



Materiality Analysis 2023

Responsibility and Sustainability Strategy of the Nueva Pescanova Group

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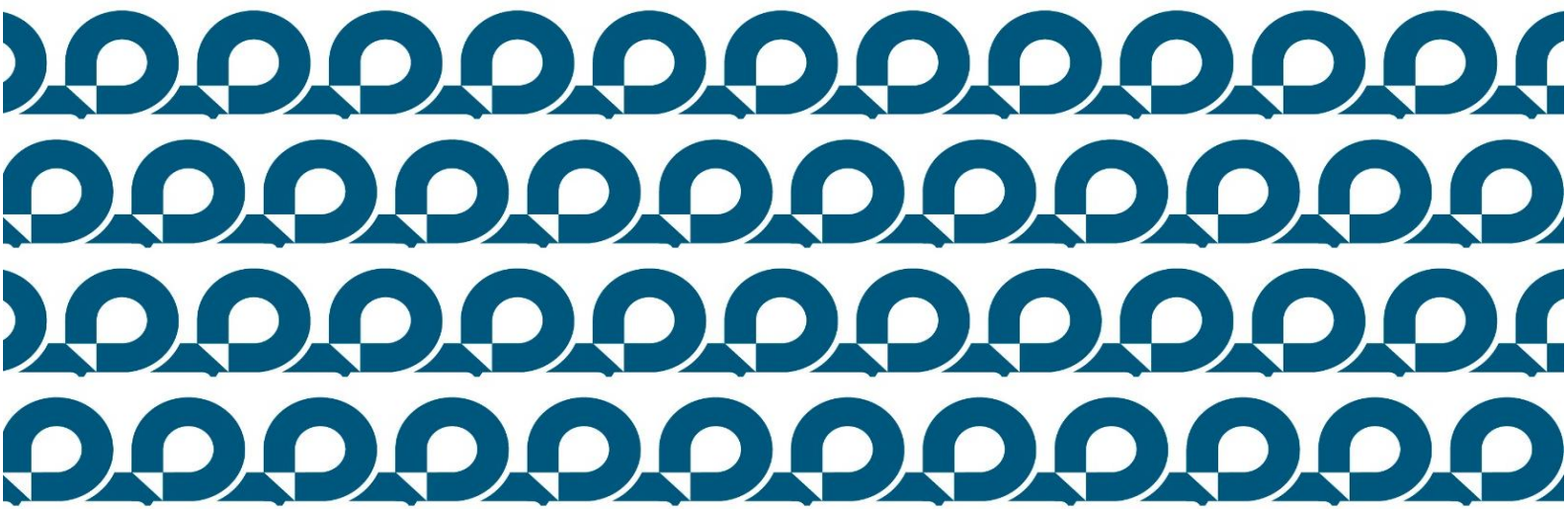


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Global CSR and Sustainability Departments

This report has been prepared with reference to the GRI standards and includes the corresponding GRI disclosures in the (XXX-XX) format.

Executive summary

At the Nueva Pescanova Group, we want to align our Corporate Social Responsibility (CSR) and Sustainability strategies with the expectations expressed by our stakeholders by conducting a **materiality analysis**.

We have followed a standardized methodology proposed by the Global Reporting Initiative (GRI) for the definition of relevant topics, consultation with internal and external stakeholders, prioritization and identification of material issues and their validation.

Based on the 4 pillars of our CSR strategy (**Planet, People, Product** and **Communities**) embraced by **Ethics, integrity, and regulatory compliance**, we have identified **27 relevant topics**. To prioritize these, we have launched a survey to our stakeholders in the countries we operate, in a large sample, in online and email formats to encourage participation. We have launched **975 surveys** to **467 people** of **8 internal stakeholder groups** and to **508 organizations and people** representing **10 external stakeholder groups**. We have received **317 (33%)** filled-out surveys, these being **240 (51%) internal** and **77 (15%) external**.

From the prioritization consultation, 13 material issues have been identified, with 4 outstanding, 2 of which are inalienable: the **QUALITY AND FOOD SAFETY** of our products and the **HEALTH AND SAFETY** of our employees, and 2 are essential for our activity: **RESPONSIBLE FISHERIES AND AQUACULTURE** and **SUSTAINABLE FISHERIES AND AQUACULTURE**. Of the remaining material issues: 4 environmental topics focused on the **use of energy, efficiency and circular economy, carbon footprint, and biodiversity**; 2 aspects on **labour responsibility and decent work**; 2 aspects related to **process and product traceability** and **packaging sustainability**, and 1 aspect related to **strengthening the Group's internal governance**.

To meet the objectives of the materiality study, we have proposed **action plans** to be promoted and implemented by the different business areas and departments of the Group, which are incorporated into the 2023-2024 CSR action plan. The implementation of specific measures in these plans will be **monitored for verification or compliance assurance** by the programmes implemented, or to be implemented, by the CSR and Sustainability Departments, in clear alignment with the **Group's 2020-2024 Strategic Plan 'Journey to Growth'**.

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(102-3)

1. Preamble

The Nueva Pescanova Group is a multinational business group engaged in the fishing, farming, processing, and commercialization of seafood products, especially fish and shellfish. (102-1) (102-2)

To meet the Nueva Pescanova Group's DNA, we are expected to ensure that:

"We work to be the best food company, bringing the freshness of the sea to the consumer's table."

"We rely on our brand and innovation to fish, farm, select and process the best product wherever it may be."

"Our commitment to the sustainability of natural resources and of our partner communities, whose trust we build and maintain by acting ethically and creating value."

The responsible and sustainable development of our activities in their biological, environmental, technological, economic, commercial, and social aspects is an indisputable and essential trait of the business culture of the Nueva Pescanova Group. This is more relevant as our activities involve the extraction and/or consumption of natural resources through the capture fishing, aquaculture farming, processing, and marketing of our seafood products.

In this context, we see **Corporate Social Responsibility (CSR)** as a key element in the business strategy of the Nueva Pescanova Group, in addition to the strict compliance of all legal requirements in those countries where we operate. The Nueva Pescanova Group aligns its CSR strategy with the **Sustainable Development Goals (SDG)** of the United Nations (UN), framed in their 2030 Agenda. We are **participant members** of the **Global Compact** initiative through their Spanish Network.

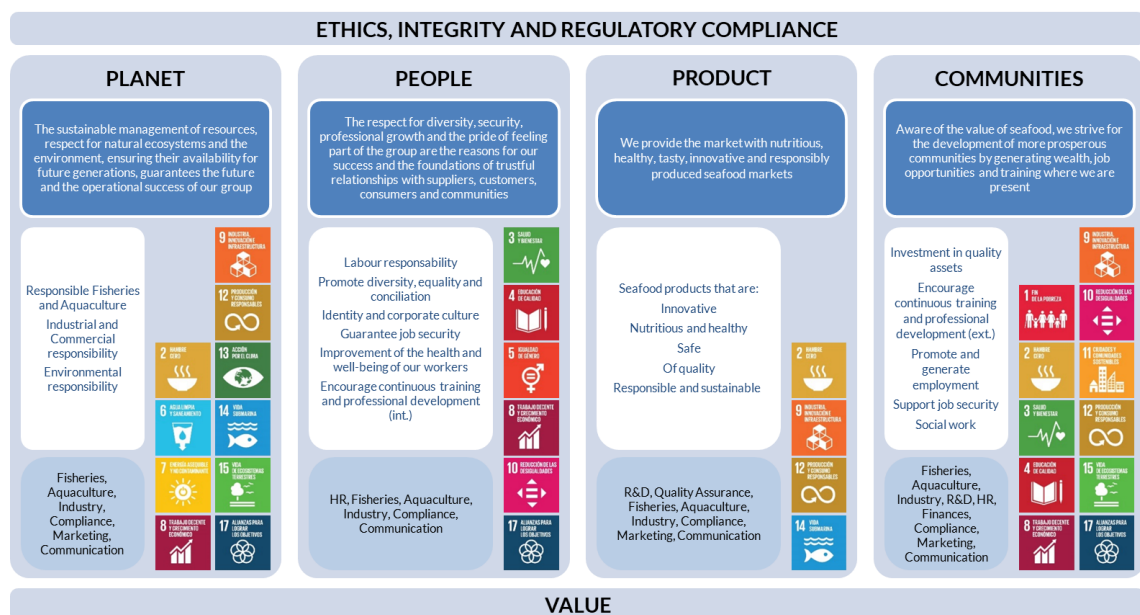


Figure 1. The structure of the Nueva Pescanova Group's Corporate Social Responsibility strategic plan combines its four pillars (Planet, People, Product and Communities) completed by Ethics, Integrity, and Regulatory Compliance to generate Value. It also mentions the most representative UN Sustainable Development Goals linked to each CSR pillar.

The guiding principles, or pillars, of the Nueva Pescanova Group's CSR strategy (Figure 1) are the respect for the **Planet**, the personal and professional development of the **People** who make up the Nueva Pescanova Group, the commitment to the markets through our **Products** and the contribution to improving the quality of life of our partner **Communities**. Simultaneously, we guarantee the full observance of the

principles of **business ethics, institutional integrity and regulatory compliance** as established in "Our Code of Ethics", and in the rest of the provisions of our Regulatory System of Corporate Governance and Compliance.

We see materiality as one more tool to rationalize and align our sustainability strategy, since it helps to identify the most current, relevant, and critical aspects of sustainability, in its environmental, social/labour and profit aspects of the business, for our activity, the sectors we operate in and interact with, and the society we integrate. By working on these aspects, we improve our ability to interpret, manage and mitigate **ESG risks** (of environmental, social and governance nature) due to their implication in the performance and sustainable performance of the Group companies.

In recent years, the Nueva Pescanova Group, through their companies with fishing activities (in Angola, Argentina, Mozambique, and Namibia), aquaculture farming (in Ecuador, Guatemala, Nicaragua, and Spain), industrial operations (in Argentina, France, Ireland, Namibia, Peru, and Spain) and trade (in France, Greece, Italy, Portugal, Spain, and USA) has promoted specific projects and actions related to its four CSR pillars (Planet, People, Products, and Communities). These actions implemented in every country where we operate have been inventoried and documented since 2018 with the collaboration of the CSR ambassadors under the Responsible Action Programme (PAR). (102-4)

The inventory of actions, their documentation and classification by general and specific plans done in the RAP, as well as their contribution to the **UN 2030 Agenda SDG** targets, have provided valuable information to the materiality analysis process, since it helps to identify the relevant topics on which to work to ensure shared value in the economic, social, and environmental aspects of our companies performance.

Throughout this document, we address the methodology applied to carry out this materiality analysis and share the results that will guide the design and implementation of the Group's **action plans** for the next 2 years, to meet the expectations of our stakeholders and ensure alignment to the **Group's Strategic Plan "Journey to Growth"**.

2. The materiality exercise

We define **relevant topic as one that can substantially affect, positively or negatively, the organization's ability to create shared value** in the short, medium, or long term. With this, we include all those topics that may generate significant economic, environmental, or social impacts or that may influence the decisions of our stakeholders.

Finally, a **relevant topic with sufficient importance** in any of the two dimensions (impact or influence) will be defined as **material** and will imply that we manage and report about the impacts, risks, and expectations associated with it.

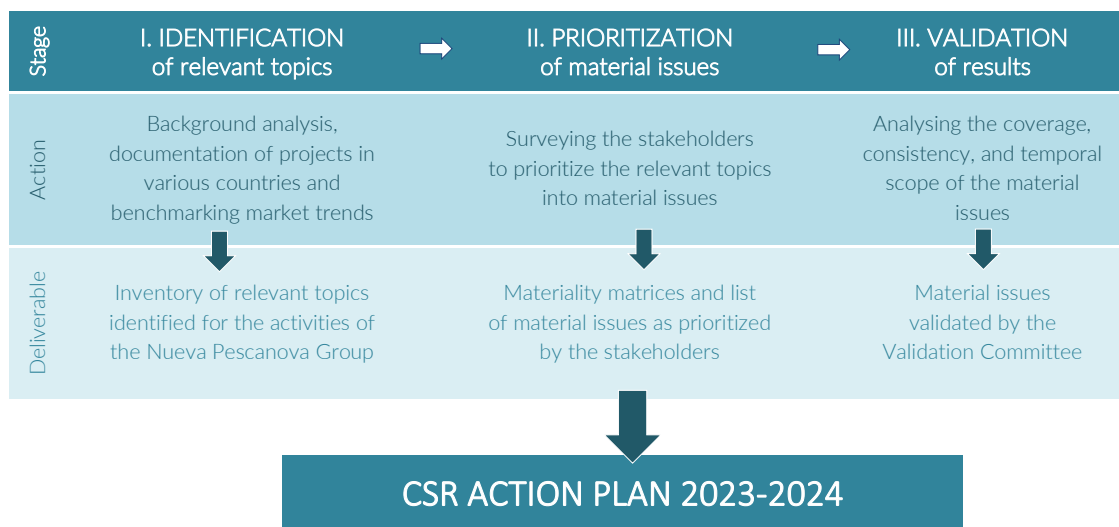
This exercise makes it possible to identify those aspects that are material and improve our CSR and Sustainability strategies by defining action plans aligned with the perception of the needs, interests, and expectations of the stakeholders and, in turn, in line with the expectations of the society for a business group like ours.

2.1. Methodology

For the design and implementation of the materiality exercise (mapping, consultation, analysis, and reporting), we have followed the methodology proposed by the Global Reporting Initiative (GRI), applying the principles of stakeholder participation, context of sustainability, materiality, and completeness.

The process includes the following stages:

- I. **Identification** of relevant topics, focusing on those that affect, or could affect, the company's ability to create value, or that influence, or could influence, stakeholder's decisions.
- II. Assessment of the importance (**priority**) of the relevant topics, taking into consideration their relative weight for each of the Company's internal and external stakeholders. This stage leads to the construction of the materiality matrix.
- III. The **validation** of the prioritization results by the Validation Committee to ensure the legitimacy and balance of the relevant topics and the material issues based on their scope, coverage, and reporting period.



In the validation step, the Governance, Responsibility and Sustainability Committee of the Board of Directors of Nueva Pescanova, S.L. participates as the **Validation Committee**. This Commission, with regard to materiality, analyses the coverage, consistency and time period of each material issue and deliberates on its representativeness and validity.

We have defined for the materiality exercises of the Nueva Pescanova Group's activity, a biennial periodicity (102-52). By identifying and prioritizing the relevant topics, we intend to support the definition of a CSR action plan for the following biennium, which in this case would be defined as the period 2023-2024. (102-50)

The main contribution from materiality to this plan consists in the design of areas of action around the material issues identified and associated with each pillar of the CSR strategy and Sustainability.

2.2. Stakeholders mapping

To this study and in the Nueva Pescanova Group's Corporate Policy on Institutional Relations, stakeholders are defined as those **groups whose needs, interests or expectations affect or are affected, directly or indirectly, by the development of the company's activity and, therefore, have the capacity to influence, directly or indirectly, the development of its strategy.** (102-42)

The Nueva Pescanova Group's vertical integration strategy that stems from fisheries and aquaculture farming, establishes a long value chain from raw materials to the final products for market, and thus making the stakeholders with whom we interact to be numerous.

The identification and classification of stakeholders, both internal and external, results from long-term work and open dialogues, and, fundamentally, from the application of the principles and provisions described in our [Stakeholders Relationship Management](#). (102-42)

All employees were identified as internal stakeholders with the capacity to influence the Group's strategy, recognizing subgroups based on their degree of influence in the definition and implementation of such strategy. The participants were grouped into 7 internal groups: (102-40)

- Members of the Board of Directors of Nueva Pescanova S.L.
- Members of the Executive Committee (COMEX).
- Members of the Senior Leader Team (SLT).
- CSR and Sustainability Departments, and other equivalent agents in each company.
- The 'Business' (Fishing, Aquaculture, Industry and Commercial areas) and 'Primary' (Marketing, SACMA and R&D, Compliance, Legal and Legal, People areas) groups broken down into 2 levels:
 - Executives with key positions, not members of the above Committees.
 - Others with key positions, not members of the above groups.
- Legal representatives of the workers ('Workers Committee').
- 'Others', comprising employees who, not belonging to any of the above groups, have collaborated directly or indirectly in the Group's Responsibility and Sustainability programmes, or participated in the development of indicators or information required for those programmes.

For the external stakeholders, 10 subgroups were identified: (102-40)

- Public Administration, Intergovernmental Organisms, International Organisms.
- Academia, Research centres, Scientists, Experts, Training agents.
- Shareholders, Investors, and other financial sector agents.
- Seafood industry, producers and manufacturers, fishing and aquaculture, other industries.
- Industry or sectoral associations, Unions or Syndicates.
- Suppliers (either goods or services).
- Customers, retailers, and wholesalers.
- Non-Governmental Organizations (NGOs), Foundations.
- Communication, Media.
- Consumers.

The external groups were classified according to the relevance that the Group's activities have for them, and vice versa. Work was done to identify prominent representatives of each stakeholder group to request and encourage their participation in the surveys that allowed us to define the materiality matrix.

Once the stakeholders were identified and classified, and a weight defined based on their relative ability to influence the Group's strategy, or to be influenced by it.

3. Identification and prioritization of relevant topics

The process of identifying the topics relevant to the activity and scope of the Nueva Pescanova Group has several phases in a robust methodology. We have identified, defined, and stated the meaning of each of the relevant topics and examined their coherence, adaptation to the aimed scopes, the representativeness and the integrity of the issues covered.

3.1. Internal relevance analysis

We have started with an internal analysis of topics related to the development and implementation of "Our Code of Ethics", the Corporate CSR and Sustainability Policy, the Group's business risk management, ESG maturity analysis and the 2020-2024 Strategic Plan "Journey to Growth".

3.2. Revision of previous materiality analysis

We have reviewed previous materiality analyses, carried out and published in 2019 and 2021 (102-51). With this critical exercise we have evaluated the methodology of the studies, focusing on the identification of the members of each stakeholders group to consult, on improving the effectiveness of the communication, achieving a greater representativeness of the proposed topics and on eliminating possible gaps in the materiality study itself. Finally, in comparison with the last edition, we have decided to merge similar topics to simplify their interpretation and evaluation, without neglecting the exhaustiveness of the contents within the proposed scope. (102-49)

3.3. Background analysis

A trends analysis was conducted among competitors of the Nueva Pescanova Group in the fishing, aquaculture, industrial and commercial sectors, as well as in other activity sectors in the Group's range, such as energy, technology, banking, or scientific development, among others. In this enlarged scope there are large national and multinational food production and consumer goods companies, public administration, governmental and non-governmental organizations, academia, etc. This analysis consisted of identifying those topics marked by trends and relevance, either national or international, in corporate responsibility, technical or scientific developments in these sectors within the most relevant supply chains and contrasting them with the dependencies and implications in the activities of the Nueva Pescanova Group and its own value chains, from fishing and farming sourcing countries to the processing and marketing of its seafood products.

To strengthen our knowledge of current issues and topics that are most relevant to the Group's mission, we have considered various sources with relevant criteria for the materiality analysis, such as the indicators of the Dow Jones Sustainability Index or the Sustainability Accounting Standards Board, disclosures defined by the Global Reporting Initiative (GRI), issues covered by the Carbon Disclosure Project, the FAO, and the UN, among others, complemented by a press analysis and by permanent dialogue with our stakeholders. In addition, we have participated in various governance initiatives and scientific platforms on responsibility and sustainability, collaborating in discussion forums, working groups and conferences, seminars, both face-to-face and web-based:

- Active collaboration as participating members of the UN Global Compact initiative in several of their work and dissemination forums, such as the Ocean Stewardship Coalition, CFO Coalition for the SDGs, or Leaders' Summit, and in the initiatives launched by their Spanish Network.

- Participation in the United Nations Ocean Conference 2022 and in the Sustainable Blue Economy Investment Forum.
- Collaboration with international benchmarking exercises on relevant topics of Responsibility and Sustainability, such as the Seafood Stewardship Index and the Food and Agriculture Benchmark of the World Benchmarking Alliance (WBA), or the Global Benchmark for Food, Beverage & Personal Care of the Global Child Forum.
- Participation in the Sustainability Committees of AECOC and the Galician Food Cluster (CLUSAGA).
- Participation in the Steering Group and working committees of the Global Sustainable Seafood Initiative (GSSI) and in its accelerator platform for sustainability evidence Seafood MAP.
- Participation in the steering and work committees of the FISH Standard for Crew (Fairness, Integrity, Safety and Health Standard for Crew).
- Collaboration in the development and implementation of the Global Dialogue on Seafood Traceability (GDST) standard.
- Work meetings and participation in seminars and other forums with the Marine Stewardship Council (MSC), Aquaculture Stewardship Council (ASC), Sustainable Seafood Partnership (SFP), among others.
- Participation in conferences and seminars organized by FAO, universities, international research groups, public administration, and private companies.

(102-46)

3.4. Inventory of projects and identification of relevant topics

For each business area, the different activities related to the four pillars of CSR and the 5 principles of sustainability were identified, as well as their respective promoting agents. These are the ones who must lead and outline the specific focus of the actions to be implemented, thus complying with the company's strategy and, furthermore, are immersed in the commitment to responsible management of their activity.

Like on previous occasions, there was exhaustive work already done by the Responsible Action Programme (RAP), which documents actions and projects on CSR, sustainability, innovation, education, social development, etc. with the collaboration of the CSR ambassadors from the countries we operate.

The version of the RAP consulted in the current materiality exercise has 1,295 documented actions in 17 countries representing the entire geographical distribution and workforce of the Nueva Pescanova Group, covering fishing, aquaculture, processing, and commercial activities. Project clusters were established according to matching classification criteria – general and specific plans. This aggregation favoured the identification of topics with comparable degrees of relevance and detail, with similar potential for implementation and monitoring, as well as the representativeness and integrity within the scope of the activities of the Group companies and the activities or influence of the CSR and Sustainability Departments.

In the process of analysing the scope and during consultations and other contacts with our stakeholders, both internal and external, we have listed the issues and topics that have been identified as relevant to the activity, objectives, and mission of the Group:

- In the field of good governance, ethics, and compliance, we point out the establishment of internal governance tools, such as policies, standards, and procedures; the commitment to the 10

Principles of the UN Global Compact and the alignment of the activity with the Development Goals. (SDG) of the UN 2030 Agenda; ensuring transparency in all our activities and adopting concrete measures to combat illegal, unreported, and unregulated (IUU) fishing; adopting sectoral commitments to improve (reduction of plastics, circular economy, responsible communication, others); and the promotion of permanent dialogue with stakeholders.

- In the environmental field, we point out the need to optimize energy consumption and transition to energy from cleaner sources; optimization of water management, preserving its quality; the implementation of measures to maximize the efficiency in the use of raw materials (fish and other ingredients, and materials); the design of packaging with less plastic, reducing its environmental impact; the optimization of processes to minimize atmospheric emissions (GHG and ozone depleting substances, ODS); the minimization of effluent discharges, ensuring their treatment, and the generation of waste, ensuring their proper management and recovery; the promotion of the circular economy of by-products, conserving resources and generating value; the promotion of sustainable and transparent fisheries and aquaculture; responsible purchasing with environmental and social sustainability criteria; promoting biodiversity conservation projects; promotion of animal welfare in aquaculture; and the assurance of the sustainable origin of the ingredients of feed for aquaculture.
- In the social and labour sphere, we point out the need to establish responsible and transparent labour relations to all Group employees; the guarantee of the safety and health of our workers; the promotion of equality and diversity; support for the professional and personal growth of the teams (training); the promotion of corporate volunteering and strengthening the pride of belonging, the reconciliation of work and family life; and the promotion of healthy habits for workers.
- In the field of development and improvement of our products, we point out the importance of guaranteeing their food safety and quality; ensuring the supply of seafood to society (food security); ensure market access to healthy and nutritious products and promote their naturalness (clean label, fewer additives); the evidence of the traceability of the products, their origins, characteristics and processes and communicate the sustainable origin of the products in their packaging; the guarantee of transparency in the labelling of the product; the minimization of food losses and waste; and innovation to improve consumer satisfaction, seeking maximum efficiency in processes.
- In the field of collaboration and integration in our partners communities, we point out the value of investing in assets and infrastructures there; the promotion of job creation through knowledge and technology transfer; the promotion of professional training in the fishing, aquaculture and food industry sectors; promoting education and awareness projects; proximity purchases to contribute to local development; the acknowledgement of the history, tradition and seafood of our communities; the promotion of social development projects; participation in environmental improvement projects; and the mitigation of the effects of emergency situations and social or economic crises.

(102-44) (102-46)

After ensuring the adequacy of the context, coverage, and exhaustiveness of the mentioned topics with the Validation Committee (102-46), we have identified **27 relevant topics** (see also survey in the Appendix) with potential importance in achieving the Group's strategy, for which it could be affected by dependency or impact, positive or negative.

Similarly, the listed topics may be sensitive to the expectations or interests of external groups or generate a positive or negative impact on them.

The relevant topics have been classified and aligned with the Group's CSR pillars and added to general plans (Table I).

Table I. Relevant topics evaluated and prioritized in the materiality analysis. (102-47)

CSR pillar	Relevant topics
ETHICS, INTEGRITY, AND REGULATORY COMPLIANCE General plan: Good Governance, Ethics, and Compliance	ET1 GOVERNANCE
	ET2 UN 2030 AGENDA FOR SUSTAINABLE DEVELOPMENT
	ET3 RESPONSIBLE FISHING AND AQUACULTURE
	ET4 STAKEHOLDERS
	ET5 SUPPLY CHAIN
PLANET General plan: <i>Our Common Planet</i>	PL1 ENERGY
	PL2 CARBON NEUTRAL
	PL3 EFFICIENCY AND CIRCULAR ECONOMY
	PL4 SUSTAINABLE FISHING AND AQUACULTURE
	PL5 BIODIVERSITY
PEOPLE General plan: <i>People First</i>	PE1 LABOUR RESPONSIBILITY
	PE2 FAIR AND DECENT SALARIES
	PE3 HEALTH AND SAFETY
	PE4 EQUAL OPPORTUNITIES
	PE5 DEVELOPMENT OF OUR PEOPLE
	PE6 PRIDE OF BELONGING
PRODUCT General plan: <i>Product Excellence</i>	PR1 FOOD SAFETY AND QUALITY
	PR2 FOOD SECURITY
	PR3 INNOVATION
	PR4 TRACEABILITY
	PR5 RESPONSIBLE COMMUNICATION
	PR6 FOOD WASTE
	PR7 SUSTAINABLE PACKAGING
COMMUNITIES General plan: <i>Growing Together with our Partner Communities</i>	CO1 EMPLOYMENT CREATION
	CO2 VALUE DISSEMINATION
	CO3 HUMANITARIAN AID AND EMERGENCY RELIEF
	CO4 IMPACT MEASUREMENT

3.1. Prioritization survey and stakeholders consultation

With the relevant topics listed and aggregated into the five general plans, a survey was prepared for consultation with the stakeholders (see [Appendix](#) for a copy of the survey).

In direct consultation with the stakeholders, participants were asked to prioritize each topic based on **RELEVANCE** towards their expectations as external stakeholder and the expected **IMPACT** on the design and implementation of the Nueva Pescanova Group's strategy, or of this in their functions, as internal stakeholder. (102-43)

The launch of the prioritization survey has met specific criteria to ensure participation and representativeness:

- National and international scope in the countries where we operate.

- Inclusion of all stakeholders groups in a large sample. We have contacted **467 internal individual stakeholders** and **508 organizations and individuals representing external stakeholders**, on a total of **975 surveys** sent out.
- An explanation accompanying the relevant topics, so as to maximize their understanding.
- Ease of response through the design of a survey that could be easily completed on an online version accessible via mobile phone, tablet, or computer, directly on the invitation email message, or by filling in a digital PDF version included in that very same email.

The following scoring criterium was proposed to establish a common assessment scale for the prioritization of the topics presented:

- **A** 'Topics with the highest RELEVANCE or IMPACT' and therefore the highest priority'.
- **B** 'Topics with medium RELEVANCE or IMPACT'.
- **C** 'Topics with the lowest RELEVANCE or IMPACT' and therefore the lowest priority'.

The consultation period and receipt of responses has been limited from November 17th, 2022, to December 31st, 2022.

3.2. Data treatment and weighting

In the results treatment methodology, the **A-B-C** scale has been converted into a numerical assessment of **3-2-1** respectively, thus allowing the quantitative evaluation of the distribution and dispersion of the assessments of each topic from an internal perspective of the impact on the strategy (internal stakeholders), or external of relevance to their expectations (external stakeholders); after applying weighting factors to each stakeholder based on their level of criticality, that is, their ability to influence or be influenced by said strategy or that their expectation influences or depends on the Group's performance or strategy, currently or in the future.

3.3. Validation

The validation step concludes the content identification and assessment process, and results from the presentation and discussion within the Governance, Responsibility and Sustainability Committee of the Board of Directors of Nueva Pescanova, S.L.

In this stage, the material issues are validated based on their scope, coverage, and reference period. The issues to report on are thus determined, by applying the principle of completeness. In the process, the legitimacy, reasonable, and balanced representation of the contributions to the Group's sustainability performance, whether positive or negative, are guaranteed. (102-46)

4. Results

4.1. Response rate

The number of responses obtained in the consultation for prioritization of relevant topics through the survey is estimated at a **total of 317**, corresponding to a **33% response rate** based on the 975 questionnaires launched. We have received **240** responses from internal stakeholders (51% response rate), and **77** responses (15%) from external stakeholders. All stakeholders groups (8 categories of internal and 10 of external stakeholders) are represented in the responses processed into the results. We highlight that all the members of the internal stakeholders groups BOARD OF DIRECTORS and COMEX have answered the prioritization questionnaire.

4.2. Relevance matrix

The matrix of relevant topics and material issues (Figure 2) shows the relative distribution of the prioritization carried out by the stakeholders. The relevance values presented for each one of the topics/issues were calculated as weighted averages of the evaluations by stakeholder group and distributed in two axes: one for the relevance for the external stakeholders, and another for the impact on the strategy given by the internal stakeholders.

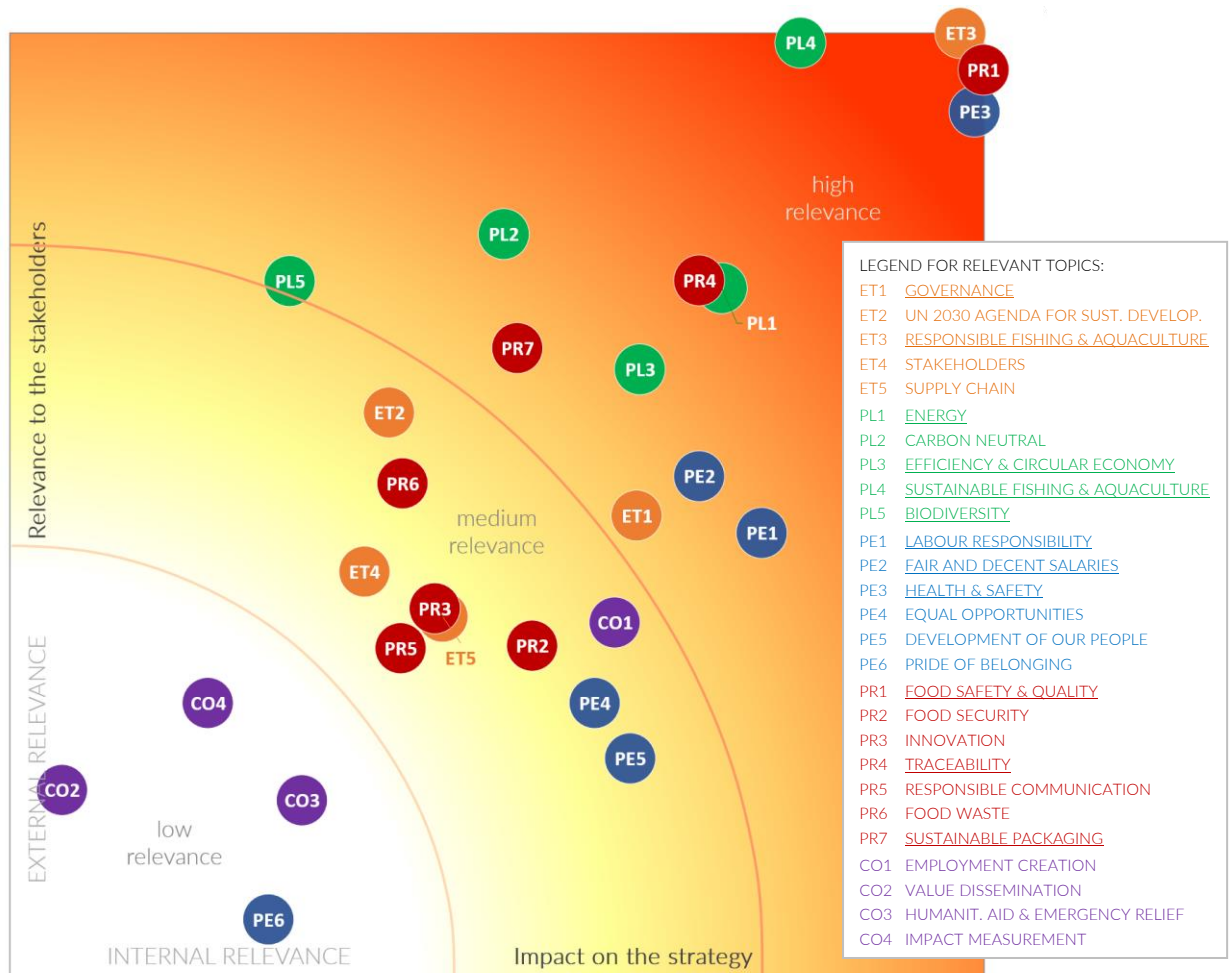


Figure 2. Relevance and materiality matrix with the assessment of relevant topics and material issues (highest relevance, underlined in the legend box) resulting from the prioritization analysis based on consultation with stakeholders.

The relevance and materiality matrix (102-47) makes it possible to quickly and easily identify those topics that require the highest priority for implementation, or assurance of their implementation, as determined by the Nueva Pescanova Group stakeholders for the deployment of its CSR and Sustainability plans.

4.3. Prioritization of relevant topics

The analysis of the relevance matrix (Figure 2) shows the prioritization of the 27 relevant topics and their classification into **3 categories of relevance**: high, medium, and low. These categories correspond to the degree of urgency in the implementation of measures, plans, projects, or actions that are deployed in each topic, or the clear and transparent assurance of their adoption and compliance, of (i) urgent and immediate nature, (ii) short- and medium-term effectiveness, or (iii) less priority, but still planned for execution.

a) Material issues, the highest priority

Among the most relevant topics, **four are inalienable topics** that clearly stand out for the Nueva Pescanova Group:

- ET3 RESPONSIBLE FISHING AND AQUACULTURE** *(Ensure responsible fishing and aquaculture operations complying with the principles of the FAO and Legal, Declared and Regulated Fishing)*
- PR1 FOOD SAFETY AND QUALITY** *(Ensuring safe processes and effective controls to offer high-quality seafood that customers and consumers can trust)*
- PE3 HEALTH AND SAFETY** *(Always and in all types of situations, safeguard the physical and moral integrity of the professionals of the Nueva Pescanova Group)*
- PL4 SUSTAINABLE FISHING AND AQUACULTURE** *(Promote sustainable and transparent fisheries and aquaculture, including animal welfare and sustainably sourced feed for aquaculture)*

Responsible (ET3) and **sustainable (PL4) fishing and aquaculture** are essential elements in the development of the Group's main productive activities, **food safety and quality (PR1)** in the transformation and supply of our food products to society, are requirements that we place on every link in our value chain from the fishing and aquaculture sources, to the markets, and the **safety and health of our workers (PE3)** are the basis that allows us to offer sound labour relations to our more than 11,000 employees.

Both the **PR1** and **PE3** issues were already listed as most relevant in the 2019 and 2021 materiality exercises and have been a hallmark of our group in managing the recent COVID-19 pandemic impacts to guarantee the health of our entire workforce, while guaranteeing the food safety and quality of the seafood products we put on the market.

Additionally, in this most urgent implementation or assurance category, we find four central issues dealing with environmental sustainability with a focus on **energy (PL1)** and the efficiency of equipment and processes, with practical implications for **circular resource management (PL3)** and the achievement of our commitment to **carbon neutrality by 2040 (PL2)**. Protection and conservation of **biodiversity (PL5)** (especially marine and coastal) is paramount to the success and sustainability of the Group's own business, since it ensures the high biological productivity on which we depend in our productive and extractive activities.

- PL1 ENERGY** *(Optimize the use of energy and transition to energy from renewable sources and reduce the energy intensity of our products and processes)*
- PL2 CARBON NEUTRAL** *(Reduce the carbon footprint of our processes and promote environmental compensation projects with the goal of achieving carbon neutrality by 2040)*
- PL3 EFFICIENCY AND CIRCULAR ECONOMY** *(Efficiently manage water and materials, minimizing waste and discharges, ensuring their treatment, and promoting circular economy solutions)*
- PL5 BIODIVERSITY** *(Promote biodiversity projects and conservation measures to improve the health and productivity of the oceans)*

We also find a clear commitment to quality, decent and safe **employment** based on **labour responsibility** principles as a pillar of social sustainability in our Group, backed by robust **governance** adapted to the ESG risks and requirements as identified by and for the Group:

- PE1 LABOUR RESPONSIBILITY** *(Establish responsible and transparent labour relations.)*
- PE2 FAIR AND DECENT SALARIES** *(Promote a fair and decent salary, and a transparent system of compensation and benefits (living wage))*

ET1 GOVERNANCE *(Strengthen good governance by improving the implementation and communication of our policies)*

Of the issues related to our products, we highlight the **traceability assurance systems (PR4)** of raw materials and associated products, as well as relevant processes, since they are essential for transparency in compliance with legal matters, as well as quality and food safety, environmental and social/labour, helping to comprehensively improve our performance. We also found development of more sustainable solutions for our **packaging (PR7)** as a material issue:

PR4 TRACEABILITY *(Implement tools and systems to guarantee the traceability of the characteristics of legality, food safety, evidence of sustainability, among others, of our raw materials, ingredients, and products; and the processes used)*

PR7 SUSTAINABLE PACKAGING *(Promote the use of reusable, recyclable, or compostable packaging)*

The 13 highest priority topics indicated above **are defined as material issues for the Nueva Pescanova Group for the next 2023-2024 period.** (102-50)

Material issues imply a quick and objective response, since they can substantially affect, positively or negatively, the ability of the Group companies to create shared value in the short, medium, or long term, as indicated by the prioritization of relevance and impact of the Group's stakeholders. The deployment of responses to the identified materiality is developed in section 5 of this document.

b) Relevant topics of medium priority

Ten topics have been classified with medium relevance and priority and, thus, effective in the short and medium term. These ten topics are important and will benefit from the responsible activities of the Group on the prioritized material issues that are already enunciated in our governance documents. In descending order of their valuation, they are as follows:

CO1 EMPLOYMENT CREATION *(Create and promote employment through the transfer of knowledge and technology, and professional training in fishing, aquaculture, and the food industry)*

ET2 UN 2030 AGENDA FOR SUSTAINABLE DEVELOPMENT *(Strengthen the adoption of the principles of the UN 2030 Agenda in terms of human and labour rights, respect for the environment and the fight against corruption, its SDGs, and other associated initiatives)*

PE4 EQUAL OPPORTUNITIES *(Consolidate equity, diversity, and inclusion in the companies of the Nueva Pescanova Group)*

PR6 FOOD WASTE *(Implement measures to reduce food losses and waste throughout the value chain)*

PE5 DEVELOPMENT OF OUR PEOPLE *(Promote the personal and professional growth of every employee, including conciliation and training)*

PR2 FOOD SECURITY *(Securing the supply of our products to the markets, and at the same time safeguard availability to local communities)*

PR3 INNOVATION *(Promote innovation and efficiency in the development of nutritious, healthy, and natural products that satisfy consumers)*

ET5 SUPPLY CHAIN *(Promote leadership in the supply chain regarding principles of responsible action (including ethical behaviour, due diligence, and sectoral agreements))*

ET4 STAKEHOLDERS *(Being transparent and accountable and promote the dialogue with all Stakeholders)*

PR5 RESPONSIBLE COMMUNICATION *(Share information about our products in a responsible and transparent manner)*

c) Relevant topics of lower priority

The projects and actions on the relevant topics of lower priority will be planned with a certain medium and long-term vision, and, like the medium-priority topics, may benefit from the execution of the actions for the most urgent material issues. They are, in decreasing order of average valuation:

CO3 HUMANITARIAN AID AND EMERGENCY RELIEF *(Participate in mitigating the effects of emergency situations caused by climatic events, natural disasters, as well as social, health or economic crises)*

CO4 IMPACT MEASUREMENT *(Measure the economic, social, and environmental impact of our activities)*

PE6 PRIDE OF BELONGING *(Promote corporate volunteering, healthy habits, and the pride of belonging of our workers)*

CO2 VALUE DISSEMINATION *(Promote and disseminate projects of a social, environmental, and promotion nature of history and culture associated with our activities)*

4.4. Assessing the scores for relevant topics and material issues

To ease the visualization and interpretation of the results described above, we have worked on the valuation trends by CSR pillar and by group of participants and relevant outlying results.

a) Comparison between internal and external stakeholders

The comparison between the average evaluations provided by internal and external stakeholders by relevant topic (Figure 3) points to a marked overvaluation trend by external groups in topics belonging to the PLANETA pillar. This overvaluation by external groups extends to issues of the pillars (in descending order of average deviation) COMMUNITIES, PRODUCT, and ETHICS, INTEGRITY AND REGULATORY COMPLIANCE. On the other hand, we highlight the overvaluation trend by internal stakeholders of topics belonging to the PEOPLE pillar. We understand that these results naturally reflect a differentiated external and internal demand for attention to the identified topics.

With the significant presence of the Group companies in countries where we source the fishing and aquaculture raw materials with an intense relationship with the local communities and the proximity to environments dominated by natural ecosystems, as productive as they are sensitive, we find ourselves with a societal expectation (in the form of external stakeholders) that our activity is governed by respect for the environment (especially) and by responsible actions that promote the sustainable development of communities in an ethical manner and in compliance with international rules. We see it as decisive to respond to this clear demand for responsible management initiatives and improvement of our performance in these matters and that we remain firm in achieving the sustainability objectives that we have set ourselves.

Finally, we naturally see the topics on the PEOPLE pillar that are most valued by internal groups, to represent both the importance attributed to these aspects within the Group and the proactivity that we place in its governance and management. In conclusion, we identified the need to continue promoting

aspects of labour responsibility to meet the expectations of our internal stakeholders of Group employees and continue offering quality employment characterized by fair, decent, and safe working conditions that favour the development of those (all our) people.

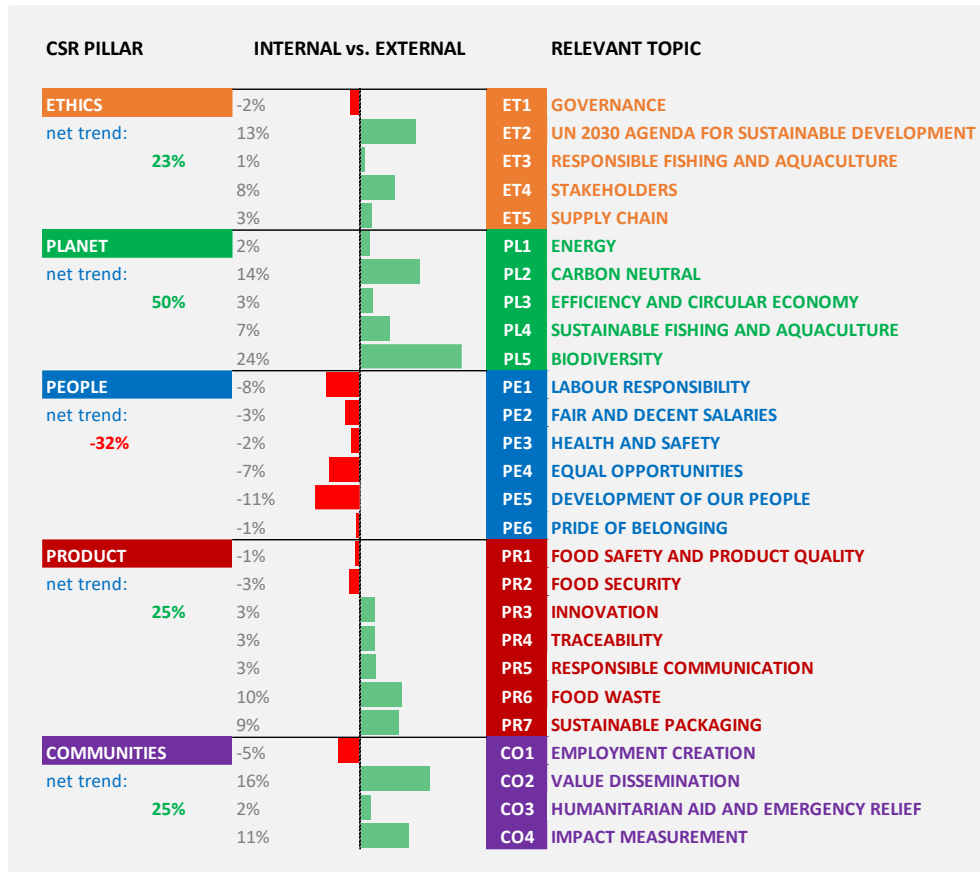


Figure 3. Percentage deviations between average assessments by internal and external stakeholders for the 27 relevant topics.

b) Trend analysis per stakeholders subgroup

Next, we analyse the alignment between the responses of the **external stakeholders** identified as **PRESCRIBERS** (current and future references to follow, in which we include Public administrations and intergovernmental, and international organizations; Academia, scientific research and technical experts, training agents; Shareholders, Investors and other agents of the financial sector; and Non-Governmental Organizations (NGOs) and foundations), the responses of the external stakeholders that represent the **SUPPLY CHAIN AND MARKET** regarding the main activity of the Group in the production and supply of seafood products (that include suppliers, customers and consumers), as well as the **internal stakeholders** that make decisions in the definition of the Group's strategies (**INTERNAL DECISION-MAKERS**) (in which we include the Board of Directors, COMEX, the Senior Leader Team and the CSR and Sustainability Departments) and the **INTERNAL PRACTITIONERS** executing those same strategies and action plans (in which we include all those who occupy key positions in the deployment of the strategies and who do not belong to the senior management committees, collectively identified by 'Business', 'Primary', and 'Others', cf. section 2.2) (Figure 4).

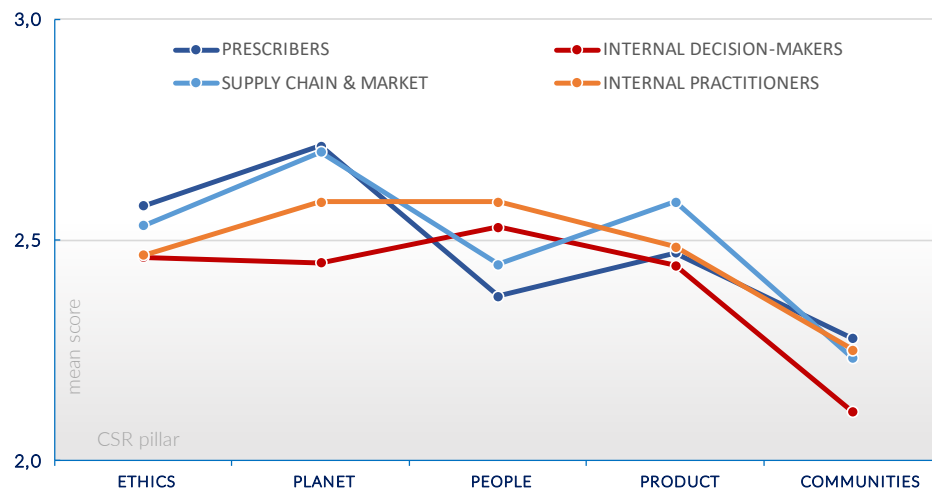


Figure 4. Comparison between the average prioritization of the prescribing stakeholders and the expectations of the market (external) and of the decision-makers and strategy executors or practitioners (internal) by CSR pillar.

We point out three trends: the expectations of external groups are more demanding than those of internal ones in the topics belonging to ETHICS and PLANET, and vice versa for PEOPLE; the overvaluation of the execution over the internal decision; and an undervaluation of the topics related to COMMUNITIES by all the stakeholders.

The topics (PE5) DEVELOPMENT OF OUR TEAMS, (PE1) LABOUR RESPONSIBILITY, (PE4) EQUAL OPPORTUNITIES, the most valued internally in the PEOPLE pillar, suggest that we should work on transparency and internal information, both vertically and transversally among the companies of the Group, and continue implementing improvement measures.

Topics belonging to the PLANET pillar show an overvaluation by external stakeholders as a possible result of increased demands on environmental issues with greater visibility and impact, such as climate change, ocean health, loss of biodiversity, and environmental protection/conservation. The 2 topics that contribute the most to this differentiation between external and internal expectations are (PL5) BIODIVERSITY and (PL2) CARBON NEUTRAL in favour of external stakeholders (see also Figure 3). The topics (CO2) PROPAGATION OF VALUE and (ET2) UN 2030 AGENDA also reveal an overestimation mainly external to the Group. This deviation may mean that there is an intense demand or a more active disclosure of these issues among society, and/or that the importance of these issues is not sufficiently clear among the internal groups.

We should reinforce training/information on the relevance of these issues, especially those associated with the sustainability objectives set by the Group, such as carbon neutrality by 2040, or the fundamental role of marine and coastal biodiversity for the availability of biological resources and productivity of the ecosystems on which we depend for our fishing and aquaculture activities, as well as the internal communication of the projects and actions that we implement on these particular issues to improve the internal perception of the commitment set and the performance achieved.

We explain the overvaluation of the execution over the internal decision by the specificity of the relevant topics presented, being that they would generate more familiarity among those individuals who implement them (such as technical management of consumptions and emissions, for instance) while the decision-making bodies would tend to deal with more strategic topics (such as governance and alignment with other programmes or principles).

Also noteworthy is the overvaluation of the stakeholders associated with the supply chain and markets with respect to topics on the PRODUCT pillar, meaning that these actors are decisive when defining the requirements for market access, and commercial success, for which we believe it is essential that we must collaborate effectively to respond to these criteria and demands.

c) Comparison with previous results

In a comparison with the results obtained in previous materiality studies (2019 and 2021), there is a coincidence between two of the highest priority topics – (PR1) FOOD QUALITY AND SAFETY of the products we offer to the markets and (PE3) SAFETY AND HEALTH of our employees. The fact that these topics are once again identified as priorities, that is, with a maximum assessment of relevance and impact, is not surprising, since, as we mentioned, they are central and inalienable aspects for our Group, aligned with the firm commitments to responsibility with consumers through our products and with safe employment for all our staff, bearing clear requirements expected from society.

All other material issues, most under some other name, had already been identified as material in said previous analyses. However, the topic (ET2) UN 2030 AGENDA, identified as material in the previous edition and whose values were broken down under the headings "Align the activity with the Sustainable Development Goals (SDG) of the UN 2030 Agenda" and "Compliance with the 10 Principles of the UN Global Compact", does not qualify within the highest priority topics in the present edition.

This result does not mean that we do not continue promoting these principles, recognizing their values, and promoting the measurement of impact and contribution to the SDGs. Such work is ensured through the Responsible Action Programme (RAP) and the Contribution to Sustainable Development report that we prepare annually and report back to the UN Global Compact platform. We do reiterate our firm support to their ten principles related to Human Rights, Labour Rights, the Environment, and the fight against Corruption, which we see represented in various topics that have been revealed as material.

5. Action plans drawn on the results of this study

We acknowledge that all the 27 relevant topics evaluated in this materiality analysis are important and that they are, jointly or separately, unavoidable issues for a correct and modern management of such a vast group of companies with fishing, aquaculture, industrial and commercial operations. However, for us to dedicate the necessary and adequate resources to its management, including reporting and promoting improvement measures, we need to limit ourselves to a manageable number of issues on which to focus our action, that is, those that are considered priority due to a significant assessment of its importance, i.e., the material issues.

The consultation exercise conducted with our stakeholders has resulted in useful information for the design of action plans that can contribute to the alignment of the Group's strategy with the most up-to-date relevant topics. At the same time, it allows us to meet the expectations of external agents and consider today's prescriptions and trends in science, good practices in the sectors and regulatory compliance at the service of continuous improvement, modernization, and efficiency of our operations and our overall performance.

As we initially defined in the objectives of the analysis, with the material issues here identified for the 2023-2024 period, we set ourselves out to design action plans that incorporate concrete measures for their implementation and/or assurance of compliance:

- To *Ensure responsible fishing and aquaculture operations complying with the principles of the FAO and Legal, Declared and Regulated Fishing (ET3 RESPONSIBLE FISHING AND AQUACULTURE)*, we commit to comply with our Sectoral Policies on Responsible Fisheries and Aquaculture, to the implementation of traceability tools that make transparent the regulatory compliance and our voluntary efforts to the sustainability of operations and the management of natural resources. The execution of this plan is the responsibility of the Fisheries and Aquaculture Departments with the assistance of the companies which main activities are fishing and aquaculture and promoted by the Sustainability Department.
- To *Ensure safe processes and effective controls to offer high-quality seafood that customers and consumers can trust (PR1 FOOD QUALITY AND SAFETY)*, we commit to certifying 100% of the facilities and processes for the transformation of food products by the relevant standards, or to maintain the applicable certifications in force, clearly and transparently communicating which products are made in each industrial centre or facility, and under which standards. We already have the 'Quality Excellence Pescanova' Programme that pursues compliance with the highest food safety standards and to ensure their application to all the products we make. This plan is the responsibility of the Group's Food Safety, Quality and Environment Department.
- To *Always and in all types of situations, safeguard the physical and moral integrity of the professionals of the Nueva Pescanova Group (PE3 SAFETY AND HEALTH)*, we intend to continue implementing the necessary and appropriate measures to prevent the occupational hazards identified and to improve working conditions in all our facilities, and to publicly and transparently report the relevant information that comes from demonstrating the results of the Group's occupational risk prevention management plan in all work centres, presenting performance indicators and reporting the results, plans, and calendars for their completion. This plan is the responsibility of Occupational Health and Risk Prevention areas.
- To *Promote sustainable and transparent fisheries and aquaculture, including animal welfare and sustainably sourced feed for aquaculture (PL4 SUSTAINABLE FISHERIES AND AQUACULTURE)*, we commit to transparently document and communicate the evidence of sustainability of all the raw materials we use (the fish species caught by our fishing fleet, those reared on our aquaculture farms, or those seafood products acquired from third parties) according to criteria already defined in the *Corporate Sustainability Policy of the Nueva Pescanova Group* and in the 'Pescanova Blue' Sustainability Programme. We will communicate annually and transparently our performance and progress in terms of sustainability of raw materials of fishing and aquaculture origin in the *Progress Report on Sustainability Objectives*, in clear compliance with our *Sectoral Policies of Responsible Fisheries and Aquaculture* and alignment with the sustainability objective set out by the Nueva Pescanova Group of working with 100% sustainable raw materials by 2030. The implementation of the measures in this plan is the responsibility of the Group's Fisheries and Aquaculture Departments, with the support of the Corporate Quality and Environment Department with its Food Safety, Quality and Environment System (SACMA) for the necessary certification and report by the Sustainability Department.
- To *Optimize the use of energy and transition to energy from renewable sources and reduce the energy intensity of our products and processes (PL1 ENERGY)*, we commit to promoting and implementing the decarbonization measures recommended in the *Measurement and Performance Programme* and in the *Environmental Compensation Programme*. In this sense, we want to transparently communicate the progress of the initiatives implemented through the relevant indicators (such as efficiency in the use of energy in key processes, industrial reconversion with substitution of the most polluting energy sources or investment in energy from renewable sources, among others) through the communication of *Non-Financial Information Statements (EINF)* of the Group companies and in a *Progress Report on Sustainability Objectives*. The execution of these plans and programmes are the responsibility of the

Directors of Industry, Aquaculture, Fisheries, and Operations, with the collaboration of the Sustainability Department in the integration and reporting of performance indicators in the aforementioned programmes.

- To *Implement tools and systems to guarantee the traceability of the characteristics of legality, food safety, evidence of sustainability, among others, of our raw materials, ingredients, and products; and the processes used (PR4 TRACEABILITY)*, we are committed to continue implementing the necessary and adequate processes and systems to ensure the traceability of the characteristics of origin, regulatory compliance, quality and food safety, sustainability and other relevant attributes of our products including obtaining raw materials and their transformation until they reach the markets. We will continue to implement our *Seafood Traceability System*, a robust digital traceability system based on the IBM Food Trust™ tool, meeting the GDST 1.0 standard (Global Dialogue on Seafood Traceability) requirements. This plan is promoted by the CSR Department, requiring the collaboration of the Group's Fisheries, Aquaculture, Industry, Commercial, Purchasing, Quality, Sustainability and Systems Departments.
- To *Efficiently manage water and materials, minimizing waste and discharges, ensuring their treatment, and promoting circular economy solutions (PL3 EFFICIENCY AND CIRCULAR ECONOMY)*, we are committed to implementing the *best management practices* for our transformation and processing to optimize the use of main raw materials (fish) and auxiliary materials (ingredients and others), as well as packaging materials (plastic, paper, cardboard and others) in all phases of the chain from capture or harvest to the processing at a plant. We will continue to invest in *measures for the responsible management of water and effluents* through the technological improvement of equipment and processes, favouring efficiency in their consumption, and investment in equipment that favours it, while establishing consumption indicators for production, ensuring its return to the environment in compliance with applicable regulations. Likewise, we are committed to collecting monthly information on the *generation, segregation, and management of waste* in each industrial centre or company of the Group, recording the progress of the measures to optimize operations and waste management, working with the most appropriate authorized operators in each country, type of waste or technical solution for its elimination, treatment or recovery, at the same time that we will continue promoting *circular economy solutions* for the by-products of our activity and that they do not result in waste. We intend to communicate about indicators of efficiency in the use of said raw materials and other materials, the responsible management of water and effluents, waste, and circular recovery, by area of activity and annually in the *EINF* and in the *Progress Report on Sustainability Objectives* in accordance with our commitments and the *Measurement and Performance Programme*. The execution of this plan is a transversal responsibility shared between the Group's Fisheries, Aquaculture, Industry and Operations Departments, and promoted by the Quality and Environment, R&D (particularly circular economy) and CSR Departments with the collaboration of the Sustainability Department for the integration and reporting of performance indicators.
- We are committed to *Establish responsible and transparent labour relations (PE1 LABOR RESPONSIBILITY)* through the development and implementation of *responsible action policies* and/or procedures necessary to ensure the application of our principles, policies, code of ethics and regulatory compliance, and, among others, developing ways to evaluate, quantify and communicate our commitment to equal opportunities between genders, inclusion, non-discrimination and diversity in all its variables, as well as promoting work-life balance, flexibility and remuneration, and improving work conditions, always in accordance with our *Corporate Policy for Responsible People Management* and specific measures defined for its achievement. This plan is the responsibility of the HR Director.
- To *Reduce the carbon footprint of our processes and promote environmental compensation projects with the goal of achieving carbon neutrality by 2040 (PL2 CARBON NEUTRAL)*, we commit to continue

investing in [decarbonization measures and technological improvement](#) of equipment and processes. We will promote the industrial reconversion with substitution of the most polluting fuels, as well as the change to energy from renewable sources whenever possible, increasing our supply of electrical energy with a greater share from renewable sources and our own renewable energy generation equipment. We will continue to invest in more efficient equipment and processes in energy conversion or production and in their proper maintenance. We want to improve greenhouse gas (GHG) emission indicators per production unit. At the same time, we will implement the necessary and appropriate measures to promote and quantify the effort to compensate our carbon footprint through actions and projects for (re)forestation of forests and mangroves, or equivalent projects, depending on the feasibility and capacity on the terrain, to increase the sequestration and long-term storage of carbon. We understand that the commitment to carbon neutrality by 2040 can only be achieved with the combined effort to reduce emissions and compensate those that we cannot avoid, meeting the commitments set out by the Group. The implementation of this plan is the responsibility of the Industry, Operations (particularly Purchasing and Logistics), Fisheries and Aquaculture Departments and is promoted by the Quality and Environment Department in collaboration with the CSR and Sustainability Departments.

- To *Promote a fair and decent salary, and a transparent system of compensation and benefits (living wage)* (**PE2 FAIR AND DECENT WAGE**), as a company with assumed labour and social responsibility commitments, we commit ourselves to the implementation of the necessary and appropriate measures to ensure a decent wage for all our workers, understood as the income necessary for them to satisfy their basic needs and those of their family, including some discretionary income, promoting the identification of the inherent risks of non-compliance or insufficiency, both in the companies of the Group and in the supply chain, promoting measures to improve these conditions that are within its reach, also taking into account other criteria, such as those related to equity among employees. The implementation of this plan is the responsibility of the HR Director with the support of the CSR Department and the Compliance Unit.
- To *Promote the use of reusable, recyclable, or compostable packaging* (**PR7 MORE SUSTAINABLE PACKAGING**), we are committed to implementing the [best practices](#) for process and production management to optimize the use of packaging materials (plastic, paper, cardboard, and others). We will continue working on the analysis and improvement of the design and materials used in our packaging solutions, with the aim of optimizing the material used, working towards the balance of the minimum material that protects our products, and eliminating overpackaging, using materials that are recyclable and for which recycling technology exists in the country where each product is marketed. Likewise, we will seek to eliminate plastics and use recycled plastics whenever possible without compromising food safety, and studying and validating the use of new, more environmentally friendly materials. We will continue to implement our Sustainable Packaging strategy, which establishes that 100% of PESCANOVA packaging will be designed to be recyclable, reusable, or compostable, by 2025, depending on the selection and recycling technologies present in each market. The execution of this plan is the responsibility of the Innovation Department (R&D) and with the collaboration of the Sustainability Department for the integration and reporting of performance indicators.
- To *Strengthen good governance by improving the implementation and communication of our policies* (**ET1 GOVERNANCE**), we commit ourselves to the development and implementation of responsible action policies and/or the necessary procedures to ensure the application of our principles, code of ethics and compliance regulations. The promotion and development of this plan is the responsibility of the Directors of the business or support areas in collaboration with the Compliance Unit and the Internal Audit Directors to ensure its proper vertical deployment in the Group companies.

- To *Promote biodiversity projects and conservation measures to improve the health and productivity of the oceans (PL5 BIODIVERSITY)*, we intend to continue implementing the necessary and appropriate measures for the promotion and conservation of biodiversity, with special focus on the marine and coastal ecosystems. Aware of the importance of biodiversity for the sustainability and continuity of our business, we are committed to documenting and communicating transparently and periodically, the performance and progress indicators associated with the implemented actions and projects, in the *Progress Report on Sustainability Objectives*, meeting the commitments already assumed in various internal policies, such as CSR, Sustainability, Responsible Fisheries and Aquaculture, and in the 'Pescanova Blue' Sustainability Programme. This plan is promoted and reported by the Sustainability Department in collaboration with the Fisheries, Aquaculture, Industry and Operations Departments, and requires execution by the Group companies.

The previous plans and programmes, and their associated actions, are also incorporated into the CSR 2023-2024 action plan. Their impact will be monitored and measured through the Responsible Action Programme (PAR) on an annual basis, which also establishes the contribution to the targets of the Sustainable Development Goals of the UN 2030 Agenda.

For questions about the report, please contact: csr@nuevapescanova.com
(102-53).

Appendix

Survey sent out for internal and external stakeholders consultation
on the prioritization of relevant topics in November 2022

RELEVANT TOPICS AND IDENTIFICATION OF MATERIAL ISSUES

Below you will find a survey divided into 5 chapters. Please mark each answer with an X according to the criteria A, B, or C (as explained below), depending on their **RELEVANCE** (for the external stakeholders) and **IMPACT** (for the internal stakeholders) of each topic.

Please qualify each relevant topic as A, B, or C, according to the following scale:

A 'Topics with the highest RELEVANCE or IMPACT' and therefore the highest priority

B 'Topics with medium RELEVANCE or IMPACT'

C 'Topics with the lowest RELEVANCE or IMPACT' and therefore the lowest priority

Based on this prioritisation, we will put up our 2020-2021 materiality matrix.

1

CSR pillar: **ETHICS, INTEGRITY, AND REGULATORY COMPLIANCE**

General plan: **Good Governance, Ethics, and Compliance**

Relevant topics		A	B	C
ET1	GOVERNANCE <i>Strengthen good governance by improving the implementation and communication of our policies.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ET2	2030 AGENDA FOR SUSTAINABLE DEVELOPMENT <i>Strengthen the adoption of the principles of the UN 2030 Agenda in terms of human and labour rights, respect for the environment and the fight against corruption, its SDGs, and other associated initiatives.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ET3	RESPONSIBLE FISHING AND AQUACULTURE <i>Ensure responsible fishing and aquaculture operations complying with the principles of the FAO and Legal, Declared and Regulated Fishing.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ET4	STAKEHOLDERS <i>Being transparent and accountable and promote the dialogue with all Stakeholders.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ET5	SUPPLY CHAIN <i>Promote leadership in the supply chain regarding principles of responsible action (including ethical behaviour, due diligence, and sectoral agreements).</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

2

CSR pillar: **PLANET**

General plan: **Our Common Planet**

Relevant topics		A	B	C
PL1	ENERGY <i>Optimize the use of energy and transition to energy from renewable sources and reduce the energy intensity of our products and processes.</i>			
PL2	CARBON NEUTRAL <i>Reduce the carbon footprint of our processes and promote environmental compensation projects with the goal of achieving carbon neutrality by 2040.</i>			
PL3	EFFICIENCY AND CIRCULAR ECONOMY <i>Efficiently manage water and materials, minimizing waste and discharges, ensuring their treatment, and promoting circular economy solutions.</i>			
PL4	SUSTAINABLE FISHING AND AQUACULTURE <i>Promote sustainable and transparent fisheries and aquaculture, including animal welfare and sustainably sourced feed for aquaculture.</i>			
PL5	BIODIVERSITY <i>Promote biodiversity projects and conservation measures to improve the health and productivity of the oceans.</i>			

3

CSR pillar: **PEOPLE**

General plan: **People First**

Relevant topics		A	B	C
PE1	LABOUR RESPONSIBILITY <i>Establish responsible and transparent labour relations.</i>			
PE2	FAIR AND DECENT SALARIES <i>Promote a fair and decent salary, and a transparent system of compensation and benefits (living wage).</i>			
PE3	HEALTH AND SAFETY <i>Always and in all types of situations, safeguard the physical and moral integrity of the professionals of the Nueva Pescanova Group.</i>			
PE4	EQUAL OPPORTUNITIES <i>Consolidate equity, diversity, and inclusion in the companies of the Nueva Pescanova Group.</i>			
PE5	DEVELOPMENT OF OUR PEOPLE <i>Promote the personal and professional growth of every employee, including conciliation and training.</i>			
PE6	PRIDE OF BELONGING <i>Promote corporate volunteering, healthy habits, and the pride of belonging of our workers.</i>			

4

CSR pillar: **PRODUCT**

General plan: **Product Excellence**

Relevant topics		A	B	C
PR1	FOOD SAFETY AND PRODUCT QUALITY <i>Ensuring safe processes and effective controls to offer high-quality seafood that customers and consumers can trust.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PR2	FOOD SECURITY <i>Securing the supply of our products to the markets, and at the same time safeguard availability to local communities.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PR3	INNOVATION <i>Promote innovation and efficiency in the development of nutritious, healthy, and natural products that satisfy consumers.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PR4	TRACEABILITY <i>Implement tools and systems to guarantee the traceability of the characteristics of legality, food safety, evidence of sustainability, among others, of our raw materials, ingredients, and products; and the processes used.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PR5	RESPONSIBLE COMMUNICATION <i>Share information about our products in a responsible and transparent manner.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PR6	FOOD WASTE <i>Implement measures to reduce food losses and waste throughout the value chain.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PR7	SUSTAINABLE PACKAGING <i>Promote the use of reusable, recyclable, or compostable packaging.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

5

CSR pillar: **COMMUNITIES**

General plan: **Growing Together with our Partner Communities**

Relevant topics		A	B	C
CO1	EMPLOYMENT CREATION <i>Create and promote employment through the transfer of knowledge and technology; and professional training in fishing, aquaculture, and the food industry.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CO2	VALUE DISSEMINATION <i>Promote and disseminate projects of social and environmental nature, and on the history and culture associated with our activities.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CO3	HUMANITARIAN AID AND EMERGENCY RELIEF <i>Participate in mitigating the effects of emergency situations caused by climatic events, natural disasters, as well as social, health or economic crises.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CO4	IMPACT MEASUREMENT <i>Measure the economic, social, and environmental impact of our activities.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>