



**CORPORATE POLICY ON RESPONSIBLE PEOPLE
MANAGEMENT IN THE NUEVA PESCANOVA
GROUP**

Approved by the Board of Directors of Nueva Pescanova, S.L., in its Meeting held on 28 January 2021

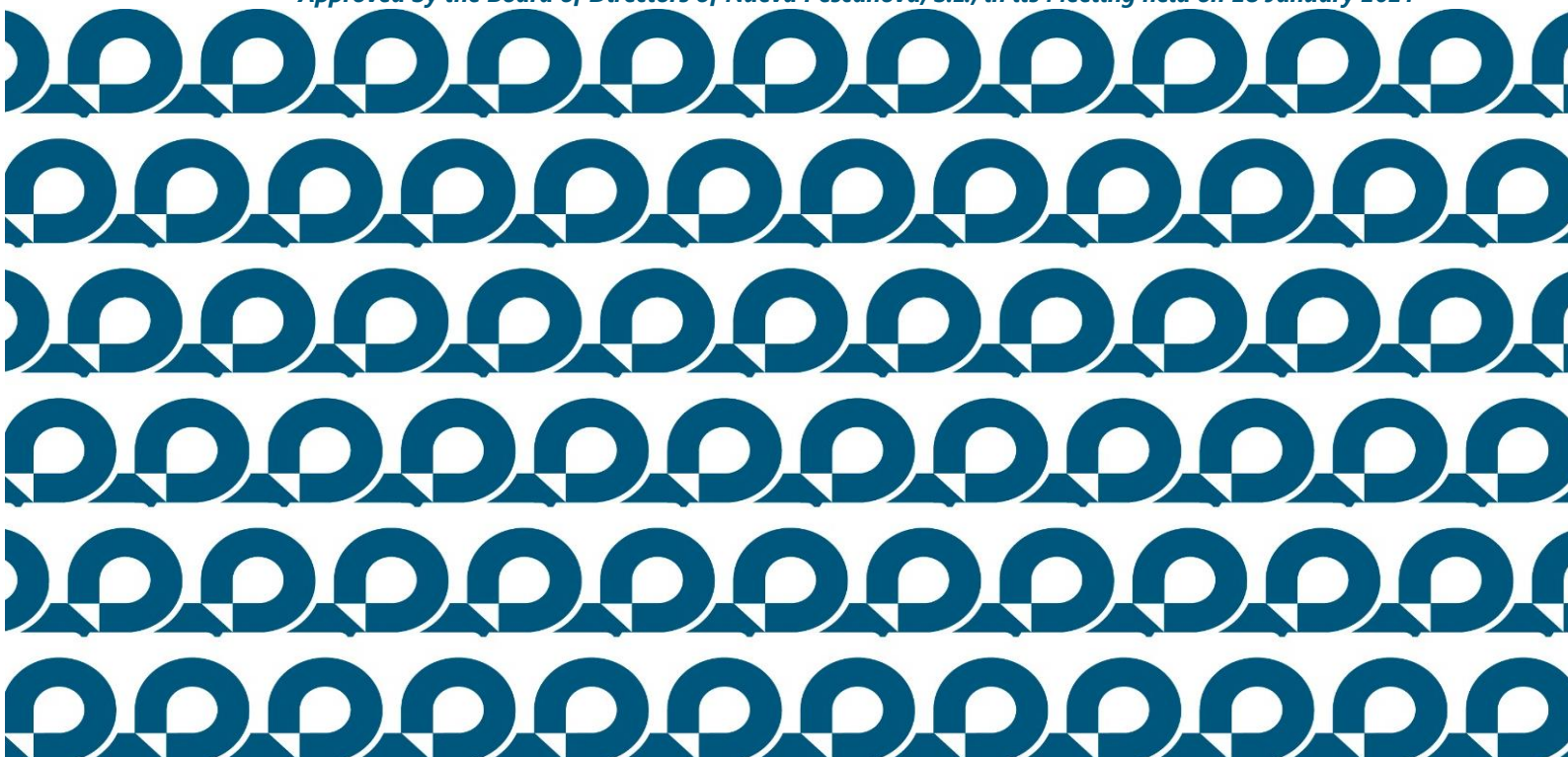


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Introduction

1. The Nueva Pescanova Group is a multinational business group engaged in fishing, farming, processing and marketing of seafood, especially fish and shellfish.
2. The Nueva Pescanova Group considers people as a key factor of its business activity.
3. Therefore, in **Our Code of Ethics** the Group, which through its parent company is a signatory of the *UN Global Compact*, states its commitment and affiliation with the human and workers' rights recognised in national and international legislation, derived from declarations of the United Nations on matters related to human rights, work, environment and anticorruption. We likewise adopt formal regulations as our own, on the responsibilities of transnational companies and other commercial companies within the sphere of human rights of the United Nations, the OECD Guidelines for Multinational Enterprises, the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, International Labour Standards on Social policy, as well as the documents or texts that could substitute or complement the aforementioned. In particular, the Nueva Pescanova Group will take great care to ensure that its facilities and fishing equipment, as well as all its fishing and aquaculture activities, regardless of where they are in the world or wherever they are carried out, offer safe, healthy and fair working and living conditions, in accordance with pertinent local and international regulations. In the same way, the Nueva Pescanova Group states it fully rejects child labour and forced or obligatory labour and it undertakes to respect the freedom of association and collective bargaining, as well as the rights of ethnic minorities and indigenous people in the places where it develops its activity. The Group states its firm commitment and respect of its professionals' rights recognised in the applicable labour regulations, including the right to freedom of association, unionisation and strike. The Group proscribes and forbids anyone of the following conducts: **(i)** the imposition of working or social welfare conditions that jeopardise, suppress or restrict the rights of professionals recognised by the legal provisions, collective agreements or individual contract applicable in each case; **(ii)** the recruitment of foreign persons who are not in possession of a work permit; **(iii)** illegal manpower trafficking or fraudulent migration.
4. The '**Persons**' pillar of our **Corporate Policy on Corporate Social Responsibility** likewise states that the Group is firmly committed to respecting diversity, security, professional growth, and pride in feeling part of the Nueva Pescanova Group as the foundation for success and the maintenance of trusting relationships with suppliers, customers, consumers, and communities. Under these commitments, all the companies that form part of the Nueva Pescanova Group anywhere in the world shall: **(i)** guarantee that the job offered is legal, safe, decent and fair, and that the employees have the right to freedom of association, unionisation, collective bargaining and strike; **(ii)** guarantee workers' safety at work, their health and well-being by promoting a safe and healthy work environment for everyone, through an effective hazard prevention system and campaigns for improving health and the work environment; **(iii)** respect, actively encourage and protect diversity, promote equal opportunities for men and women and a suitable work-life balance; **(iv)** promote our employees' professional growth with policies for personal and professional development achieved through ongoing training, assessment and

compensation; and, lastly, **(v)** create and maintain a corporate identity and culture and the pride of belonging to the Nueva Pescanova Group.

5. Article 5 of our **Corporate Policy for the Prevention of Criminal Risks** contains a series of rules of conduct for the '**Defence of fair labour relations**', which state that in the Nueva Pescanova Group the following are strictly forbidden: **(i)** impose harmful working or social welfare conditions that jeopardise, suppress or restrict the rights recognised by the legal provisions, collective agreements or individual contracts applicable in each case; **(ii)** hire or employ people without registering them with the corresponding Social Security regime and, where applicable, without having obtained the appropriate authorisation or work permit; **(iii)** engage in illegal manpower trafficking, fraudulent emigration or fraudulent immigration of foreign citizens; **(iv)** reject forced, compulsory or child labour, in accordance with the pertinent provisions set forth in the Conventions of the International Labour Organization and, particularly, its Convention 138 on the minimum working age and its Convention 188 on labour rights in the fishing industry; **(v)** discriminate against employees on grounds of ideology, religion, beliefs, ethnicity, race or nationality, gender, sexual orientation, family situation, illness or disability, for being a legal representative of the workers or a trade union, being related to other professionals of the Group or using any of the official languages in each one of the countries where the Group operates; **(vi)** prevent or restrict the exercise of the freedom of association or the right to strike by means of deception or taking advantage of those in need.
6. Lastly, in the **Providers' Ethical and Social Charter of the Nueva Pescanova Group** we precisely demand from our providers, suppliers and temporary employment agencies a series of rules of conduct for matters related to '**internationally recognised basic human and labour rights**' (Article 5), namely: **(i)** fair treatment of their employees and collaborators, with adherence to the applicable wage laws, including minimum wage, overtime and social benefits; **(ii)** prohibition of any form of harassment, abuse of authority or intimidation, humiliation or offensive treatment to the personal rights of their employees and collaborators; **(iii)** prohibition of any form of forced or obligatory labour, or the use of child labour; **(iv)** respect of the right to join trade unions, strike and collective bargaining, as well as the rights of ethnic minorities and indigenous people; **(v)** prohibition to impose on their employees and collaborators any harmful working or social welfare conditions that are contrary that unfairly restrict their rights, employ people without a work permit or engage in any practice related to the illegal manpower trafficking of labour or fraudulent emigration; **(vi)** promote equal opportunities for men and women and encourage a work-life balance, rejecting any form of discrimination; **(vii)** establishment of a safe working environment, always complying with the applicable legislation on health and safety at work; or, **(viii)** respect the rights to secrecy of communications, private and personal privacy and the protection of its employees and collaborators' personal data.

Article 1. Objective

1. The objective of this Corporate Policy is to:
 - a. Formally establish the commitments and principles of Labour Responsibility of the Nueva Pescanova Group that guide all its fishing, aquaculture, industrial and marketing activities, guaranteeing decent and safe work.

5. Develop a value proposition that fosters the selection, recruitment and promotion of talent based on our people's professional and personal growth, the commitment to the business project and the feeling of belonging.
6. Training and the continuous performance assessment of our employees as a formula for the professional growth and development of our teams.
7. The promotion and professional development of employees based on policies and programmes that pivot on equality, merit and capacity.
8. Develop an equitable and competitive salary structure that encourages continuous improvement, commitment and achievement of the Group's goals.
9. Guarantee the dissemination of this Corporate Policy among all our employees and promote responsible people management among our governing body, directors and middle management.
10. Establish a constructive and open framework for dialogue with all groups of interest that play a relevant role in responsible people management.

Article 5. *Specific Labour Responsibility measures*

1. Establish an organisational structure with clearly defined roles in the area of human capital management, based on responsibility and the fulfilment of the commitments and principles contained in this Corporate Policy and People Management systems.
2. Include labour and safety aspects in risk management and control.
3. Implement people management systems (labour, safety, talent) that make it possible to set goals and measure their progress while demonstrating the fulfilment of our commitments in all our activities.
4. Provide specific budgets.
5. Provide training and information to senior staff and employees in the people management area.
6. Collaborate with providers to make responsible people management a common principle in the Group's entire value chain.

Article 6. *Transparency and accountability*

1. The Global People Department shall render accounts to the higher level of hierarchy, in a transparent and habitual manner. It shall submit reports of its activities related to the action of the Nueva Pescanova Group and its Corporate Policy on Labour Responsibility.
2. Accounts in all written forms shall be of a technical nature and shall be rendered annually. They shall be addressed to various internal and external groups of interest by means of reports, memorandums and other pertinent and applicable documents, that provide an assessment based on the corresponding relevant indicators. This information may be included in other Annual Reports of a corporate nature.
3. Activities related to this Corporate Policy on Labour Responsibility shall be disseminated and coordinated with the Corporate Department of Communication and Institutional Relations, in accordance with the Corporate Communication Policy and the content

provided by the Global People Department, so they may be adapted to internal and external public via the Nueva Pescanova Group's different communication channels and tools. Communications will be made with the collaboration and approval of the Global People Department; the final approval shall be given by COMEX and/or the CEO whenever necessary. The Corporate Responsibility and Governance Committee shall be informed.

Article 7. Development and control

It corresponds to the Global Chief People Officer of the Nueva Pescanova Group to monitor the implementation, development and fulfilment of this Corporate Policy throughout the whole Group, as well as ensure and coordinate the implementation of programmes or other value-creation actions related to this policy.

Article 8. Assessment

On a yearly basis, the Global People Department shall assess the fulfilment and effectiveness of this Corporate Policy and the programmes and actions related to it, which are executed in the Nueva Pescanova Group. The assessment shall be included in the pertinent Annual Activity Report, which shall be submitted to the Corporate Responsibility and Governance Committee of the Board of Directors of Nueva Pescanova, S.L., The assessment shall also be presented to the Board of Directors and the COMEX of the Nueva Pescanova Group.

Article 9. Dissemination, training and communication

In accordance with the Corporate Communication Policy, it corresponds to the Global People Department, in collaboration with the Corporate Department of Communication and Institutional Relations, to carry out the pertinent dissemination, training and communication actions to ensure this Policy, as well as any internal regulation that develops it, is made effectively known throughout the entire Nueva Pescanova Group. It is also responsible for its translation to other relevant languages within the Nueva Pescanova Group and its eventual dissemination and publication on both the corporate **PESCANET** intranet and corporate websites in the People section.

Article 10. Review and changes

1. This Corporate Policy shall be reviewed periodically, at least once a year, by the Global Chief People Officer.
2. Any change to this Corporate Policy shall be proposed to the Corporate Responsibility and Governance Committee by the Global Chief People Officer. The change will be taken into consideration and, if appropriate, presented to the Board of Directors of Nueva Pescanova, S.L. for its eventual approval.

Article 11. Approval, entry into effect and duration

1. This Corporate Policy was approved by the Board of Directors of Nueva Pescanova, S.L., at the proposal of its Corporate Responsibility and Governance Committee, in the meeting held on 28 January 2021, when it entered into effect. Since that day, it has been in force for the whole Nueva Pescanova Group.
2. Any change to this Corporate Policy must be approved by the Board of Directors of Nueva Pescanova, S.L., at the proposal of its Corporate Responsibility and Governance Committee.

Article 12. Change control

Version	Summary of changes	Promoter of changes	Change approval body	Change approval date
v_1	Initial approval of this Corporate Policy	Corporate Responsibility and Governance Committee	Board of Directors of Nueva Pescanova, S.L.	28/01/2021

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