>
Children at risk of exclusion	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>

8. What do you think it can be your contribution to the volunteer program in which you want to join?	
Knowledge and skills:	Specify:
9. Would you be interested in receiving information about the initiatives that arise around the Corporate Volunteering of the Nueva Pescanova Group?	

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