



# CORPORATE POLICY ON INDUSTRIAL RESPONSIBILITY IN THE NUEVA PESCANOVA GROUP

*Approved by the Executive Committee (COMEX) of the Nueva Pescanova Group in its Meeting held on November 29<sup>th</sup>, 2021*

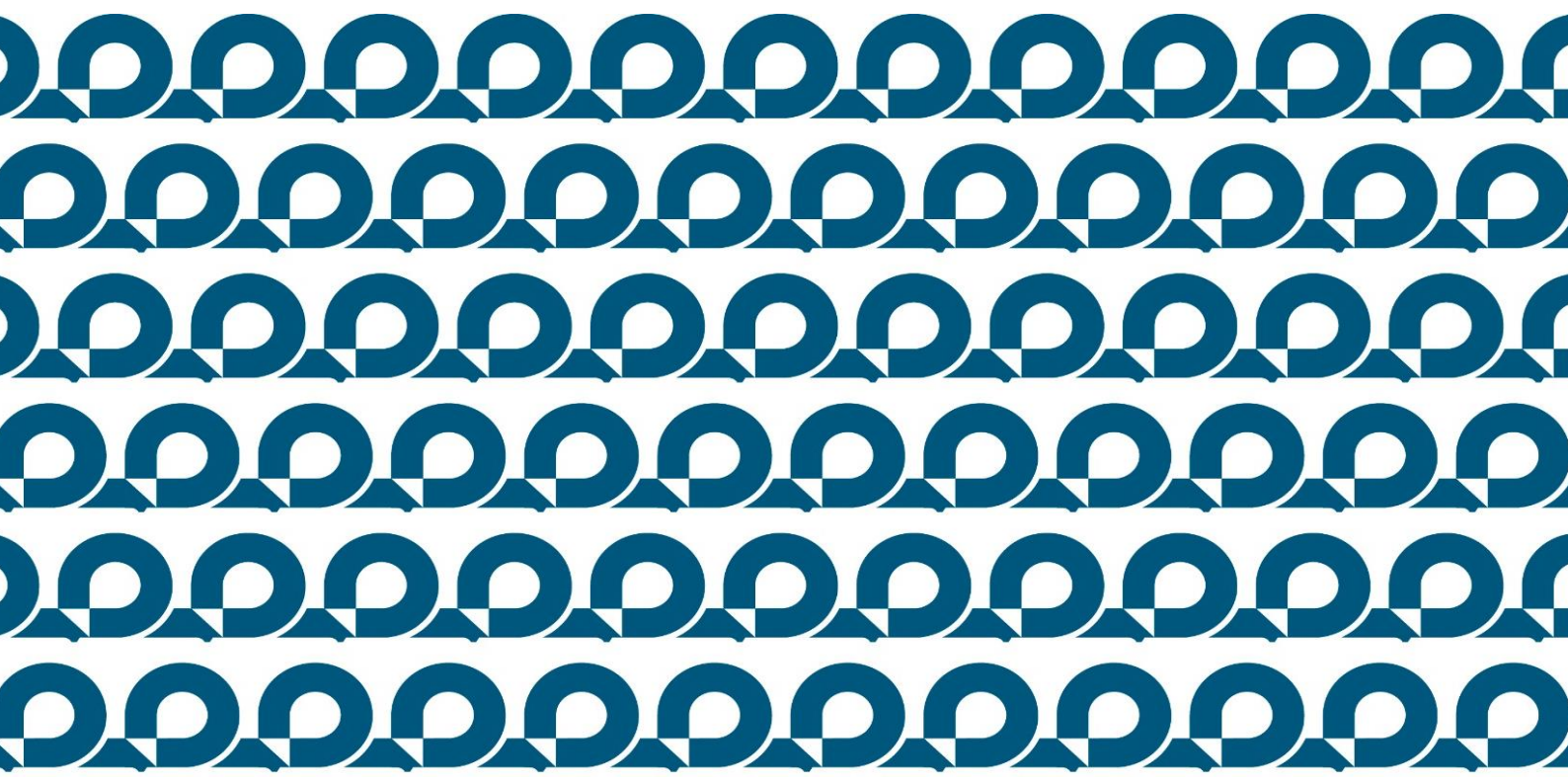


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## Preamble

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1. **Sustainable development** and **responsible action** are inalienable and essential aspects of the Nueva Pescanova Group's business culture, and this is bearing in mind that the industrial processing activity of sea products is determined by both its extractive nature, as well as the commitment to provide society with healthy and nutritious food.
2. The Nueva Pescanova Group has its own code of conduct and good business practices known as '**Our Code of Ethics**' which establishes a series of principles and standards of business ethics, institutional integrity, and transparency aimed towards ensuring ethical conduct and responsible behaviour of all its professionals. In article 32 (**'Food safety and quality'**) we state:
  - a. The quality and excellence of the products offered by Nueva Pescanova Group are paramount. In this regard, the Group is committed to selling high-quality food products that comply with the strictest standards on safety and food preservation. To do so, the Group shall carry out extensive control of its products and processes concerning food safety and health.
  - b. The Group will only market products that meet the requirements and guarantees set forth by applicable legislation on quality, composition, and shelf-life to offer its customers optimum products of the highest quality. To do so, the Group shall only work with suppliers that provide the relevant quality and food safety certificates. In addition, the Group will maintain at all times internal processes put in place to detect potential health risks, including necessary measures to resolve quality issues. In this sense, the Group has implemented the necessary guidelines and policies to offer its customers and consumers products of the highest quality.
3. Likewise, in article 16 of **Our Code of Ethics**, referring to '**Health and safety in the workplace**', we declare:
  - a. The Nueva Pescanova Group shall ensure that, wherever it operates, employees have the necessary equipment and means to carry out their activities in a safe and healthy manner, to safeguard at all times their physical well-being and moral integrity. To do so, the Group fosters and will promote, at all times and everywhere it operates, health and safety programmes on occupational risk prevention in accordance with current and future rules and regulations.
  - b. Group professionals shall observe workplace health and safety standards to prevent and minimise potential occupational risks.
  - c. The Subjects of the Code must rigorously comply with the occupational health and safety standards. In addition, they must use their best efforts to ensure that they, and the people around them, are safe while carrying out their duties.
  - d. The Group shall encourage its suppliers to comply with its health and safety rules and regulations in the workplace.
4. Article 44 of **Our Code of Ethics** (**'Protection of the environment and of natural resources'**) states that the companies in the Group undertake to minimise waste and pollution, preserve natural resources, and promote practices to save energy and freshwater, assuming them as standards of conduct.
5. Likewise, article 4 (letters e, f, and g) of the '**Planet**' pillar of our **Corporate Policy on Corporate Social Responsibility of the Nueva Pescanova Group** describes a series of guidelines that advise the Group on how to carry out its actions:

- a. Commit to the responsible management of water, energy, and raw materials by minimising discharges, emissions, and waste.
  - b. Identify and assess environmental impacts from the activities carried out.
  - c. Establish and maintain an environmental management system in situations in which its activity involves significant environmental impact.
6. Article 8 of the **Corporate Policy on Corporate Social Responsibility** sets out the series of Policies for the Group's Responsible Action. The '*Planet*' pillar includes Industrial Responsibility, which constitutes the object of the present Policy.
7. In conclusion, in line with the commitments assumed in our **Corporate Policies on Corporate Social Responsibility** and **Sustainability**, the Nueva Pescanova Group, its professionals and the people who act in its name will help to ensure that our industrial processing activity of fishing and aquaculture products is developed in an appropriate and responsible manner, so that they satisfy the multiple needs and wishes of the society and communities with which we interact.

#### **Article 1. Object**

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1. The object of this Corporate Policy is to:
  - a. Define the scope, principles, and purposes of the responsible action within the area of the Nueva Pescanova Group's industrial activity.
  - b. Formally establish the Responsible Action Policy for the industrial activities identified in the **Corporate Policy on Corporate Social Responsibility of the Nueva Pescanova Group** (article 8), which it includes and complements, to promote the sustainability of these industrial activities.
  - c. Contribute towards fostering a culture of business responsibility based on the creation of value in a sustainable manner, preserving the natural environment where we conduct our activity, and committing to the development and well-being of local communities.
2. This Corporate Policy will be complemented by specific internal plans, relating to both the operational and functional areas of the Nueva Pescanova Group, namely, plans for occupational health and safety; the food quality assurance of our products; optimal use of natural resources; emission reduction plans; plans to minimise discharges and solid waste, ensuring their proper management, etc.

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

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1. Compliance with this Corporate Policy is compulsory for all the companies and professionals of the Nueva Pescanova Group, especially those that carry out an industrial activity or those considered relevant.
2. The Nueva Pescanova Group comprises the company Nueva Pescanova S.L., and all the Spanish and foreign companies directly or indirectly controlled by Nueva Pescanova, S.L.
3. Professionals of the Nueva Pescanova Group are understood to be all the board members, directors, proxies, and other employees of the Nueva Pescanova Group, anywhere in the world and whatever the nature of their contract.

### Article 3. *General principles of industrial responsibility*

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The general principles of the Nueva Pescanova Group's industrial responsible action focus on:

- a. Sustainable improvement of the productivity and efficiency of industrial processes, thus fulfilling the objectives of Quality, Cost, Service, Safety and Motivation (*Pescanova Way*).
- b. Assurance of occupational health and safety for all workers in the industrial centres.
- c. Assurance of the food safety and quality of all our final products, supported by a traceable, certifiable, and auditable management system.
- d. Respect for the international framework of the human and labour rights that are acknowledged throughout our industrial activity.
- e. Industrial processing of our food products in an environmentally friendly manner, using natural resources responsibly and promoting their efficient management through environmental performance improvement measures.
- f. Contribution towards the development and implementation of appropriate technologies for transforming fishing and aquaculture products, particularly technologies that respect the environment and create employment, whether directly or indirectly.
- g. Identification of the possible impacts and risks caused by our activity, to be able to prevent them, maintaining open and transparent relationships with our stakeholders, and preventing or mitigating any adverse impact.
- h. Commitment to sourcing raw materials in a manner that contributes to the preservation and sustainable use of fishing and aquaculture resources in the long term, promoting optimal use and maintaining their availability and quality for current and future generations. Added to this commitment is the sourcing of raw materials of animal origin that ensures their welfare.
- i. Full compliance with legal requirements on matters related to the industrial transformation of fishing and aquaculture products in the countries where we carry out our industrial activity, and per the applicable national and international regulatory frameworks.
- j. Respect for national and international labour standards, paying special attention to (i) the freedom of association, (ii) the right to strike, (iii) the elimination of all kinds of forced labour, (iv) the abolition of child labour, and (v) the elimination of discrimination of all forms and types.
- k. Access to decent working conditions and salaries that foster the development of the professionals in our industrial centres and their families.
- l. Effective equality and diversity, and the necessary training to encourage the personal and professional growth of all our workers.
- m. Promotion of public health by (i) ensuring appropriate practices that prevent any threat to life, health, or well-being in our operations, (ii) adopting the best food safety practices that prevent any risk derived from consuming or using our products, and (iii) helping to protect the health and safety of our partner communities with which we relate during the lifecycle of our products.
- n. Contribution of our operations to the sustainable and inclusive development of our partner communities.
- o. Commitment to supplying food products to society while maintaining the nutritional value of the products produced in any of our industrial centres.

#### Article 4. *Specific measures for responsible industrial action*

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In line with the general principles and objectives of our responsible industrial action, the Nueva Pescanova Group promotes the implementation of specific measures, to contribute towards the sustainability of its industrial operations; namely:

- a. Management system based on Industrial Excellence, *Pescanova Way*, which:
  - i. Integrates the rollout of the Annual Strategy (established by the Strategic Plan) with the continuous improvement of processes and tracking of results.
  - ii. Promotes the achievement of sustainable results over time, improving productivity, reducing delivery times, improving quality, and lowering costs.
  - iii. Boosts the teams' empowerment, through prevention, training, and participation actions, providing the teams with autonomy to increase their involvement.
  - iv. Develops industrial processes that are more sustainable and robust over time, based on standard work, visual management, and autonomous groups, aimed towards eliminating wastage.
- b. Work-related hazard prevention programme, based on internationally recognised health and safety standards to prevent accidents and sickness derived from the work activity performed by our employees in each industrial centre.
- c. Food safety and quality management system that guarantees the innocuousness and quality of all the products that are processed in our industrial centres, as well as ensure that the products fully comply with their technical specifications and the necessary legal requirements.
- d. Environmental management system in each industrial centre, designed to reduce environmental risks, improve resource management, optimise investments, and cut costs.
- e. Implementation, maintenance, and documentation of a system that ensures the traceability of the products produced in any of our industrial centres.
- f. Maintenance plan of current equipment, as well as an investment plan for new equipment and the application of new technologies, especially those that help protect the environment.
- g. Plans to improve the efficiency of industrial equipment and processes, ensuring an optimised use of natural resources, raw materials, and energy, and driving circular economy.
- h. Optimisation plan for the use of materials (main raw materials, ingredients, as well as packaging) that reduce food and material wastage.
- i. Continuous improvement plan, and the innovation of products and processes that ensure the optimal use of resources, as well as the continuous adaptation to market trends.
- j. Implementation, maintenance, and documentation of a waste management system for those generated by the industrial activity, providing it with an appropriate management solution and final disposal.
- k. Implementation and maintenance of a purchasing procedure for the procurement of raw materials and services that ensures compliance with legal requirements and the applicable integrity, ethics, and environmental standards, as well as the continuity in the supply of goods, products, and services.
- l. Compliance with the legal regulations in force in the country where the food transformation activity is located.

- m. Verification or certification that the totality of employees in our industrial centres are covered by legal contracts, have safe and decent working conditions and are fairly remunerated, complying with national and international labour standards.
- n. And other measures derived from the Group's other Corporate and Sectoral Policies that affect our activities (e.g., responsible people management, fishing and aquaculture responsibility, environmental management, etc.).

#### Article 5. Application of the general principles and measures for responsible industrial action

In the countries in which the Nueva Pescanova Group carries out its industrial transformation activities of fishing and aquaculture products, it will act proactively in the application of the general principles and specific measures for the industrial responsible action listed above, in the following manner:

- a. Promotion of permanent dialogues with our stakeholders to develop and apply the principles outlined in this Policy on Responsible Action, through:
  - i. Continuous and transparent dialogue with the Workers' Legal Representatives in the design and implementation of policies and processes that apply to workers.
  - ii. Collaboration with universities and public institutions in research projects in the field of food production and transformation.
  - iii. Collaboration with non-governmental organisations (NGOs) and other associations in the sector, including those of a scientific nature, to disseminate good practices in industrial operations, fostering knowledge and helping to spread such good practices.
  - iv. Promotion of alliances and cooperation projects with different entities, both public and private, to generate shared value in industrial matters.
- b. Adoption of the best available practices that apply to industrial activities, to improve the performance and transparency of the operations:
  - i. Always providing the traceability of the products from the point of origin to the market.
  - ii. Applying a proper labelling and identification system to be able to track products from their origin until they reach the consumer's table.
  - iii. Promoting a continual cultural transformation over time, through *Pescanova Way*, the Nueva Pescanova Group's Industrial Management System, based on the key international benchmarks. The purpose of sharing this work philosophy is to improve the productivity and efficiency of our industrial processes in a sustainable manner, complying with Quality, Cost, Service, Safety and Motivation goals.
  - iv. Adopting measures to optimise the use of natural resources, energy and chemical products, measures to reduce atmospheric emissions, discharges, and waste, which translates into more efficient and responsible production processes and consumption.
  - v. Adopting waste reuse measures through recycling or energy recovery, and circular economy solutions applied to the organic by-products resulting from the seafood transformation.
  - vi. Promoting a culture for the responsible use of natural resources, energy, and materials, throughout the entire supply chain, which favours the use of clean energy, avoids using scarce resources, promotes the use of reusable and recyclable materials to reduce pollution, and results in lowering the amount of toxic gases in the atmosphere and increases the availability of freshwater.

- c. Adoption of the best available practices relevant to people management, to ensure the health and safety of the workers, establish responsible, loyal, and transparent relationships, and promote equality and diversity among the workers through:
  - i. The application of an occupational hazards prevention programme in the totality of our industrial centres.
  - ii. Setting fair salaries, providing decent work, and acknowledging the right to freedom of association.
  - iii. Promoting equality and diversity among the workers in every industrial centre.
- d. The dissemination of these values and principles of responsible action for industrial matters throughout our supply chains. In turn, we must ensure that our suppliers are governed by the same values of responsible action and, where relevant, they agree with and subscribe to the Responsible Declaration of the [Supplier's Social and Ethical Charter of the Nueva Pescanova Group](#).

#### **Article 6. Guidelines for responsible industrial behaviour**

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1. The definition of the principles of responsible action for the industrial centres is the consequence of the commitments assumed by the Nueva Pescanova Group for our activity in [Our Code of Ethics](#), in the [Corporate Criminal Risk Prevention Policy](#), the policies on [Corporate Social Responsibility](#) and [Sustainability](#), as well as the [values and behaviour of the Pescanova Leader](#) (among others).
2. Within the area of labour responsibility, promoting legal, fair, decent, and safe work, the industrial centres in the Nueva Pescanova Group are governed by the principles of non-discrimination and equality set forth in the provisions of [Our Code of Ethics](#), as well as our [Corporate Policies on People Management; Talent Management; Recruitment, Incorporation, Selection and Departure](#); and [Occupational Health and Safety](#).
3. Within the area of Food Safety and Quality, the quality of the products processed in the industrial centres of the Nueva Pescanova Group is equal to or higher than the required by legally established quality standards, per the stipulations set forth in [Our Code of Ethics](#), as well as in our [Food Safety and Quality Policy](#).

#### **Article 7. Development and control**

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It is the responsibility of the Global Director of Industry of the Nueva Pescanova Group to control the implementation, development, and compliance with this Corporate Policy on Industrial Responsibility in all the industrial centres of the Group, as well as to ensure and coordinate the implementation of projects or other actions aimed at its improvement or development.

#### **Article 8. Assessment**

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The Global Department of Industry of the Group will annually evaluate the compliance and effectiveness of this Corporate Policy and of the projects and actions carried out in the Nueva Pescanova Group in the industrial area, incorporating them into the corresponding Annual Reports of the Business Area, which will be presented to the CEO and the COMEX of the Group.

#### **Article 9. Diffusion, training, and communication**

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The Global Department of Industry, in collaboration with Corporate Communication, in the terms provided in the Corporate Communication Policy, is responsible for the appropriate dissemination, training, and communication actions to guarantee effective dissemination of this Corporate Policy, as well as any internal standard that results from it, including its translation into the relevant languages within the Nueva Pescanova Group and its eventual dissemination



and publication both through the **PESCANET** corporate intranet and the relevant web pages directly controlled by the Nueva Pescanova Group.

**Article 10. Revision and modifications**

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1. This Corporate Policy will be reviewed periodically, and at least annually, by the Global Department of Industry.
2. Any modification of this Corporate Policy will be approved by the Executive Committee (COMEX) of the Nueva Pescanova Group, at the proposal of the Global Director of Industry.

**Article 11. Approval, entry into force and validity**

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1. This Corporate Policy was approved, at the proposal of the General Director of Industry, by the Executive Committee (COMEX) of the Nueva Pescanova Group in its Meeting on November 29<sup>th</sup>, 2021, held at its headquarters in Chapela (Redondela – Pontevedra – Spain), being in force and valid for the entire Nueva Pescanova Group from that date.
2. The current version at all times will be the one appropriately stated in the "Modifications control" article of this document.

**Article 12. Modifications control**

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Version	Modification summary	Modification promoter	Modification approval body	Modification approval date
v1	Initial approval of this Corporate Policy	Global Director of Industry	Executive Committee COMEX	29/11/2021

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