



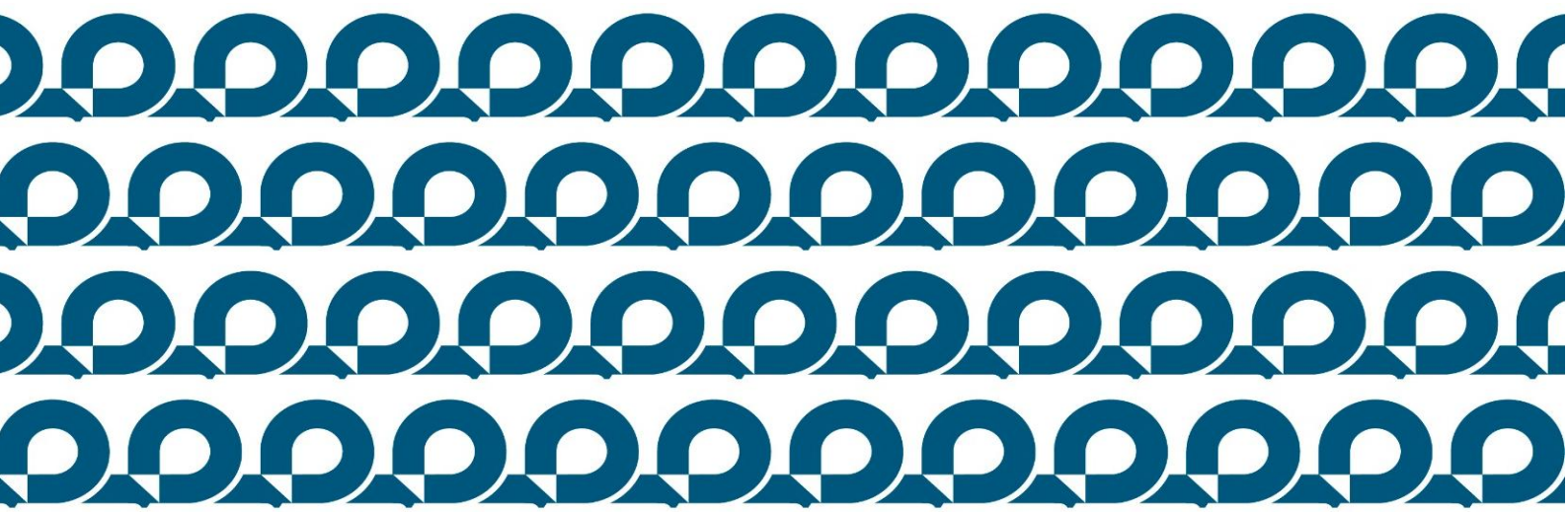
## STAKEHOLDERS RELATIONSHIP MANAGEMENT

### TRANSPARENCY IN SUSTAINABILITY PROGRAMME

Rúa José Fernández López s/n  
36320 Chapela. Redondela. Pontevedra [España]  
Teléfono +34 986 818 100 [www.nuevapescanova.com](http://www.nuevapescanova.com)

---

NUEVA PESCANOVA SL. Registro Mercantil Pontevedra - folio 40, libro 4054, inscripción 1ª, hoja PO-58757 - NIF ES B94123908



## STAKEHOLDERS RELATIONSHIP MANAGEMENT

### TRANSPARENCY IN SUSTAINABILITY PROGRAMME

#### TABLE OF CONTENTS

1.	STAKEHOLDER RELATIONSHIP STRATEGY .....	3
2.	IDENTIFICATION OF STAKEHOLDERS .....	3
3.	COMMUNICATION CHANNELS AND DIALOGUE WITH STAKEHOLDERS .....	5
4.	DIALOGUE CHANNELS WITH STAKEHOLDERS.....	7
4.1	Transversal channels common to all stakeholders .....	7
4.2	Relevant cross-cutting issues .....	7
4.3	Specific channels and relevant issues mentioned.....	8
5.	TRANSPARENCY IN LOBBYING ACTIVITIES AND ADVOCACY .....	9
6.	OUR GLOBAL APPROACH TO ADVOCACY AND LOBBYING .....	14
7.	PREVENTING, MITIGATING, AND REMEDIATING SALIENT HUMAN RIGHTS ISSUES IN OUR OPERATIONS AND SUPPLY CHAIN .....	15
7.1	Policies and Governance.....	15
7.2	Risk Assessment and Salience Identification .....	15
7.3	Prevention and Mitigation Measures .....	15
7.4	Stakeholder Engagement .....	16
7.5	Remediation Processes .....	16
7.6	Monitoring, Reporting, and Accountability .....	16
8.	COMMITMENT TO REMEDYING ADVERSE IMPACTS.....	16
8.1	Policies and Governance Framework.....	16
8.2	Grievance and Whistleblowing Mechanisms .....	17
8.3	Stakeholder Engagement and Dialogue.....	17
8.4	Expectations in Our Business Relationships.....	17
8.5	Corrective and Remedial Actions.....	17
8.6	Integration with Environmental and Social Programmes.....	17
8.7	Monitoring, Reporting, and Accountability .....	18

#### CORPORATE DEPARTMENT OF SUSTAINABILITY AND CSR

#### Nueva Pescanova Group

DECEMBER 2024

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

## STAKEHOLDERS RELATIONSHIP MANAGEMENT

### TRANSPARENCY IN SUSTAINABILITY PROGRAMME

#### 1. STAKEHOLDER RELATIONSHIP STRATEGY

We identify all the stakeholders that can engage with any of the companies of the Nueva Pescanova Group along the value chain of their specific activities and in the physical and relational environment in which their activities are carried out.

We classify the stakeholders according to their influence, involvement and sensitivity to our activity and strategies, and assign them specific strategies and dedicated communication and dialogue channels to better understand their needs and interests and ensure we meet their expectations.

The guide for the implementation and success of these strategies is to 'get to know and collaborate with all our stakeholders, committing to active listening and build constructive dialogue to understand their expectations and respond to them'.

#### 2. IDENTIFICATION OF STAKEHOLDERS

Stakeholders are defined in the [Nueva Pescanova Group's Corporate Policy on Institutional Relations](#), 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, can influence, directly or indirectly, the development of its strategy.** (102-42)

The Nueva Pescanova Group's vertical integration strategy which stems from fisheries and aquaculture farming establishes a long value chain from raw materials to the final products for the market and thus makes 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 are 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, and International Organisms.
- Academia, Research centres, Scientists, Experts, and Training agents.
- Shareholders, Investors, and other financial sector agents.
- Seafood industry, producers and manufacturers, fishing and aquaculture, and 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.

*Table I. Internal and external stakeholders, as identified according to their relevance to the Group's strategy and activities.*  
(102-42)

<i>Stakeholder group</i>	<i>Description</i>	<i>What do we need from them?</i>	<i>What interests have they in the Nueva Pescanova Group?</i>
<i>Internal</i>			
Board of Directors, COMEX and SLT	Members with a high capacity for direct influence in the definition and implementation of the company's strategy.	Information on the business strategy and its implication in the creation of shared value, Corporate Social Responsibility and Sustainability.	Profitability, generation of quality and sustainable employment and respect for and conservation of the environment.
Internal subgroups and workers' committees	The people who work in the Nueva Pescanova Group, regardless of their employment or commercial relationship with it.	Involvement in business development. Knowledge for the implementation of projects and development of solutions.	Quality employment through labour responsibility measures. Application of their knowledge and development of their functions and projects.
<i>External</i>			
Public administrations, intergovernmental and international organizations	Set of institutions and organizations of a public nature with which the Nueva Pescanova Group must relate in the exercise of its business activity.	Design of appropriate policies for business development in terms of innovation, competitiveness, as well as tax and labour.	Regulatory compliance and sectoral development, wealth generation and sustainable employment.
Academia, Research centres, Scientists, Experts, Training agents	Outstanding people or institutions in the sciences that generate, collectively or individually, knowledge about the Group's activities.	Application of the knowledge generated for the benefit of the activities and needs of the Group. Adaptation of training and practice programs and collaboration in lines of research of strategic interest.	Practical application of their intellectual work. Internships and stable hiring. Participation in research projects.

<i>Stakeholder group</i>	<i>Description</i>	<i>What do we need from them?</i>	<i>What interests have they in the Nueva Pescanova Group?</i>
Shareholders, Investors, and other financial sector agents	Individuals or legal entities that participate as partners or shareholders in the capital of the companies or facilitate the necessary investments for the development of projects.	Information on trends in new investment formulas or criteria for access to companies' capital, particularly aligned with ESG criteria.	Regulatory compliance, return on investment, risk analysis.
Seafood industry, producers and manufacturers, fishing and aquaculture, and other industries	Business organizations that share similar opportunities and risks in the production (extraction or cultivation) of seafood and its transformation, as well as industries producing other goods or services.	Alliances facing common challenges and opportunities. Commercial alliances. Recognition of free competition.	Alliances facing common challenges and opportunities. Commercial alliances.
Industry or sectoral associations, Unions or Syndicates	Organizations defending common interests in each field and territory.	Trends information. Support and collaboration in strategic work.	Trends prescription. Setting alliances.
Suppliers (either goods or services)	Individuals or legal entities that provide goods or services to the Nueva Pescanova Group.	Financing, adequacy of inputs to market trends (traceability).	Viability and profitability. Continuous supply.
Customers, retailers, and wholesalers	Individuals or legal entities that purchase products marketed by the Nueva Pescanova Group.	Information on demand and market trends. Commercial agreements.	Response to market trends.
NGOs, Foundations	Non-profit institutions that carry out activities of social, environmental, labour interest, etc., that can be related to the operations of the Nueva Pescanova Group.	Trends information. Support and accompaniment in lines of strategic work.	Trends prescription. Setting alliances.
Communication, Media	Understood as the instruments used in society to inform and communicate messages in a textual, sound, visual or audio-visual version.	Information on market trends. Support in communication about the strategies and performance of the Nueva Pescanova Group.	Information
Consumers	People who consume a product marketed by the Nueva Pescanova Group on a frequent, occasional, or punctual basis in their diet.	Information about their preferences and evaluation of your current and future expectations.	Food quality and safety, price/savings, variety, and convenience, clear and transparent labelling, and other aspects related to the product.

### 3. COMMUNICATION CHANNELS AND DIALOGUE WITH STAKEHOLDERS

Dialogue and participation with stakeholders are intended to serve the interests of all involved parties, and we understand it as key to the long-term success of the Group. Regular engagement with stakeholders contributes to the Company's understanding of diverse and sometimes conflicting perspectives, which drives innovation and helps shape robust and inclusive approaches.

The Nueva Pescanova Group establishes Dialogue Channels with its stakeholders to actively listen to their needs and expectations, and ethically and efficiently transfer information on the activities of the different Group companies, thus establishing action plans that create shared value.

We have equipped ourselves with tools for the identification of those matters of our business activities that are considered relevant at a global level, and that are related to the fishing, aquaculture, industrial and commercial businesses directly, formally or informally, among which is worth highlighting:

- **Employees:** As a general rule, the direct contacts and meetings held with the different representatives of the workers are promoted by the HR Department of the Group or its subsidiary companies and/or Country Managers to maintain and strengthen relations with employees, complying in any case with what results from the applicable labour legislation in each country the Group operates about the official channels of dialogue between the Management of the Company and the Legal Representatives of the Workers or the Unions. The employee portal, wherever it is implemented, is coordinated and managed by the HR and Communication Departments, with the Corporate Intranet (PESCANET) being maintained by the Communication Department, without prejudice to the assistance that may be required from the different Business Areas, Departments and subsidiaries of the Group, to provide PESCANET with content that helps keep employees duly informed.
- **Public administrations and regulatory and supervisory bodies:** Periodic meetings and/or consultations through direct contacts and sectoral associations.
- **Academy and Research:** Meetings and encounters focused on the search for continuous improvement of fishing, aquaculture farming, industry, commerce, marketing, R&D processes, or support functions, driven by members of the COMEX and promoted by their different areas of responsibility.
- **Shareholders, partners and investors:** Relations of the Group with the Partners and Investors of the head company of the Group, Nueva Pescanova, S.L., through meetings of the Board of Directors, its Committees and General Assemblies, under the responsibility of the Presidency, CEO or Secretary of the Board of Directors of said company, without prejudice to the actions that certain Committees or Area Directors may have assigned and the periodic meetings with representatives of the Institutional Partners or Investors for informational purposes.
- **Industry:** Direct relations with companies in the industrial sector of seafood products and others, competitors of the Nueva Pescanova Group or not, or interaction with them within sectoral associations or chambers of commerce, are carried out solely by the CEO, Area Directors or Country Managers of the country in question (or by other professionals -Managers- of the Group authorized by them for such purposes).
- **Associations:** The contacts, meetings and encounters with the associations or organizations that defend fishing, aquaculture, industrial, and commercial interests relevant to the Nueva Pescanova Group, are managed by the Area Directors, or other members of the Management Committee in whom they could delegate such functions, as well as to the Country Managers of each country where the Group operates.
- **Suppliers of goods and services:** Contacts and meetings with suppliers of products and raw materials, to establish stable and reliable business relationships, correspond to the Purchasing Department, without prejudice to the powers that Country Managers have on this matter on each country and its directors or purchasing managers and the personnel assigned to this function.
- **Clients:** Contacts and meetings with clients from the different commercial teams and customer service (including online channels), the website itself, or social media, are maintained by the Commercial Department and the Country Managers of each country, in coordination with Marketing and Communication.

- **NGOs and Foundations:** The meetings and encounters with the different NGOs and Foundations that may feel influenced by the activity of the Nueva Pescanova Group and, in particular, those with an interest or mission of an environmental, social, or labour nature, are coordinated with the different business areas involved, all to open ethical and constructive dialogues seeking to establish action programmes capable of building shared value.
- **Media:** Contacts with the media and/or individual or collective meetings with them (press releases or video releases, organization of visits, maintenance of the corporate website, etc.), are managed by the Communication Department.
- **Local communities and Society in general:** The promotion, management, and development actions of educational, cultural or sports activities in the different countries where the Group operates, are promoted by the Institutional Relations Department, without prejudice to the intervention that the CEO of the Group, the Area Directors, and the Country Managers must have in each case.
- **Consumers:** The channels for direct listening, complaints, and communication in general with consumers (consumer service systems, consumer suggestions, corporate websites and information through social media, advertising media, etc.) are managed, depending on the matter to be dealt with the consumer, by the Marketing, R&D, Quality and Environment and Communication Departments.

## 4. DIALOGUE CHANNELS WITH STAKEHOLDERS

At the Nueva Pescanova Group, we maintain a constant and transparent dialogue with our stakeholders, which allows us to identify their main expectations and incorporate their suggestions in the design and implementation of our action plans in terms of Corporate Social Responsibility and Sustainability.

### 4.1 Transversal channels common to all stakeholders

- Face-to-face: Encounters, interviews, and meetings.
- Remote: Telephone, email, corporate website, social networks, activity reports.
- Listening channels: Electronic mailboxes, [Compliance Channel](#), materiality surveys, social media.

### 4.2 Relevant cross-cutting issues

- Ethics, integrity, and regulatory compliance.
- Institutional communication
- Human rights.
- CSR and Sustainability Strategies.
- 2030 Agenda and Sustainable Development Goals (SDG).
- Transparent and sustainable practices in fishing, aquaculture, and industry.
- Commitments and Sustainability Goals.
- Care and protection of the environment.



- Climate change and renewable energy.
- Innovation and sustainability of products and packaging.
- Sustainable Development of our partner communities.

### 4.3 Specific channels and relevant issues mentioned

<i>Stakeholder</i>	<i>Specific channel</i>	<i>Specific relevant issues</i>
<i>Internal</i>		
Employees (Board of Directors, Executive Committee and SLT, Internal subgroups and employees legal representatives)	Corporate intranet Mailings Suggestion boxes Departmental conferences Unions and syndicates Breakfasts with the CEO HR Department Performance evaluations	Occupational Health & Safety Labour responsibility Fair labour practices and gender equality Fair and decent wages Career development and training opportunities Performance and reporting ESG performance Economic and financial results
<i>External</i>		
Public Administration, Intergovernmental Organisms, International Organisms	Queries and requests Institutional Relations, CSR, and Legal Departments Corporate reports	Governance Regulatory compliance Transparency CSR and Sustainability Strategies Food safety and public health International cooperation
Academia, Research centres, Scientists, Experts, Training agents	Corporate web CSR and Sustainability Departments Participation in fairs, forums, and conferences Collaboration in research projects Knowledge alliances	Sustainability of our activities Performance and transparency Training and development of people Investigation and development Circular economy Energy and decarbonization UN Global Compact and 2030 Agenda
Shareholders, Investors, and other financial sector agents	Shareholders General Meetings Results presentations Financial and non-financial corporate reports Other corporate reports	Economic and financial performance ESG performance Financing linked to Sustainability
Seafood industry, producers and manufacturers, fishing and aquaculture, and other industries	Corporate web CSR and Sustainability Departments Participation in fairs, forums, and conferences Participation in sectoral associations Strategic Alliances	Circular economy Energy and decarbonization Certifications and market requirements Competitiveness and innovation Packaging sustainability Alliances
Industry or sectoral associations, Unions or Syndicates	Corporate web CSR Department Participation in assemblies and working groups Strategic Alliances	Circular economy Energy and decarbonization Packaging sustainability Certifications and market requirements Alliances
Suppliers (either goods or services)	Corporate web Commercial web in each country Commercial visits Participation in fairs and sectoral forums	Sustainability of products and companies Market and supply chain requirements Certifications and progress in programs CSR and Sustainability Plans Commercial alliances



<i>Stakeholder</i>	<i>Specific channel</i>	<i>Specific relevant issues</i>
Customers, retailers, and wholesalers	Corporate web Commercial web in each country Marketing and communication campaigns Satisfaction surveys Commercial visits Participation in fairs and sectoral forums Customer Service	ESG compliance Quality of the products Customer experience and satisfaction Management of claims, complaints, and incidents Sustainability of products and companies Market and supply chain requirements Certifications and progress in programs CSR and Sustainability Plans Commercial alliances
Non-Governmental Organizations (NGOs), Foundations	Participation in fairs, forums, and conferences Media news monitoring Social media monitoring Communication and CSR Departments	Prescription in sustainable development Sustainable sourcing Best practices in fishing and aquaculture Animal welfare Sponsorship and donations Strategic Alliances UN Global Compact and 2030 Agenda
Communication, Media	Corporate web Commercial web in each country Press releases Events and meetings Interviews and consultations Social media	Strategic decisions Economic and financial performance ESG performance New projects and relevant events
Consumers	Marketing and communication campaigns reports Satisfaction surveys Consumers panels Market studies Consumer service	Quality of the products Food safety of products and processes Packaging materials and sustainability Product sustainability and certifications CSR and Sustainability Plans Customer experience and satisfaction Management of claims, complaints, and incidents Price management and communication Promotional and savings campaigns

The periodicity and form of communication with each stakeholder vary depending on the Nueva Pescanova Group company that carries them out and the reason for the consultation or meeting, establishing a minimum of once a year.

## 5. TRANSPARENCY IN LOBBYING ACTIVITIES AND ADVOCACY

Participation in sectoral organizations and associations working on topics related to the main activities of the Nueva Pescanova Group (102-13).

<i>Entity</i>	<i>Sector</i>	<i>Purpose</i>	<i>Country</i>	<i>Role or type of participation</i>
Spanish Aquaculture Business Association (APROMAR)	Aquaculture	Competitiveness	Spain	Member
Galician Aquaculture Cluster (CETGA)	Aquaculture	Innovation and competitiveness	Spain	Member of the Board

<i>Entity</i>	<i>Sector</i>	<i>Purpose</i>	<i>Country</i>	<i>Role or type of participation</i>
Calidalia S.L.	Food sector	Food quality, health, and nutrition	Spain	Member
Vigo Fish Marketers Association (ACOEVI)	Commerce	Competitiveness	Spain	Member
Spanish Association of Ready Meal Manufacturers (ASEFAPRE)	Commerce	Competitiveness	Spain	Member
Spanish Association of Manufacturers and Distributors (AECOC)	Commerce	Competitiveness and commercial EAN codification	Spain	President
Provincial Association of Fish Consignee Sellers in Ports	Commerce	Comercio	Spain	Member
Galician Food Cluster (CLUSAGA)	Commerce	Competitiveness	Spain	Member
Sustainability Committee of the Galician Food Cluster (CLUSAGA)	Commerce	Sustainability	Spain	Vice-president and member
Sustainability Committee of the Spanish Association of Manufacturers and Distributors (AECOC)	Commerce	Sustainability	Spain	Member
Galician Business Confederation (CEG)	Commerce	Private entrepreneurship and market economy	Spain	Member
ALIMENTUM Foundation	Corporate	Research to improve the quality of life and social well-being	Spain	Member of the Board and patron
Spanish Network of the UN Global Compact	Corporate	Sustainable development	Spain	Participant Member
Spanish Ornithological Society (SEO/BirdLife)	Ecology	Conservation	Spain	Patron
As Gándaras Business Association – Porriño	Industry	Competitiveness	Spain	President
Polígono de Sabón Business Association – Arteixo	Industry	Competitiveness	Spain	Member of the Board
Plastic and Related Materials Research Association (AIMPLAS)	Industry	Research and development	Spain	Member
Spanish Association of Wholesalers, Importers, Exporters and Processors of Fishing and Aquaculture Products (CONXEMAR)	Industry	Competitiveness	Spain	Member
Multisectoral Association of Food and Beverage Companies (AME)	Industry	Competitiveness	Spain	Member of the Delegate Commission
National Association of Manufacturers of Canned Fish and Seafood (ANFACO-CECOPESCA)	Industry	Competitiveness, quality and food safety, technical assistance	Spain	Member
Owners Community of the Fuente Del Jarro Industrial Estate – Paterna	Industry	Competitiveness	Spain	Member
Business Federation of Agri-food of the Valencian Community (FEDACOVA)	Industry	Competitiveness	Spain	Member
Circle of Businessmen of Galicia	Business	Competitiveness	Spain	Member
National Association of Shipowners of Mixed Companies (ANASCO)	Fishing	Competitiveness of the fishing industry	Spain	Member
Spanish Fisheries Confederation (CEPESCA)	Fishing	Competitiveness	Spain	Member of the Board
Cooperative of Fishing Shipowners of the Port of Vigo (ARVI)	Fishing	Representation and competitiveness	Spain	Member of the Governing Council

<i>Entity</i>	<i>Sector</i>	<i>Purpose</i>	<i>Country</i>	<i>Role or type of participation</i>
Association for the Self-regulation of Commercial Communications (AUTOCONTROL)	Marketing	Responsibility and transparency	Spain	Member
GRADIANT	Technology	Research and development	Spain	Member of the Business Council and patron
Spanish Chamber of Commerce of the Argentine Republic	Commerce	Competitiveness	Argentina	Member
Chamber of Argentine Jig Owners	Fishing	Competitiveness	Argentina	Member
Organization for the Protection of Fisheries Resources of the South Atlantic (OPRAS)	Fishing	Fighting illegal, unreported, and unregulated (IUU) fishing	Argentina	Member
Coalition of Legal Toothfish Operators (COLTO)	Fishing	Fighting illegal, unreported, and unregulated (IUU) fishing	Australia	Member
National Chamber of Aquaculture	Aquaculture	Competitiveness	Ecuador	Member
Official Spanish Chamber of Commerce of Ecuador	Commerce	Competitiveness	Ecuador	Member
Duran Chamber of Industries	Aquaculture industry	Competitiveness	Ecuador	Member
Global Seafood Alliance (GSA)	Aquaculture	Commerce and aquaculture	USA	Member of the Board
National Fisheries Institute (NFI)	Fishing	Sustainability and nutrition	USA	Member
Sustainable Fisheries Partnership (SFP)	Fishing	Fisheries sustainability	USA	Member
Fresh Catering Company (ETF)	Commerce	Seafood commerce	France	Member
MEDEF – Employers' Union	Commerce	Labour	France	Member
UPE 06 – Employers' Union	Commerce	Labour	France	Member
International Organisation for Women in the Seafood Industry (WSI)	CSR	Gender equality	France	Patron
Greek Association of Frozen Food Companies	Commerce	Competitiveness	Greece	Member
Hellenic Spanish Chamber of Commerce	Commerce	Competitiveness	Greece	Member
Guatemalan Association of Exporters (AGEXPORT)	Aquaculture	Export and competitiveness	Guatemala	Member
Pacific Experimental Center (CEPAC)	Education	Education	Guatemala	Patron
CFO Coalition for the SDGs – UN Global Compact	Sustainable finance	Sustainable finance and transparency	International (UN)	Participant Member
Ocean Stewardship Coalition – UN Global Compact	Environmental sustainability	Sustainable development	International (UN)	Participant Member
Irish South & West Fish Producer's Organisation	Fishing industry	Competitiveness	Ireland	Member
Business Association Confindustria Emilia	Commerce	Competitiveness	Italy	Member
National Association of Fishing Companies (Assoittica Italia)	Commerce	Competitiveness	Italy	Member
Mozambican Association of Industrial Shrimp Fishing Shipowners (AMAPIC)	Fishing	Competitiveness	Mozambique	Member
Luderitz Chamber of Commerce & Industry	Commerce and Industry	Competitiveness	Namibia	Member
Namibia Chamber of Commerce and Industry (Luderitz Branch)	Commerce and Industry	Competitiveness	Namibia	Member
Fishing Industry Human Resources Forum	Labour	Labour	Namibia	Member

<i>Entity</i>	<i>Sector</i>	<i>Purpose</i>	<i>Country</i>	<i>Role or type of participation</i>
Confederation of Namibian Fishing Associations	Fishing	Competitiveness	Namibia	Member
Fisheries and Maritime – Industries Skills Committee (ICS)	Fishing	Vocational training	Namibia	President
Namibia Employers' Federation	Fishing	Labour	Namibia	Member
Namibian Hake Association	Fishing	Competitiveness	Namibia	Member
Lüderitz Rotary Club	Social	Social	Namibia	Member
Nicaraguan Association of Aquaculture Farmers (ANDA)	Commerce	Competitiveness	Nicaragua	Member
Official Spanish Chamber of Commerce of Nicaragua	Commerce	Competitiveness	Nicaragua	Member
Institute for Protection and Agricultural Health (IPSA)	Aquaculture industry	Aquaculture health and veterinary control	Nicaragua	Member
National Free Zone Commission	Industry and export	Competitiveness	Nicaragua	Member
Global Sustainable Seafood Initiative (GSSI)	Fishing and aquaculture	Benchmark of sustainability standards	Netherlands	Member of the Steering Board
Global Dialogue on Seafood Traceability (GSSI)	Fishing, aquaculture, industry, commerce	Benchmark of seafood traceability	Netherlands	Member of the Supervisory Committee
Exporters Association (ADEX)	Commerce	Fisheries products	Peru	Member
National Society of Industry (SNI) of Peru	Industry	Fisheries products	Peru	Member
Regional Committee of Mahi Producers and Processors (COREMAHI)	Fishing	Conservation	Peru, Costa Rica, Ecuador	Member
Frozen Food Industry Association (ALIF)	Commerce	Competitiveness	Portugal	Member
Fish Traders Association (SCOPE)	Commerce	Competitiveness	Portugal	Member
National Association of Food Products Traders and Industries (ANCIPA)	Commerce	Competitiveness	Portugal	Member
Portuguese Association of Branded Product Companies (CENTROMARCA)	Commerce	Competitiveness	Portugal	Member
Portuguese Association for Product Identification and Coding (CODIPOR GS1)	Commerce	Commercial EAN codification	Portugal	Member
Luso-Spanish Chamber of Commerce and Industry (CCILE)	Commerce	Competitiveness	Portugal	Member
PUMP Portugal Packaging SGPS S.A.	Commerce	Environmental management	Portugal	Member of the Board
Ponto Verde Society (SPV)	Commerce	Environmental management	Portugal	Member
Portuguese Association of Advertisers (APAN)	Marketing	Competitiveness	Portugal	Member
South African Patagonian Toothfish Industry Association (SAPTIA)	Fishing	Fighting illegal, unreported, and unregulated (IUU) fishing	South Africa	Member

Besides direct participation in the aforementioned organizations and associations, we globally advocate for the following matters:

- **Better dietary habits and healthier foods for better health to all:** Our daily work ensures the supply of nutritious, healthy, tasty, affordable, and innovative seafood with trustful quality and safety, produced responsibly and sustainably, to the markets, the consumers, and society at large, regardless of their condition, income, and geographies using our worldwide commercial reach. For that, we improve fishing, aquaculture, and industrial processes, clean labels and improve formulations to 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); minimize or completely avoid the nutrients to limit: total fat, saturated fat, trans fat, sugars, salt, as far as possible; and make seafood adapted to the needs of the population, taking into account 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.
- **Transparent and responsible communication:** We want to lead the way on nutritional information disclose by sharing it for our products (both front-of-pack labelling and digital formats), strictly follow the laws and recommendations for responsible marketing to children, and actively engage in sectoral efforts and campaigning for obesity prevention, healthier diets, physical activity - promoting communication.
- **Reducing our contribution to climate change and mitigating its impacts:** With an eye on our 2040 carbon neutral goal, we set ambitious goals and programmes to push technological improvement to reduce GHG emissions in our value and supply chains, and invest in consistent carbon compensation initiatives, in coastal resilience for climate risks adaptation and improve coastal communities' quality of life. For that, we condemn deforestation and phase out any deforestation-linked ingredient from our products, reduce food loss and waste, and invest in best environmental management practices, forestation projects, and renewable energy.
- **Halting biodiversity loss:** Given our high dependency on nature, especially biodiversity, it is paramount to us to help bring biodiversity loss to a close, setting a zero-net loss pledge and helping to reverse the trend by investing in biodiversity net-gain projects. For that, we will continue investing in mangrove and tree reforestation, fauna conservation and repopulation projects, adopt sustainable fishing practices, and anticipate environmental risks to push early mitigation measures.
- **Offering better 'starts in life' for children:** We strongly back the breastfeeding programme in the Group, and acknowledge the educational, health, nutritional, and developmental benefits that nurseries and kindergartens offer to children. For that, we will continue supporting company nurseries/kindergartens and help collaborate with the schools in our partner communities.

## 6. OUR GLOBAL APPROACH TO ADVOCACY AND LOBBYING

---

We believe that the private sector has an important role to play in supporting the sustainable development of communities and helping to maintain a healthy planet.

We work together with all our stakeholders to encourage frank dialogue and help us develop our purpose of generating shared value. We will continue to persevere to ensure more sustainable and responsible operations, better, fairer, and safer working conditions, offer higher quality and more nutritious products and promote the sustainable development of our partner communities. We understand that this is the only way to achieve full success for our business and society.

We acknowledge that collaboration is essential since alone we will not be able to achieve our global objectives. We work in strategic alliances, in transversal sectoral projects, and in specific collaborations with others who share our problems, our efforts, and our ideals.

We collaborate and support public and private entities, associations, companies, and whenever possible, all those who share our values and principles, who ensure the transparency necessary to build trust, who demonstrate the ability to advance and meet their objectives, who generate shared value among its stakeholders, that favour sustainable development and improve the quality of life of the poor and most vulnerable human communities, and that contribute to a positive net result for nature.

We will annually evaluate the relevance and our alignment with the mission and vision of the entities, sectoral associations, industrial and commercial, as well as the organizations with which we collaborate and financially support. We want to ensure the relevance of our participation concerning our strategies and the achievements obtained through these associations and collaborations. We also want to verify and ensure that these entities operate in strict compliance with universal principles that we have also assumed, and that are reported in our corporate regulatory compliance system, code of ethics, UN Global Compact principles, and sustainable ocean principles, among others, and that at the same time, the object of the collaboration is compatible with the CSR and Sustainability principles and objectives of the Group.

We believe in action based on collaborative work and we will advocate for constructive dialogue to generate the maximum consensus on the issues and decisions produced in the collaborations and associations to which we have subscribed.

In circumstances where we disagree with an agenda or position of such an organization or association, we will transparently inform of our position and reserve the right to act individually and pursue our commitment independently to the public, authorities, or other concerned parties.

The decision to renounce one of these associations or collaborations will consider aspects such as:

- The position of the Nueva Pescanova Group, or one of its companies, is regularly in opposition to the association's agenda, including disagreement with the lobbying activities carried out or considering these as inappropriate.
- The agendas, values, principles, purposes, and expectations between the association or collaboration and the Nueva Pescanova Group, or its companies, are no longer aligned.
- The association or our collaboration has not achieved the expected results for a significant and reasonable period.
- The governance of the association or collaboration is weak and may put the reputation of the Nueva Pescanova Group, its companies, or its brands, at risk.

## 7. PREVENTING, MITIGATING, AND REMEDIATING SALIENT HUMAN RIGHTS ISSUES IN OUR OPERATIONS AND SUPPLY CHAIN

---

At Nueva Pescanova, we recognize that our responsibility for human rights extends across our own operations and our supply chain. We have established structured processes to prevent, mitigate, and remediate our most salient human rights risks, ensuring alignment with international standards such as the UN Guiding Principles on Business and Human Rights (UNGPs).

Through these integrated processes, we ensure that our operations and supply chain actively prevent, mitigate, and remediate salient human rights issues. This approach reflects our commitment to ethical, responsible, and sustainable practices while protecting the rights and well-being of workers, communities, and other stakeholders connected to our business.

### 7.1 Policies and Governance

- We have a Human Rights Policy embedded in our Code of Ethics and Sustainability Policy, which applies to our operations, suppliers, and business partners.
- Our Sustainability and Compliance teams oversee the implementation of these policies, including human rights due diligence, risk assessment, and remediation measures for both operations and supply chains.

### 7.2 Risk Assessment and Salience Identification

- We conduct regular risk assessments to identify the most salient human rights issues across our operations and supply chain, considering the severity and likelihood of impacts.
- Salient issues include labour rights, occupational health and safety, non-discrimination, freedom of association, and environmental impacts affecting local communities.
- For suppliers, we integrate sustainability and human rights criteria into sourcing decisions, focusing on areas of high risk.

### 7.3 Prevention and Mitigation Measures

In our own operations:

- Strict adherence to health and safety protocols, labour standards, and environmental management practices.
- Continuous training and awareness for employees on human rights, sustainability, and ethical conduct.

In our supply chain:

- Supplier codes of conduct and contractual obligations require suppliers to respect human rights and adhere to our environmental and social standards.
- We engage in supplier audits, monitoring, and capacity-building programmes to ensure compliance with human rights expectations.
- Collaborative initiatives with suppliers aim to identify risks early, implement corrective actions, and improve practices across the value chain.



## 7.4 Stakeholder Engagement

- We maintain active dialogue with employees, communities, authorities, and suppliers to anticipate and address potential human rights impacts.
- Consultation and participatory mechanisms, including local social dialogue committees and project-specific working groups, ensure that affected parties can express concerns and contribute to solutions.

## 7.5 Remediation Processes

- When an adverse impact occurs in our operations or supply chain, we have established procedures to investigate, address, and remediate the issue.
- Remedial measures may include operational adjustments, compensation, restorative actions, or improvements in internal policies and procedures to prevent recurrence.
- We collaborate with suppliers to correct non-compliance and ensure that affected stakeholders have access to effective remedies.

## 7.6 Monitoring, Reporting, and Accountability

- We monitor the effectiveness of our prevention, mitigation, and remediation measures both internally and across our supply chain.
- Progress and outcomes are reported publicly in our Sustainability Progress Reports and Non-Financial Information Statements, enhancing accountability and transparency.

# 8. COMMITMENT TO REMEDYING ADVERSE IMPACTS

---

At Nueva Pescanova, we are committed to respecting human rights and addressing any adverse impacts on individuals, workers, or communities that may result from our operations or value chain. This includes a clear responsibility to remedy any harm we have caused or contributed to, in line with the UN Guiding Principles on Business and Human Rights (UNGPs).

Through our policies, due diligence processes, and stakeholder engagement practices, we ensure that remediation is an integral part of our sustainability and human rights commitments. We recognise that preventing harm is our primary responsibility, but when harm occurs, we act decisively and transparently to provide or cooperate in providing remedy to those affected.

## 8.1 Policies and Governance Framework

- We have adopted a Human Rights Policy (included within our Code of Ethics and Sustainability Policy) that sets out our responsibility to respect human rights and to act on any potential or actual adverse impacts.
- These commitments are overseen by our Sustainability Department and Compliance structure, which are responsible for implementing due diligence, assessing risks, and coordinating remediation when needed.

## 8.2 Grievance and Whistleblowing Mechanisms

- We provide accessible grievance channels for employees, suppliers, and external stakeholders to report concerns, misconduct, or human rights violations.
- These channels are designed to ensure confidentiality, protection from retaliation, and fair resolution, and they form the first step in our remediation process.

## 8.3 Stakeholder Engagement and Dialogue

- When incidents occur or risks are identified, we engage directly with affected stakeholders (workers, communities, local authorities, and NGOs) to understand the impacts and agree on appropriate remedial measures.
- This engagement is often done through local social dialogue committees or project-specific working groups, ensuring that remedies respond to real community needs.

## 8.4 Expectations in Our Business Relationships

- We expect our suppliers, partners, and other business relationships to uphold the same human rights commitments, including the right to remedy.
- Through contracts, supplier codes of conduct, and collaborative initiatives, we require that business partners identify, prevent, and address adverse impacts they may cause or contribute to, ensuring that affected individuals or communities have access to effective remedies.
- This expectation reinforces a shared responsibility across the value chain for preventing harm and providing solutions when impacts occur.

## 8.5 Corrective and Remedial Actions

Where we have caused or contributed to harm, we implement corrective measures, which may include:

- Compensation or restitution.
- Operational adjustments (changes in practices or technologies).
- Rehabilitation or restoration measures (e.g. in cases of environmental damage affecting livelihoods), and
- Commitments to prevent recurrence through staff training and improved procedures.

## 8.6 Integration with Environmental and Social Programmes

- We integrate remediation principles across our social development programmes, such as occupational health and safety, labour rights protection, and community development projects.
- For example, in our ecosystem restoration projects (mangrove recovery, reforestation, turtle conservation), we work closely with local communities to repair and improve ecosystems that support their livelihoods, especially when these may have been affected by industrial activity.

## 8.7 Monitoring, Reporting, and Accountability

- We monitor the effectiveness of our grievance and remediation mechanisms and report progress publicly in our annual Sustainability Progress Reports and our Non-Financial Information Statement.
- This transparency reinforces accountability and builds trust with stakeholders who may be affected by our operations.