



HUMAN RIGHTS CORPORATE POLICY OF THE NUEVA PESCANOVA GROUP

Approved by the Executive Committee (COMEX) of the Nueva Pescanova Group in its Meeting held on February 27th, 2023

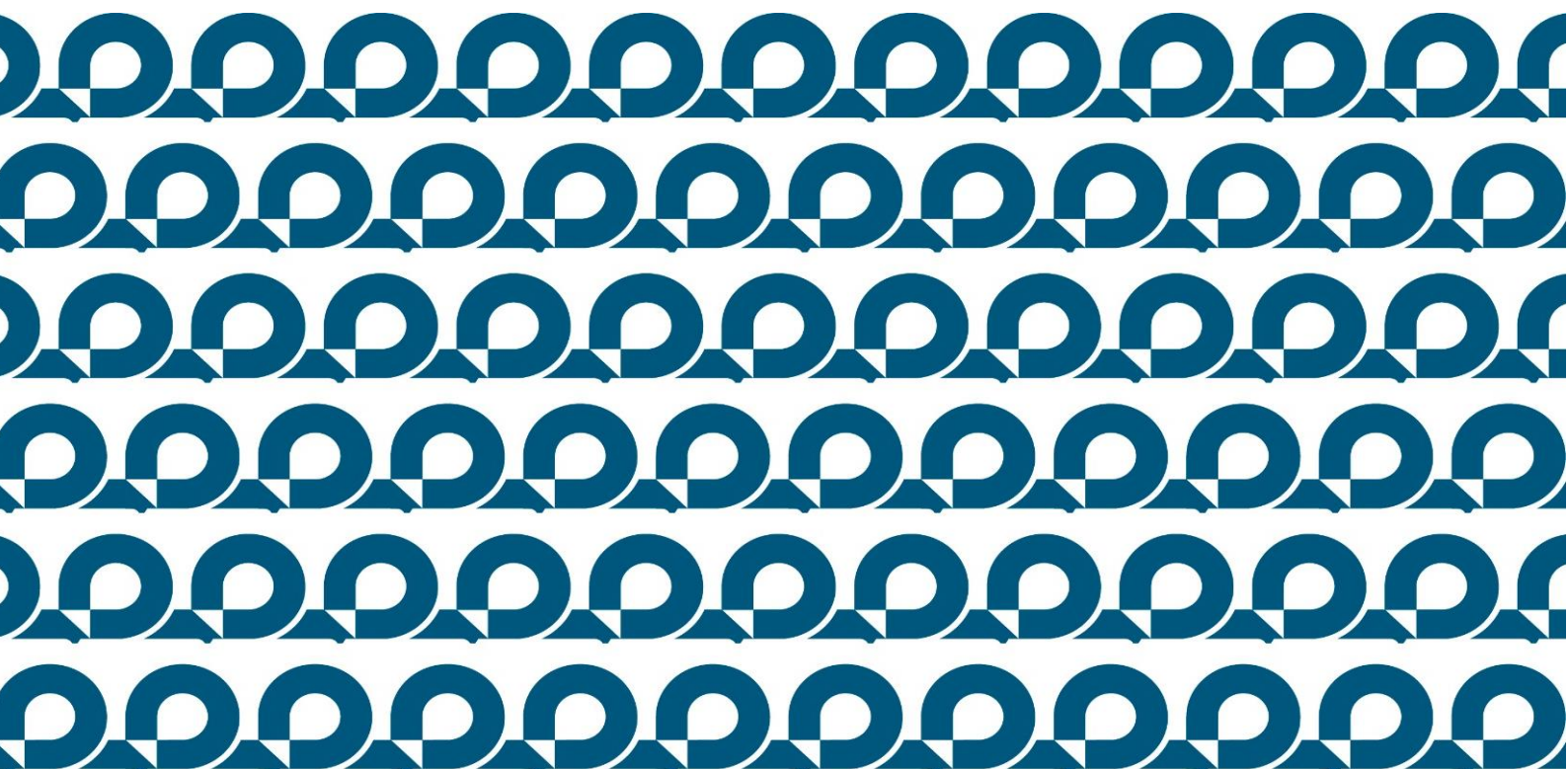


TABLE OF CONTENTS

<i>Preámbulo</i>	3
CHAPTER I. GENERAL DISPOSITIONS	4
<i>Article 1. Objective and purpose</i>	4
<i>Article 2. Scope of application</i>	4
<i>Article 3. Responsible management of respect for Human Rights based on risk</i>	4
<i>Article 4. Basic principles of action in matters of respect for Human Rights</i>	4
CHAPTER II. SPECIFIC COMMITMENTS AND DUE DILIGENCE REGARDING RESPECT FOR HUMAN RIGHTS	5
<i>Article 5. Specific Human Rights commitments of the Nueva Pescanova Group and its professionals</i>	5
<i>Article 6. Specific commitments to respect Human Rights in our supply chain</i>	6
<i>Article 7. Due diligence of the Nueva Pescanova Group in the supply chain</i>	7
CHAPTER III. FINAL PROVISIONS	8
<i>Article 8. Implementation, development, and control</i>	8
<i>Article 9. Assessment</i>	8
<i>Article 10. Diffusion, formation, and communication</i>	8
<i>Article 11. Revision</i>	8
<i>Article 12. Approval, validity, and modification</i>	8
<i>Article 13. Modifications control</i>	8

Preamble

1. The Nueva Pescanova Group is a multinational business group engaged in fishing, farming, processing, and marketing of seafood products, especially fish and shellfish.
2. It is in the DNA of the Nueva Pescanova Group:
 - a. Work to be the best food company, bringing the freshness of the sea to the consumer's table.
 - b. Rely on our brand and innovation to fish, farm, select and process the best product wherever it may be.
 - c. Our commitment to the sustainability of natural resources and of our partner communities, whose trust we build and maintain acting ethically and creating value.
3. Implicit in the commitment to sustainability, local communities, and ethical action included in our DNA, is our belief that the Nueva Pescanova Group companies must have a positive impact on society and that respect for Human Rights must be considered as the cornerstone of responsible, sustainable, and ethical progress that goes beyond mere compliance with current regulations.
4. Our specific, inalienable, and firm commitment to respect Human Rights (both in its internal and external projection of our value and supply chains) is formally proclaimed in a very prominent way in ***Our Code of Ethics***: "*The Nueva Pescanova Group considers people as a key factor in its business activity and defends and promotes compliance with human and labour rights. Therefore, the Group expresses its commitment and relationship with the human and labour rights recognised in national and international legislation and with the principles on which the United Nations Global Compact ("UN Global Compact") is based, which derive from declarations of the United Nations on human rights, labour, the environment and anti-corruption, the United Nations Rules on the Responsibilities of Transnational Corporations and Other Business Enterprises in the Field of Human Rights, the OECD Guidelines for Multinational Enterprises, the Tripartite declaration of principles on multinational companies and social policy, the Social Policy of the International Labour Organization, as well as the documents or texts that may replace or complement those previously referred to*".
5. It is logical, therefore, that this commitment to Human Rights has been permeating in a very significant way in our corporate governance and, as a result, that it is embedded in the different Corporate Policies and other internal regulations that we have been preparing, especially those that make up our corporate social responsibility and sustainability systems (***Corporate Policies of Corporate Social Responsibility, Sustainability, Responsible Human Resources Management, Fisheries Responsibility and Aquaculture Responsibility***, to name a few) and business ethics, institutional integrity and regulatory compliance (***Corporate Criminal Risk Prevention Policy*** or ***Our Anti-Corruption Code***, to name just a few).
6. In the specific field of our value and supply chains, in addition to the provisions of our ***Corporate Policy*** and ***General Procedure on Procurement***, our ***Supplier's Ethical and Social Charter of the Nueva Pescanova Group*** stands out, which contains, specifically, the set of principles of professional action and rules of business conduct that we require from our suppliers anywhere in the world. Within its **10 pillars**, precisely the first, is the "*Commitment to internationally recognized basic human and labour rights*". The suppliers sign, in the foreseen cases, the ***Responsible Declaration of the Supplier's Ethical and Social Charter of the Nueva Pescanova Group***.
7. Proof of the robustness of our commitment to respect Human Rights is that the Nueva Pescanova Group, through its parent company NUEVA PESCANOVA, S.L., has been a participating member of the United Nations Global Compact, through their Spanish Network, for years, assuming as its own the principles of universal sustainability and responsibility, including Human and Labour Rights, the Environment and the Fight against Corruption, and the sustainable development goals of the UN 2030 Agenda.
8. In this state of affairs, to unify, systematize and develop all these commitments assumed concerning Human Rights present in the different corporate regulations we have prepared, this Corporate Policy is approved, formalizing such commitments in a more precise way, all in line with the results of the ***Materiality Analysis*** resulting from consultations with our internal and external stakeholders, and following the criteria established in the "*Guide to the United Nations Global Compact United for Business: How to Develop a Human Rights Policy*".

CHAPTER I. GENERAL DISPOSITIONS

Article 1. Objective and purpose

1. The objective of this Corporate Policy is to specify and develop the commitment of the Nueva Pescanova Group to respect Human Rights in the activities within both our internal value chain, from fishing and aquaculture origins to the markets, and our external supply chains, taking into account the relations with suppliers of goods and/or services, within the framework of the set of regulations that make up our Regulatory System of Corporate Governance and Compliance of the Nueva Pescanova Group.
2. In addition to formalizing the Group's commitment to the respect for Human Rights as recognized in national and international legislation, the purpose of this Corporate Policy is to define the principles that must be applied for due diligence processes in matters of respect to Human Rights, following the *United Nations Guiding Principles on Business and Human Rights*, the *OECD Guidelines for Multinational Companies*, the principles on which the *United Nations Global Compact* is based, the *Tripartite declaration of principles on multinational companies and social policy*, the conventions of the International Labour Organization, the *Sustainable Development Goals (SDG)* approved by the United Nations Organization, our Code of Ethics and the rest of the internal regulations identified in the Preamble of this Corporate Policy, as well as the documents and texts that may replace or complement those previously mentioned.

Article 2. Scope of application

1. This Corporate Policy is mandatory in all companies and for all professionals of the Nueva Pescanova Group, anywhere in the world and will extend to its entire value chain.
2. The Nueva Pescanova Group is made up of the Spanish company Nueva Pescanova, S.L. (parent entity) and all Spanish and foreign companies (subsidiaries) controlled, directly or indirectly, by the parent entity Nueva Pescanova, S.L.
3. The professionals of the Nueva Pescanova Group are understood to mean all the directors, managers, and employees of the Nueva Pescanova Group, regardless of their location and employment relationship with the company.
4. In those investee companies and/or joint ventures for which this Corporate Policy is not directly applicable, the Nueva Pescanova Group will promote its alignment through its representatives in its administrative bodies.

Article 3. Responsible management of respect for Human Rights based on risk

1. This Corporate Human Rights Policy covers the entire approach to responsible management of the supply chain, including our specific commitments in these areas that must be transferred throughout the chain, both internally and externally to our suppliers. It must be read and interpreted together with the rest of the regulations that make up our Corporate Governance and Compliance Regulatory System.
2. This way, our responsible supply chain management model must be aligned with and ensure compliance with other regulations that are part of the Group's Corporate Governance and Compliance Regulatory System with special impact in these areas; business ethics, institutional integrity and regulatory compliance, risk management, crime prevention and fight against corruption, corporate social responsibility, sustainability, environment, quality and food safety, occupational health and industrial safety hazards prevention or, in brief, the commitments derived from the different Responsible Action Policies.

Article 4. Basic principles of action in matters of respect for Human Rights

To meet the objectives and commitments assumed in terms of respect for Human Rights, the Nueva Pescanova Group commits to and promotes the following basic principles that must govern its activities in all areas:

- a. Identify the potential impacts that the operations and activities carried out by the Group, directly or through a third party, may generate on Human Rights.
- b. Have a due diligence system that identifies the situations and activities with the greatest risks of violation of Human Rights, to develop mechanisms for the prevention and mitigation of said risks, as well as repairing the impacts if they materialize.
- c. Periodically evaluate the effectiveness of the due diligence system through monitoring indicators, with a special focus on those places where it carries out its activity where there could be a greater risk of violation of Human Rights.
- d. Communicate the result of the evaluation of the effectiveness of the due diligence system in the public non-financial information that is issued annually, as well as in corporate social responsibility and sustainability reports on our contribution to the Sustainable Development Goals and other documents, all periodically available on the Group's corporate website.
- e. Promote a culture of respect for Human Rights and actions aimed at raising the awareness of professionals in this matter in all Group companies.
- f. Have grievance mechanisms, with sufficient guarantees and adequate resolution procedures, to deal with potential cases of violation of Human Rights.
- g. Adopt as soon as possible the appropriate measures in the event of detecting a violation of human rights in the Group's workplaces and facilities (including fishing vessels, aquaculture farms and transformation/ processing plants) or those of its suppliers and inform the competent authorities of this so that they can take the appropriate actions when said violation may constitute an administrative, criminal, or any other type of infraction.

CHAPTER II. SPECIFIC COMMITMENTS AND DUE DILIGENCE REGARDING RESPECT FOR HUMAN RIGHTS

Article 5. Specific Human Rights commitments of the Nueva Pescanova Group and its professionals

1. The Nueva Pescanova Group assumes the following specific commitments in terms of respect for Human Rights, extended to all Spanish and foreign companies that integrate the Group at any time and to every one of its professionals, whatever their contractual relationship:
 - a. We reject any form of child labour, per the provisions contained in this regard in the Conventions of the International Labour Organization (ILO) and, especially, in its Convention 138 on the minimum age for admission to employment and in its Convention 188 on the work in the fishing industry.
 - b. We reject any form of forced or compulsory labour, as well as any other manifestation or type of modern slavery such as debt bondage or any other form of involuntary labour, through deception or under coercion, threat or abusing a situation of need or special vulnerability, sex trafficking, human trafficking, illegal labour trafficking, fraudulent emigration, illegal immigration, or illegal recruitment, and use of child soldiers.
 - c. We respect the freedom of association, the right to strike and collective bargaining.
 - d. We respect the right to move freely within each country, rejecting and being expressly prohibited the deduction or withholding of the remuneration due to workers of any expense or charge for their hiring, the retention of their personal documents (including identification cards or equivalent identification documents, passports, driving licenses or residence or work permits), as well as improperly, illegally or illegitimately, impeding or limiting the right of workers to freely leave the premises, work centres or facilities of the Group.
 - e. We set the salaries of our professionals by applicable laws, respecting minimum wages, overtime, and social benefits. In this sense, and whenever possible, in the strict application of local labour regulations regarding minimum wages, the Nueva Pescanova Group will guarantee its workers that they will receive a minimum living wage that allows them to cover their own basic needs and of their families, including housing, nutritional, educational, and sanitary, considering the indicators or indices of the cost of living of the country in question.

- f. We guarantee that our professionals conduct their work under appropriate safety, health, and hygiene standards, with strict compliance with applicable regulations on occupational hazards prevention, adequately evaluating the occupational hazards they face in their activity, and preventing or minimizing sufficiently, as appropriate, the probability of occurrence of accidents or occupational diseases or carrying out work in such conditions that may endanger their physical or mental integrity.
 - g. We reject any form of discrimination for any condition.
 - h. We reject any conduct or action of humiliation, demeaning or discredit, or actions directly or indirectly fomenting, promoting or inciting hate, hostility, discrimination or violence against groups or individuals for belonging thereto for racist, anti-Semitic, anti-gipsy, or other motives referring to ideology, religion or beliefs, family situation, membership of an ethnic group, race or nation, national origin, sex, sexual orientation or identity, for reasons of gender, aporophobia, illness or disability, as well as the public denial, trivialization or exaltation of crimes of genocide, crimes against humanity or persons and goods protected in case of armed conflict, or glorification of their authors.
 - i. We respect the rights of ethnic minorities and indigenous and tribal peoples in the places where we are present, and we favour an open dialogue that integrates different cultural backgrounds.
 - j. We respect the right of all our partner communities to enjoy a quality and sound environment, considering their expectations and needs, including customary law, when recognized in local national law, and access to and use of ecosystem services offered by the natural environment.
2. The professionals of the Group must show strict respect for the Human Rights recognized in national and international legislation during their activity in any of the countries where we operate. Therefore, they will further ensure compliance with *Our Code of Ethics* and the *Supplier's Ethical and Social Charter*, as well as this Corporate Policy and the rest of the Group's internal regulatory framework on Human Rights.
 3. All professionals that are part of the Nueva Pescanova Group are expected to act as a first line of defence of Human Rights, informing the *Compliance Unit* of any possible impact on those or any non-compliance through the *Compliance Channel*.

Article 6. Specific commitments to respect Human Rights in our supply chain

1. The Nueva Pescanova Group considers its suppliers as key allies for compliance with our policies and commitments regarding Human Rights in the development of its activity. Therefore, suppliers must also show similar strict respect for Human Rights. Suppliers, their subcontractors, and respective employees must:
 - a. Not allow any form of sexual or labour harassment, abuse of authority, intimidating, vexatious or offensive treatment.
 - b. Adopt the necessary measures to eliminate all forms of forced or compulsory labour, or any type of modern slavery (debt bondage, involuntary work, or obtained through deception, coercion, threat, or abuse of a situation of need or special vulnerability, sex trafficking, human trafficking, illegal labour trafficking, fraudulent emigration, illegal immigration, or illegal recruitment, and use of child soldiers).
 - c. Expressly reject the use of child labour in their organization, per the provisions contained in this regard in the Conventions of the International Labour Organization (ILO) and, especially, in its Convention 138 on the minimum age for admission to employment and in its Convention 188 on the work in the fishing sector.
 - d. Respect the freedom of association, the right to strike and the collective bargaining of its professionals.
 - e. Respect the rights to the secrecy of communications, to privacy and personal intimacy of its workers and adequate protection of their personal data.

- f. Avoid any form of discriminatory practice in terms of employment and occupation.
 - g. Respect the right to the free movement of its workers, prohibiting the retention of their personal documents (including national identification cards or equivalent documents, passports, driving licenses or residence or work permits) or illegally preventing or limiting their ability to leave freely their dependencies, work centres or facilities
 - h. Set the salaries of its professionals by applicable laws, respecting minimum wages, overtime, and social benefits. In this sense, and whenever possible, in the strict application of local labour regulations regarding minimum wages, the suppliers of the Nueva Pescanova Group will guarantee their workers that, in any case, they will receive a minimum living wage that allows them to cover their own basic needs and of their families, including housing, nutritional, educational, and sanitary, considering the indicators or indices of the cost of living of the country in question.
 - i. Guarantee that their professionals conduct their work under appropriate safety, health and hygiene standards, with strict compliance with applicable regulations on occupational hazards prevention, adequately evaluating the occupational hazards they face in their activity, and preventing or minimizing sufficiently, as appropriate, the probability of occurrence of accidents or occupational diseases or carrying out work in conditions in such conditions that may endanger their physical or mental integrity.
2. The suppliers of the Nueva Pescanova Group will sign, except in the cases provided for, the *Responsible Declaration of the Supplier's Ethical and Social Charter* or, as appropriate and with prior approval, the *Supplier's Ethical and Social Decalogue*, following the criteria and instructions established by the Compliance Unit for this purpose.
 3. Suppliers, their subcontractors, and their respective employees will use the Nueva Pescanova Group *Compliance Channel* and/or *Suppliers' Ethics Channel* to report, even anonymously, potential cases of violation of Human Rights following the provisions of this Corporate Policy and, in general, to denounce any breach of the Supplier's Ethical and Social Charter of the Nueva Pescanova Group. Such grievance mechanisms (which guarantee confidentiality, anonymity, and absence of reprisals, and which have adequate investigation and resolution procedures by the Group's Compliance Unit), are available to Group suppliers, companies that they hire to provide services or supplies to Group companies anywhere in the world, their respective employees, as well as to companies that have participated in a tender for services or supplies to be suppliers of the Nueva Pescanova Group.

Article 7. Due diligence of the Nueva Pescanova Group in the supply chain

1. The Nueva Pescanova Group will promote and ensure alignment of all its companies with this Corporate Policy both internally in its supply chain and externally in the selection phase of new suppliers and during the business relationship with them.
2. As an element of risk assessment of third parties, in the processes of selection and validation of suppliers, the execution of due diligence actions regarding respect to Human Rights, described in this Corporate Policy, will be promoted, without prejudice to the due diligence actions that proceed on other ethical requirements, regulatory compliance, social and environmental responsibility or sustainability. Said due diligence actions regarding respect for Human Rights may be conducted in the form of questionnaires, requests for information and documentation, audits, consultations with public sources of information or screening, among others.
3. For those suppliers that are identified as relevant and are evaluated as high risk concerning Human Rights, performance evaluations may be conducted and/or appropriate verification by independent entities be required, which will help them assimilate the expectations of the Nueva Pescanova Group companies in terms of responsible management of the supply chain.

CHAPTER III. FINAL PROVISIONS

Article 8. Implementation, development, and control

It corresponds to the Global Corporate Social Responsibility Department, within its tasks and powers, to ensure the effective implementation, development, and control of this Corporate Policy, as well as to promote the effective establishment of due diligence actions in the supply chain of the Nueva Pescanova Group.

Article 9. Assessment

The Global Corporate Social Responsibility Department will evaluate in its Annual Report or Activities Report the degree of implementation, development, and compliance with this Corporate Policy and, where appropriate, report on the status of implementation and the level of compliance with due diligence actions in the supply chain in terms of respect for Human Rights.

Article 10. Diffusion, formation, and communication

1. It is the responsibility of the Global Corporate Social Responsibility Department to promote the dissemination, training, and internal and external communication actions that it deems appropriate to guarantee adequate knowledge, awareness, and compliance with this Corporate Policy, in coordination with the General and Corporate departments with competences in this area.
2. In addition to the PESCANET corporate intranet, this Corporate Policy will be published on the corporate website and translated into all the relevant languages within the Nueva Pescanova Group, without prejudice to any other internal and external dissemination action deemed appropriate.

Article 11. Revision

The Global Corporate Social Responsibility Department will periodically review, at least annually, this Corporate Policy and will propose to the Executive Committee (COMEX) of the Nueva Pescanova Group the modifications and updates that contribute to its development and continuous improvement.

Article 12. Approval, validity, and modification

1. The first version (v1) of this Human Rights Corporate Policy was approved by the Executive Committee (COMEX) of the Nueva Pescanova Group, at the proposal of the Global Corporate Social Responsibility Director, at its meeting on February 27, 2023, entering into force and being valid for the entire Nueva Pescanova Group as of that date.
2. Any modification of this Corporate Policy must be approved by the Executive Committee (COMEX) of the Nueva Pescanova Group, at the proposal of the Global Corporate Social Responsibility Director, having such modifications recorded in the Modifications Control table in the following article, making the version in force at any time, the latest one approved by the Executive Committee (COMEX).

Article 13. Modifications control

Version	Modification summary	Modification promoter	Modification approval body	Modification approval date
v1	Initial approval of this Corporate Policy	Global CSR Director	Executive Committee (COMEX)	27/02/2023

CONTACT

Rúa José Fernández López, s/n
36230 Chapela – Redondela – Pontevedra – Spain
Phone +34 986 818 100

Global Corporate Social Responsibility department: csr@nuevapescanova.com

