

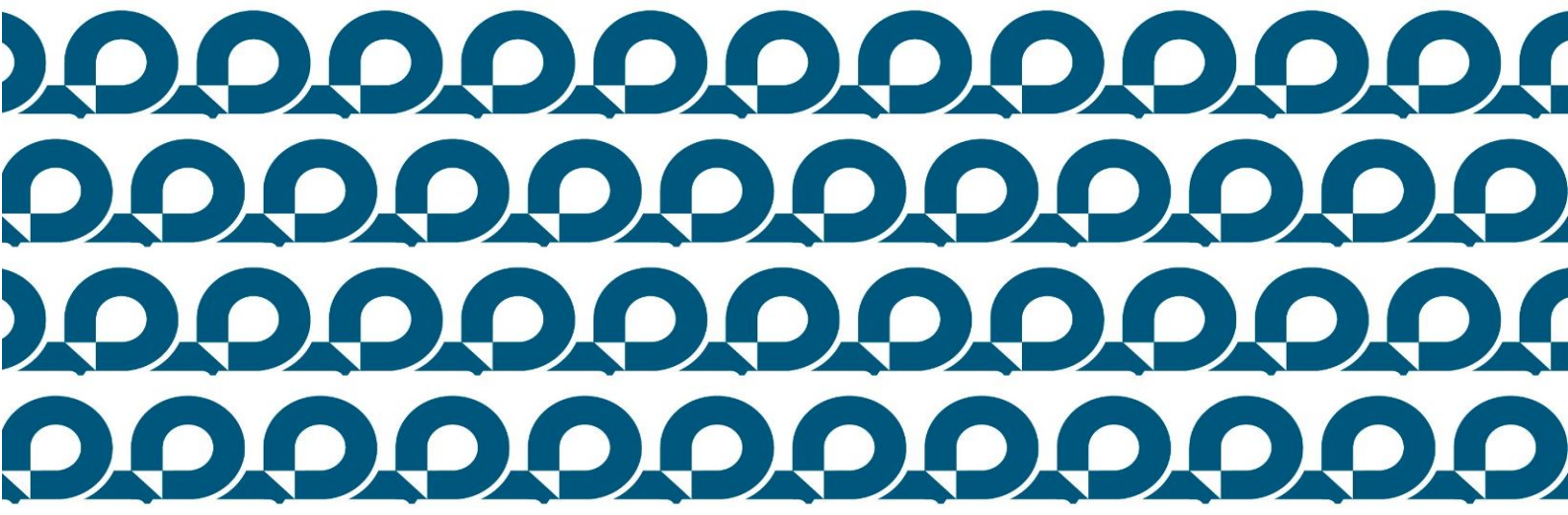


NUTRITION AND HEALTH PROGRAMME

Nutritional Commitment to Our Products

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TABLE OF CONTENTS

PREAMBLE	3
1. DEVELOPMENT OF NUTRITIOUS AND HEALTHY PRODUCTS.....	4
2. CONTINUOUS IMPROVEMENT OF NUTRITIONAL COMPOSITION	4
3. INVESTIGATION OF HEALTH BENEFITS	4
4. HEALTHY PREPARATIONS	5
5. RESPONSIBLE AND TRANSPARENT COMMUNICATION.....	5
5.1 Marketing and advertising directed at children	5
5.2 Package labelling.....	5
5.3 Other initiatives	6

DEPARTMENT OF NUTRITION AND HEALTH
Nueva Pescanova Group

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PREAMBLE

Sustainable development and responsible action are essential aspects of the business culture of the Nueva Pescanova Group. These two aspects are decisive for fulfilling our commitment to responsibility with consumers through our products.

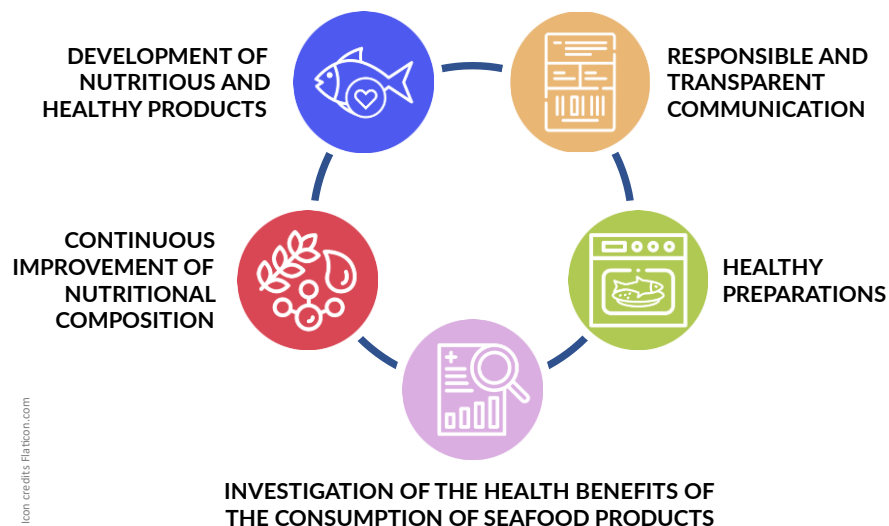
We acknowledge that nutrition is a fundamental pillar in today's society, where the quality of food and lifestyle play a key role for growth and maintenance of good health at all stages of life. That is why we express our firm commitment to nutrition that we extend to our products.

We work for our products to meet the strictest food safety and quality criteria, that they are healthy, nutritious, and pleasant, and that their production processes are carried out with the best available techniques and are based on efficiency and sustainability.

Our [CSR Policy](#) includes our [commitment to our product](#) to offer nutritious, healthy, tasty and innovative seafood, produced responsibly, to the markets

Principle 3 of our [Sustainability Policy](#) formalizes our commitment to nutrition and health through our products by establishing that: "Our products contribute positively to the health and well-being of our consumers".

We have materialized this principle in the following 5 nutritional commitments to our products:



1. DEVELOPMENT OF NUTRITIOUS AND HEALTHY PRODUCTS

The development of new products is done embedding our definition of healthy foods: a **healthy food product** contributes positively to the nutrition and health of our consumers, therefore our developments must:

- (i) maximize the proportion of nutrients with beneficial effects for health: healthy fatty acids (such as omega 3, EPA and DHA), proteins of high biological value, fibre, vitamins (e.g., B12, B3, D, E or A), minerals (e.g., phosphorus, selenium, zinc, iron, copper, iodine, magnesium, potassium, or calcium),
- (ii) minimize or completely avoid the nutrients to limit, as far as possible: total fat, saturated fat, trans fat, sugars, salt, and
- (iii) comply with the following premises: that they are adapted to the needs of the population, considering allergies and intolerances, meeting the specific requirements of each physiological life stage, maintaining the nutritional value of the seafood products, and using only healthy fats.

Furthermore, all our products are low in sugar and trans-fat free, and we are committed to keeping them that way.

2. CONTINUOUS IMPROVEMENT OF NUTRITIONAL COMPOSITION

As part of the R&D+i work on products and improvement of formulations, we continuously focus on improving the nutritional composition of our products under the following premises:

- Reduce the content of specific nutrients to limit: salt and total fat. We **focus on salt** since our products do not contain trans fats and no sugars are added in their preparations. We set ourselves the goal of meeting the [sodium content levels for food](#) established by the World Health Organization (WHO).
- Increase the content of specific nutrients with beneficial effects: high biological value proteins, healthy fatty acids, fibre (vegetables and whole grains), vitamins, and minerals.

Additionally, we are committed to adhering to the initiatives to improve nutritional composition that are promoted by different government agencies or institutions. For that reason, we have joined the "[Collaboration Plan for the improvement of the composition of food and beverages and other measures 2020](#)" launched by the Spanish Agency for Food Safety and Nutrition (AESAN), as part of the Nutrition, Physical Activity and Obesity Prevention Strategy (**NAOS Strategy**)

3. INVESTIGATION OF HEALTH BENEFITS

With the aim of improving knowledge about nutrition and health and adding value to society, we are committed to researching the health properties of fish and seafood.

We are currently participating in the following 2 research projects:

- The [Medkids Project](#): "*Research and development of new food products for the preparation of a healthy basket for children's nutrition*" in which we participate developing new fish-based products for children, which contributes to improving the dietary habits of the child population, with a focus on the prevention of obesity. The benefits of the new fish products will be clinically evaluated through intervention studies in children to support their effects on health.

- The [Meli-Pop study](#): "*Mediterranean Lifestyle in Paediatric Obesity Prevention*", a multicentre, parallel, randomized and controlled clinical trial that seeks to evaluate the effect of the Mediterranean lifestyle on the incidence of childhood obesity and its complications. It includes a cohort of boys and girls from 3 to 6 years old, at risk of presenting obesity, with a planned follow-up of 10 years. Our collaboration consists in the supply of the seafood necessary for the clinical intervention.

4. HEALTHY PREPARATIONS

Our work in innovation includes offering consumers the healthiest and most convenient preparation options. In this sense, we have committed to reformulating our battered products so that they can be prepared in the oven in 2023 and we are fine-tuning the conditions for preparation in an air fryer, to complement the oven preparation mode and offer alternatives to prepare food avoiding the fats that are added through frying.

5. RESPONSIBLE AND TRANSPARENT COMMUNICATION

We express our commitment to responsible communication, ethical marketing, and the promotion of our products. For this reason, we support and adhere to codes of good commercial practices and responsible self-regulation, with a focus on communication and advertising aimed at minors, complying with all responsible communication and marketing regulations applicable to food products.

We are committed to aligning all our advertising and marketing activities with the guidelines set out in the "[ICC Code of Advertising and Marketing Communications](#)".

Additionally, we are part of [AUTOCONTROL](#), the independent self-regulatory body of the advertising industry in Spain, which integrates advertisers, advertising agencies, the media, and professional associations, with the aim of working for responsible advertising that is truthful, legal, honest, and loyal.

5.1 Marketing and advertising directed at children

The Pescanova Group's commitment to action includes the protection of children and children's rights, which we extend to our responsible marketing activities aimed at minors.

This way, we are committed to ensuring that all our advertising and marketing aimed at anyone under 18 years of age complies with the regulation code established by the European Office of the WHO: "[NUTRIENT PROFILE MODEL](#)".

Additionally, in Spain we have [adhered](#) to the [PAOS Code](#), the Spanish self-regulation code for food and drinks advertising aimed at children under 12 years of age and food and drinks advertising over the Internet aimed at children under 15 years of age, prevention of obesity and health, promoted by the Spanish Agency for Food Safety and Nutrition (AESAN).

5.2 Package labelling

We add full national and international legal compliance of labelling and information on the package in accordance with the FAO labelling guidelines for fish and fishery products and the legislation applicable in each country.

Our commitment to labelling extends to nutritional labelling, which must be clear and transparent, including:

- Compliance with all applicable legislation regarding nutritional food labelling in all the countries where we market our products.
- The nutritional declaration of the product in all our packaging for the final consumer (although it is not mandatory).
- The declaration of the nutritional information of the food after preparation (when applicable), and when multiple types of preparation are possible, we express the nutritional information of all, to help consumers choose the healthiest option.
- The adoption of expressions and additional presentations of nutritional information that better help consumers to choose the healthiest option.

We measure and annually communicate in the [Progress Report on Sustainability Goals](#) the fulfilment of all the assumed objectives mentioned above and additionally:

- Communicate the nutritional declaration on all our products in all markets.
- Include a front-of-pack nutritional labelling system in all our packages, for which we have begun to incorporate the Nutri-Score system in the packages for Spain, Portugal, France, and Greece.
- Developing the healthiest preparations in our range of battered products, we also transferred it to the labelling to include oven and air fryer preparations in this range of products.

5.3 Other initiatives

We promote and collaborate in the technical and scientific dissemination associated with the seafood products and species that we fish or farm, such as [Argentine toothfish](#) or [Ecuadorian shrimp](#), and in promoting the [frozen products](#) sector and its [competitiveness](#), responsible [fishing](#) and [aquaculture](#), among others.